



**Washington State  
Department of Transportation**

**Douglas B. MacDonald**  
Secretary of Transportation

**Washington State Ferries**  
2901 3rd Avenue, Suite 500  
Seattle, WA 98121-1012

206-515-3400  
TTY: 1-800-833-6388  
[www.wsdot.wa.gov/ferries](http://www.wsdot.wa.gov/ferries)

**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. 12692-000  
San Juan Channel Tidal Energy Project Preliminary Permit

Dear Secretary Salas:

The Washington State Department of Transportation, Washington State Ferries, operate vehicular and passenger ferry service in San Juan Channel between Friday Harbor and the Anacortes, Lopez Island, Orcas Island and Sidney, BC, terminals. 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 San Juan Channel. WSF currently operates daily ferry service between the hours of 5:25 am and 3:25 pm in San Juan Channel on the routes 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 San Juan Channel is outside of WSF vessel and terminal daily operations.

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

- Horizontal axis turbine with 20 meter diameter rotor;
- One half diameter (10 meters) lateral spacing between units to prevent flow blockage;
- Ten diameters (200 meters) downstream spacing to allow turbine wake to dissipate;
- Seabed clearance of 8 meters to keep turbine rotors outside less energetic boundary layer; and
- Overhead clearance of 8 meters at lowest astronomical tide to allow clearance for deep draft container vessels.



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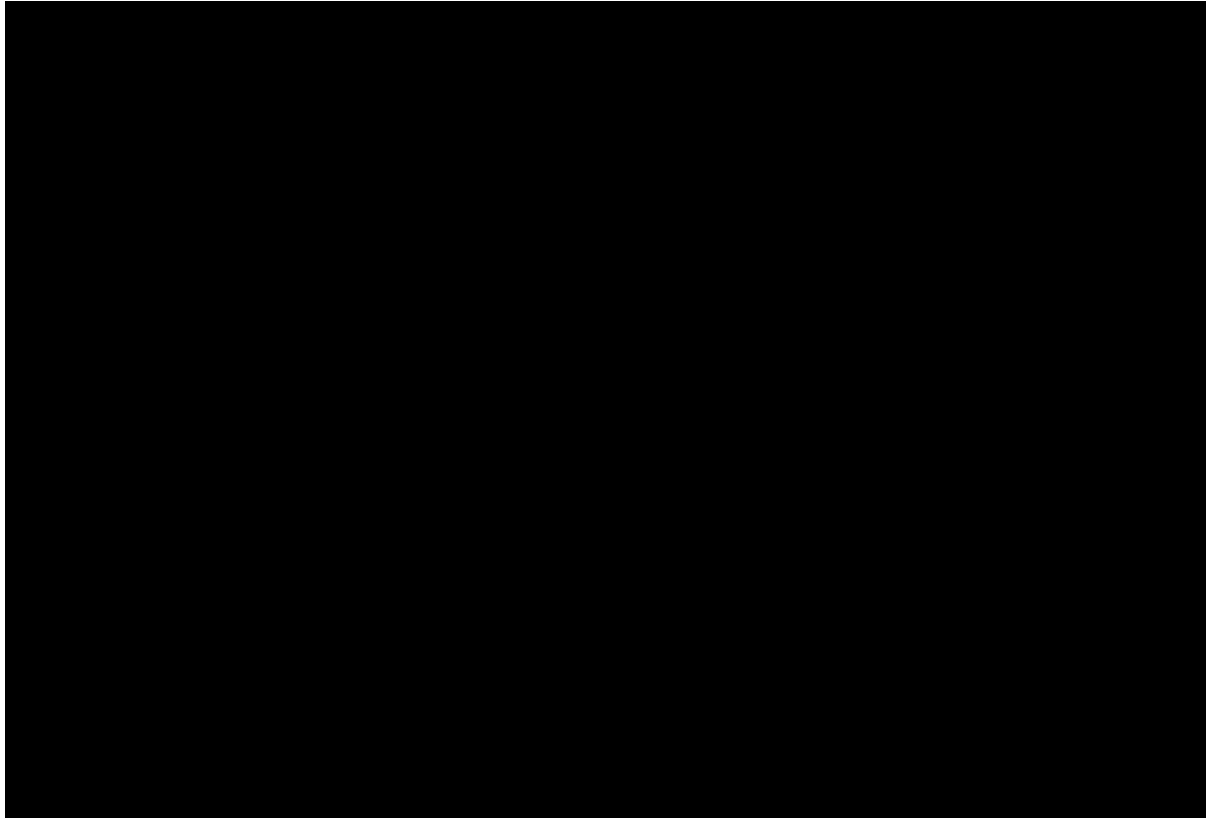


Exhibit 1: Vicinity Map

The proposed turbine infrastructure for San Juan Channel includes use of approximately 5 transects (rows) of 20 to 27 turbines (116 total) that would capture approximately 12% of existing tidal energy so as to minimize disruption to the tidal ecosystem.

WSF is concerned that projects in the vicinity of our daily route could impact vessel operations. This includes the potential use of the Friday Harbor, as well as transit through other waters currently transited by WSF vessels, during project installation and maintenance activities. WSF requests clear notification of any construction or maintenance activities of the facility, especially project related vessel traffic in San Juan Channel. 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 San Juan Channel. 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

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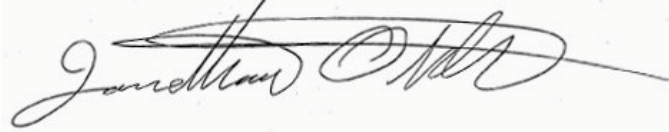
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is no information with regards to how the PUD intends to transmit the generated power from the plant to the existing electric utility grid. Although the PUD may not be concerned with that portion of the project until a final site selection is made and engineering and environmental studies are completed, it is difficult to further assess potential impacts on terminal operations at Friday Harbor 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 San Juan Channel, please contact Captain Mark McElwaine at (206) 264-3549 or by email at [McElwaM@wsdot.wa.gov](mailto:McElwaM@wsdot.wa.gov). If you are not able to contact Captain McElwaine you may contact me at (206) 515-3911 or by email at [oldsj@wsdot.wa.gov](mailto:oldsj@wsdot.wa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan Olds", written over a light-colored rectangular background.

Jonathan Olds  
Environmental Program Manager  
Washington State Ferries

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

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