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BlueLift POPD comment letter

Additional submitted attachment is included below.



May 22, 2026

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, California 95814

Re: Docket # No. 26-POPD-01

Comments on Proposition 4 Offshore Wind Port Development Program (POPD)

The following comments are offered on behalf of BlueLift LLC, a company that is developing a multipurpose terminal at Port of Los Angeles.

Multipurpose solution for risk mitigation

California's offshore wind ports strategy faces an uncomfortable truth: The multiple risks currently constraining the sector may be partially mitigated in the short term by the 2028 federal elections but are likely to remain significant over the long term. Even if the Democrats win a trifecta in Washington DC starting January 2029, project developers may remain cautious in committing capital because the long-lead-time profile of these huge investments necessarily will stretch across multiple election cycles and presidential administrations. Unfortunately, offshore wind has become a completely partisan topic in federal politics, and any expectation that Republicans will return to their former "all of the above" tolerance of the sector is an extremely high-risk hypothetical.

As a result, the POPD will need to prioritize flexibility and adaptability to allow for a variety of development pathways. This means that Proposition 4 investments in ports infrastructure should be phased, should avoid maximalist, all-at-once grant allocations, and should prioritize those projects that have genuinely multipurpose business models. Projects that are single-purpose, depend entirely on offshore wind, and have multi-billion-dollar price tags will remain unsustainable. They will face a Catch-22 of weak revenue projections, the likelihood of extended periods of vacancy, and difficulty in attracting sufficiently large sums of public and private capital investment.

But creating viable, multipurpose business models for offshore wind ports is easier said than done. California breakbulk terminal operators report insufficient revenue growth to justify construction of new breakbulk facilities, and container terminals are logistically unsuitable for offshore wind. The only feasible option for occupancy and revenues that

would enable Proposition 4 port investments to pencil out is offshore oil decommissioning, as explained below.

Decommissioning

Offshore wind and offshore oil decommissioning are two sides of the same coin: the transition from dirty to clean ocean energy. They are complementary for several reasons.

- Removal of the offshore oil sector has been a key environmental goal for Californians ever since the 1969 Santa Barbara oil spill, and every governor of California from Pete Wilson onward has sought to end offshore oil development. The state is currently waging a complex legal battle against expansion of offshore oil production, and facilitating the removal of oil rigs would be an early victory for this strategic policy goal.
- The ports needs for decommissioning are almost identical to those for offshore wind: Both need wharves and backlands with extremely heavy weight capacity, far exceeding the levels available in any existing ports on the U.S. West Coast.
- Decommissioning work will initiate on a large scale by 2029-30, long before the launch of offshore wind. Therefore, it could enable specialized facilities to be constructed and operational long before the offshore wind industry needs them.
- Oil decommissioning requires a ports footprint much smaller than those of major staging and integration ports and at a small fraction of their cost, which means its facilities can serve as an early de-risking strategy rather than competing with the major S&I projects. This work must be done on land-based facilities rather than floating docks because significant environmental mitigation will be required, with zero-emissions equipment operating on shore power. These decommissioning port facilities can make supplemental capacity available for early construction of the first wind platforms while the large projects such as Pier Wind are completing their federal permitting, assembling funding sources, and undergoing construction.

The process of removing the first of 27 oil rigs along California's coast is starting this year, with the State Lands Commission (SLC) currently initiating its EIR for the state-owned Platform Holly off Goleta. Removal and disposal of Holly is expected for 2029-2030, and Chevron has begun planning for decommissioning of its five offshore platforms in the years to follow. Unfortunately, California currently lacks any suitable port facilities for this work. If no local facilities are created to enable the disposal and recycling of the huge platform segments, neither Holly nor the other decommissioning projects, each costing hundreds of millions of dollars, will produce more than a handful of California jobs. Instead, these projects' supply chains would become entirely foreign, with the labor-intensive disposal and recycling process taking place in Asia and/or Mexico rather than Southern California. The ocean extraction and removal of these oil rigs would take place in full view of millions of people from Orange County to northern Santa Barbara County - but if the huge structures are then immediately exported, the message of no jobs and no benefits would be damaging for California's overall climate agenda.

Inter-agency cooperation

A successful strategy for a PODP first-phase approach requires cooperation and coordination between the CEC and SLC. Put simply, these two agencies can provide what each other needs. The CEC has Proposition 4 funding that can enable initial development of joint port facilities. For its part, the SLC is in charge of the EIR and overall planning for the Platform Holly decommissioning, and thus it will determine the port location of the disposal phase for Holly – SoCal or Asia/Mexico – and will heavily influence the port locations for all subsequent 26 platforms.

The synergy is undeniable. The CEC needs a major, local industry that can provide a viable, multipurpose business model for offshore wind ports grants; the SLC can guarantee that revenue by directing Holly and the other platforms to local ports. Likewise, the SLC needs assurance that in-state rather than foreign disposal is a feasible strategy for its Holly EIR because local port facilities will be created; the CEC can guarantee that by funding appropriate facilities. We urge the CEC to dialogue with the SLC to create a joint strategy to ensure success for both agencies.

BlueLift's role

Our company, BlueLift, is proposing a multipurpose, zero-emissions facility in Port of Los Angeles for both the disassembly of oil rigs and the assembly of offshore wind platforms. We expect to be fully operational by 2029, in time for Platform Holly and subsequent decommissioning projects. BlueLift is complementary to Pier Wind and not in direct competition to it. Our project would enable earlier construction of platforms, albeit at a lower production rate. We will be operating sustainably for years before offshore wind companies need us – and then we will be ready for them.

It should be noted that BlueLift is not the only company that might provide such a multipurpose facility in the region. Market competition in this field is real and genuine. But for the CEC's PODP strategy, the takeaways are the same:

- Multipurpose facilities can create the economic viability needed for the first phase of a sustainable PODP granting strategy.
- Offshore oil decommissioning is the sole available multipurpose alternative for a complementary revenue stream prior to the full expansion of offshore wind.
- The CEC should coordinate with the SLC to enable joint action to support both offshore wind and offshore oil decommissioning and thus enable in-state jobs creation.

Thank you for considering our input.

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