

DOCKETED

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*Comment Received From: Margaret Pilaro
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comment letter re Seaport Readiness

Please see included letter.

Additional submitted attachment is included below.

February 19, 2026

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814



Re: Offshore Wind Seaport Readiness Plan – Impacts to Humboldt Bay Shellfish Aquaculture

Dear Commission Staff,

Thank you for the opportunity to provide input on the Offshore Wind Seaport Readiness Plan. The Pacific Coast Shellfish Growers Association (PCSGA), along with several commercial shellfish businesses operating in or dependent upon Humboldt Bay. Recognizing that your work will inform the federal consistency determination for this project and as an established use in the coastal zone, we very much appreciate being included in this process.

Collectively and individually, we have engaged in offshore wind planning efforts for several years. We support California’s transition to renewable energy and are not opposed to offshore wind development. However we remain deeply concerned about how port-related activities, particularly the proposed Humboldt Bay Offshore Wind Heavy Lift Multipurpose Marine Terminal Project, may impact shellfish aquaculture operations and the long-term viability of these businesses.

We assert that a “Seaport Readiness Plan” is fundamentally incomplete if it prepares a port for a new industry by dismantling an existing one. Under the California Coastal Act (Section 30222.5), aquaculture is a priority coastal-dependent use that must be protected. A plan that creates existential threats—such as viral pathogens or toxic copper loading—to an established maritime sector has not met the AB 3 mandate to “minimize impacts.” To be truly “ready,” the Plan must explicitly resolve the conflict between these industries rather than deferring them to later permitting stages.

In 2022, the Humboldt Bay Harbor District made a formal commitment to support shellfish aquaculture and undertook the extensive process of pre-permitting designated aquaculture areas within the Bay. Based on these assurances, multiple shellfish businesses have since made significant long-term investments in infrastructure, workforce, and production capacity. These investments are now at risk as are the shellfish farms and related industries linked to shellfish and seed production of Humboldt Bay.

Shellfish growers rely on clean water and healthy ecosystems to produce safe, nutritious food and sustain their livelihoods. Humboldt Bay is the largest producer of oysters in California and one of the most productive shellfish estuaries on the West Coast. The local shellfish industry generated approximately \$20 million in economic activity in 2016, with continued growth since that time.

Beyond market oysters, Humboldt Bay is a critical hub for shellfish nurseries and hatcheries. In 2024 alone, Humboldt Bay operations produced approximately 470 million shellfish seed which supplied more than 120 farms from Southern California to Alaska. This region plays an essential role in maintaining a resilient West Coast shellfish supply, particularly as ocean acidification, hypoxia, and warming temperatures increasingly threaten other production areas.

Any disruption to Humboldt Bay's water quality, ecosystem function, or disease status would have consequences far beyond local businesses—it would reverberate across the entire West Coast shellfish industry.

Our primary concerns include:

1. Water Quality Impacts

Short- and long-term changes to water quality, including sediment disturbance, turbidity, and pollutant mobilization, pose existential risks to shellfish operations. After extensive testing, the California Department of Public Health has designated Humboldt Bay as an “approved” growing area. If this classification were downgraded due to port development activities, shellfish farms would face forced relocation, costly operational changes, or permanent closure. Water quality and CDPH classifications must be treated as a top-tier priority in any port readiness evaluation.

2. Biosecurity and Disease Risk

Relying on standard state and federal ballast water regulations is insufficient for readiness in Humboldt Bay. Current regulations target invasive species, not viral pathogens like OsHV-1, which has caused catastrophic industry collapse in Australia and France and is present in other California bays. An outbreak in Humboldt Bay would devastate local farms and would immediately end all interstate markets for shellfish seed.

3. Operational Disruptions

Port readiness planning must account for area closures, construction impacts, vessel congestion, and potential power disruptions. If shellfish operations are

displaced, the financial burden of re-permitting, water testing, infrastructure relocation, and lost production must be fully considered as project impacts.

4. Dredging and Dredged Material

The removal and dispersal of dredged material, estimated to total substantial volumes, could have long-term effects on both seed production and food safety. Potential impacts include contaminant release, disturbance of eelgrass habitat, alteration of tidal flows, and resuspension of harmful cysts or sediments. These effects threaten shellfish at multiple life stages and undermine the ecological integrity of Humboldt Bay.

5. Toxic Exposure

The Readiness Plan must account for the unique scale of floating offshore wind platforms. These massive structures represent a concentrated source of potential copper and biocide leaching that far exceeds typical vessel traffic in Humboldt Bay. Current commercial exemptions for copper leach rates are insufficient to protect shellfish larvae in a semi-enclosed estuary.

We urge the Commission to fully integrate these risks into its Port Readiness evaluation and to ensure that shellfish aquaculture is not treated as a secondary or incompatible use of Humboldt Bay. Additionally, we request that any considerations for mitigation extend beyond harm to local businesses and include those impacted by loss of inventory and/or certifications to export seed out of the Bay.

The shellfish industry represents decades of investment, provides high-quality local food, supports rural employment, and contributes meaningfully to California's and the region's coastal economy. We appreciate your consideration of these comments and welcome continued dialogue. We would be pleased to meet with Commission staff and host site visits with local shellfish growers to provide firsthand insight into how this project may impact their operations.

Sincerely,



Margaret Pilaro
Executive Director

margaretpilaro@pcsga.org

Supported by:

Heidi Gregory
Farm Manager
Tomales Bay Oyster Company
hgregory@tomalesbayoystercompany.com

Sebastian Elrite
Aqua-Rodeo Farms and Humboldt Bay
Provisions
sebastianelrite@gmail.com

Rebecca A. Richards
Managing Principal
San Diego Bay Aquaculture
rebecca@acaciapacific.com

Nathan Reiss
President
Grassy Bar Oyster Co.
gboysterco@gmail.com

Scott and Kyle Sterner
North Bay Shellfish LLC
Humboldt Bay
Shellfish95519@sbcglobal.net

Diane Kim, PhD
Co-Owner & Chief Executive Officer
Holdfast Aquaculture & Grassy Bar Oyster
Co.
diane@holdfastAQ.com

Brittany Taylor
Director of Hatchery and Nursery Production
Taylor Shellfish
Britt@taylorshellfish.com

Nathan Churches, PhD
Co-Owner & Chief Science Officer
Holdfast Aquaculture & Grassy Bar Oyster
Co.
nathan@holdfastAQ.com

Bill Dewey
Director of Public Affairs
Taylor Shellfish
billd@taylorshellfish.com

Ian Jacobson
Co-Owner & Chief Operating Officer
Holdfast Aquaculture & Grassy Bar Oyster
Co.
ian@holdfastAQ.com

Terry Sawyer
Vice President and Co-Founder
Hog Island Oyster Co., Inc.
Terry@hogislandoysters.com

Kelly Stromberg
Co-Owner & Chief Sales Strategist
Holdfast Aquaculture & Grassy Bar Oyster
Co.
kelly@holdfastAQ.com

Justin Mojonier
Director of Science and Technology
Hog Island Oyster Co., Inc.
Justinm@hogislandoysters.com