

## Blenheim-Gilboa Pumped Storage Project (FERC No. 2685-026) Initial Study Report (ISR)

Town of Fulton comments:

Town of Fulton makes the following requests for modifications to the ISR .

Effect of BG Project on Downstream Flooding Study:

Town of Fulton requests that an estimate for a 1000 year flood be added to the study. Schoharie Valley has had a flood that was near the 500 year flood projection (Irene 2011). Dams should be designed to withstand a 1000 year flood.

The Town requests that the study explores the effect of BG pumping up with 1,2,3 & 4 units during a high water event and the result it would have on a typical flood. Also request the use of void creation in BG reservoir ahead of high water event as another tool for flood mitigation.

The Town requests that the study adds the effect to Schoharie Valley, if the BG Project dam fails due to a breach.

The Town requests that the Probable Maximum Flood PMF done by RJ Associates in 2009 be updated. The extra data from flood of 2011 since 2009 will provide a better study. NYPA should reveal the data used in RJ Associates PMF ( i.e. PMP, drainage basin used and 1000 year duration ).

The delay of this important study is unacceptable. Task 2 in this study should have been completed, concerned residents downstream await this study.

Socioeconomic Study:

Effects of tax-exempt status on hosts of the BG Project cannot be measured without an accurate valuation of the Project. An assessment by a professional appraiser (paid for as part of this study) is the only way to get a true value. The Schoharie County Real Property Tax Office valuation was done by local tax assessors untrained in the assessment of a facility the size of BG. A true value will

provide the real impact that the BG Project would have had on hosts if they had paid taxes.

Employment, while important, provides very little benefit to the hosts of the BG Project. Many who work at the Project reside in other counties.

Schoharie County provides many resources to community emergency services in the county, i.e. training and backup. All emergency services in the rural areas have mutual aid agreements; this should be considered in the study.

NYPA makes low cost electricity allocations to many entities in New York State, Schoharie County should, as a host communittee, be at the top of the list for that program. This could be an important factor in socioeconomic development of our area.

#### Recreation Use Study:

This study is supposed to look to the future, but the impact of conservation water releases by NYDEP are not taken into account. The discussion between NYDEC and NYDEP now are agreeing that 25 to 40 CFS conservation release will be done. This study should address the effect of this release on Schoharie Valley (fisheries and recreation) when these releases come about. NYPA needs to talk to NYDEP and NYDEC on this issue as part of this study.

A Trail Feasibility Study by SALT needs funding for a hiking, biking, snowmobile and four wheeler trail that ends at BG project. Projects like this need a partner to come to fruition.

The Town of Fulton has canoe/Kayak races that start in our town and may need recreation flow releases. If NYPA BG could help with this it would promote recreation.



Document Content(s)

ISR\_town of fulton comments.RTF.....1-3