DRAFT FINAL

JUNE 10, 2024

MARYLAND OFFSHORE WIND PROJECT OFFSHORE HISTORIC PROPERTIES TREATMENT PLAN—OFFSHORE PROJECT COMPONENTS

PREPARED FOR:

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LIST OF ACRONYMS

ac	acre
ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effect
ADLS	Aircraft Detection Lighting System
BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
DHCA	Delaware Division of Historical and Cultural Affairs
FAA	Federal Aviation Administration
ft	foot
GIS	Geographic Information System
ha	hectare
HDD	horizontal directional drilling
HPTP	Historic Preservation Treatment Plan
HRVEA	Historic Resources Visual Effects Analysis
km	kilometer
KOP	Key Observation Point
Lease Area	the OCS-A 0490 Lease, located approximately 13 mi (11.3 nautical miles, 21 kilometers) off the coast of Maryland and includes approximately 80,000 acres of submerged lands
Lessee	US Wind
m	meter
Medusa	A historic database operated by the Maryland Historical Trust
MHT	Maryland Historical Trust
mi	mile
MPDF	Multiple Property Documentation Form
MW	megawatt
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHPA	National Historic Preservation Act of 1966
nm	nautical mile
NPS	National Park Service
NRHP	National Register of Historic Places
OCS	Outer Continental Shelf
PAPE	Preliminary Area of Potential Effects
PDE Project	Project Design Envelope Maryland Offshore Wind Project
RCG&A	R. Christopher Goodwin & Associates, Inc.
SHPO	State Historic Preservation Office
USCG	United States Coast Guard
WEA	Wind Energy Area
WTG	Wind Turbine Generator

1 EXECUTIVE SUMMARY

This Historic Preservation Treatment Plan (HPTP) was developed to provide background data, information on historic properties, and detailed implementation steps for mitigation measures developed to resolve adverse visual effects to three historic properties identified by the Bureau of Ocean Energy Management (BOEM) through Section 106 consultation for the Maryland Offshore Wind Project (Undertaking), as identified by the Offshore Historic Resources Visual Effects Analysis (HRVEA), dated January 2024, and submitted to BOEM on January 10, 2024. The aforementioned Offshore HRVEA summarized effects from Offshore Project Components to onshore historic resources. The following HPTP is anticipated to support a Memorandum of Agreement (MOA) regarding the Undertaking among the Bureau of Ocean Energy Management (BOEM), the State Historic Preservation Officers (SHPO) of Delaware, Maryland, New Jersey, and Virginia, and the Advisory Council on Historic Preservation (ACHP). The mitigation measures within this document, and their implementation if selected, are anticipated to be developed in consultation with federally and state recognized tribes, the Delaware Division of Historical and Cultural Affairs (DHCA), Maryland Historical Trust (MHT), ACHP, and other consulting parties.

2 BACKGROUND INFORMATION

2.1 Project Overview

BOEM has determined that the Maryland Offshore Wind Project (Undertaking) constitutes an undertaking subject to Section 106 of the National Historic Preservation Act (NHPA; 54 U.S.C. § 306108) and its implementing regulations (36 CFR §800). The proposed activities to support the Project, as detailed in the US Wind, Inc. (US Wind) Construction and Operations Plan (COP), have the potential to affect historic properties. The work of the Project detailed in the COP will be performed for US Wind. The Project is located in the Commercial Lease of Submerged Lands for Renewable Energy Development on the Outer Continental Shelf (OCS) Offshore Maryland (OCS-A 0490, the Lease), which was awarded to US Wind (Lessee) through the Bureau of Ocean Energy Management (BOEM) competitive renewable energy lease auction of the Wind Energy Area (WEA) offshore of Maryland in 2013. The Lease area covers approximately 80,000 acres (ac; 32,375 hectares [ha]) and is approximately 13 statute miles (mi) (11.3 nautical miles [nm], 21 kilometers [km]) off the Ocean City, Maryland, coastline. Up to 121 Wind Turbine Generators (WTGs) and up to 4 offshore substations (OSSs) would be constructed in the Lease area. The Offshore Export Cable Route Corridor will connect the Lease area to a Point of Interconnection at the Delmarva Power & Light Indian River Substation near Millsboro, Delaware.

The Offshore HRVEA (Appendix I3) that was prepared as part of the Maryland Offshore Wind Project COP evaluated effects to onshore historic properties from Offshore Project Components. Based on the results of the Offshore HRVEA, it has been determined that the Undertaking will result in an adverse visual effect to three properties that are either listed or treated as eligible for listing for purposes of this analysis. Consultation will be undertaken between federally and state recognized Native American tribes, DHCA, MHT, and other consulting parties to develop manners in which to avoid, minimize, and mitigate adverse effects to these three historic properties.

2.1.1 Section 106 of the NHPA

Under the Section 106 regulations at CFR § 800.6(b)(1)(i-iv), an undertaking that will or may adversely affect historic properties calls for the federal agency to consult with the SHPO or Tribal Historic Preservation Officer (THPO) and other parties to negotiate and execute a Section 106 agreement document that sets out the measures the federal agency will implement to resolve those adverse effects through avoidance, minimization, or mitigation. An MOA is considered appropriate for this Undertaking in order to record the agreed upon resolution for this specific undertaking, which includes a defined beginning and conclusion, where adverse effects are understood. This HPTP was developed to address adverse effects determined in the Offshore HRVEA and is intended to help mitigate the visual adverse effects from the Undertaking. These proposed mitigation measures may be appropriate for consultation and inclusion in an MOA for the Undertaking.

3 HISTORIC SIGNIFICANCE AND EXISTING CONDITIONS OF THE HISTORIC PROPERTY

Three historic resources are included in this HPTP based on analysis of visual effects to properties as outlined in the HRVEA; these properties are listed in Table 3-1. Two of these properties are located in Ocean City, Worcester County, Maryland, and one is located in Lewes, Sussex County, Delaware.

Table 3-1. Table of Effected Properties

SHPO ID Number	Name	City	State	Eligibility	Distance from Nearest Turbines
S06048	Fort Miles Historic District	Lewes	DE	NRHP Listed	20-30 mi
WO-347	U.S. Coast Guard Tower	Ocean City	MD	NRHP Eligible	12-20 mi
WO-323	U.S. Life-Saving Station Museum	Ocean City	MD	NRHP Eligible	12-20 mi

3.1 Historic Context and Significance

3.1.1 Sussex County, Delaware

Coastal development at Sussex County began with the establishment of camp meeting grounds which, over time, evolved into resort towns during the late-nineteenth and early-twentieth centuries. As such, two types of coastal development emerged: the religious camp and seasonal, recreational development. Camp meeting grounds generally were seasonal religious communities comprised of modest dwelling units or tents, a central gathering place for worship or meetings, and landscaped exteriors (University of Delaware 2014). In contrast, the resort town emerged in the late-nineteenth and early twentieth-centuries as a seasonal place of leisure, generally along the coast or mountains, with recreational amenities and lodging facilities (Ressetar 2011:8). In Delaware, camp meeting grounds often were expanded by real estate developers. These developers platted parcel lots and these camp meetings grounds evolved into resort towns between the by the early twentieth-century, catering to expanded wealth affording the American family disposable income and more time-off from work.

At the end of the nineteenth century, the predominantly agricultural economy of Sussex County began to be supplemented by the economy of seasonal, religious developments along the coast (Carter 1976:32). Rehoboth Beach was one of the earliest these communities, first established as camp meeting grounds. When Reverend Todd and the Rehoboth Beach Camp Meeting Association established their seaside retreat, the meeting grounds were placed at the west end present-day Rehoboth Beach on lands acquired from local farmers. The grounds were laid out in a fan-shaped design with wide streets, parks, and modest or narrow building lots. Instead of tents, simple frame houses had populated the meeting ground streets. Most of these buildings were standard designs comprising 300-sq ft. wooden structures divided into two rooms (Morgan 2010:29).

The area surrounding the camp meeting grounds began to develop after the New Castle Railroad had extended to Rehoboth Beach in 1878 (Morgan 2010:30). Initially, the tracks ended at the periphery of the camp. However, in 1884, the line was extended down Rehoboth Avenue to a new depot near the current-day center of town. This line extension provided vacationers from the Washington-Baltimore metropolitan

area more convenient access to Rehoboth Beach. As the camp evolved into a desirable seasonal community, it began to attract visitors unrelated to its religious purposes. These visitors constructed their own summer cottages or, in certain cases, year-round houses. In 1891, Delaware's General Assembly established the growing development a municipality, originally naming it Henlopen City; later that year it had been renamed Rehoboth Beach.

Approximately 13 mi south of Rehoboth Beach, another camp meeting ground would soon be developed. In 1898, F.D. Powers, a minister at a congregation of the Disciples of Christ in Washington, D.C., suggested a Christian meeting place be established along the Atlantic coast. The Delmarva Peninsula subsequently was chosen as a suitable location for such a settlement. An empty coastal area owned by Ezekiel Evans, a Sussex County landowner, was selected. This site would become Bethany Beach (Meehan and Dukes 1998:17). In 1900, the Disciples of Christ formed the Bethany Beach Improvement Company, which raised money to purchase the land from Evans. The company sold 150 lots in Bethany Beach, primarily to families from Washington, D.C., Pittsburgh, Pennsylvania, and Scranton, Pennsylvania. The company laid out streets and divided the blocks into 40- by 125-ft lots (Morgan 2010:24). In addition to these residential lots, the Christian Church reserved a large area near the town center to serve as the assembly grounds, which included a building known as the Tabernacle. This building was an octagonal auditorium completed in 1903 and served as the central meeting place. The octagon-shaped wooden building was designed with sides that could be opened to allow the sea breeze to cool the audience (Morgan 2010:24). The building was situated on an open field several blocks from the beachfront and would become a symbol of the town; it also held lectures and some of the first picture-shows to be shown at the beach (Morgan 2010:25).

Resort tourism did not flourish at Bethany Beach with the same speed as its northern neighbor, Rehoboth Beach. In fact, the first fifty years of Bethany Beach history generally are referred to as the "Quiet Years" by local residents, tourists, and historians (Meehan and Dukes 1998:18). Despite the Bethany Beach Improvement Company's efforts to connect the town by existing rail lines along the Delmarva Peninsula, such efforts were never realized. Therefore, traveling to Bethany Beach required greater time and more transfers between ferries, trains, and automobiles. Financial problems also contributed to the camp's slow development. Local bankers were hesitant to loan money for the development of Bethany Beach because they recently had lost money on similar camp meeting grounds. Without sufficient financial backing, the company was unable to move forward with its ambitious construction and little development occurred. Eventually, in 1903, six Pittsburgh investors agreed to purchase all of the Bethany Beach Improvement Company's stock, leaving three shares to a Delaware resident so that the company could retain local ownership (Meehan and Dukes 1998:19). This influx of capital improved the company's financial footing and allowed development of Bethany Beach to resume, albeit slowly.

As the development of Bethany Beach progressed, a series of recreational, residential, and maritime properties were constructed to support the growing seasonal community. Recreational properties included a boardwalk, modest hotels, and theaters; residential properties included summer residences; and maritime properties included life-saving stations.

The boardwalk was constructed in 1903 and later rebuilt in 1905 following a severe storm and a United States Lifesaving Service (USLSS) station was constructed and began operations in 1907. The Town of Bethany Beach was incorporated in 1909. In 1910, Bethany Beach had 56 recorded permanent residents, many of whom lived in summer houses. Unlike the tent houses of Rehoboth Beach, many of the first houses

in Bethany Beach were two-story buildings with wide porches and several rooms (Morgan 2010:26). Many families built houses north of the Tabernacle, near present-day 1st Street. As many of the early families were from western Pennsylvania, this area became known as Little Pittsburgh. Louis Drexler, who later would serve in the Delaware state legislature, built a two-story cottage with a wrap-around porch one block from the beachfront (Morgan 2010:27). This house design was representative of a domestic architecture found at Bethany Beach during the early-twentieth century.

During this period, two hotels operated at Bethany Beach: the Sussex Hotel or and the larger, Bellevue-Atlantic, which later became known as the Seaside Inn (Morgan 2010:28). These hotels did not adopt many of the luxury standards that had been implemented since the founding of Tremont House in 1830. The Tremont House in Boston, Massachusetts, often is credited as the earliest iteration of modern hotel standards in the United States. The design of the Tremont House incorporated several innovations including lobbies, indoor plumbing, lock-key rooms, and private dining or social halls.

These patterns of hotel innovations implemented over the nineteenth and early-twentieth were not realized at Bethany Beach. Most visiting Bethany Beach either had their own summer cottage or family and friends who could host them (Morgan 2010:27). As Bethany Beach was not attracting large crowds of tourists, their lodging stock represented more minimal and modest design and function (Morgan 2010:28). Bethany Beach began to offer attractions during this period as well, realized through recreational properties. Boardwalks were constructed in coastal resorts on both the east and west coasts. By the 1920s, boardwalks had expanded to include hotels and restaurants. The boardwalks at Bethany and Rehoboth followed these early trends. The Bethany Beach Boardwalk constructed in 1903 had been rebuilt several times over the years due to storm damage. Seasonal communities along the coasts built boardwalks, generally constructed of poured concrete or wood-plank, as a pedestrian path along the ocean. This pedestrian thoroughfare typically was lined with hotels, commercial buildings, and recreational facilities. The Ringler Theater opened on the boardwalk in 1923 and became one of the town's major attractions. Restaurants and new hotels began to open in the 1930s and a dirt road connected Rehoboth and Bethany in 1934 (Meehan and Dukes 1998:23).

The recreational boardwalk had been flourishing just north at Rehoboth Beach since the early twentieth century as well. Aided by the more direct transportation and access, during much of what Bethany Beach considers the "Quiet Years", was a period of recreational growth for Rehoboth Beach. The Rehoboth Boardwalk was constructed in 1905 and was credited with offering evening recreation to vacationers who, prior to its construction, had few entertainment options in the evenings (Morgan 2009:18). The boardwalk was built on elevated wood-plank pilings and was popular during both day and evening. After sundown, the pedestrian thoroughfare was gaslit until 11:00pm allowing vacationers to stroll along a protected pathway (Morgan 2009:19). Not unlike at Bethany Beach, by the 1930s the Rehoboth Beach boardwalk was lined with commercial storefronts and low-scale hotels.

After war broke out in Europe in 1939, the U.S. government took an increasing interest in defending the Delaware coast. The dirt road between Rehoboth and Bethany was paved in 1940 and both towns were blacked out at night to reduce the chances of German submarine attacks on ships offshore (Meehan and Dukes 1998:99). German prisoners of war were held in the area, a radar station was built to the west of Bethany Beach, and the U.S. Army built a gunner control tower south of town to support Coast Artillery guns at Fort Miles on Cape Henlopen (Meehan and Dukes 1997:115). A destructive storm struck Bethany and Rehoboth beaches in mid-September 1944 destroying the boardwalks in both towns and several

recreational amenities (Meehan and Dukes 1997:117). While the boardwalks were rebuilt the following year, some of the major attractions never reopened, including the Ringler Theater at Bethany Beach.

Following World War II, the Delaware coastline rapidly developed as a seasonal tourism destination. The first wave of development occurred between 1952 and 1978. During this period, Rehoboth Beach became a vacation destination and the "Quiet Years" of Bethany Beach had ended as the community expanded and was accessible by automobile. Outlying development in unincorporated areas expanded to include the areas in and around Fenwick Island and Dewey Beach. Fenwick Island, sited just north of Ocean City, Maryland, was incorporated in 1953 and Dewey Beach, just south of Rehoboth Beach, was incorporated by 1981. These communities slowly developed during early- to mid-twentieth century as collections of single-family residences. Unlike Rehoboth Beach and Bethany Beach, Fenwick Island and Dewey Beach did not follow a planned development pattern comprising platting and subdivided lots.

Rapid development of the Sussex County coastline between 1952 and 1978 was two-fold. In 1952, the Chesapeake Bay Bridge opened, beginning a pattern of accelerated construction among coastal communities. For the first time, motorists were able to drive from Washington, D.C., and Baltimore to the Delmarva Peninsula without a lengthy detour around the northern tip of the Chesapeake Bay. In addition, a growing sector of the American population had more time and money for vacations and second homes (Lasner 2012:169). As a result, condominiums were created during this period. During the 1960s, condominiums were introduced as a form of low-cost homeownership. Vacation condominiums for younger families proliferated in this era and many viewed vacation condominiums as a sound way to invest surplus equity with the possibility to rent these spaces to vacationers when not occupied (Lasner 2012:169). However, while other Mid-Atlantic coastal communities saw an increase in multi-unit buildings and high-rises along their beachfronts, such as Ocean City, Maryland, and Virginia Beach, Virginia, the Delaware communities remained low-scale and residential building heights seldom exceed 35-ft due to strict zoning. Consequently, condominiums rarely exceeded two- to three-stories in height.

3.1.2 Worcester County, Maryland

In the middle of the nineteenth century, towns such as Cape May City, New Jersey, Saratoga Springs, New York, and Newport, Rhode Island, developed as areas that wealthy citizens along the east coast of the U.S. could travel to during the summer months. Small-scale, seasonal oceanfront communities with direct access to the water were constructed to accommodate recreational activities. The "resort town" emerged during the late-nineteenth and early twentieth-centuries as seasonal places of leisure, generally along the coast or mountains, with recreational amenities and lodging facilities (Ressetar 2011:8). While Ocean City, Maryland, began its development later than the aforementioned resort towns, Ocean City's architectural, economic, and population growth patterns closely followed those of other resort towns found along the east coast.

Stephen Taber, a speculator, purchased the land that became Ocean City in 1868 (Corddry 1991:15-16). Four years later, Taber sold ten acres of land on the barrier island to a group of five investors from Baltimore, Philadelphia, and the Eastern Shore who formed the Atlantic Hotel Company Corporation (DeVincent-Hayes & Jacob 1999:iv; Corddry 1991:17). As part of the deal, Taber agreed to expand the amount of property sold to 50-acres in order to build a town around the Atlantic Hotel once it was completed (Corddry 17:1991).

Developing Maryland's barrier island into a resort town was not a new concept by the time the Atlantic Hotel Company Corporation purchased the land from Taber. Between 1869 and 1872, Isaac Coffin built the first beachfront guest cottage on the island called the Rhode Island Inn and a guest cottage was built by James Massey at the present-day intersection of Baltimore Avenue and Wicomico Street (Walker & Sullivan 2001:xxiii). However, the opening of the Atlantic Hotel on July 4, 1875, often is considered the official founding of Ocean City (the name of the town was selected by the company's board of directors) and the beginning of the town's reputation as a resort destination (DeVincent-Hayes & Jacob 1999:iv).

When the Atlantic Hotel opened in 1875, the hotel had rooms to house 400 guests, a billiards room, and other entertainment (Oceancity.com 2017). The building extended a full city block from the ocean front to Baltimore Avenue (Craig 2023:12). After the hotel opened, the additional land Taber provided for the building of a town was subdivided into 205 lots and roads were graded. Shortly after the opening of the Atlantic Hotel, 104 of the 205 lots were sold. However, the sale of these lots did not guarantee development and many remained undeveloped for years. North-south roads were named after prominent U.S. cities, and east-west roads were named after counties in Maryland's Eastern Shore, with South Division Street and North Division Street marking the boundaries of the original town (Craig 2023:10; DeVincent-Hayes & Jacob 1999:iv).

At the end of the late-nineteenth century, many of the Ocean City parcels were sporadically developed and planned streets went unpaved. By 1913, Baltimore Avenue had only been paved to 7th Street (Sullivan 2001:74). The densest development was between present-day South Division and Caroline streets (Sullivan 2001:5). Archival photographs of the Ocean City Boardwalk, also known as Atlantic Avenue, during this period depict three-story buildings with verandas fronting directly onto the boardwalk or beach. These three-story buildings exhibited residential designs, but often were hotel or lodging facilities. Several hotels had opened along the boardwalk during the first decade of the twentieth century, including the Mt. Pleasant Hotel (Atlantic Avenue and 1st Street) and the Hamilton Hotel (Atlantic Avenue and 3rd Street) (Sullivan 2001:10). These hotels strategically fronted the boardwalk as it operated as a pedestrian thoroughfare featuring commercial and recreational buildings or amenities.

By 1938, the Maryland General Assembly approved the construction of the Chesapeake Bay Bridge; however, construction of the bridge did not begin until after World War II (Morgan 2011:29). After the Chesapeake Bay Bridge north of Annapolis opened in 1952, Ocean City changed rapidly due to the increased accessibility to residents of the greater Baltimore-Washington metropolitan area. Within four years of its opening, the bridge transported vacationers every weekend during the summer months (Morgan 2011:30).

During the 1950s, tens of thousands of visitors came to Ocean City every weekend during the summer, filling the city's hotels to capacity. Private cottages attempted to fill the excess demand for seasonal housing. Despite the additional capacity provided by cottages, there were still not enough rooms available to meet the demand. In response, local residents built cottage courts and cabin camps. These were groups of small square or rectangular wood cabins with gable roofs that were built along the roadside, often in an L or U shape (Craig 2023:71-72). However, most of these seasonal cottages were demolished to clear way for housing redevelopment, generally multi-unit condominiums between five- to ten-stories in height, during the 1960s and 1970s.

3.2 NRHP Criteria and Aspects of Integrity Affected by the Undertaking

This section details the historic and physical context of the affected properties and their character defining views to the ocean.

3.2.1 DELAWARE

3.2.1.1 DHCA ID: S06048, Fort Miles Historic District (NRHP Listed)

Located east and south of Lewes, Sussex County, Delaware, Fort Miles represents nationally significant trends in federal coastal defense policy, military landscape and post planning, and standardized military architecture. The installation was constructed between 1938 and 1941 with primary purpose to defend the Delaware Bay and protect domestic shipping between Cape May and Cape Henlopen. The historic district consists of 51 contributing buildings and 9 structures over approximately 1,165-acres. Fort Miles is exemplary of a mid-twentieth century military landscape consisting of defense and support buildings and structures. These include resources such as batteries, gun emplacements, fire control towers, a parade ground, and road layout, as well as examples of support resources such as storage buildings, barracks, and mess halls. The buildings that support the fortifications represent significant examples of buildings constructed from standard Army plans. The historic district was listed in the NRHP under Criteria A and C in 2004 (Ross and Bodo 2004). Fort Miles is strategically situated at the point where the Delaware Bay and Atlantic Ocean meet at Cape Henlopen, Delaware. Maritime setting and unobstructed ocean views are key to the significance of the property.

As a result of the Project, the integrity of location, workmanship, design, and materials would not be affected. However, the integrity of setting, feeling, and association of the lighthouse would be diminished. Unobstructed ocean views and a beachside or maritime setting are character-defining features of the property that contribute to its significance because they were integral considerations in the placement and design of the property. The introduction of modern elements would interfere with how visitors experience the historically and currently unadulterated ocean viewscape. Therefore, the Project would result in an adverse effect to the Fort Miles Historic District.

3.2.2 MARYLAND

3.2.2.1 WO-347, U.S. Coast Guard Tower (NRHP Eligible)

The U.S. Coast Guard Tower was constructed ca. 1934-1935. The property follows the standardized design used by the USCG for coastal, steel lookout towers (U.S. Department of Transportation, USCG 2002; Mattheis and Hutchinson n.d.). Archival images and available architectural plans indicate the property historically has been used as a coastal, lookout tower operated by the USCG.

The presence of the USCG played a role in the development of Ocean City with lookout towers constructed to increase safety measures along the Atlantic Ocean coastline. Due to expanded maritime activities throughout the twentieth century, purpose-built lookout towers directly benefited USCG operations. The period of significance spans ca. 1934-1935 to 1964 and correlates to the tower's operation by the USCG. The U.S. Coast Guard Tower is directly associated with documented events and recognized historic trends, specifically the development and evolution of the USCG (Criterion A). Archival research, including a

review of property deeds and newspaper articles, did not identify associations with individuals whose specific achievements or historic contributions can be identified and documented (Criterion B). Lastly, the lookout tower embodies the characteristics depicted in the standardized plans developed by the USCG for the construction of such resources and as represented in similar towers constructed along the Atlantic seaboard during the 1930s. The steel, lookout tower represents a type, period, and method of construction for such resources constructed during the period (Criterion C).

The property retains integrity of location, design, setting, materials, workmanship, feeling, and association. Despite no longer operated by the USCG, the property remains at the original location overlooking the Ocean City Inlet. A review of original plans and historic photographic suggests the building has undergone relatively few modifications. The structure maintains its appearance as an observation tower constructed during the early 1930s, and as such, maintains integrity of design, materials, and workmanship. While new construction was built adjacent to the tower, the structure still maintains its association and feeling as a lookout tower. The building retains significance for association with the standardized plans developed for the USCG for observation towers (Criterion A and C) and integrity to merit consideration for inclusion in the National Register of Historic Places. As such, the structure is recommended eligible for listing in the NRHP with MHT concurrence.

The Project will not alter the aspects of integrity of location, workmanship, design, or materials. However, the integrity of setting, feeling, and association of the U.S. Coast Guard Station would be diminished. Unobstructed ocean views and a beachside or maritime setting from the early twentieth century are character-defining features of the property integrity of setting that contribute to its significance. The Project would result in an adverse effect to the U.S. Coast Guard Station.

3.2.2.2 WO-323, U.S. Lifesaving Station Museum (NRHP Eligible)

The U.S. Life-Saving Station Museum is comprised of one ca. 1891 building. The building was operated by the United States Life-Saving Service (USLSS) from 1891 to 1915 and the United States Coast Guard (USGC) from 1915 to 1964. In 1964, the property was handed over to the General Services Administration (GSA) before being relinquished to the municipal government of Ocean City for various civic uses. The building historically was located along Atlantic Avenue between North Division Street and Caroline Street before being relocated to its current location at the south terminus of the Ocean City Boardwalk in 1977. BOEM, in consultation with MHT, has determined the U.S. Life-Saving Station Museum is eligible for inclusion in the NRHP under Criterion A and Criterion Consideration C for its role in the lifesaving state for Ocean City and its beachfront.

As a result of the Project, the integrity of location, workmanship, design, and materials would not be affected. However, the integrity of setting, feeling, and association of the U.S. Life-Saving Station Museum would be diminished. The introduction of modern elements would interfere with how visitors experience the historically and currently unadulterated ocean viewscape. Therefore, the Project would result in an adverse effect to U.S. Life-Saving Station Museum.

4 POTENTIAL MITIGATION MEASURES

The following mitigation options were developed to further preservation, preservation education, and preservation scholarship in the public interest. The lessee is meeting with property owners to discuss preferred mitigation measures and consultation is ongoing. The following mitigations that have been developed are classified as "alternative" or "creative" mitigation—mitigation that does not prescribe the traditional documentation of the affected resources, but, rather, chooses to further the preservation needs of the community as a whole. The proposed mitigations have been informed based on the aforementioned mitigation meetings. Guidance on alternative mitigation can be found by the Advisory Council on Historic Preservation.

Table 4-1. Table of Effected Properties and Associated Mitigation Proposals

SHPO ID Number	Name	City	State	Applicable Mitigation Proposal	Distance from Nearest Turbines
S06048	Fort Miles Historic District	Lewes	DE	4.2	~22 mi
WO-347	U.S. Coast Guard Tower	Ocean City	MD	4.1	~12 mi
WO-323	U.S. Life-Saving Station Museum	Ocean City	MD	4.1	~12 mi

4.1 Mitigation Measure—National Register Nomination Form for the U.S. Life-Saving Station Museum (WO-323) and U.S. Coast Guard Tower (WO-347)

4.1.1 Purpose and Intended Outcomes

US Wind, Inc. shall develop a combined National Register nomination form for the U.S. Life Saving Station Museum (WO-323) and the US. Coast Guard Tower (WO-347) for inclusion in the National Register of Historic Places, within one year of a signed Memorandum of Agreement (MOA).

4.1.2 Scope of Work and Methodology

The SOI-qualified contractor shall develop the nomination package in consultation with the MD SHPO's National Register program, mht.nationalregister@maryland.gov. The documentation will be prepared in accordance with the following documents and other applicable NPS and MD SHPO guidance:

- National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf);
- National Register Bulletin 16 A: How to Complete the National Register Registration Form (https://www.nps.gov/subjects/nationalregister/upload/NRB16A-Complete.pdf);
- National Register of Historic Places and National Historic Landmarks Program Consolidated and Updated Photograph Policy 2024 (https://www.nps.gov/subjects/nationalregister/upload/NR-NHL-photo-policy-2024-01-02.pdf);
- Standards and Guidelines for Architectural and Historical Investigations in Maryland, 2019 (https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf).

US Wind shall use staff or contractors that meet the Secretary's Professional Qualifications to prepare the nomination form.

4.1.3 Deliverables

US Wind, Inc. shall submit the completed National Register nomination, including the accompanying documentation, to the MD SHPO for review and approval and shall revise the nomination to address any MD SHPO comments if applicable. Once approved by the MD SHPO, the MD SHPO shall forward the nomination form to the Keeper of the National Register of Historic Places for listing, within one (1) year of receipt of the nomination package.

4.1.4 Funds and Accounting

US Wind would provide the funding for this project to a contractor meeting the Secretary's Professional Qualifications. US Wind proposes up to $40,000 for consultant fees to undertake the field survey, archival research, and technical report writing for the nomination form and an additional $10,000 for the process to formally list the combined properties dependent on property owner approval. Fees would be negotiated between US Wind and stakeholders.

4.1.5 Minimum Standards for the Professionals Engaged to Complete the Work

All work and documentation for this mitigation measure will be completed by professionals meeting the Secretary of the Interior (SOI) professional qualification standards as outlined in the NHPA (NHPA; 54 U.S.C. § 306108) and its implementing regulations (36 CFR §800).

4.2 Mitigation Measure—Funding for Orientation Building Improvements at Fort Miles

4.2.1 Purpose and Intended Outcomes

US Wind, Inc. shall contribute funding for improvements to the Orientation Building, a publically accessible resource utilized for programs, events, and tours at Fort Miles. US Wind would make funds available upon the finalization and signature of the MOA and COP approval with a three-year timeline for completion.

4.2.2 Scope of Work and Methodology

U.S. Wind, Inc. would contribute to needed improvements identified at the Orientation Building, which may include:

- Window repair or replacements;
- Insulation upgrades; and,
- HVAC upgrades.

4.2.3 Deliverables

The DNREC would oversee the deliverables of this project resulting in building improvements. US Wind solely would provide the funds.

4.2.4 Funds and Accounting

US Wind would contribute the funding for the Orientation Building improvements to DNREC, who would disperse the contributions for prioritized improvements. US Wind proposes up to $40,000 for these contributions. Fees would be negotiated between US Wind and stakeholders.

4.2.5 Minimum Standards for the Professionals Engaged to Complete the Work

All work for this mitigation measure will be completed by licensed professionals or those meeting the Secretary of the Interior (SOI) professional qualification standards as outlined in the NHPA (NHPA; 54 U.S.C. § 306108) and it's implementing regulations (36 CFR §800).

5 IMPLEMENTATION

5.1 Timeline

Mitigation measures discussed within this HPTP and selected would be implemented as follows:

- US Wind would make funds available upon the finalization and signature of the MOA and COP approval with a three-year timeline for completion.

5.2 Reporting Requirements

US Wind will provide annual reports to BOEM to document the progress and completion of mitigation measures.

5.3 Organizational Responsibilities

5.3.1 BOEM

- Act as the federal agency and oversee Section 106 compliance;
- Determine if mitigation measures selected adequately address adverse effects; and
- Oversee consultation with consulting parties.

5.3.2 US Wind

- Fund mitigation measures.

5.3.3 DHCA, DNREC, and MHT

- Consult as appropriate, on the implementation of the HPTP.

5.3.4 ACHP

- Consult as appropriate, on the implementation of the HPTP.

6 FINALIZATION

6.1 Notification

Upon completion of the selected mitigation measures, US Wind will notify BOEM and signatories of the proposed MOA.

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