20171025-5093 FERC PDF (Unofficial) 10/25/2017 10:42:08 AM

Carol R Weidner, Cold Brook, NY.

My husband and I have owned and operated Trail's End Campground and Mobile Home Park since April of 2000. It located on the shores of Hinckley Reservoir and includes a mobile home park, 100 site campground, 5 cabins, pavilion and boat rentals, store and snack bar, beach and boat launch.

I am submitting these comments in the hopes that FERC will study several issues prior to recertifying the Jarvis Power Plant. We have issue with is the ignorance with which the reservoir water levels are manipulated for the benefit of other areas in the state and even other countries with respect to Brookfield Power (a Canadian corporation).

We understand that the dam was constructed for the primary purpose of feeding the barge canal at a time when the canal was a lifeline of transportation and shipping. One hundred years later, the canal is used primarily as a tourist attraction that is heavily subsidized by taxpayer funds. Our biggest question here is why is their tourism economy more valuable than ours?

A tourist attraction ourselves, we rely heavily on our summer season and Hinckley Reservoir to help draw the camping public to our facility. We are literally half of the operation we could be because of fluctuations in the reservoir levels. Any sort of compromise to keep the level at a certain level for the months of May – September would dramatically increase our ability to make money. If we could count on a level between 1220 and 1225, boating would be assured during those months, thereby increasing desirability of our facility as a destination camping area. At 1215, we are unable to launch boats.

The constant fluctuation is extreme in that we can lose 10+ foot of shoreline overnight. This strands boats and causes us to move our state mandated swimming area constantly.

We have had campers purchase boats, only to rip out their lower units on a sand bar on the first voyage. Hinckley Reservoir does not have the best reputation for boating or fishing due to the unmarked hazards. To my knowledge, there is only one topo map of the area and there is no map showing the depth of the reservoir. I would request that one be done in advance of the relicensing.

We have seen "fema" flooding in the Mohawk Valley in May, only to have the reservoir too low to launch boats by July 4th weekend. Any time we make up ground with some rain after a dry spell, they then let out even MORE water to "make up" for what they could not take during the dry period. It is common practice to draw more water than is coming into the reservoir.

At a level of 1215, we no longer are able to launch boats. This results in campers cancelling their reservations. Low water years have seen our gross income go down by almost 10% once you include lack of boat rentals, lost revenues in terms of cancelled reservations. Further, store sales plummet as our seasonal campers (we have 70) stop coming to camp because they cannot get on the reservoir.

Property Values

Our campground is valued far less than similar properties on other lakes due to the instability of the reservoir level. Properties on the Great Sacandaga and Delta do not share similarly depressed values. The water management at Hinckley is the issue.

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Environmental Impacts

We would request that the DEC be permitted to conduct an environmental impact study regarding the constant fluctuation of the reservoir levels. We also request that the DEC be permitted to conduct and release to the public an actual accounting of the water volume in the reservoir. Everyone likes to quote the volume of the reservoir when they are arguing over who gets the water. Since the Rule Curve change in 2013, erosion has increased dramatically.

Lack of Compensation

With the four power plants that are downstream of the reservoir, no compensation is made to land owners for their inconvenience – something that is pretty standard in the industry. I am not asking for compensation, I am asking for consideration, which to date we have not seen. Perhaps compensation is what we should be asking for – maybe then we will get consideration.

Accountability

There is no accountability with regard to the state agencies which control the reservoir to the townships in which the reservoir is located or the land owners. We are faced with a “we are taking what is ours; you are last on the list” attitude by the agencies involved. There have been many “uprisings” when the reservoir gets low that have amounted to no more than a photo op for the politicians and a bargaining chip for the power companies, canal corporation and water board. NO consideration is given the property owner, environment or recreational users. There is NO consideration given to the idea that this area has as much right to a tourism economy as the canal communities downstream.

Hopefully, now that NYPA owns the NYS Canal Corporation, there will be more cooperation between those two entities but the Mohawk Valley Water Authority and Brookfield Power Company also have claim to the water in Hinckley Reservoir. We would ask that FERC review and change or eliminate the Rule Curve in favor of better management the benefit of the entire community. We also request that the re-certification of the other downstream power facilities be considered at the same time as Jarvis.

We appreciate this opportunity to voice our concerns to FERC as our state agencies are like a snake eating its own tail. With the growth of the Mohawk Valley and revitalization of Utica and Rome we can expect our population to grow in the future. That population will not only need drinking water and water to support industry, but will need local recreation in order to thrive. Hinckley Reservoir is a local treasure that should be allowed to continue and we would support any effort to make that happen. Certainly further study is warranted before the Jarvis Plant is recertified. The area cannot wait (economically) for another 40 years to be represented on these issues.

20171025-5093 FERC PDF (Unofficial) 10/25/2017 10:42:08 AM

Document Content(s)

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