

March 20, 2021

Kimberly D. Bose

Federal Energy Regulatory Commission,

888 First St. NE Room 1A

Washington, D.C. 20426

The FERC project and sub-docket number: P-15056:000

Dear Ms. Bose,

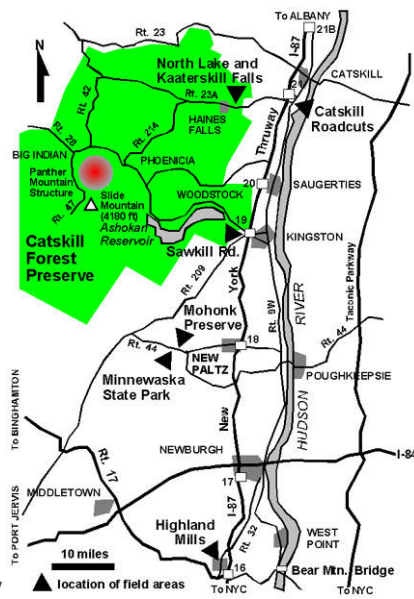
Please consider the following points in your decision for the proposal by Premium Energy Holdings of California to build a hydroelectric power plant at the Ashokan Reservoir, Town of Olive, Ulster County, in New York's Catskill Mountains:

- We know hydroelectric storage pump plants will happen now and in the future to help meet green initiative goals for developing and maintaining our growing needs for energy utilizing renewable resources. Adding hydro storage pump systems does make a lot of sense for NY to meet our goals. We are about 100 miles north of New York City and the current reservoir is part of the New York City water supply system which serves over 9 million people. The NYC Department of Environmental Protection has expanded its precinct, officers and worked hard to protect it's watershed by a land acquisition program. It looks practical from a map perspective of the reservoir to use the existing water to turn the turbines with a building of a reservoir from one of the mountain sites proposed, but the mountainous areas have been protected by the state and the city for over 100 years.
- The City's drinking water would be threatened by high turbidity from this project and interfere with the Environmental Protection Agency's Grant of consent for the New York City's Filtration Avoidance Program (FAD) <https://www1.nyc.gov/site/dep/about/filtration-avoidance-determination.page> which was just revised and granted again in December of 2017 which clearly protects our ecosystems. This is one of the few sources of natural, unfiltered water in the United States. Through this waiver it

protects one of the largest water systems in the country. All of the protected forests, soils help maintain adequate levels of carbon for the natural filtration process to happen. An estimated 8 to 10 billion dollar filtration plant would really be costly to NYC to build and maintain.

- After reviewing the Application of the Ashokan Reservoir Power Plant Proposal/Electric, it came to my attention that it has several misrepresentations:
 1. One major one is that the configuration is proposed as a closed loop system. The reservoir to be built from one of the three proposed sites is clearly added on to the open system. The Ashokan reservoir has the Esopus Creek running into it which is clearly not a closed loop system.
 2. Ulster County should not be the only county to be identified (notified) for this proposal. The proposed Stony Clove Reservoir falls within Greene County as well. Green County was not notified.
- Many people would be surprised to learn that New York has one of the largest percentages of both state land and state-managed conservation easements in the United States. The Department of Environmental Conservation (DEC) is the state agency which manages 90% of the state land and 4.6 million acres.
- The three proposed sites for the hydro plants are all connected to New York's Forest Preserve Catskill Park (state land). The Catskill Park was created along with the Adirondack Park as a way to preserve ALL forested lands both public and private. Protected as "forever wild" by [Article XIV of the New York State Constitution](#). This protection of the streams and animal habitats has been in effect for over 100 years.
- The Maltby Brook MoonHaw project proposal site has parts which are protected as forever wild land. At the end of MoonHaw there is a widely used trailhead to access the Friday Mountain and Balsam Cap from the end of MoonHaw Road and is a 5.6 mile heavily trafficked out and back trail located. All of the mountains in these proposals bring tourists who enjoy camping and hiking.

The NYC Region - map of the Catskill Mountains & Hudson River region



United States Geological Survey

- The placement of high tension/voltage electric lines required would also fall within these protected lands.
- These protected lands are home to many protected animals and plants by the DEC:
 1. The protected Three Birds Orchid (*Triphora trianthophora*), is present at the end of Maltby Hollow Creek and both sides of the upper Dry Brook; these sites are registered in the Biological and Conservation Database for North America.
 2. Summer foraging habitat for NY-threatened northern long-eared bat [Protection of Northern Long-eared Bats - NYS Dept. of Environmental Conservation](#)
 3. Audubon Catskill Peaks Important Bird Area. Habitat for NY-Species of Greatest Conservation Need, such as black-throated blue warbler, scarlet tanager, and wood thrush, as well as NY-Special Concern raptors Cooper's hawk, red-shouldered hawk, and sharp-shinned hawk.
 4. Habitat for NY-Special Concern eastern hognose snake and NY-Threatened timber rattlesnake.
 5. Maltby Hollow Creek and Wittenberg Brook are both trout waters and trout spawning habitat.

Thank you for taking the time to examine my findings on why this proposal would not work on the Ashokan site.

Thank you,
Ms. Jen Brueckner

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