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Michael Anderson
Executive Director

November 8, 2006

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

RE: COMMENTS Project No. 12742-000
Admiralty Inlet Tidal Energy Project Preliminary Permit

Dear Secretary Salas:

The Washington State Department of Transportation, Washington State Ferries, operate vehicular and passenger ferry service in Admiralty Inlet between Port Townsend and the Keystone Harbor on Whidbey Island. 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 City of Port Townsend's competing application to build a tidal energy project within Admiralty Inlet. WSF currently operates daily ferry service between the hours of 6:30 am and 9:45 pm in Admiralty Inlet on the route as shown in the vicinity map (Exhibit 1). Based on our review of the preliminary permit application, two of the proposed locations for the tidal energy project in Admiralty Inlet would have a terminus at Admiralty Head, directly adjacent to our terminal facilities at Keystone Harbor.

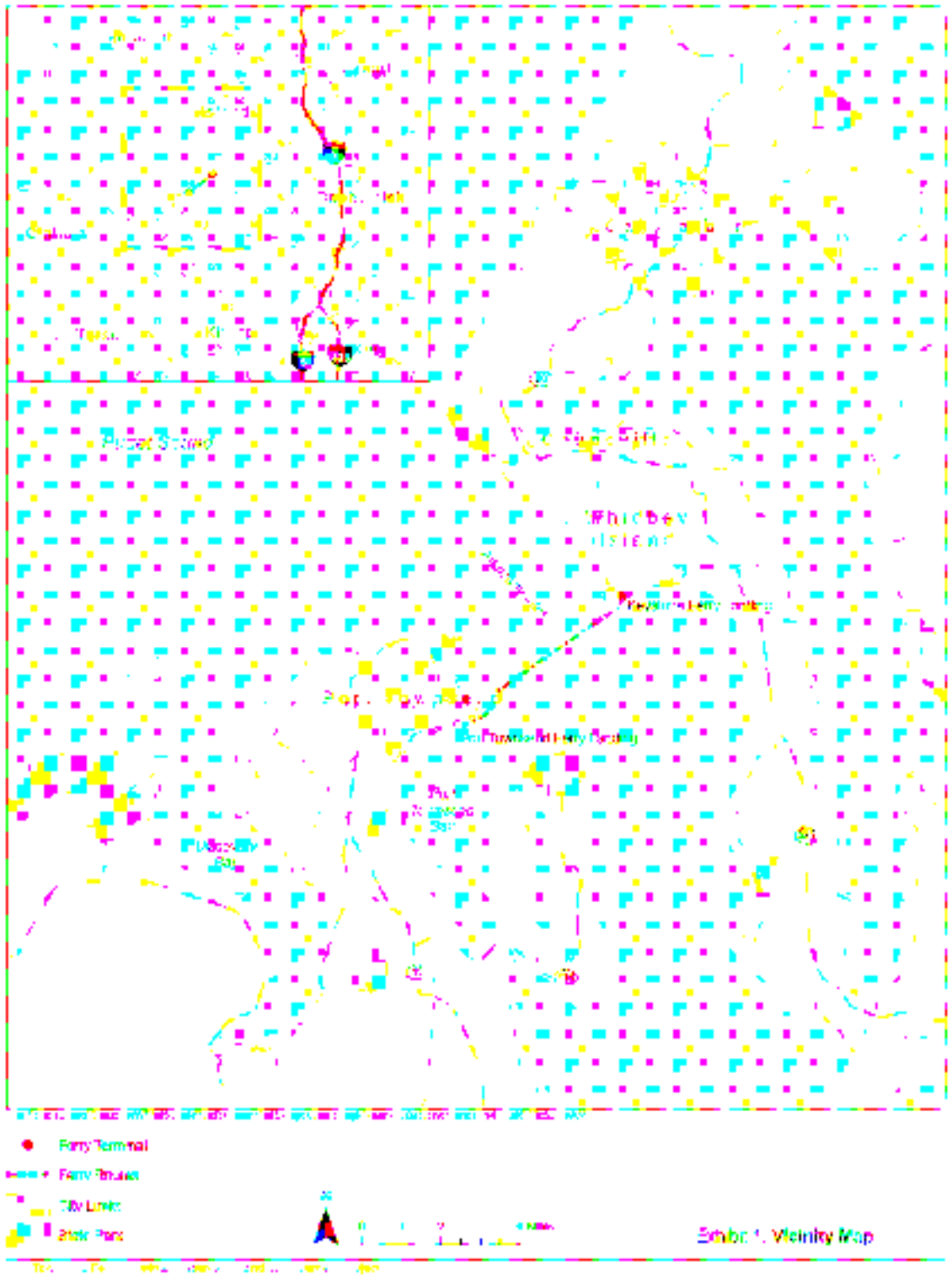
The alternative between Bush Point and Nodule Point is outside of WSF vessel and terminal daily operations, and would avoid impacts to WSF facilities.

At this time, WSF is studying alternatives to improve and replace deteriorating terminal structures at both Port Townsend and Keystone. This service is plagued by low tide and wind and current cancellations. As part of potentially improving service to this area, WSF has conducted a study that looks at ways to redesign the jetty adjacent to the Keystone Harbor to help minimize the impacts of the cross current to vessel operations. We would recommend the Keystone Harbor Study (ESHB 2474, Chapter 229, Laws of 2004, Section 304) completed January 7, 2005, and the modeling therein be reviewed to



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assess whether our potential changes to the jetty have any effect on tidal energy proposals in the vicinity of the harbor. The study does not define a preferred alternative and, as of yet, no further clarity can be provided as to what, if any, changes will take place at Keystone Harbor. However the study did show the potential for large scale changes to the tidal circulation. These changes would likely have little effect on the feasibility of the tidal energy due to their small magnitude and the inherent nonlinearity of tidal circulation, but could provide some insight to the highly dynamic system that exists in Admiralty Inlet.

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 15 meters at lowest astronomical tide to allow clearance for deep draft container vessels.

The proposed turbine infrastructure for both alternatives with an Admiralty Head terminus (Point Wilson and Marrowstone) anticipate use of approximately 5 transects (rows) of 82-100 turbines (450 total). This infrastructure would capture no more than approximately 10% of existing tidal energy so as to minimize disruption to the tidal ecosystem.

WSF Vessels under consideration for this route range from 13 to 15 foot draft, well within 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, nonetheless. WSF would also need clear notification of any construction or maintenance activities of the facility, including the 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 Admiralty Inlet. 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

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engineering and environmental studies are completed, it is difficult to assess potential impacts on terminal operations at the Keystone Harbor, directly adjacent to Admiralty Head, 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 would 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.

In addition, WSF is proceeding with a State Environmental Policy Act (SEPA) Environmental Impact Statement, which is expected to be completed in the summer of 2007. Without the details of the utility connections for the tidal energy plant, we will not be able to coordinate our design of alternatives to best suit our two public agencies.

Finally, WSF currently consults with seven Tribes for the Port Townsend/Keystone ferry route. We've attached our contact list for your information.

Thank you for this opportunity to comment. If you have any questions about WSF's current operations and/or proposed improvement projects in Admiralty Inlet, please contact Michelle Elling, Environmental Coordinator for the Port Townsend/Keystone Improvement projects at (206) 264-3578 or by email at ellingm@wsdot.wa.gov.

Sincerely,

Jonathon Olds
Environmental Manager

Attachment

cc: Capt. Mark McElwaine, WSF
Capt. Kelley Mitchell, WSF
Charlie Torres, WSF
Michelle Elling, WSF
David Timmons, City Manager, City of Port Townsend
Chris Yeakel, FERC
file

Submission Contents

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