



May 14, 2024

The Honorable Mike Johnson
Speaker of the House
U.S. House of Representatives
The Capitol, H-232
Washington, D.C. 20515

The Honorable Hakeem Jeffries
Minority Leader
U.S. House of Representatives
Rayburn House Office Building, 2433
Washington, D.C. 20515

Speaker Johnson and Minority Leader Jeffries,

As the House of Representatives prepares to vote on the Coast Guard Authorization Act of 2024 ([H.R. 7659](#)), the American Clean Power Association (ACP) respectfully expresses its deep concerns regarding Section 346 titled, “Manning and Crewing Requirements for Certain Vessels, Vehicles, and Structures.” Section 346 threatens to materially disrupt the offshore wind industry posing significant risks to American jobs and energy independence.

The proposed maritime crewing language in Section 346, requiring crews on certain international vessels to match the flag of the vessel or be American, would significantly halt offshore wind development.¹ Access to a few globally limited and highly specialized vessels is crucial for the construction of offshore wind turbines. These mandates risk jeopardizing the creation of thousands of good-paying American jobs, the development of more than 40 U.S.-flagged offshore wind vessels,² and billions of dollars’ worth of domestic manufacturing investments.³

It is important to recognize that on average, 82 percent of all marine crew man-hours across a typical offshore wind project’s 35-year lifespan will be performed by American mariners.⁴ The lifespan includes 2-3 year periods of construction and pre-construction phases that employ different ratios of American and foreign mariners, such as surveying, seabed preparation, construction, and cable laying. However, these short-term work periods are dwarfed in comparison to the decades-long operations and maintenance phases which will provide the bulk of full-time work for American mariners.

¹ [Offshore Wind: Maritime Crewing | ACP \(cleanpower.org\)](#);

<https://cleanpower.org/resources/offshore-wind-and-maritime-crewing/>

² [Offshore Wind: Investments in U.S.-Flagged Vessels | ACP \(cleanpower.org\)](#);

<https://cleanpower.org/resources/offshore-wind-investments-in-u-s-flagged-vessels/>

³ [Interactive Map: The Economic Benefits of Offshore Wind | ACP \(cleanpower.org\)](#);

<https://cleanpower.org/resources/interactive-map-the-economic-benefits-of-offshore-wind/>

⁴ [Offshore Wind Mariner Assessment Fact Sheet | ACP \(cleanpower.org\)](#);

<https://cleanpower.org/resources/offshore-wind-mariner-assessment-fact-sheet/>



Additionally, Section 341 of the bill would pose significant challenges for floating offshore wind by regulating the use of anchor handling vessels. The successful deployment of floating wind requires flexibility to utilize a range of anchor handling technologies based on environmental conditions and seabed material. Overregulating anchor handling vessels would restrict the flexibility needed for developers to build floating wind farms optimized and tailored to their specific conditions, and ACP is eager to work with Leadership in the coming weeks to resolve this issue.

We urge Leadership to consider alternative measures that support the growth of both the maritime and offshore wind sectors. Encouraging Congressional Leadership to pass meaningful permitting reform with offshore wind-specific updates to the Outer Continental Shelf Lands Act would help level the playing field for offshore energy development and advance additional investments in vessels and manufacturing facilities. Another step in the right direction would include urging the Administration to expedite the Merchant Mariner Credential application process and implement the Military to Mariner program included in the National Defense Authorization Act of 2023 and the U.S. Maritime Administration (MARAD) Authorization Act of 2023. By fostering a regulatory environment that removes red tape for permitting and mariner credentialing, we can together ensure the continued growth and competitiveness of the American maritime industry.

Thank you for considering our position on this critical issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "JC Sandberg". The signature is stylized and fluid.

JC Sandberg, Chief Advocacy Officer
American Clean Power Association