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Comment Received From: Morro Bay Commercial Fishermen's Organization
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Port San Luis is not feasible for an offshore wind operations and maintenance port

See attached letter.

Additional submitted attachment is included below.

MORRO BAY COMMERCIAL FISHERMEN'S ORGANIZATION, INC.



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September 7, 2026

Regarding: Assembly Bill 3 – Port readiness for offshore wind energy in Port San Luis Bay.

Docket – 25-AB-03

Dear California Energy Commission,

The feasibility study done by Mott McDonald(MM) regarding the use of Morro Bay and Port San Luis (PSL) Bay for an offshore wind operations and maintenance (O&M) port found that Morro Bay will not be feasible, but that PSL could possibly be feasible with the use of the Cal Poly Pier.

There are many requirements for an O&M port that MM did not address that should have made PSL unfeasible as well:

1. PSL has no protection from a south swell. *(see attached map) This would require a very long jetty. This has been attempted by the Army Corp. of Engineers in the past and found unfeasible due to a large deep sink hole. Also, this would change the entire ecosystem and waves of the bay. It is often full of bait, fish, whales, and porpoise because of its open exposure to ocean currents. Avila Beach is also a popular beach for swimming and surfing.

2. Industrial chemical storage and transportation. Avila Beach has a history of a large oil spill that required the entire town to be dug up and cleaned in the 90's. Avila locals will not be open for any more chemical storage anywhere near their town. Each turbine requires 187 gallons of grease, 40 gallons of hydraulic oil, 106 gallons of gear oil, 1585 gallons of dielectric fluid, 793 gallons of diesel fuel, 243 lbs. of sulfur hexafluoride, 357 gallons of propylene glycol, and 48 gallons of ethylene glycol. (BOEM Revolution Wind FEIS). The single road access to San Luis Bay, used by locals

and tourist alike, is a very narrow windy single lane road that is not amenable to large tanker trucks.

3. Lay-down platform area for turbine equipment – The Cal Poly Pier is permitted to be used for marine research only, not industrial use. MM gave the option of moving Cal Poly's marine research lab somewhere else. There is no other local option for this, that is an unrealistic option and unfair to all the San Luis Obispo Cal Poly students that attend to get a degree in marine science. A large platform off the Hartford pier would require large amounts of costly dredging in an ESHA protected area.

4. Wet storage for towed-in platforms - towing is the highest cost of wind turbine maintenance. Towing to Long Beach (over 200 miles away) for all repairs will not be a viable option. Wind developers will need to tow in wind turbine platforms for needed turbine component exchanges for 3% - 10% of their turbines per year. This would be another problem with the locals and tourist. Currently, PSL has a pristine beautiful view that people come from all over the world to enjoy – no one wants to see giant 1000'tall wind turbines on football stadium sized platforms in the middle of their scenic harbor. Also unpopular would be the displacement of anchorages, recreational users, commercial fishing and impacts to port operations.

5. There will be significant navigation hazards from large ship traffic and tow-in platforms in a harbor regularly used by swimmers, kayakers, paddleboarders, sailors, and fishermen. The SOVs are over 300'! This will diminish access for recreational users and impact commercial fisherman's operations.

6. Fueling capacity was not addressed. The current fuel dock is in a shallow area and limited to small vessels. A new fuel dock would have to be installed at Cal Poly pier or some other location. A fuel dock, large cranes, and large truck and vessel traffic would not work with the current marine research done at the pier. It is not realistic to consider coexistence of both.

We hope you take an honest look at these significant issues with an Offshore wind O&M in PSL and relocate your plans to another port. Even better,

reconsider the whole idea of floating offshore wind energy (FOSW) off California. We simply do not have the geography to make it work- at least not without a tough battle against mother nature. FOSW is bad for the environment, fishing, and the economy. The whole project should be tossed overboard!

Sincerely,

MBCFO Directors

*Note the south end of San Luis Bay is open to south swells.

