



April 5, 2021

Online submission - Motion to Intervene: Ashokan Pump Storage Project

Ms. Kimberly Bose  
Secretary Federal Energy Regulatory Commission  
888 First Street NE  
Washington, DC 20426

RE: MOTION TO INTERVENE Docket # P-15056 - Ashokan Pumped Storage Project

Dear Secretary Bose,

Pursuant to Rule 214 of the Rules, Practices and Procedures (18 CFR Section 385.314), the New York-New Jersey Trail Conference (Trail Conference), a non-profit organization incorporated in the state of New York with its primary office in Mahwah, New Jersey, hereby petitions the Federal Energy Regulatory Commission to grant it full party status in the above captioned proceeding.

The person to whom communications should be addressed and to whom service should be made is as follows:

Joshua Howard, Executive Director  
[jhoward@nynjtc.org](mailto:jhoward@nynjtc.org)  
845-304-2782

Hank Osborn, Director of Programs  
[hosborn@nynjtc.org](mailto:hosborn@nynjtc.org)  
201-512-9348

600 Ramapo Valley Road  
Mahwah, NJ 07430

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As grounds for this Motion, the Trail Conference, a 501(c)(3) non-profit organization, has a vital and unique interest in the Preliminary Permit application submitted to the Commission by Premium Energy Holdings for the Ashokan Pumped Storage Project (P-15056).

The Trail Conference is recognized as an advocate for the Catskill region, working with more than 80 member organizations and a combined membership of almost 100,000 concerned trail users, citizens, and strategic partners to ensure the integrity and quality of trail-based recreation. That includes the protection of the natural areas surrounding the trails in the Forever Wild lands of the Catskill Forest Preserve in Ulster County, N.Y.

The Trail Conference has a signed Volunteer Stewardship Agreement with the New York State Department of Environmental Conservation that authorizes a stewardship program between the Commissioner and our organization for the purpose of preserving, maintaining, or enhancing a state-owned natural resource or portion thereof in accordance with the policies of the Department. Additionally, our agreement permits the Trail Conference, whenever possible, to educate others using the trail(s) on how to hike safely, encouraging them to value open spaces and to treat the land wisely. This proposal contradicts that charge.

The proposed dam, reservoir, powerhouse, pipeline, and subsequent powerlines will significantly and permanently damage the viewshed and trail user experience from multiple hiking trails, including the most popular trails in the Slide Mountain Wilderness and the 360-mile Long Path, which transects the Forest Preserve and connects New York City to the Mohawk River and eventually to the Adirondack Forest Preserve. The pristine scenery of the area is a prime reason for the popularity of the trail network in the Forest Preserve.

Additionally, the road closures in the proposed pumped storage project eliminate vital access points to popular hiking destinations and recreational resources. By interrupting Route 214, access to the Devil's Path, Diamond Notch, and Becker Hollow trails are disrupted, as well as the Devil's Tombstone Campground. By interrupting/obliterating Woodland Valley Road, access to the Burroughs Range, Long Path, and Giant Ledge-Panther Mountain trails are affected, and the Woodland Valley campground is cut off. The elimination of these trailheads will force increased usage in other areas of the Forest Preserve and magnify the negative ecological impacts that we have observed over the past 12 months due to unprecedented visitation on these trails during the pandemic.

The impacts to these already overwhelmed trailheads and destinations have been identified as a critical issue by Governor Andrew Cuomo and the New York State Department of Environmental Conservation's Commissioner

Basil Seggos. As a result, the Catskill Advisory Group was formed. This group, which the Trail Conference serves on, is charged with creating recommendations and actionable steps to safeguard the Catskills for sustainable recreation. This project would further exacerbate the goals and charge of the Catskill Advisory Group.

The proposed project would also have negative impacts to the natural areas surrounding the trails we are charged with maintaining and protecting. The required powerline right of ways will cross different ecosystems and fragment habitat, lead to the clearing of sensitive vegetation, and create pathways for the spread of invasive species. There is also unnecessary risk of the introduction of invasive species into the Forest Preserve during construction of these facilities, as cited in a Pennsylvania State University study of gas drilling platforms.

The lands and waterways that support the native flora and fauna that are synonymous with the Forest Preserve would be irreversibly damaged and affected by the construction of new dams and reservoirs; the noise pollution from the operation of the facilities would additionally produce undesirable impacts on the trail user experience.

Accordingly, the Trail Conference has a substantial interest in this matter. No other party represents the Trail Conference's interests, and no other party reasonably could do so. Neither disruption to the proceedings nor any additional burden to any party will result from the granting of this Motion. Considering the concerns mentioned above, the Trail Conference respectfully petitions for intervention.

Sincerely,

A handwritten signature in black ink, appearing to read 'JH', is positioned above the typed name.

Joshua Howard  
Executive Director