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Michael Anderson
Executive Director

August 16, 2006

Ms. Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington D.C., 20426

RE: COMMENTS Project No. 12688-000
Rich Passage Tidal Energy Project Preliminary Permit

Dear Secretary Salas:

The Washington State Department of Transportation, Washington State Ferries, operate vehicular and passenger ferry service in Rich Passage between Seattle and Bremerton. Any plans to develop a tidal energy plant in the vicinity of our routine ferry service are of interest to WSF, therefore we would appreciate being added to the Commissions mailing list for this project.

It is our understanding that the Commission is receiving comment on the preliminary permit application for the Snohomish PUD proposal to build a tidal energy project within Rich Passage. WSF currently operates daily ferry service between the hours of 4:30 am and 1:50 am in Rich Passage on the route as shown in the vicinity map (Exhibit 1). Based on our review of the preliminary permit application, the proposed location for the tidal energy project in Rich Passage would span the western end of the passage, directly intersecting our ferry service route between Seattle and Bremerton.

Turbine installation parameters in this Snohomish County PUD proposal are listed as:

- Horizontal axis turbine with 10 meter diameter rotor;
- One half diameter (5 meters) lateral spacing between units to prevent flow blockage;
- Ten diameters (100 meters) downstream spacing to allow turbine wake to dissipate;
- Seabed clearance of 5 meters to keep turbine rotors outside less energetic boundary layer; and
- Overhead clearance of 4 meters at lowest astronomical tide to allow clearance by pleasure craft and small fishing vessels.



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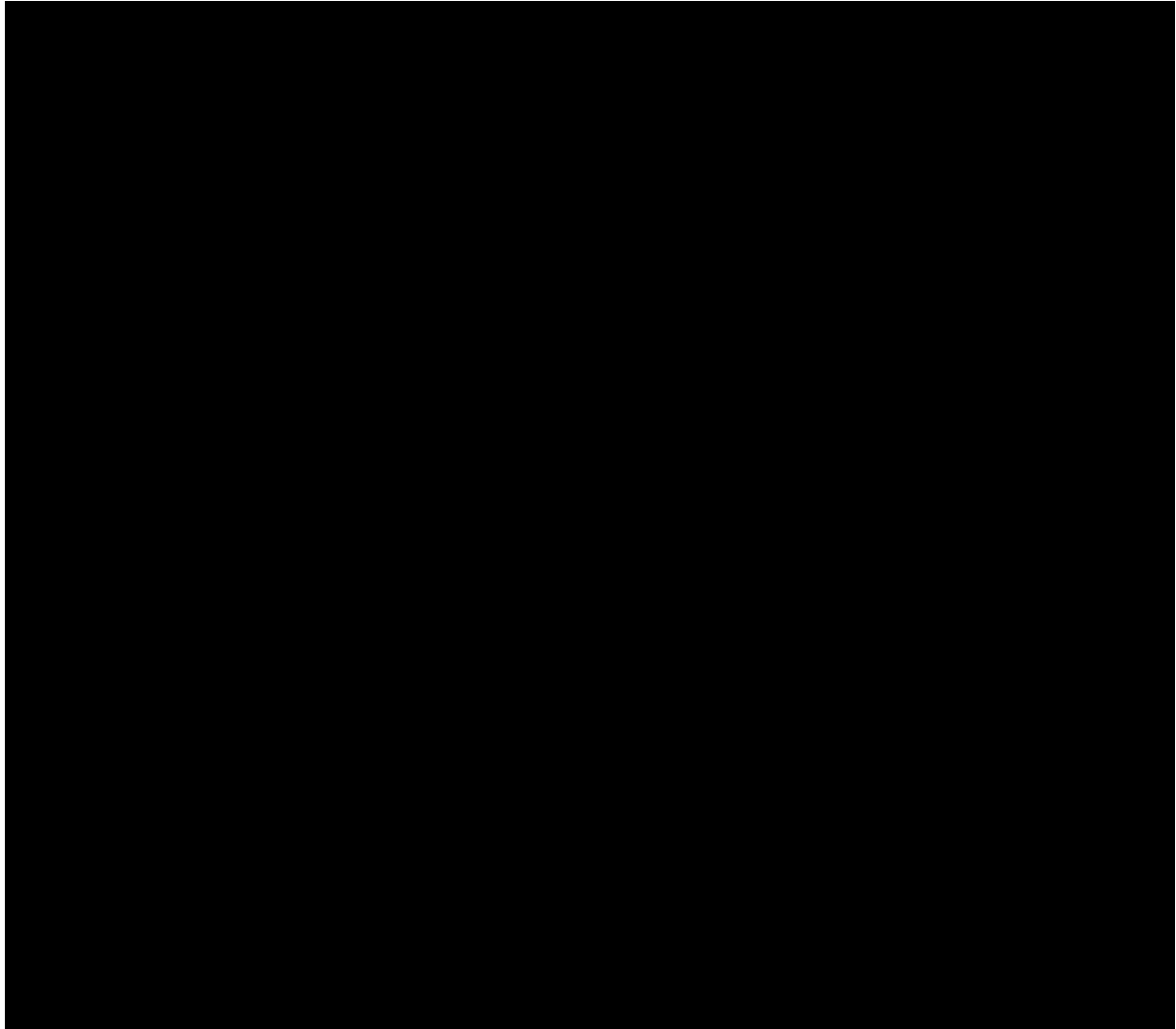


Exhibit 1: Vicinity Map

The proposed turbine infrastructure at the western end of Rich Passage includes use of approximately 4 transects (rows) of 14 to 18 turbines (62 total). This infrastructure would capture no more than approximately 16% of existing tidal energy so as to minimize disruption to the tidal ecosystem.

WSF Vessels under consideration for this route range from approximately 18 to 19 foot draft, significantly exceeding the overhead clearance zone being proposed by the tidal energy project. WSF is concerned that projects in the vicinity of or transecting our daily route could impact vessel operations. This includes the potential use of the Bremerton port during project installation and maintenance activities. WSF would also need clear notification of any construction or maintenance activities of the facility, including the

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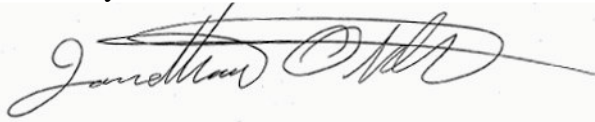
proposed study locations. WSF will need to verify the proposed locations of the moored platforms for future study of the proposed tidal energy facility to determine if there will be any impacts to daily operations within Rich Passage. It is our understanding that the moored platforms will be in place for a period of one year, so it is critical that this study not impede WSF vessel operations.

As described in the Snohomish County PUD proposal, the preliminary permit is for a period of 36 months and the scope of the application includes site selection, equipment selection, and design for a test installation and a commercial scale plant. However, there is no information with regards to how the PUD intends to transmit the generated power from the plant to the existing electric utility grid. Although the PUD may not be concerned with that portion of the project until a final site selection is made and engineering and environmental studies are completed, it is difficult to further assess potential impacts to WSF operations without those details.

The RCW Title 54 indicates the PUD's right to acquire property, rights of way, etc. for constructing the electrical transmission system between the turbines and the existing electrical utility grid. This right of way may need to be negotiated between the PUD and WSDOT, as our agency also has the right to acquire property and rights of way. Again, it is difficult to assess this potential impact without this level of detail in the permit application.

Thank you for this opportunity to comment. If you have any questions about WSF's current operations in Rich Passage, please contact Captain Pete Williams at (206) 264-3590 and by email at WilliPe@wsdot.wa.gov. If you are not able to contact Captain Williams you may contact me at (206) 515-3911 and by email at oldsj@wsdot.wa.gov.

Sincerely,



Jonathan Olds
Environmental Program Manager
Washington State Ferries

cc: Capt, Pete Williams, WSF
Capt. Kelley Mitchell, WSF
Jeffrey Kallstrom, WSF
Steve Klein, Snohomish PUD
Chris Yeakel, FERC

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