

DAM CONCERNED CITIZENS

Feburday 3, 2015

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Dear Secretary Bose:

The following comments are submitted by the Dam Concerned Citizens (DCC), in response to the Revised Study Plan. Re: Blenheim-Gilboa Pumped Storage Project #2685-026, submitted by the New York Power Authority (NYPA), on January 20, 2015.

This portion of the submission by the DCC will be confined to Section 2.5 **EFFECT OF PROJECT OPERATIONS ON DOWNSTREAM FLOODING**.

DCC RESPONSE

2.5 - Subsection 1 GENERAL DESCRIPTION OF PROPOSED STUDY

This general description of the proposed study adequately identifies many of the concerns raised by the public, their advocates and elected representatives during the scoping and commentary phase of preparing Scoping Document 1 and Study Requests. Unfortunately, the Applicant, NYPA, fails to adequately address these concerns, as the subsequent comments will demonstrate.

2.5 - Subsection 2 GEOGRAPHIC SCOPING

NYPA states that the study area includes the area from the Gilboa Dam to the confluence of the Schoharie Creek with the Mohawk River. This description of the study area seems to exclude the 314 square mile catchment of the Schoharie Reservoir, impounded by the New York City Department of Environmental Protection (NYCDEP) owned Gilboa Dam. While NYPA operations at Blenheim-Gilboa (BG) can in no way affect flooding upstream of the Gilboa Dam, BG operations are greatly influenced by storm and snow melt induced flooding upstream of their operations at Blenheim. The probable maximum flood and probable maximum precipitation disparity, >40%, might be explained and reconciled, were NYPA to adequately address these issues relating to public safety, as the NYCDEP has done. While the SCBS does not desire to be tedious, it feels compelled to remind the applicant of their failure to offer a reasonable explanation of their PMF estimate of 181,809 CFS, as opposed to that of the NYCDEP of 312,000 CFS, at the Gilboa Dam. The catchment of BG is 42 square miles > than that of the Gilboa Dam.

2.5 – Subsection 3 STUDY GOALS AND OBJECTIVES

The first specific objective of this section once again reverts to correctly identifying valid questions raised by the public regarding the operation of BG and the Project's ability both potential and actual, to alter the impact of flooding downstream of the Project, in a positive or negative way. Unfortunately, as in the two previous sections, the applicant then evades, qualifies or compromises its stated goal. The following example illustrates this claim. Please refer to the first study objective of Section 2.5.3 at the bottom of page 37, "stream flows, water elevationsa, b, c." It will be noted that the estimation of the impact of "alternative reservoir operations of the upper and lower reservoirs in anticipation of a flood event," has to be ELIMINATED in the objective shown at the top of page 38. Item c has not been included in this objective. If the third study objective shown on page 38 under the heading of "Identify a range of reasonable, credible and prudent operational measures," is an attempt to address the "alternative operations" alluded to in Item c, the Applicant should clearly indicate this. The list of 5, a-e, of qualifying and modifying conditions made in this portion of 2.5.3, further complicates and obfuscates an already needlessly nebulous study objective.

The SCBS requests NYPA to explain how the Applicant's operation of BG could impact flooding upstream of the Project, as stated on page 35, in the last objective in Section 2.5.3.

The SCBS recognizes the flood attenuating effects of the Schoharie Reservoir and the lower reservoir of BG in times of flooding. The SCBS understands and appreciates the fact that the inflow in both reservoirs exceeds the discharge from these bodies of water, at any given time during a flood, unless NYPA were to make power in the midst of a flood. This naturally occurring phenomenon is of benefit to those living downstream of both NYCDEP and NYPA infrastructures in the Schoharie Valley, in times of extreme precipitation and excess runoff. However, NYPA should not be allowed to "hide behind" its current license requirements of having the BG discharge be roughly equal to inflow into the lower reservoir, especially in times of flooding. The new license, if and when granted by FERC to NYPA for Project #2685-026, should be amended so as to compel the Applicant to exercise reasonable efforts of flood mitigation in anticipation of and during times of excess precipitation and imminent actual flooding. An established protocol of flood mitigation should be a license requirement, so as to eliminate the current practice of hasty, imprudent attempts at "flood control" and last minute ad hoc declarations of a state of emergency, as was the case prior to the onslaught of Hurricane Sandy.

Section 2.5 - Subsection 4 RELEVANT RESOURCE MANAGEMENT GOALS AND PUBLIC INTEREST CONSIDERATIONS

The SCBS feels that this is a highly commendable goal, if it is pursued objectively. Consideration should be given to the impact the "extraction" of 10,000 CFS of water from the lower reservoir of BG, during 10, 50, 100 and 500 year recurrence interval floods, for a period of 6 hours, be a component of this study. Additionally, NYPA should include water elevations at BG with an inflow of 312,000 CFS.

Section 2.5 - Subsection 5 EXISTING INFORMATION AND NEED FOR ADDITIONAL INFORMATION

The SCBS asks that NYPA and NYCDEP work in collaboration to jointly develop an accurate and agreed upon estimation of the PMP and PMF figures, i.e. rainfall rates and amounts, and rates of stream flow, expressed in CFS and water elevations. Additionally, a map showing the estimated PMP over the 356 square mile catchment of the BG lower reservoir should be prepared as a component of this study plan.

Section 2.5 - Subsection 6 PROJECT NEXUS

The relicensing of Project #2685-026 should include a modification of the current requirement of the Blenheim-Gilboa Pumped Storage Project to have a parity of rates of inflow and discharge at BG. This change should relax that requirement in time of flooding and compel NYPA to exercise flood mitigation to the fullest extent possible, consistent with meeting their prime objective for existence.

2.5 - Subsection 7 METHODOLOGY

As the license Applicant is the entity undertaking this study, the Schoharie County Board of Supervisors relies upon and expects that the public deserves a fair and objective analysis of the items raised in our response to the New York Power Authority's study requests. The five tasks enumerated in this subsection are reasonable in scope and in substantial agreement with the expectations of the SCBS, if performed in an unbiased and scientific manner.

Sincerely, Howard Bartholomew - president of DCC

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