

## Submission of Comments to FERC on NYPA's Blenheim-Gilboa

### Study Plans by the Town of Middleburgh docket # P-2685

Before entering into the specifics of each study plan, it needs to be understood that the project is located in an topographic area that is prone to large precipitation amounts, a large drainage basin with steep slopes, and includes seasonal winter recreational businesses that add snow pack that increases runoff during spring storms or melts.

#### Study plan 2.1; Historical Structures.

The Area of Potential Effects (APE) impacted by the Blenheim-Gilboa (BG) project needs to be expanded. The Schoharie Valley is one of the earliest European settlements in NYS. We are requesting that that this study be expanded to include discussion with local historians to include such structures as the Blenheim Bridge, Governor Boucks house, Middleburgh Power and Light site and other historic sites that are situated in the flood way.

It is our understanding that NYPA will be applying to SHPO for historic designation for their project. We believe that any part of the facility that in any way could impact the safety of the valley NOT be allowed to be submitted as part of the historic designation under SHPO. This includes but not limmited to the dam, tainer gates and any facilities and equipment needed for operation of the gates along with instrumentation installed on and in the dam itself. SHPO designation of any of the afore mentioned would only create another level of bureaucracy that would need to be delt with in the future should safety issues arise and modifications were needed.

#### Study plan 2.2 Archeological Survey.

The APE. due to the regular impacts from flooding, needs to be expanded to include the flood way of the Schoharie to identify and establish with GPS coordinates sites relating to Native American settlements before these sites have been erased due to violent flooding. The flooding that occurred due to Irene may have already significantly disturbed soils to the point where some sites may have

been lost. Since weather patterns seem to be more severe, it can be expected that future floods could erase the the Native American settlement history before they can be identified. BG's location and their possibility of mitigation places them in the position of being a steward for the valley below and north of them.

Study plan 2.3 Fish entrainment/Protection assessment study.

The APE should be expanded to include the area of the Schoharie Creek above the lower reservoir to the DEP dam so to compare the type of aquatic species and their healths to the environments below the BG project, in the reservoir itself, and the areas of the Schoharie and its tributaries above the lower reservoir up to the DEP dam.

The study needs to also address the identification of any invasive fauna or floral species. The tiger trout, being a fallow hybrid, can not interbreed with native or reproduce on their own, but do rely on the same resources in the food chain. What impact do they have on the native species and can they be affected with health problems that wouldn't normally occur in native populations is a question to be asked. Proactive steps should also be taken to avoid introduction of the zebra mussel.

Study Plan 2.4 Recreation use/User contact study.

Work with Schoharie County's tourism agency to coordinate events to minimize conflict dates enabling maximum attendance of BG events and other county events.

That BG host events that would span multiple days such as swap meets or a free flea market/craft fair that would not only promote local crafters and cottage industry but create also opportunity for more over night stays which would help increase the bed tax revenue for the county.

Traffic studies done on Rt.30S, Rt. 30N, and Rt.990V to identify what direction attendees are coming from and how marketing/advertising can be used to better maximize attendance for BG's events.

Hunting and snowmobiling should be included along with events for these sports

such as trap shooting and archery contests. A winter snowmobile meet/rodeo would have a huge draw for tourism at a time when overall tourism is low.

Establishment of a multi use trail for hiking, biking, cross-country skiing, and snowshoeing that would connect to the planned multi use trail that the county just received a grant for would extend the entire length of the county from Montgomery to Greene. NYPA could sponsor an outside classroom area that would be used by schools/groups for environmental studies.

Recreational water releases could be timed with DEP in the future so that additional flow, if needed, could be used for canoe, kayak or tubing races hosted by towns/villages down stream of BG thus helping to increase tourism.

Installation of a floating dock and the clearing of driftwood in the lower reservoir would increase day use. The floating dock would allow for the change in water level so that boats tied to it wouldn't become so taunt on their lines as the water level rose or fell due to pumping or discharge.

Improvements to the long path through Schoharie county, which begins in the palisades in Westchester county and extends through the Adirondacks, is a popular hiking trail which also intersects with the Appalachian trail could use help in the maintenance as well as the Vroman's Nose recreational area.

A couple of events held at the upper reservoir would help increase awareness of this beautiful scenic facility to the public. A star party would be an excellent event to be held there since it is away from light sources or a summer sunset picnic that would allow for residents to get together, observe the scenic beauty and vacate before it is dark. The upper reservoir and the public use of it is one of the best kept secrets and needs to be promoted.

Study plan 2.5 Effect on Downstream Flooding.

Under NYPA's current license, they do not interfere with the natural flow to the extent that what flows in, the same flows out. Taking into account the enormous storage capacity of the upper and lower reservoir and their ability to pump 10,000 cu. ft./sec. to the upper reservoir means that if a major melt or precipitation

event is probable to occur, NYPA does have the ability to mitigate the impact of the flooding event and should be required to do so under their new license. The DEP dam that is above theirs will be installing a 9 ft. in diameter low level outlet so that they will be able to begin lowering their level in the event that a major precipitation event is impending and will be able to provide for greater storage capacity and absorb as much of the flow as possible. If NYPA could work in conjunction with DEP, A major event could be turned into a moderate event saving millions of federal and state dollars not to mention the toll it takes on the local economy and residents. This involves not only Schoharie county, but Montgomery and Schenectady counties as well.

Three new steam gauges are being installed on the Schoharie which brings the number up to 6 in all. I would ask that NYPA help in the maintenance of the gauges in the future.

Schoharie county and the host towns of Blenheim and Gilboa should be notified when safety inspections of the BG facility are being performed and should have a chance to provide input.

The study should also take a look at any impingement points downstream to see what effect these have and under what different flow rates.

Presently there is a siren and flood warning system in place along the valley from Blenheim through Esperance and BG should help in the maintenance of this system.

Study 2.6, Socioeconomics.

This study can not ignore the fact that a multi million dollar facility is sitting on this property. If this was a private enterprise, it would be contributing to the tax base of the host towns and the entire county and school districts. To even consider proposing that the value of the facility and its economic impact be evaluated on unimproved land shows no regard for the responsibility that BG should have as a good neighbor.

This study needs to be expanded to include the neighboring towns and the first

responder service that is provided and to take into account that a mutual aid system is also in place to provide this service.

I thank you for being able to submit these considerations.

Sincerely,

James S. Buzon

Chairman, Schoharie County Flood Committee

Supervisor, Town of Middleburgh

Document Content(s)

Middleburgh's study proposal.RTF.....1-5