



January 9, 2011

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Natural Currents Energy Services, LLC Project No. 13849-000

Dear Ms. Bose:

The undersigned groups of the South Jersey Bayshore Coalition (SJBC) are submitting the following comments regarding Natural Currents Energy Services' application for a preliminary permit proposing to study the feasibility of the Salem Tidal Energy Project.

SJBC is a collective of 21 nonprofit environmental and cultural organizations that seek to preserve the cultural heritage and environmental integrity of the South Jersey Bayshore.

We have several concerns regarding the potential environmental impacts of the proposed tidal turbine project to the aquatic environment, surrounding wetlands and wildlife resources and, given the ecological significance of the area, we believe that FERC should require the applicant to adequately address these concerns in their Baseline Environmental Monitoring Program as a basis for assessing and determining the appropriateness of this project and whether there may be significant, unacceptable impacts.

Natural Currents proposes to develop tidal turbines in the stretch of the Salem River between the confluence of Fenwick Creek (to the north) and the Mid-Atlantic Port Terminal (to the south). The project proposes between 10 and 30 NC Sea Dragon or Red Hawk tidal turbines at a rated capacity of 100 kilowatts (kW).

We acknowledge Natural Currents' plan to undertake an environmental monitoring program, and believe that monitoring and evaluation are essential. However, FERC must require that this program evaluate potential impacts that tidal energy systems may have on anadromous and non-migratory fish, and the abundant avian wildlife resources of the

area that depend on them, as well as on overall water quality. We believe tidal energy systems may potentially restrict fish passage and impact aquatic habitat. Historically, river herring runs have been documented in the Salem River and Mannington Creek (NJDEP Bureau of Freshwater Fisheries Anadromous Fish Inventory, 1976). We believe the status of this and other anadromous fisheries such as the federally endangered shortnose sturgeon should be addressed in the monitoring plan, including, but not limited to consultation with NJ Department of Environmental Protection. Also, we believe that tidal energy systems may degrade water quality by causing silt to build up as well as prevent water flow by trapping seawater as the tide recedes. Furthermore, we believe that the environmental monitoring requirements should reflect those of an EIS under NEPA.

The proposed project site is located within an area of global significance. It is part of the Delaware Bay National Estuary and within the Delaware Bay Ramsar Treaty Site under the terms of the 1971 “Convention on Wetlands of International Importance, especially as Waterfowl Habitat.” The 32-mile Salem River represents a major tributary to the Delaware River. In addition, a 17-mile segment of the Salem River, upstream from the proposed project site, is listed on the Nationwide Rivers Inventory (NRI). The NRI is a National Park Service register of river segments that may potentially qualify for Wild and Scenic River status due to “outstandingly remarkable values.”

The proposed project location is also adjacent to Supawna Meadows National Wildlife Refuge. The refuges’ 2,400 acres of tidal marshes provide waterfowl with an important feeding and resting area, particularly during the fall and spring migrations. Located along the Atlantic Flyway, the refuge and surrounding wetlands support large concentrations of avian wildlife species as a foraging area and major stopover during the fall migration. The refuge also supports nearby Pea Patch Island Rookery, which is home to over 6,000 pairs of Colonial Wading Birds comprising nine different species. It is the largest rookery on the east coast north of Florida.

Due to the proximity to a federal refuge, this project could potentially thwart the very mission of the National Wildlife Refuge System, which is “to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.” Furthermore, we believe the applicant should consult with U.S. Fish and Wildlife Service.

Additionally, the project area is located approximately a half mile downstream from a division of the Salem River Wildlife Management Area (WMA). The Salem River WMA is part of the Mannington Meadows complex, which encompasses over 6,000 acres of critical open water and wetland habitat for a variety of avian and other wildlife. Recognized as an internationally significant migratory waterfowl habitat, Mannington Meadows complex, which surrounds the project area, is listed as an Important Bird Area (IBA) under NJ Audubon’s IBA Program.

In closing, due to the project area's global significance and proximity to federal refuge boundaries, we believe FERC must require Natural Currents to adequately address potential impacts to avian wildlife, anadromous and other fish, and water quality in their environmental monitoring plan in such a manner as to allow an informed assessment of the appropriateness of this proposed project.

Respectfully,

Tim Dillingham, Executive Director
American Littoral Society

Francis Rapa, Regional Manager
Delaware Bay Watershed
New Jersey Conservation Foundation

Jane Morton Galetto, President
Citizens United to Protect the Maurice River and its Tributaries

David Pringle, Campaign Director
NJ Environmental Federation
Garden State Chapter of Clean Water Action

Sandy Batty, Executive Director
Association of New Jersey Environmental Commissions

Eric Stiles, Chief Operating Officer & VP Conservation & Stewardship
NJ Audubon

Christine Nolan, Executive Director
South Jersey Land & Water Trust

John Wilmont, President
Friends of Supawna National Wildlife Refuge