



Village of Middleburgh

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Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N. E.
Washington, D.C. 20426

Robert Panepinto
NY Power Authority
123 Main Street
White Plains NY 10601-3170

Re: FERC, NYPA
Blenheim-Gilboa Dam Relicensing
Town of Gilboa, Schoharie County

February 3, 2015

Dear Secretary Bose and Mr. Panepinto,

On behalf of the Middleburgh Village Board, I am pleased to present to you comments contained herein on the Revised Study Plan filed January 20, 2015 by the New York State Power Authority (NYPA) for the Blenheim-Gilboa (BG) project, docket number P-2685.

Our first set of comments relate to item 2.5 in the Revised Study Plan: "Effect of Project Operations on Downstream Flooding Study".

Background:

It is noted that a major study objective is to: *identify a range of reasonable, credible, and prudent operational measures, if any, that potentially could reduce downstream flooding during high-flow events.*

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14th & Independence Ave., SW, Washington, DC 20250-9410

It is noted that stream flows, water surface elevations, and extent of flooding along Schoharie Creek downstream of the lower BG dam will be estimated for the 10-year, 50-year, 100-year, and 500-year precipitation events. We also note that several US Army Corp of Engineer hydrologic models will be used including:

- HEC-HMS to estimate inflows to the Lower Reservoir
- HEC-ResSim to model operational capabilities and practices for both the Upper and Lower Reservoirs to evaluate various operations scenarios in order to estimate the outflow hydrograph from the project.
- HEC-RAS to estimate water surface elevations and extent of flooding in Schoharie Creek between Gilboa dam through downstream communities in Schoharie County.

We note that various modeling studies will begin at Gilboa dam. The Schoharie drainage above the Gilboa dam will not be studied with models.

Comments:

1. We feel that hydrographs should be made for the Schoharie watershed in its entirety and the various storm events should be routed through Schoharie-Gilboa Reservoir.
2. Insofar as the inflows and outflows from BG must essentially remain the same for various storm events, we feel that as a practical matter there will be little "wobble room" to really *reduce downstream flooding during high-flow events*. Any flood control benefits will be marginal at best.
3. We feel that a range of reasonable, credible, and prudent operational measures that potentially could reduce downstream flooding during high-flow events could be realized in the Schoharie-Gilboa Reservoir, but for these benefits to be optimized the Schoharie drainage above the Gilboa dam should be modeled with the HEC models and integrated with the NYPA modeling initiatives.
4. We feel the NYPA and New York City Department of Environmental Protection should closely coordinate their managerial activities in the Schoharie drainage relative to finding reasonable, credible and prudent operational measures that could potentially reduce downstream flooding during high-flow events.
5. However, we do note that Schoharie Reservoir was not designed as a flood control structure. Rather, it was constructed to provide water to New York City. Nevertheless, we feel that a range of reasonable, credible and prudent operational measures that could reduce downstream flooding during high-flow events are potentially available that would not jeopardize New York City's water supply needs.
6. Assuming that federal, State and /or funding from New York City could be obtained, do you share our view that such studies and close coordination between the BG and Schoharie Reservoir would be highly desirable relative to finding reasonable, credible and prudent operational measures to reduce downstream flooding? Inasmuch as both BG and Schoharie Reservoir are being studied and structural changes to Gilboa dam are being made as we speak, we feel that it would be most responsible for the State of New York and New York City to seize upon the opportunity to provide, perhaps with federal assistance, additional funding to undertake the appropriate HEC watershed modeling studies upstream of the Gilboa dam unless such study results already are available. We feel that a study of the entire Schoharie watershed relative to reducing flood damages and associated costs, would best serve the people of New York State, particularly residents of Schoharie County, downstream of BG and Schoharie-Gilboa

dams.

Our second set of comments relate to safety and first responder needs.

Background:

In several locations of the revised study plan reference is made to the importance of first responders. We agree that first responders are an integral component of BG's overall operations whether it relates to water rescues, chemical spills, explosions, fires, employee accidents or sickness, or other kinds of incidents including those which might involve visitors.

The Middleburgh Fire Department is an entity of the Village of Middleburgh which can provide first responder services. The Department maintains a high degree of training and proficiency and equipment, and it has the capacity to respond to many kinds of contingencies. It should be noted, however, that the Village of Middleburgh's annual budget is approximately \$740,000 which must be allocated to a variety of village programs. This limits funds which can be allocated to the fire service for equipment, training, and capacity building especially related to the equipment and training needs for the unique kinds of emergencies that can be anticipated at BG.

Comments:

1. We note that fire chief Michael Devlin has submitted comments and a list of building expansion and equipment needs to further build first response capacity. We fully support Chief Devlin's request for funding and hope the funds will come out of NYPA's community contribution program as part of the re-licensing process.
2. We feel that one or more workshops should be conducted between the various fire service first responders and BG staff to identify emergency scenarios which might be anticipated at BG and then develop periodic training sessions on-site for first responders.
3. First responders should have a complete list of and Material Safety Data Sheets for all chemicals having MSDS's so that first responders will have the equipment and knowledge for dealing with them in emergency situations.
4. In addition to public safety concerns, we are also interested in a means to create the following as a part of the community contribution program during the period of possible relicensing. These include in priority order: infrastructure projects, especially regarding repair and possible extension of water and sewer infrastructure, overhaul of the Village Hall that was used as an emergency center during Irene, including handicapped accessibility, streambank erosion control, public infrastructure, including Victorian lighting, stamped concrete sidewalks, energy efficiency and renewable energy, improved storm drainage, funding for parks and recreation improvements including pool repairs and possible enclosure, playground equipment, Youth Commission funding, economic development funding, and other needs the community will face over the next 30-50 years.

We want to take this opportunity to extend our appreciation for making it possible to comment on the BG project. We are also interested in learning more about the community contribution program

referenced in the revised study plan.

Very truly yours,



Matthew Avitabile, Mayor
Village of Middleburgh

cc: wo/attachments

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Honorable Emily Lloyd, Commissioner
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