



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

**JUN 02 2011**

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

Re: Roosevelt Island Tidal Energy Project – FERC Project No. 12611

Dear Ms. Bose:

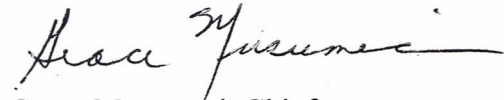
The Environmental Protection Agency (EPA) has reviewed the Federal Energy Regulatory Commission's Environmental Assessment (EA) to license construction and operation of the Roosevelt Island Tidal Energy (RITE) Project proposed by Verdant Power, LLC. The proposed RITE Project would use the tidal currents of the East River to generate electricity via turbine generator units mounted on the riverbed.

Verdant proposed a three-phased development approach for the RITE project consisting of: (1) three 35-kilowatt (kW), 5-meter-diameter axial flow Kinetic System turbine generator units (KHPS) mounted on a single triframe mount, with a total installed capacity of 105 kW, installed in year 1, in Phase 1; (2) nine additional 5-meter-diameter axial flow KHPS mounted on three triframe mounts, with a total installed capacity of 420 kW, installed in year 3, in Phase 2; (3) eighteen additional 5-meter-diameter axial flow KHPS mounted on six triframe mounts, with a total installed capacity of 1,050 kW, installed in year 5, in Phase 3; (4) 480-volt underwater cables from each turbine to five shoreline switchgear vaults that would interconnect to a control room and interconnection points; and (5) appurtenant facilities for navigation safety and operations. The pilot project is estimated to have an annual generation of 2.40 gigawatt-hours after the completion of Phase 3. The project would be located in the East River, on the west side of Roosevelt Island in New York City, New York.

Overall, we find the EA to be satisfactory; however, enclosed are some technical comments. EPA commends Verdant Power, LLC and FERC for their consultation and collaboration with all the resource agencies involved in the EA development and the license process. In addition, as per the interagency call held on May 24, 2011 and the supplemental adaptive management plan e-mailed to the agencies on May 26, 2011, EPA concurs with the adaptive management plan to Phases 1, 2, and 3 of the RITE Project. We look forward to future meetings to discuss monitoring results during the adaptive management process.

Thank you for the opportunity to comment on the RITE Environmental Assessment. If you have any questions, please call Lingard Knutson of my staff at (212) 637-3747.

Sincerely,

A handwritten signature in cursive script, appearing to read "Grace Musumeci". The signature is written in dark ink and is positioned above the typed name.

Grace Musumeci, Chief  
Environmental Review Section

Enclosure

EPA Comments on Environmental Assessment for Hydropower Pilot Project License Roosevelt Island Tidal Energy Project – FERC Project No. 12611, East River, NYC, NY

- 1) As per Executive Order 12898, the environmental assessment should address environmental justice, and any possible impacts the project may have to minority or low income populations. This should be included in the Finding of No Significant Impacts.
- 2) Under the New York Codes, Rules and Regulations, any use of underwater lands requires an easement/lease/permit from the New York State Office of General Services. This regulation should be included in Section 1.3 of the EA, and incorporate a discussion about Verdant's permitted use of the East River.
- 3) Page 33, first paragraph, second sentence. The New York City Department of Environmental Protection Drinking Water Sampling is from water mains throughout the city. This sampling is not related to any harbor sampling, and drinking water would not be affected by the RITE project.
- 4) Page 96, Section 3.3.8.2. This paragraph references Figure 16, however there is no Figure 16 in the document.
- 5) Page 106, Section 4.3. Please clarify that Table 19 includes the costs of all measures that were analyzed in the EA, but were not necessarily included in the summary of annual costs (Table 18).
- 6) Section 5.3. We would recommend that the following comprehensive plans for the NY Harbor and environs be included in your list.
  - a) The Hudson-Raritan Estuary Comprehensive Plan, March 2009, US Army Corps of Engineers, NY District.
  - b) NY-NJ Harbor Estuary Program Action Plan, Revised April 2011, NY-NJ Harbor Estuary Program.
  - c) Regional Sediment Management Plan, October 2008, NY-NJ Harbor Estuary Program.