

FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON, D. C. 20426  
December 17, 2014

OFFICE OF ENERGY PROJECTS

Project No. 2685-026-NY  
Blenheim-Gilboa Pumped Storage Project  
New York Power Authority

Mr. Robert Daly  
Licensing Manager  
New York Power Authority  
123 Main Street  
White Plains, NY 10601

**Reference: Staff Comments on the Proposed Study Plan for the Blenheim-Gilboa Pumped Storage Project**

Dear Mr. Daly:

We have reviewed your proposed study plan for the Blenheim-Gilboa Pumped Storage Project filed on September 22, 2014. In addition to our verbal comments provided during the proposed study plan meeting on October 16, 2014, we are providing written comments pursuant to section 5.12 of the Commission's regulations. Please note that your revised study plan is due to be filed with the Commission by January 20, 2015.

Detailed comments on your proposed study plan are provided in the attached Schedule A. If you have any questions, please contact Andy Bernick at (202) 502-8660, or via email at [andrew.bernick@ferc.gov](mailto:andrew.bernick@ferc.gov).

Sincerely,

John B. Smith, Chief  
Mid-Atlantic Branch  
Division of Hydropower Licensing

Enclosure: Schedule A

cc: Mailing List  
Public Files

## **SCHEDULE A**

### **Comments on the Proposed Study Plan**

#### **General Comments**

1. Please ensure that the *Geographic Scope* section of each of your proposed studies clearly defines the area to be studied, including the use of maps and other figures as appropriate.

2. Please ensure that the *Methodology* section of each of your proposed studies is thorough and complete, and provides the following information: 1) an exhaustive list of the source(s) of background information to be used in the study, including citations; 2) a description of the specific data collection methods for all desktop studies and field surveys, including citations to any guidance documents that explain the method; 3) a discussion of how the results of any desktop studies or field surveys will be analyzed, including any guidance documents that explain the method; and 4) a specific description of the information that will be contained in the resulting study report.

3. Section 5.11(b)(3) of the Commission's regulations requires the proposed study plan to include provisions for periodic progress reports, including the manner and extent to which information will be shared, and sufficient time for technical review of the analysis and results. Your proposed study plan does not include a provision to provide the results of each study as periodic progress reports, including those studies that will take more than one year to complete. Therefore, please include this provision in your revised study plan, including proposed dates for periodic progress reports, who will receive the reports, and in what format the reports will be provided.

#### **Effect Of Project Operations On Downstream Flooding Study (Section 2.5)**

1. Under Task 1, you state that the hydrologic model, HEC-HMS (Hydrologic Engineering Center - Hydrologic Modeling System), was previously calibrated to the September 1999 (Hurricane Floyd) and September 2004 (Hurricane Ivan) storms, which represent 100-year precipitation events. However, you do not discuss validation of the HEC-HMS model in the proposed hydrologic analysis. Your study plan should be modified to include validation of the HEC-HMS model using the August 2011 (Hurricane Irene) storm, a 500-year precipitation event, before simulating inflows to the lower reservoir for the 10-, 50-, 100-, and 500-year precipitation events. Model validation using this recent and substantial storm is important to determine if the HEC-HMS model accurately represents physical processes and provides predictive capability.

2. Under Task 2, you state that the existing out-of-bank geometry in the HEC-RAS (River Analysis System) model will be updated with the 2014 U.S. Geological Survey LiDAR data and the New York State Canal Corporation's additional bridge

information if it is available at the start of the study. However, you do not discuss calibration and validation of the HEC-RAS model after updating the geometry data in Task 3. Your study plan should be modified to include calibration and validation of the HEC-RAS model with the updated geometry, because the HEC-RAS model cannot produce precise and accurate results without its calibration and validation.

3. Under Tasks 1 and 3, you propose a hydrologic analysis to determine inflows to the lower reservoir using HEC-HMS for the 10-, 50-, 100-, and 500-year precipitation events and a hydraulic analysis for storm events using HEC-RAS to predict water surface elevations in Schoharie Creek from the upstream end of the lower reservoir through the downstream communities in Schoharie County due to water release from the lower reservoir. You have previously stated that you are not proposing any changes to project operation under relicensing. Nevertheless, your study plan should be modified to include real-time project operation modeling (including the lower and upper reservoirs) with the proposed hydrologic and hydraulic models to determine the effect (if any) that project operation may have on flooding downstream of the project, and to provide recommendations for enhancing a forecasted and optimized project operation during flooding events if the study results indicate that project operation could be modified to attenuate the effects of flooding events downstream of the project.

### **Other Comments**

1. In its July 30, 2014 comment and study request letter, the U.S. Fish and Wildlife Service (FWS) recommended that you conduct a northern long-eared bat survey to provide information on the existence of this species within the project area and allow FWS and the Commission to determine if existing or proposed project activities may affect the northern long-eared bat, a species proposed for listing under the Endangered Species Act. You state in your proposed study plan that, during a September 3, 2014 teleconference with FWS, you reached a consensus with FWS that a field study is not needed at this time, and that you will consult with the FWS on specific management measures for any future activities, such as tree-clearing, that may affect the northern long-eared bat or its habitat. Your preliminary licensing proposal and final license application should include any consultation you have with FWS regarding the northern long-eared bat, including any proposed management measures for this species.

Document Content(s)

P-2685-026Letter4.DOC.....1-3