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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 deeply flawed proposal by Premium Energy Holdings to build a hydroelectric power plant in NYS Catskill Mountains. I urge the FERC to decline their request for a preliminary permit for the Ashokan Pumped Storage Project P-15056. This project would be devastating to the environment, highly disruptive to local communities, and have a negative impact the purity of New York City’s drinking water.

Pumped storage and other hydroelectric projects may play a role in our country’s transition to renewable energy. However, the pristinely and protected forests, streams, and wildlife of Catskill Forest Preserve must not be sacrificed. 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 is unique in that it currently contains 700,000 acres of continuous wildlife habitat which we should keep intact. 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. There are rare plants and animals throughout the Catskill Forest Preserve. The Whittenberg Brook site is habitat for the rare Three Birds Orchid (Triphora trianthophora) which is registered in the Biological and Conservation Database for North America by the NY Natural Heritage Program, an agency funded by the NYS Dept. of Environmental Conservation and The Nature Conservancy. The Orchids as well as their habitat will be obliterated should this project be approved. It would be unconscionable to destroy this sacred and wonderfully preserved land. Such action would set a terrible precedent for protected lands across the country.

This project would cause environmental devastation due to the interconnectedness of the Ashokan watershed and its tributaries. Pumped storage is notorious for wreaking havoc on nearby stream ecology, on aquatic and land habitats because of rapid fluctuation in water levels. These rapid fluctuations will alter the sediment regime in connected tributaries, which has a cascading effect. The Ashokan Pumped Storage Project would ultimately affect the sediment regime in the Esopus Creek, one of the Catskills’ most vital trout breeding waters, and one of the key creeks feeding into the Ashokan Reservoir. The Ashokan Reservoir supplies 40% of NYC’s water supply, serving 1 billion gallons of water a day to 9.5 million people. Premium Energy’s proposal is not a closed-loop system as they claim, it is in fact an “add-on”. As such, water fluctuations would increase turbidity within the Ashokan Reservoir and watershed. The Ashokan is the largest unfiltered water supply in the nation. It represents over $1.7 billion of investments since the 1990s. It would be reckless to allow this project to proceed.

In addition, Premium Energy’s proposal would be deeply damaging to local communities. Any conceivable upper reservoir site in the Catskill Forest Preserve would require the seizing of homes and private property via eminent domain. This process displaced thousands of residents when the Ashokan was constructed 100 years ago, and this has not been forgotten. There is currently a housing shortage in Ulster County, and for affordable homes. Residents displaced by the Ashokan Pumped Storage Project would have difficulty securing new housing. Beyond the problem of community displacement, there is also the proposed project’s effect on the Catskills’ growing tourism economy, which generated 17% of employment in the Catskill region in 2019, and is a $1.6 billion industry, supporting roughly 20,000 jobs. Premium Energy’s project would limit access to hiking, fishing, and other forms of recreation in the Catskills, decrease the area’s natural beauty, cut off access to skiing and seasonal programming at Hunter Mountain Ski Center, towns of Hunter and Tannersville, and otherwise dampen tourism in the region, negatively affecting businesses in Ulster County and beyond.

As a last point to make in opposition to Premium Energy’s Ashokan Pumped Storage Project, it must be pointed out that their proposal does not represent the kind of innovation that the Department of Energy wants to see. Closed-loop pumped storage projects have smaller environmental impacts than those that make use of existing watersheds making them eligible for streamlined FERC approval. In an unethical attempt to get FERC approval, Premium Energy is falsely claiming this project is a “closed-loop” system. Premium needs to be honest about what this project is. It is an “add-on” system, using an existing body of water as a lower reservoir. This kind of project carries with it significantly higher risks, especially in this instance, when the lower reservoir is not a vital source of drinking water for our nation’s largest city. How can we trust a company that would lie in their proposal simply for the advantage of being fast-tracked for approval?

Our country’s transition to renewable, green-energy resources must not come at the cost of environmental and community devastation. It my opinion that the Catskill Forest Preserve and communities within the Blue Line should be off limits to such development. I hope Premium Energy will be able to find a suitable alternative location for a pumped storage project—one where the construction and operation will not destroy protected wilderness, displace vulnerable communities, and threaten incredibly important natural resources.

Please do the right thing and deny Premium Energy’s proposal for a preliminary permit for the Ashokan Pumped Storage Project P-15056.

Sincerely,

Stephen B. Ackermann