

April 9, 2021

Kimberly D. Bose
Federal Energy Regulatory Commission
888 First St. NE, Room 1A
Washington, D.C. 20426.

Docket number P-15056-000

Dear Ms. Bose,

I am writing in response to the proposal by Premium Energy Holdings to build a hydroelectric power plant in New York's Catskill Mountains. I urge FERC to decline their request for a feasibility permit for the Ashokan Pumped Storage Project P-15056 on the basis that the proposal is not accurate in its stated intention, and that such a proposal would have devastating impacts on important aquatic and wild life, local and New York City drinking water, and protected, high quality forests.

The proposal states that the Ashokan Pumped Storage system would be a closed-loop system. This is not the case; the lower pool for the project - the Ashokan Reservoir - is continuously connected to a flowing body of water; the Esopus Creek.

In a report prepared by the DOE Water Power Technologies Office, under its HydroWIREs Initiative, dated April 2020, researchers concluded: "...operational impacts [of open-looped projects] are still likely to be higher than for a closed-loop projects because the add-on project's lower reservoir is still continuously connected to, and may affect, the naturally flowing water feature that was dammed for its original construction."

Premium Energy's proposal has potentially devastating impacts on aquatic and wild life. The same report cited above states: "The impacts of PSH construction and operations on fish and other aquatic ecology are primarily related to the in-stream construction of dams (for open-loop projects), the initial withdrawal of surface water for reservoir fill, and the movement of water between and within the project water bodies, especially naturally flowing lakes or rivers."

Premium Energy's proposal to use the Ashokan Reservoir as its lower pool would seemingly be at odds with the City of New York's determination to keep local and city drinking water safe and of high quality. In a letter filed by the City to FERC dated April 2021, the City states: "Based on its long experience operating the Ashokan Reservoir, the City is very confident in stating that the Project would exacerbate turbidity problems and reduce water quality within the Reservoir."

Finally, the Ashokan Pumped Storage project proposed sites are within highly protected forests, and are part of the Forever Wild Catskill Forest Preserve. Under Article XIV of the NYS Constitution, it is clearly guaranteed that these lands "shall be forever kept as wild forest lands. They shall not be leased, sold or exchanged, or be taken by any corporation, public or private." The Preserve currently contains 700,000 acres of continuous wildlife habitat (very rare in our increasingly fragmented environment), and the

forest around the proposed sites ranks among the top 1% of forest habitats region-wide, according to the New York State Forest Condition Index.

For these reasons, I urge FERC to decline Premium Energy's request for a feasibility permit for the Ashokan Pumped Storage project.

Sincerely,

Kimberly Daley
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