

ORIGINAL

*Pleasant Point Reservation*P.O. Box 343 • Perry, Maine 04667
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7/22/2009

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

Re: Tidewalker Associates Project No. 12704-002

Dear Ms. Bose:

The Passamaquoddy Tribe at Pleasant Point has reviewed the Scoping Document from Tidewalker Associates (FERC application #P-12704-002) to develop the Half-Moon Cove Tidal Power Project. The project consists of a barrage across the mouth of Half-Moon Cove at Eastport and Perry, Maine. The results of this proposed construction would alter the water levels of Half Moon Cove and may have considerable impacts to the Passamaquoddy Tribe, the owner of 20% of the shoreline of Half-Moon Cove. The following are the concerns of the Tribal Council under Section 106.

- A. **Traditional Subsistence Food Gathering**
- B. **Half Moon Fisheries**
- C. **Cultural Sites and Activities Disturbance**
- D. **Half Moon Cove Sediment buildup**

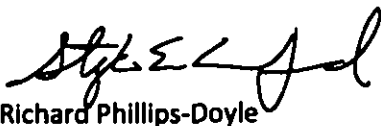
- A. **Traditional Subsistence Food Gathering.** The proposed project would elevate the average low water level by 2-3 ft, removing roughly 100-200 acres from the intertidal zone. This will impact the habitat of several shellfish species are traditionally harvested by tribal members. This water level alteration will also cause an increase in water temperature during the summer and a decrease in the winter. In recent years heavy blooms of macro-algae including *Enteromorpha* and *Ulva* species, collectively known locally as "green slime" have occurred in this Cove. Warmer summer temperatures may enhance this growth, and negatively impact shellfish survival. Decreased winter water temperatures may impact the ecology of the Cove and must be studied.
- B. **Half Moon Fisheries.** Half Moon Cove has been a historic nursery for many fish and shellfish. Impacts to the endemic fish and shellfish from alterations in water flow, egress and ingress to the Cove from the outer bays, mortality from the turbines, altered water temperatures and other physical and chemical water parameters including dissolved oxygen, CO₂, pH, redox

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reactions of iron in the substrate (ferrous and ferric oxide) no longer exposed to the air due to increased water levels, must be identified.

- C. **Cultural Sites and Activities.** There are several cultural sites in this area. The Tribal Historic Preservation Officer must be consulted, per requirements of Section 106 of the Historic Preservation Act.
- D. **Half Moon Cove Sediment Buildup.** The Tribe has made an effort during the last few years to remove the causeway built during the 1930's and restore the natural circulation of the Cove. This would have major affects on the heavy siltation that has occurred in the Cove, and presumably would restore the Cove as a lobster nursery. This tidal project is diametrically opposed to this Tribal effort. The project must implement design considerations to enhance water flow and reduce siltation.

Sincerely,



Richard Phillips-Doyle

Chief/Sakom

Passamaquoddy Tribe at Pleasant Point