DOCKETED	
Docket Number:	25-AB-03
Project Title:	Assembly Bill 3 California Offshore Wind Advancement Act
TN #:	265528
Document Title:	Alliance of Communities for Sustainable Fisheries Comment-General Comments on deep water, floating OSW development
Description:	N/A
Filer:	System
Organization:	Steve Scheiblauer
Submitter Role:	Public
Submission Date:	8/11/2025 4:53:26 PM
Docketed Date:	8/11/2025

Comment Received From: Steve Scheiblauer
Submitted On: 8/11/2025
Docket Number: 25-AB-03

Alliance of Communities for Sustainable Fisheries Comment- General Comments on deep water, floating OSW development

Additional submitted attachment is included below.

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California Energy Commission August 11, 2025

Docket 25-AB-03

Sent electronically to: docket@energy.ca.gov

RE: Comments on AB3 Report Requirement on Offshore Wind Port Requirements; General Comments and Specific Comments on Port Development

Dear California Energy Commission,

Who we are

The Alliance of Communities for Sustainable Fisheries ("ACSF") is a 24-year-old 501(c) 3 not-for-profit organization, founded for the purposes of educating the public on fisheries issues, connecting fishing men and women ("fishermen") with their communities, and to represent fishing interests in state and federal processes. The ACSF is a regional organization, comprised of commercial fishing leaders representing Monterey, Moss Landing, Santa Cruz, Morro Bay, Pillar Point, Port San Luis, and Santa Barbara, on our Board of Directors. Port communities, several recreational fishing organizations, and the California Wetfish Producers Association (squid, sardines, etc), also have representatives on our Board. Thus, the ACSF represents a large cross-section of fishing and community interests for the Central Coast of California.

General Comments on deep water, floating OSW development

California fishermen have deep concerns about OSW development in state and federal waters offshore California, and the great majority oppose this type of development. The reasons for this concern and opposition include fisheries impacts, but also include other environmental, social, and economic reasons. Our

concerns are based on decades of on-the-water empirical observations of ocean conditions:

- OSW development will see major displacement of fisheries. The full, proposed buildout of OSW will remove 4,500 square miles from fishing opportunity. Most commercial fishing gears can't be deployed inside, or near, wind farms. Considering that fisheries are reliant on specific habitats, finding replicate habitat outside the 4.500 square miles will be challenging and in some cases impossible. Without significant economic mitigation from the state or OSW developers, fisheries, communities, and food security will be at grave risk.
- Fishermen believe that a reduction in ocean upwelling is likely, which will have profound negative effects on ocean productivity. It just stands to reason that if the turbines remove wind energy, converting it to electricity, less wind energy will blow across the ocean, reducing upwelling.
- There is a long list of environmental concerns: 1) OSW turbines will kill a lot of seabirds. The floating bases will have marine growth which in turn will attract small bait fishes which in turn will attract birds. 2) Blade and turbine failures can cause plastics and gear oil water pollution. 3) The large quantities of antifouling paints are another source of pollution. 4) The cooling systems for offshore transformer stations will kill massive amounts of sea life larvae. 5) There are documented harmful effects from electromagnetic field energy on crabs coming from transmission cables, even when buried.
- The effects of site assessment and survey OSW work, using modern equipment, is not well-understood and may well be causing harm to sea life; the State Lands Commission should update its guidance for this work.
- Based on our experience offshore, fishermen believe that there is a fair possibility that the one-thousand feet tall turbines will topple in extreme weather, or more likely drag their mooring gear through the wind farm and towards shore.
- It will be extremely expensive to maintain these marine structures, very likely resulting in high electricity rates and/or intermittent system failures.

- Port development in support of OSW will displace or eliminate key fisheries infrastructure, and/or crowd out fishing vessels for berthing or navigation channel space. This is in addition to the harmful environmental effects from port development (dredging, increased erosion, etc, as described more fully below).
- Recent polling by the Public Policy Institute of California asserted that offshore deep water floating OSW is supported by 80% of Californians. We think that Californians are not generally well-informed about OSW issues and that support in communities that will be directly affected by these projects is far lower. Further, we believe that local opposition is strong enough that locally-elected leaders who favor OSW development will be defeated, such as has already occurred in Morro Bay and Port San Lius.
- We wonder: will floating deepwater OSW technology really be the best option for renewable energy in 2045?

Specific comments about Port requirements to support OSW

- It will not be possible for the state to realistically create 15-17 large port sites (>80 acres) AND 10 small port sies (2-10 acres). Only LA/LB harbors can handle full assembly, and possibly manufacturing, towing assembled turbines to the rest of the state. Bridge clearance and lack of land space will limit other CA ports, such as several SF Bay area deep water ports, to possible manufacturing roles, barging the finished components elsewhere.
- RE Humboldt Bay specifically, there is no way that the harbor channel can be made and sustained to be wide and deep enough to accommodate turbine assembly. The floater bases must be @ 425'x425', while the navigation channel is @ 375'wide, and is also prone to regular winter surf and shoaling. Channel depths up to 100' are needed, which will result in several million cubic yards of dredged material, some of which is highly likely to contain elevated toxins and heavy metals. Where will this go? Contaminated dredge material will not be permitted to go to an offshore dumping site. Increasing the channel depth will also increase the tidal flow and velocity, putting oyster and eelgrass beds subject to erosion (look to

Elkhorn Slough as an example). Further, the roads leading to the Eureka area can not accommodate trucked-in turbine components; they will have to be barged in from elsewhere. Further again, this area does not have the population to fill the skilled jobs needed for assembly, even with local training programs. This will mean workers from elsewhere will be imported, causing a crisis in housing.

Humboldt Bay could be used as an operations and maintenance port, with some improvements, but that's all.

- There are no central or north coast ports or harbors that can accommodate OSW assembly.
- Few of the small craft harbors identified in the report have the space, land or water, to accommodate even operations and maintenance OSW needs. Most have fully developed land-side features, often serving commercial and recreational fishing, and/or tourism. Most are at capacity for wet berthing, and many have waiting lists for such space. Only Port San Luis might have the land and water space for an operations and maintenance role, but even then the access road is not good, housing is expensive and in short supply, and there will likely be strong local opposition to such changes to the port's facilities.

Thank you for considering comments from the Alliance of Communities for Sustainable Fisheries.

Alan Alward

Co-Chair

Frank Emerson

Co-Chair