

The Honorable Mary D. Nichols, Chairman  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: Comments to the Draft Proposed First Update to the Climate Change Scoping Plan

Dear Chairman Nichols:

On behalf of The Glostén Associates, Inc, thank you for the opportunity to comment on California's Climate Change Scoping Plan. The Glostén Associates, a world leader in engineered offshore solutions based in Seattle Washington, has committed substantial resources to development of technologies relating to greenhouse gas reduction and renewable energy in the marine environment. Of particular relevance to California's Climate Change Scoping Plan is Glostén's PelaStar floating wind turbine foundation system. The PelaStar system provides efficient, cost-effective access to the vast, but previously unreachable offshore wind energy resources available in California's deep coastal waters.

Glostén, like other technology and engineering companies active in the renewable energy sector, appreciates California's leadership on climate and renewable energy issues. California's commitment to reducing greenhouse gas emissions under the Global Warming Solutions Act of 2006 (AB 32) and the State's ambitious RPS regime have been important drivers of renewable energy technology. As California policy makers craft the framework for further greenhouse gas reductions and renewable energy gains in the years after 2020, Glostén urges the Air Resources Board and the Climate Action Team to consider the potential for offshore wind to diversify California's renewable energy resources.

Offshore wind has received relatively little attention in past discussions of California's renewable energy resources. California's strong offshore winds hold enormous promise, but commercial technology has not been available to allow for the installation of wind turbines in the deep waters off the State's coast. Glostén and several other companies in the U.S., Europe, and Japan are now in the process of commercializing floating foundation technology that will permit development of deep water wind resources near coastal population centers. Glostén is currently preparing an advanced demonstration project to deploy a utility-scale, 6 MW wind turbine on a PelaStar floating foundation in deep water off of the UK coast. Other companies are moving ahead with similar projects at other locations. Building on this demonstration project experience, conservative estimates of costs to deploy and operate large, efficient offshore wind turbines on PelaStar floating foundations show that offshore wind power in favorable deep water sites off California's coast will be cost-competitive with other sources of renewable energy by the early 2020s.

California can develop its offshore wind resources without compromising the ocean environment. Floating foundation wind farms can be sited far from shore to protect migratory birds, sensitive marine areas, and views, while retaining comparatively easy access to coastal demand centers. In addition, because offshore winds blow at night and on cloudy




days, offshore wind power can complement solar power and provide needed diversification as the State's reliance on renewable energy increases.

In view of the economic and environmental benefits that California could realize from its offshore wind resources, Glosten believes that offshore wind development should be part of the next phase of California's leadership on climate and renewable energy issues. Glosten respectfully requests that the updated scoping document include recommendations that will allow offshore wind to become part of California's renewable energy mix for the post-2020 period.

Again, thank you for this opportunity to comment on California's Climate Change Scoping Plan. Please let me know if there is anything we can do to further support California's forward-looking leadership on climate and renewable energy issues.

Yours very truly,

The Glosten Associates, Inc.

A handwritten signature in black ink, appearing to read "John Edgar", written in a cursive style.

John L .R. Edgar  
President

JLRE:zzb