

**UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION**

**New York Power Authority  
Blenheim-Gilboa Pumped Storage Project**

**FERC Project No. 2685**

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AMERICAN WHITEWATER'S COMMENTS IN RESPONSE TO THE NOTICE OF INTENT TO FILE LICENSE APPLICATION, FILING OF PRE-APPLICATION DOCUMENT (PAD), COMMENCEMENT OF PRE-FILING PROCESS, AND SCOPING: REQUEST FOR COMMENTS ON THE PAD AND SCOPING DOCUMENT, AND IDENTIFICATION OF ISSUES AND ASSOCIATED STUDY REQUESTS REGARDING THE BLENHEIM-GILBOA PUMPED STORAGE PROJECT, FERC PROJECT NO. 2685

American Whitewater is a national non-profit 501(c)(3) river conservation and recreation organization founded in 1954. We have approximately 6,000 members and 100 affiliate clubs, representing tens of thousands of whitewater paddlers across the nation. American Whitewater's mission is to protect and restore our nation's whitewater resources and to enhance opportunities to enjoy them safely. Our members are primarily conservation-oriented kayakers and canoeists, many of whom live and/or engage in recreational boating in the New York region, including Esopus Creek, where flows are supplemented by water piped from the Schoharie Reservoir upstream of the Blenheim-Gilboa Pumped Storage Project ("Project").

American Whitewater submits these comments in order to address deficiencies in the Pre-Application Document filed by the New York Power Authority for the Project. Specifically, the Licensee has failed to adequately address the impact of the project on whitewater boating opportunities both within the project boundary and whether those opportunities might be enhanced under another mode of operation or through decommissioning of the project. Accordingly, we request that FERC direct the Licensee to correct this deficiency in its Pre-Application Document by providing supplemental information on the impact of its project works and mode of operation on whitewater boating in order to provide FERC with sufficient information with which to complete its NEPA analysis.

**Issue #1: Impacts Blenheim-Gilboa Pumped Storage Project on ecological and recreational values on the Schoharie Creek**

The Licensee erroneously states in its Pre-Application Document that "[t]he Project is considered a 'closed cycle' because water is recycled between the reservoirs during Project operation." Contrary to the Licensee's assertion, the project has a damaging impact on river recreation, regional fisheries, and the ecological function of the river. These impacts include habitat fragmentation, blocking gravel and wood transport, and modification of the natural flow regime. In terms of recreation, the lower reservoir dam has eliminated all whitewater boating opportunities between the Gilboa Dam and the project boundary, 1.2 miles north of the Lower

Reservoir Dam, along Schoharie Creek. This section of the river drops approximately 200 vertical feet, a vertical drop that is likely sufficient to produce a Class II/III whitewater boating opportunity but for the presence of the Lower Reservoir Dam. It is unknown at present whether the section of the river that lay beneath the lower reservoir has inundated significant whitewater features; however, the licensee should be required to supplement its Pre-Application Document to include an appropriate analysis of the recreational impacts of its operation.

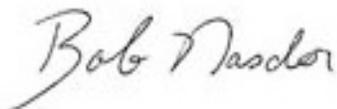
### **Issue #2: Mitigation for Loss of Whitewater Recreation on the Schoharie Creek**

The Blenheim-Gilboa Pumped Storage Project has likely eliminated what would otherwise be a significant whitewater boating opportunity, both above and below the Lower Reservoir Dam, potentially depriving the local community of economic benefits. Other communities that have developed whitewater boating opportunities have experienced economic benefits that far outweigh the value of power generation. In some cases, communities have developed or are in the process of developing whitewater parks as an alternative to hydropower projects, creating tourism and other benefits for the community. In cases where decommissioning of a hydropower project is not the preferred alternative, it would be possible to compensate for this loss through either on-site or through off-site mitigation by supporting conservation and recreation stewardship in the region to mitigate for the loss of whitewater boating opportunities.

### **Conclusion:**

We respectfully request that FERC require the Licensee to supplement its Pre-Application Document with additional information to adequately describe the impact of the Blenheim-Gilboa Pumped Storage Project on whitewater boating on the Schoharie Creek, and explore appropriate mitigation for lost whitewater boating opportunities due to the presence of project facilities and operations. Thank you for considering these comments and study requests.

Respectfully submitted this 6<sup>th</sup> day of August, 2014.



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UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

New York Power Authority  
Blenheim-Gilboa Pumped Storage Project

FERC Project No. 2685

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused the foregoing **American Whitewater's Comment on in Response to the Notice of Intent to File License Application, Filing of Pre-Application Document, Commencement of Pre-Filing Process and Scoping for the Blenheim-Gilboa Pumped Storage Project (P-2685)** to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 6th day of August 2014.



Megan Hooker  
American Whitewater

Document Content(s)

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