

Secretary Kimberly D. Bose
Federal Energy Regulatory Commission
888 First St., N.E.
Washington, DC 204626
FERC Docket# 2685-000

Dear Secretary Bose,

Re: Proposal for HEC-RAS Inundation Mapping Study

Dam Concerned Citizens, Inc., a 501-3(c)(3) corporate entity devoted to issues related to dam safety requests that the following study be performed by the Applicant for the relicensing of the Blenheim/Gilboa Pumped Storage Project #2685:

Section 5.9(b) (1) Goals and Objectives

Goal

The preparation of inundation maps by the applicant, the New York Power Authority, NYPA, for that portion of the Schoharie Valley, downstream of the Blenheim-Gilboa Pumped Storage Project, B/G, showing the estimated extent of inundation resulting from a failure of the dam impounding the lower reservoir at B/G under two different hypothetical circumstances: A "Sunny Day" or Non-Flood Failure of the dam when the lower reservoir is at a full pool elevation of 900' above mean sea level. Such a failure could be of Man Made or Seismic origin. The second hypothetical failure would be the dam's response to the NYPA estimated Probable Maximum Flood (PMF). DCC, Inc requests that NYPA use the Hydrologic Engineering Center's River Analysis System (HEC-RAS) as the tool to produce the inundation Maps.

Objectives

To obtain an up to date estimates of the response of the Schoharie Creek from the sudden discharge of Five billion gallons of water, resulting from a failure of the dam at the lower reservoir of the Schoharie Creek, when the creek is flowing at 400CFS, at North Blenheim, USGS#0135180.

To similarly obtain an up to date estimate of the response of the Schoharie Creek to the sudden discharge of an additional five billion gallons of water resulting from a failure of the lower reservoir dam as a result of the PMF.

The flood maps should utilize USGS 7.5 minute projections of the Schoharie Valley from B/G to the confluence of the Schoharie Creek with the Mohawk River at Fort Hunter, N.Y.

Relevant Resource Goals and Public Interest Section 5-9(b) (2) Not Applicable

Section 5-9(b) (3)

The Schoharie Creek and the Mohawk River downstream of its confluence with the Schoharie Creek at Fort Hunter, Montgomery Co, N.Y, experienced a flood with the highest flood water elevations recorded since the arrival of Europeans in the Schoharie & Mohawk Valleys in the late 17th and early 18th centuries. This epic flooding was a result of the passage of Hurricane Irene and its accompanying rain fall on Aug. 28, 2011. Dam Concerned Citizens, Inc. is one of several organizations that represent the public interest on Flood related matters. Dam Concerned Citizens Inc, hereafter to be referred to as D.C.C. Inc. considers the issue of dam safety to be its prime objective. As the Schoharie Creek passes through not only Schoharie County, but also portions of Schenectady and Montgomery counties, we feel that up-to-date inundation maps would be of great benefit to the public in the following areas:

1. Establishing safe routes for evacuation in time of a dam breach of the lower reservoir at B/G.
2. Aiding municipalities in the preparation of hydrologic based zoning regulations.
3. Reducing costs to government at all levels by limiting or restricting construction in areas of high risk of flooding. This action would ultimately result in some reduction in flood damage and as a consequence, lower flood insurance rates.

Existing Information and the Need for Additional Information

Section 5.9(b) (4)

The existing inundation maps of the Schoharie Creek are 13 years old. They were prepared by the NYCDEP and EZA, INC.

In light of the flood of Aug. 28, 2011, these maps need revision. Separate and discrete flood maps dealing with a dam breach/failure by each dam operation on the Schoharie Creek should be mandated. This information would be most useful to the Emergency Management Offices of Schoharie, Schenectady, and Montgomery Counties.

Project Nexus

Section 5.9(b) (5)

It is in the interest of Public Safety that inundation maps relating to a dam failure specifically at B/G be prepared by the applicant and be made available to the relevant governmental entities downstream of project # 2685. The preparation and sharing of this vital information with local and state government should be a requirement for the relicensing of B/G.

Proposed Methodology

Section 5.9(b) (6)

While it is recommended by D.C.C. INC. that the 7.5 minute projection U.S.G.S. maps be utilized in the preparation of inundation maps, it is also recommended that the contour interval plotting be broken down into two foot increments. This would better enable of affected parties to develop accurate and reasonable zoning designations. The reach of Schoharie Creek to be mapped extends from the Spillway at B/G to the confluence of the Schoharie Creek with the Mohawk River at Fort Hunter, N.Y.

Level of Effort and Cost

Section 5.9(b) (7)

The Applicant is requesting that its license for operating B/G be renewed for a period of 50 years. It is only reasonable to request in a time of change in climate patterns in the catchment and drainage area of this utility that it provide updated inundation maps, as the need arises to those areas downstream of its infrastructure. Based upon inquiries, D.C.C. Incorporated estimates the cost of a HEC-RAS based flood mapping of the requested reach to be approximately \$75,000.00.

Submitted by;

Howard Roger Bartholomew

President – Dam Concerned Citizens Inc.

P.O. Box 310 12122-0310

Middleburgh, N.Y 12122-0310

Phone # (518) 827-9558

E-mail – sbarthol@midtel.net

Document Content(s)

Secretary Bose.DOCX.....1-3