

Blenheim Gilboa Pumped Storage Project FERC docket # P-2685-026

July 17, 2014

ORIGINAL

Secretary Kimberly D. Bose  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426  
FERC docket# P-2685

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SECRETARY OF THE  
FEDERAL ENERGY REGULATORY COMMISSION  
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Dear Secretary Bose:

The following are comments and suggestions by the Town of Fulton, for studies and topics we feel are needed for relicensing of New York Power Authority's Blenheim-Gilboa Pump Storage Project, FERC docket # 2685.

The relicensing of New York Power Authority's Southeast New York Regional Control Center known as the Blenheim Gilboa Pumped Storage Project is in the process of applying for a new operating license (FERC docket # 2685-026). Besides operating a 1160 megawatt power plant at Blenheim Gilboa (BG), also operates four unmanned or partially manned run of the river hydroplants: Ashokan Project in Ulster County(2 generators at total of 4750kw) , Crescent Project in Albany County (4 generators at total of 9,948kw, Vischer Ferry Project in Schenectady County(4 generators at total of 9,948kw) and Gregory B Jarvis Project in Oneida County (2 generators at total of 9000kw). From the BG control room NYPA also operate 2 switchyards and a interconnect under the Hudson River crossing. The BG switchyard has 9 SF6 345kv breakers in a breaker and a half configuration and a Cap bank for voltage support. The Frederick R. Clark Energy Center has a 765kv switchyard and 345kv switchyard operated from BG. The 345kv Hudson River crossing connects Central Hudson to Con Ed.

BG also monitors a large number of USGS stream and reservoir levels. BG piggy backs its own equipment on USGS and sends it back to BG for evaluation. Alarm thresholds and rate of change provide info for operating 2 low flow Howe Bunger Valves and the 3 Taintor gates for

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**Schoharie Creek discharge. Due to the design of the spillway BG has total control of water that flows down Schoharie Creek.**

**The above list of equipment/projects gives an idea what is going on in the BG project on a day to day basis. There is a lot of vehicle traffic generated to support all of BG's activities and the county and towns provide good safe roads for them.**

**The Town of Fulton requests that for its safety, a study of BG spillway be done to determine if its gates and valves are of adequate design for the maximum possible flood. A breach of the earthen dam would be catastrophic for all Schoharie Valley.**

**The Town of Fulton requests that an economic impact study of BG on host communities and the County be done. The goal of this study would be to determine if the economic impact is proper for a project the size of BG. Since BG pays no taxes the communities pick up their slack.**

**The Town of Fulton also requests that a study be done to assess what should be done to prevent soil erosion and stream siltation of Schoharie Creek. It stated in the current license (scoping doc. page 15 Flood Erosion Control Plan) that BG is suppose to help us, we have not seen any help. The Federal Government awarded a 17 million dollar grant to help Schoharie County restore the creek bed and to help mitigate future floods. Taxpayers have to pay for engineering costs and it's placed a tax burden on our county. We must exceed our tax cap to do this project. We are asking for help with this as it falls in line with requirements of its current license. A comprehensive plan to mitigate flooding, conserve waterways, affected by the BG project, is needed.**

**What can be done to encourage more tourism, boating , fishing, hunting and recreation? These are allowed but a difficult and unfriendly process discourages most people from these activities. The number of people that take advantage of these activities has steadily declined.**

**What land not needed by BG for power production can be returned to the tax rolls?**

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Support for emergency services needs to be increased as BG places a burden on our fire and ambulance services.

Can the conservation release of 7cfs be increased in concert with NY DEP low flow release? Can recreational releases be done for special events?

The town of Fulton requests a full environmental impact assessment be done, including the environmental impact on host communities of SF6 breakers in the BG switchyard? Operation, transport and storage of SF6 (Sulfur hexafluoride, is the most potent greenhouse gas that has been evaluated) is an ongoing concern.

In future high water events will BG leave room in the upper reservoir, so that if needed, pumping to reduce peak flooding can be done. In the flood of 1996 BG did this and it helped. If 4 pumps at about 2500cfs each were pumping it could reduce flood flow by about 10000cfs per hour. If timing of the peak flow can be anticipated, then a void could be created in the lower reservoir and holding back peak flow could also help. BG is not a flood control project but it can and has helped during high flow events.

The Town of Fulton believes these issues are important and should be dealt with in relicensing process. We look forward to working with you as we progress.

Yours sincerely,  
*On Behalf of The Town of Fulton Town Board + Planning Board*  
*Elizabeth A. Coons, Town Clerk*

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