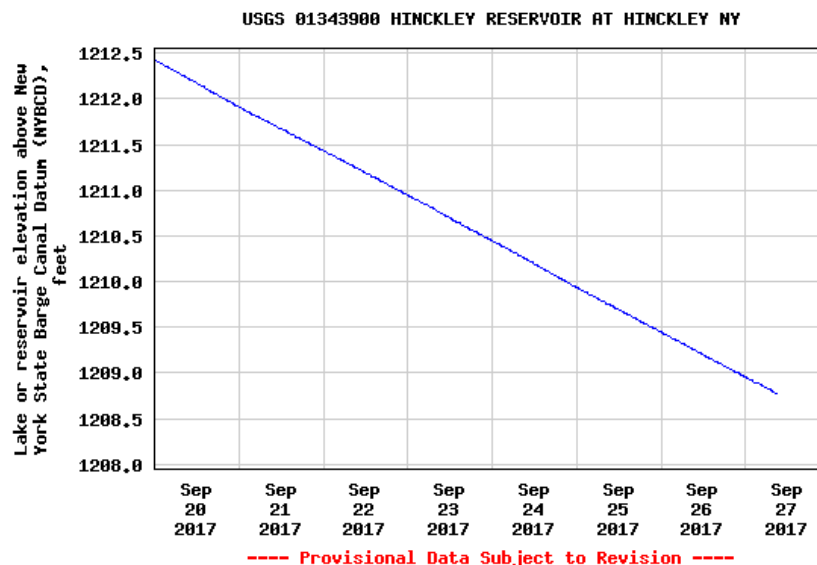


Secretary, Federal Energy Regulatory Commission
888 First Street, NE,
Washington, D.C. 20426.

Regarding: **Jarvis Project P-3211-009**

I am writing this letter on behalf of the 3,300+ members of the **Hinckley Lake (NY)** Facebook page. The page was created about 5 years ago to keep people informed and updated on things that are happening on or around Hinckley. One of the most important things we do on the Facebook page is routinely post water level data for our followers. We receive a lot of feedback from people regarding the water levels. This feedback tends to always come down to one major concern – the apparent mismanagement of the water resources from Hinckley.

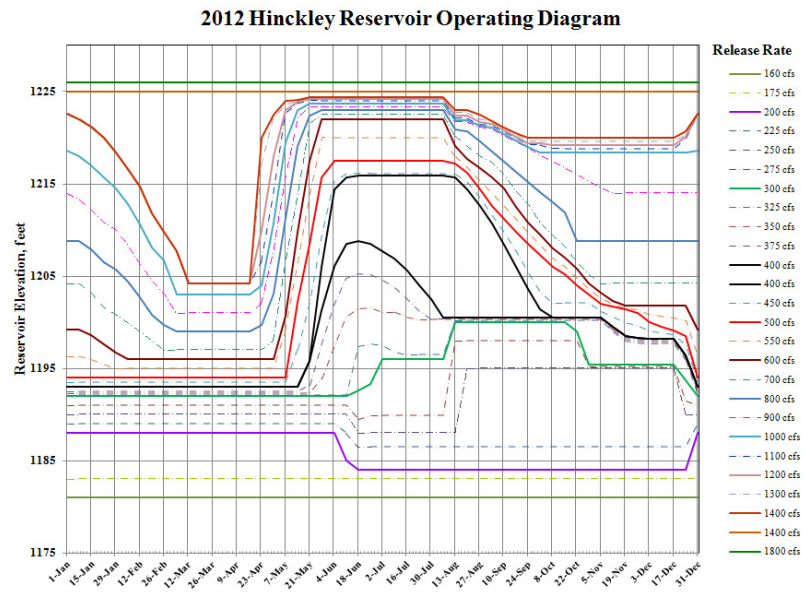
Most recent instantaneous value: 1208.78 09-27-2017 08:45 EST



The above graph is probably one you have seen many times. This specific graph shows the water level change in just one week. To a typical analyst all this graph shows is an approximate 4ft vertical drop in water level. But to people who live on Hinckley who see the water level outside of a graph, it is much more. A 4ft vertical drop can mean over a 20ft drop on a gently sloping beach. A boat tied up on shore left out unchecked in just a few days is completely beached. A loon's nest is abandoned because they can no longer swim to it. A fishermen out on a boat is at risk because he can hit one of the many sandbars that pop up in low water situations. A homeowner who built a house overlooking the beauty of Hinckley instead sees mud and low water. These and many more situations are exactly what a graph does not show. This drastic drop in water levels is all due to the demand from the power companies to produce power.

DATE	HINCKLEY RESERVOIR ELEVATION (FT)	HINCKLEY RESERVOIR COMPARISON TO ELEVATION TRIGGER (FT) ¹	HINCKLEY RESERVOIR COMPARISON TO NORMAL ELEVATION (FT) ²	HINCKLEY RESERVOIR DISCHARGE (CFS) ³	2012 OPERATING DIAGRAM RELEASE (CFS) ⁴	HINCKLEY RESERVOIR INFLOW (CFS)	HINCKLEY RESERVOIR 30-DAY RUNNING AVERAGE INFLOW (CFS) ⁵
09/26	1208.9	7.5	-1.6	606	600	124	358.0
09/25	1209.4	7.9	-1.2	607	600	169	365.0
09/24	1209.9	8.2	-0.8	639	640	171	376.0
09/23	1210.4	8.5	-0.4	637	640	138	389.0
09/22	1210.9	8.8	0.2	642	640	163	415.0
09/21	1211.4	9.2	0.7	644	640	159	457.0
09/20	1211.8	9.4	1.2	701	700	185	469.0

The above table takes the graph data even further by showing us why the water levels drop so rapidly. Again, you have probably seen these tables many times before, but only within the context of the data. In the week shown, the discharge rate of the water was between 600cfs and 700cfs (add another 30cfs for water authority). Water coming into Hinckley was roughly 4 times lower than water going out. If you were to stand at Harvey Bridge where the West Canada feeds Hinckley and then stand at the Dover road bridge where the West Canada leaves Hinckley, you would think you were visiting drastically different water ways, when in fact they both are the same body of water. All of this is a result of an agreement made in 2012 that was meant to keep water levels stable. The image below shows the result of this agreement.



It almost takes a degree in rocket science to understand the agreed upon “Operating Diagram”. But essentially it comes down to how much water there is and the best time to take it. The summer months are adjusted to keep water levels somewhat high for recreation purposes. But this diagram and the agreement is deeply flawed for a couple of reasons. First, if there is not much snowpack and/or there is a dry spring, the water levels will remain low going into summer. This occurred in the spring of 2015. Second, this diagram does not account for the amount of water that the power companies are allowed. The power companies are not concerned with water levels as they only care about producing power. If they do not receive their allotment of water then they can turn to the courts for breach of their agreement.

Since the 2012 agreement has been in place it has not been followed and most likely will never be followed as it was written. This is due to number of parties that depend on the water who refuse to conserve it because they know they are legally allowed to take it, the power companies being the biggest culprit. In order to make the water usage efficient and conservative, there needs to be a change in the allotment of water that the power companies can take. This is where the FERC re-licensing can solve this problem that has plagued Hinckley for many years. If the Jarvis power plant is to be granted a new license, they should NOT be allowed a set amount of water, but instead adjust their usage based on the availability of water on a daily basis. Taking 600cfs of water when the incoming flow is only 150cfs is completely unacceptable and causes a drastic drop in water levels. The power companies should only take out what comes in, regardless how dry or wet a season may be.

The water resources of Hinckley have been stretched too thin. Many different parties have come to rely on Hinckley for their own good and have forgotten that water is a finite resource. The power companies demand the most water and expect it to be there regardless. It is my hope and the hope of the thousands who love Hinckley that the Federal Energy Regulation Commission will consider these concerns when re-licensing the Jarvis hydroelectric project.

Regards,

Justin Horstman

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Remsen, NY 13438

<https://www.facebook.com/hinckleylake/>