



September 9, 2024

Ms. Lisa Vest, Public Hearing Officer
DNREC Office of the Secretary
89 Kings Highway, Dover, DE 19901
Submitted electronically to DNRECHearingComments@delaware.gov

RE: Delaware State Permits for the US Wind Maryland Offshore Wind Project

Dear Ms. Vest,

The Delaware Chapter of the Surfrider Foundation (Surfrider) submits these comments to the Department of Natural Resources and Environmental Control (DNREC) concerning the "Maryland Offshore Wind Project" (Project), Lease OCS-A 0490, owned by US Wind, Inc.

Full build out of the Project, which is about 10 miles offshore of Delaware and Maryland, would include 114 wind turbine generators (WTGs) of 14 to 18 MW each, up to four offshore substations (OSSs), up to four 230 kilovolt (kV) offshore export cables, and one meteorological tower.

The offshore export cables are planned to make landfall at 3Rs Beach parking lot in Delaware Seashore State Park, Sussex County, Delaware. The Project will be interconnected to the onshore electric grid through new onshore substations at the existing Indian River Power Plant substation near Dagsboro, Delaware. It will require permits and authorizations from DNREC for the installation of cable ducts and offshore/onshore export cables using horizontal directional drilling, dredging and trenching, and for the construction of transition vaults.

The Surfrider Foundation is a grassroots environmental organization of over 80 chapters, 90 youth clubs, and more than 500,000 supporters, activists, and members in the United States, dedicated to the protection and enjoyment of the world's oceans,

waves, and beaches, for all people. We submit these comments on behalf of our local Delaware Chapter.

Surfrider is deeply concerned with scientific predictions of major negative impacts to our ocean and coasts from climate change. Offshore wind energy generation can replace the burning of fossil fuels, therefore reducing greenhouse gas emissions and lessening the impacts of climate change. Reducing the burning of fossil fuels will also reduce damaging air pollution and other cumulative environmental effects, which effect hardest the people of frontline and historically underserved and overburdened communities. Offshore wind energy generation provides sustainable economic development opportunities for coastal communities while meeting the growing demand for energy.

Surfrider also recognizes that there are many questions and concerns about offshore wind energy production, including potential impacts to ocean recreation, coastal and marine environments, environmental justice concerns, aesthetics, and fishing access.

Atlantic coastal and marine environments are regularly used by Surfrider members for a variety of activities, including beachgoing, surfing, kayaking, diving, kiteboarding, boating, photography, recreational sailing, wildlife viewing, and aesthetic enjoyment. Surfrider members may be impacted by offshore wind energy development through diminished aesthetics, recreational opportunities, environmental quality, wildlife abundance, and public safety.

Surfrider requests that DNREC address the comments below as it reviews permit applications for the Maryland Offshore Wind Project. Our comments are not intended to be conclusive of all issues, but rather a summary of the most important issues for Surfrider and its members.

IMPACTS FROM DIRECTIONAL DRILLING

The directional drilling for the cable landing at 3Rs Beach is located in an area near forested dune and interdunal swales (wet areas of freshwater lenses found infrequently on barrier islands in Delaware and considered valuable habitat) that are host for rare and non-rare species. We are concerned that the directional drilling could negatively affect the freshwater table in the dune ecosystem.

As coastal recreationists, we are of course concerned about the quantity, duration, and time of year that negative impacts to parking from cable landing construction for the Project will occur. Our understanding is that there will be no permanent reduction in

parking space at 3Rs Beach, and that construction of the cable landing will occur in the offseason. Please confirm these assumptions.

DREDGE SPOILS

The current Project plan is to dispose of 74,000 cubic yards of dredge spoils from the Indian River Bay cable laying in the Jones Crossroad Landfill. We request that dredge spoils, if clean, be used for sand replenishment at Indian River Inlet beaches or for wetland reconstruction, depending on the type of sediment found.

OFFSHORE SAND RESOURCES

Offshore beach quality sand resources are already scarce, and expected to become scarier. Over the past 5 years, we have already seen the negative impacts to swimming and surfing in Ocean City Maryland from running out of finer grained sand and switching to coarser. The area of Ocean City which receives replenishment (30th St to 145th St) has been demonstrably and negatively impacted.

We are concerned about negative impacts to high quality sand resources offshore from the placement of the Project's power cable, and request that high quality sand areas be avoided as much as possible. The nature of sand replenishment economics is that project costs go up when contractors are presented with obstacles to rapid production. Even a narrow cable pathway through a potential sand borrow area creates challenges to extraction that exceed the actual footprint of the cable path.

Area G (map below) lies right off 3Rs Beach and another potential area lies just further offshore. The Southside ebb tidal shoal is particularly important (Area C). As Indian River Inlet's beaches become more vulnerable, this large bank of sand lying only ½ mile from the inlet will become increasingly valuable as a potential sand resource.

Thank you for your consideration and incorporation of our comments in your analysis of permit applications for the US Wind owned Maryland Offshore Wind Project.

Sincerely,

Emily Bryant-Álvarez , Chair
Delaware Chapter of the Surfrider Foundation
chair@delaware.surfrider.org

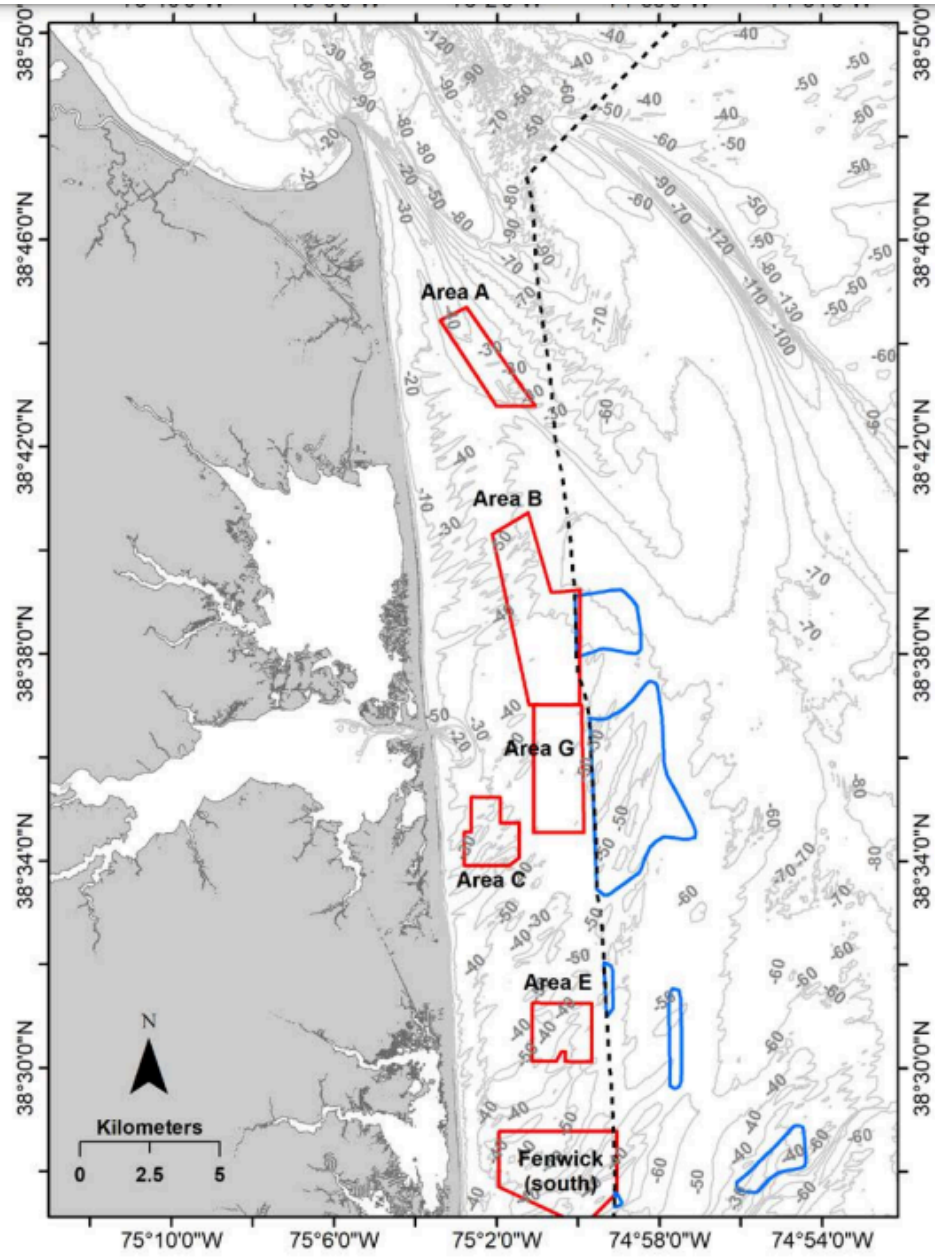


Figure 4. USACE designated borrow areas in State waters. Blue outlines were potential resource areas