Ashokan Pumped Energy Storage Comments – First Step 3-31-21

On behalf of Northern Catskills Audubon Society, the 350-member chapter of the National Audubon Society, and whose chapter territory includes the area of this proposal, I offer these comments in opposition to the proposed Ashokan Pumped Energy Storage Project, Docket P-15056.

The proposed project is located within the Catskill Peaks Important Bird Area (IBA), identified by Audubon New York as one of the largest contiguous forest tracts in the state. The area was given IBA designation due to the presence of high-elevation breeding bird species, such as Bicknell’s Thrush and Blackpoll Warbler, as well as home to the suite of lower-elevation forest nesting birds. Many of these are considered species of Special Concern or Threatened in New York State, or Species of Greatest Conservation Need and include American Black Duck, Osprey, Bald Eagle, Sharp-shinned Hawk, Cooper’s Hawk, Northern Goshawk, Red-shouldered Hawk, Peregrine Falcon, American Woodcock, Olive-sided Flycatcher, Wood Thrush, Scarlet Tanager, Cerulean Warbler, Black-throated Blue Warbler, and Canada Warbler. In addition to state protections, Bald Eagle is afforded federal protection under the Bald and Golden Eagle Protection Act. The Ashokan Reservoir, as part of the IBA, is an important site for wintering waterfowl and it is unknown how water depth fluctuations from this project would affect those birds.

Permanent protection of this IBA is of utmost importance to protecting the aforementioned species. This project, if approved, would fragment the forest to the detriment of those species, as well as species currently not identified as in need of protections.

We urge FERC to stop this project before much time and money are needlessly spent, given that further, detailed negative environmental effects that will certainly be identified in an EIS if the project is approved to move to the next step.

Sincerely,

Larry Federman

President, Northern Catskills Audubon Society, Inc.