

## **Comments on NYPA's Blenheim-Gilboa (BG) Proposed Study Plans by the Town of Fulton FERC docket # P-2685-026**

The **Town of Fulton** comments on the six Proposed Study Plans (PSP) and the additional studies dismissed by NYPA, presented to stakeholders October 16, 2014.

**Historic Structure Survey PSP section 2.1:** The scope of this study, Area of Potential Effects (APE), is limited to the Project's boundary. This APE is too narrow and should be expanded to cover the community in which the Project is located and are impacted by BG. The Towns of Fulton, Broome, Middleburgh, Schoharie and Esperance should be added. The covered bridge in Blenheim should be included in this study.

**Archaeological Survey PSP section 2.2:** The APE in this study is also too limited and should be increased to the towns impacted by BG. This region is very rural in nature and people know other people for a 20 mile radius, BG is well known and felt that is why APE in each study should include towns mentioned above.

**Fish Entrapment Study PSP section 2.3:** This study should take into account the stream below the Blenheim-Gilboa (BG) Project and how a proper conservation release will benefit fish, agriculture and recreation downstream of BG.

**Recreation Use/User Contact Study and Assessment of Effects the Project has on Recreation Use PSP section 2.4:** Hunting is omitted from the study, it is a major sport in the area and should be included. Snowmobiling is also popular, trails for use and other services for snowmobilers should be included.

Use of the Project for recreation has been on the decline due to BG's overreaction to security and decrease of efforts to provide recreation. Boating (motorboating and canoeing) on BG's lower reservoir used to be popular but BG stopped clearing driftwood out of the lower reservoir and boaters suffered damage to their boats; also added checks discouraged boating. A floating dock would also improve boating as many boaters would secure their boat and upon returning to it would find the boat tugging on the line as the reservoir elevation increased.

Improvements to Vroman's nose recreational area and the long trail should be included in this study. Bike trails should be developed in the Schoharie Valley.

Policy changes could hopefully be made to allow recreational water releases for canoe/kayak races held on the Schoharie Creek.

**Effect of Project Operations On Downstream Flooding Study PSP section 2.5:**

The Nexus of this study is flawed. The Project does have significant control in a flood. Its ability to pump up to 10,000 CFS, void creation, and timing the peak could have a huge positive impact on a high water event, and this should be done as standard operating procedure during the rare times that high water occurs, for the safety of people downstream of BG. To not help mitigate a flood when they can, as EAP and the governor says they should, is unconscionable.

A study by a *credible* engineering group should be done to provide a reasonable Probable Maximum Flood (PMF) Projection. A plan to respond to that PMF should be submitted by NYPA. This study should be done quickly and not wait until 2016 to be completed.

It is well known that Project Operations affect the Schoharie Creek Basin in Schoharie County, Montgomery County and Schenectady County. Schoharie is the largest contributor to Mohawk River during high water events causing flood damage all the way to Rotterdam.

**Socioeconomics Study PSP section 2.6:** Under Geographic Scope the neighboring communities should include the towns of Fulton, Schoharie, Esperance, Richmondville (has NYPA property), Summit and Broome as they are neighbors impacted by BG. Read the comprehensive studies of each town and you will understand these towns better, how rural and how they are impacted.

Schoharie County is among the poorest counties in New York State a huge boost to the local economy would be an allocation of low cost hydro power. NYPA has done much to help many areas in New York State we ask that the host community be one that shares in this stimulus. The study should include what affect this low cost hydro power could have on our county.

The benefit in taxes that would have been paid to towns, schools and the County if BG was privately owned should be calculated. This would determine what benefit would have been provided over the last 50 years to impacted communities if like normal companies NYPA had paid taxes to impacted neighbors. The positive economic impact of tax exempt BG has been minimal in the last 50 years. This data along with other studies (i.e. Niagara Power Project Socioeconomic Study) would provide a basis for compensation to stakeholders. This should be done on the BG Project as it exists, taking into account all the improvements made to BG, *not as if it was vacant land as proposed by NYPA!* All tax calculated in this study should be based on development and improvements on that land.

The return of unneeded land to tax roles by BG project would also provide a economic benefit to towns, schools and county.

**Additional comments:**

**PSP section 3.3 , 4.1 & 4.2**

NYPA sites the Emergency Action Plan (EAP) and Flood inundation maps as proof they take these issues seriously yet, neither is public information but hidden in CEII (critical engineering infrastructures information) status so very few people see these documents.

**PSP section 3.9**

NYPA did not address the issue of sulfur hexafluoride (SF6) gas used in switchyard breakers. The most potent greenhouse gas studied; we need to discuss the safety involved when they ship, store and emit this potent gas into the air at BG. It should be part of environmental impact study (EIA). The future conservation release from BG should also be part of an EIA and a joint decision between New York DEP, NYPA BG and Schoharie County.

Respectfully submitted by Town of Fulton Board and Town of Fulton Planning Board  
Date \_\_\_\_12/18/14\_\_\_\_\_

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