

November 15, 2023

Jolie Harrison, Division Chief
Permits and Conservation Division, Office of Protected Resources,
1315 East-West Highway, F/PR1 Room 13805,
Silver Spring, MD 20910

Subject: Whittier Head of the Bay Cruise Ship Dock Project – IHA Renewal Request
POA-2022-00233

Dear Ms. Harrison:

Turnagain Marine Construction (TMC) was issued an Incidental Harassment Authorization (IHA) for the take of marine mammals incidental to construction of the Whittier Head of the Bay Cruise Ship Dock on April 1, 2023. The IHA is valid from April 1, 2023, through March 31, 2024. Work began in May 2023 and as the project may not be complete by March 31, 2024, TMC is requesting a renewal of the IHA for a one-year extension through March 31, 2025.

We contend that this request qualifies for a renewal of the original IHA because the activities to be conducted under the proposed renewal IHA are a subset of the in-water construction activities authorized under the original IHA. This request has been submitted more than 60 days prior to the expiration of the original IHA date.

As of October 31, 2023, TMC has completed installation of 51 permanent piles to construct the approach trestle, 2 float restraint dolphins, and most of the mooring trestle. As winter weather conditions have set in, in-water work has slowed slightly. Between October 31 and March 31, 2024, it is anticipated that at a minimum, 10 more permanent piles will be installed, and 11 permanent piles (and associated temporary piles) would remain to be installed past the IHA expiration date of March 31. Work remaining to complete under the renewal IHA, at maximum, would consist of the following (Table 1 attached):

- installation of four (4) 48-inch piles for one mooring dolphin;
- installation of seven (7) 36-inch piles for the remainder of the mooring trestle; and
- installation and removal of eleven (11) 36-inch temporary piles to guide installation of the permanent piles.

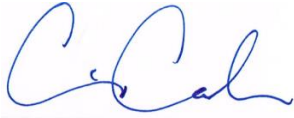
Because the project has not approached the number of Level A or Level B takes authorized under the original IHA, in-water work under the renewal IHA is not expected to exceed the authorized number of takes of any marine mammal species. Marine mammal monitoring reports have been submitted each month since the start of the project, and the results of required monitoring through October 31 are shown in Table 2 attached. Since these results do not indicate impacts of a scale or nature not previously analyzed or authorized, TMC is not requesting any changes to the authorized take numbers for the renewal IHA. TMC



proposes to use the same mitigation and monitoring measures proposed in the initial IHA for the renewal IHA.

We look forward to working with you and your staff to answer any questions you may have about this application. Please feel free to contact me at carrie@solsticeak.com or 907.929.5960 with additional questions.

Sincerely,



Carrie Connaker
Solstice Alaska Consulting, Inc.

Copies: Jason Davis, Turnagain Marine Construction; Adam Kresl, Turnagain Marine Construction



Table 1. Whittier Head of the Bay Project IHA Renewal Request Anticipated Work Summary

	Temp Pile Installation	Temp Pile Removal	36-Inch Perm Pile Installation	48-Inch Perm Pile Installation
# of Piles	11	11	7	4
Diameter of Steel Pile (inches)	36	36	36	48
Vibratory Pile Driving				
Total Quantity	11	11	7	4
Max # Piles Vibrated per Day	4	4	4	2
Vibratory Time per Pile (minutes)	10	10	15	15
Vibratory Time per Day (minutes)	40	40	60	30
# of Days	1.375	1.375	1.75	2
Vibratory Time Total (hours)	1	1	7	1
Impact Pile Driving				
Total Quantity	0	0	7	4
Max # Piles Impacted Per Day	0	0	4	2
# of Strikes per Pile	0	0	1,800	2,400
Impact Time per Pile (minutes)	0	0	45	60
Impact Time per Day (minutes)	0	0	180	120
# of Days	0	0	1.75	2
Impact Time Total (hours)	0	0	5.25	4
Down-the-Hole Drilling				
Total Quantity	11	0	7	4
Max # Piles Installed Per Day	4	0	2	2
Time per Pile (minutes)	60	0	150	150
Time per Day (minutes)	240	0	300	300
# of Days	1.375	0	0	2
DTH Drilling Time Total (hours)	5.5	0	0	10

Table 2. NMFS-Authorized Take and Take Summary as of October 31, 2023

Species	Authorized Level A Takes	Total Level A Exposures to Date	Authorized Level B Takes	Total Level B Exposures to Date
Humpback Whale	0	0	25	0
Dall's Porpoise	9	0	36	0
Killer Whale	0	0	145	0
Harbor Seal	40	0	170	12
Steller Sea Lion	0	0	218	11