May 17, 2024

Jessica Taylor, M.E.M.
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Contractor with Ocean Associates, Inc.
Permits and Conservation Division
Office of Protected Resources, NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Submitted electronically

Re: Inshore Impact Pile Driving Activity RFI
Maryland Offshore Wind Project

Dear Ms. Taylor,

US Wind, Inc. (US Wind) respectfully submits this memorandum in response to your May 2, 2024 inquiry concerning inshore pile driving activities proposed for the Operations and Maintenance Facility (O&M Facility) located in West Ocean City, Maryland.

US Wind has previously responded to information requests from BOEM on behalf of NMFS regarding the proposed O&M Facility. The sections below summarize the information that was sent at the time of the requests. The initial responses are attached to this memorandum. We would point out that we did not have all the details for the O&M Facility when the MMPA LOA application was finalized in March 2023.

RFI, November 13, 2023: O&M Facility Clarifications (US Wind responses in red, sent November 17, 2023)

1) Please provide details on construction activities and methods anticipated at the proposed waterfront O& M facility in Ocean City, Maryland:
   a) Methods that will be used to remove the existing pier structure. Removal of the existing pier structure would mostly like occur from a crane on a barge that would have spud piles anchoring the barge to the mudline. A second barge would be used for the temporary placement of demolition debris until proper disposal at an appropriate landfill facility. The existing timber deck planks and framing would be removed first. The existing timber piles could either be removed by using a vibratory hammer or could be cut at the mudline. Where feasible and appropriate, shore-side equipment, such as a crane or other demolition equipment, would be employed to remove, collect, and transport decommissioned pier components.
   b) Details of the proposed piles (number, diameter, and length) and methods that will be used to install the new pier (i.e.; impact or vibratory hammer, estimated hammer strikes, hammer energy, and piling duration). New construction would occur from a barge mounted crane which is anticipated to include pile driving for the pier and installation of concrete pile caps, deck and curbs. Equipment such as jib cranes are anticipated to

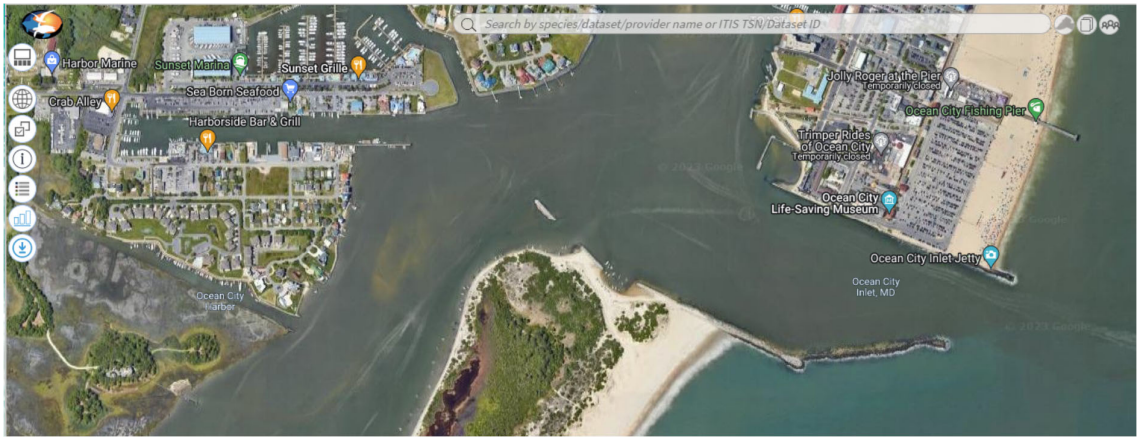
be installed on the pier deck and mooring hardware mounted along the curb as required for the CTVs. Up to 170 steel pipe pier piles- 12" to 18" diameter, 100-125 feet in length would be driven by impact hammer. A 2-foot-wide timber fender system along the north side of the pier and along the steel sheet pile bulkhead will be installed. Also, a 2-foot-wide timber fender system and wave screen on the south side of the pier would be installed. Up to 240 timber fender system piles- 12" to 18" diameter, 40-45 feet in length would be driven by impact hammer. The piling duration for the steel pipe pier piles and timber fender system piles would occur over a period of up to 6-months. The means and methods of pile installation would be consistent with similar scale projects in the area. The specific hammer energy would be further refined as the project progresses; however, US Wind does not anticipate any exceptional or non-traditional methods of installation that vary from similar work. As these installation details are further refined, US Wind would provide additional detail in the future.

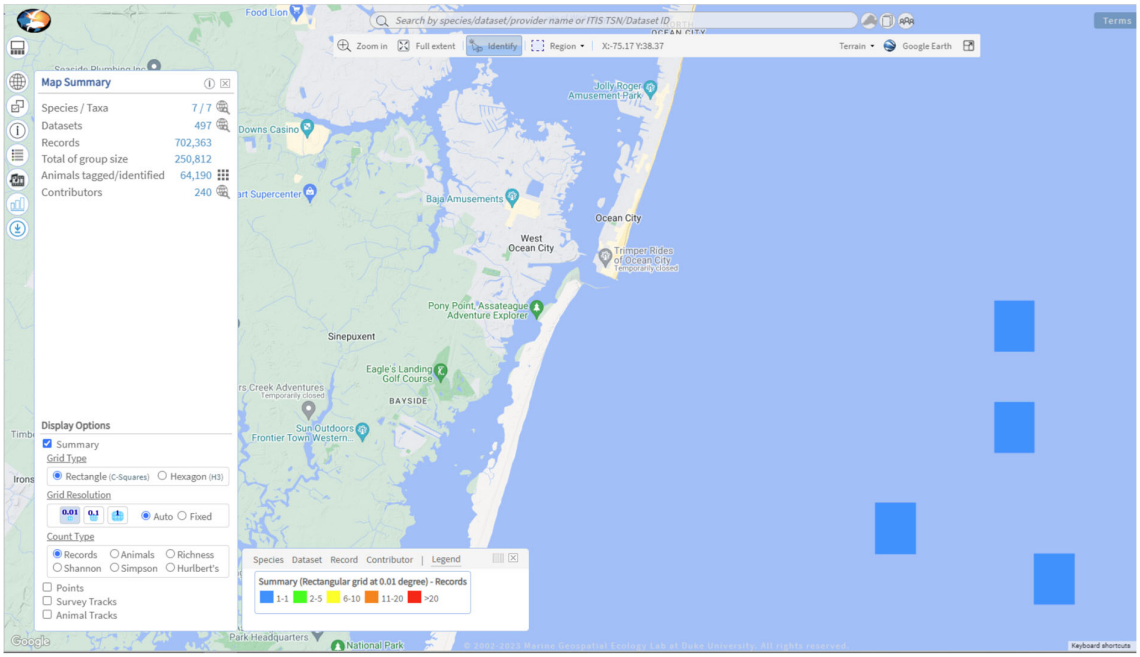
   c) Methods that will be used to install the sheet pile bulkhead (i.e.; impact or vibratory hammer, estimated hammer strikes, hammer energy, and piling duration). Up to 120 sheets would be driven by impact hammer over a period of up 3 months.

2) Has US Wind conducted any hydrographic, benthic, or geotechnical surveys at the proposed waterfront existing O&M facility to characterize water depths, habitats and seafloor? A bathymetric survey was conducted by Carpenter Engineering in May 2023 to collect bathymetry along the harbor frontage. A study to determine MHW/MHHW was conducted by Spencer Rowe, Inc. in August 2022 along the harbor frontage. Other surveys, such as geotechnical surveys, are planned but have not yet been scheduled.

RFI, December 21, 2023: O&M shoreside/dockside construction is included in the BA but not included in the MMPA application. We understand you've stated the O&M facility construction is not expected to impact marine mammals. Could you please provide a statement, if appropriate, which includes the reasoning for this exclusion from the MMPA application?

US Wind Response (December 22, 2023): Construction of the O&M facility is not expected to impact marine mammals, with relatively low sound generated within the protected inland harbor. Large whales rarely, if ever, occur within Ocean City Inner Harbor. This is supported by the lack of sighting information in the Ocean Biodiversity Information System Spatial Ecological Analysis of Megavertebrate Populations (OBIS-SEAMAP) mapper (see screenshots below of the Ocean City area without sightings and of the region with rare sighting information near shore), maintained by the Duke University Marine Geospatial Ecology Lab. The mapper does not report large whale (ESA-listed) species in the vicinity of the proposed O&M Facility location. Therefore, impacts to marine mammals due to noise generated during O&M facility construction are not expected, and was not included in the US Wind LOA Application.





RFI, January 3, 2024: NMFS has asked us to provide threshold distances for ESA-listed species using a tool they've developed for inshore pile-driving, and it requires some specific details to calculate. Does your team have the number of piles per day and the number of strikes per pile for the three pile types (steel, timber, sheet) proposed for the O&M facility?

US Wind Response (January 3, 2024): US Wind has provided all of the information we have regarding potential, worst-case piling for build out of a pier at the O&M facility. US Wind requests that, given that it is usual pier construction, that reasonable estimates are made based on similar piers throughout the region.

RFI, March 27, 2024: NMFS has provided BOEM with a draft of Ch 3 of the BiOp (Description of the Proposed Action) and Appendix A for advanced review, attached here. To ensure that the project description is correct, we are asking for your review of these documents as soon as possible, but no later than COB Wed April 3rd. NMFS has asked for a quick turnaround on this draft, and we appreciate your eyes on it as well as ours! Feel free to share with any staff who should review, but we ask that you provide a single set of comments back to BOEM.

US Wind Response (April 3, 2024): The following edits to Chapter 3.0 of the Biological Opinion were submitted to BOEM.

3.2.5 Shoreside Improvements at the O&M Facility

As described in the BA, a new O&M facility will be developed within Ocean City Harbor, Maryland. The existing floating dock which is 75 feet (22.9 meters) long and the existing pier which is 550 feet (167.6 meters) long by 12-foot (3.7 meters) wide will be replaced by a fixed pier which will be 625 feet (190.5 meters) long and range from by 30 feet (9.1 meters) to 32 feet (9.7 meters) wide. The length of the proposed pier will not extend any further into Ocean City Harbor ~~any further~~ than the current dock and pier structures. To repair the existing bulkhead, US Wind plans to place up to 120 sheet piles a maximum of 18 inches beyond the existing wharf face and fill the void between the two before being capped. ~~US Wind will~~This bulkhead repair would include replacing~~e~~ the existing bulkhead/quay wall from the end of the pier to 175 feet (53 meters) to the west. ~~by~~The fixed pier would include installing up to 170 steel pipe pier piles with diameters of 12-to-18-inches (30.5 to 45.7 centimeters) and lengths of 100 to 125 feet (30.5 to 38.1 meters). Along the north side of the pier and along the steel sheet pile bulkhead, US Wind will install a 2-foot (0.6 meter) wide timber fender system. On the south side of the pier, US Wind will install a 2-foot (0.6 meter) wide timber fender system and wave screen. Up to 240 timber fender system piles with diameters of 12-to-18-inch (30.5 to 45.7 centimeters) and lengths of 40 to 45 feet (12.2 to 13.7 meters) will be installed. The footprint of the proposed bulkhead repairs and fixed pier would permanently impact approximately 19,700 square feet (1,830.2 square meters) of seafloor.

All pile installation will be completed with an impact hammer. The piling duration for the steel pipe pier piles and timber fender system piles would occur over a period of up to 6-months and the sheet pile bulkhead repairs would occur over a period of up to 3-months. While no specific timeline for acquisition and retrofitting of the O&M facility is provided in the BA or COP, BOEM and US Wind anticipate that any inshore impact pile driving required to develop the O&M facility will be completed before the targeted commercial operations date for phase 1 in December 2025.

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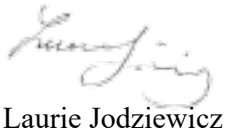
Should you have any questions related to this submittal, please contact me by telephone at 410-340-9428 or via email at l.jodziewicz@uswindinc.com.

Sincerely,



Laurie Jodziewicz
Senior Director of Environmental Affairs
US Wind, Inc.

cc: Todd Sumner, US Wind
Michael Feinblatt, TRC Environmental, Inc.