**FERC Comment Template**

Use the comment template below or parts of it to help in your submissions. [Use these instructions](https://savecatskillspreserve.org/get-involved/) to submit a comment.

To:
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 New York’s Catskill Mountains. I urge FERC to decline their request for a preliminary permit for the Ashokan Pumped Storage Project P-15056, as it would be devastating to the environment, highly disruptive to local communities, and risky for the purity of NYC’s drinking water.

While there’s no doubt that pumped storage and new hydroelectric projects will play a key role in our country’s transition to renewable energy, the pristinely protected forests, streams, and wildlife of Catskill Forest Preserve must not be sacrificed in the process. 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. It would be a true crime to destroy this sacred and wonderfully preserved land, and would set a doomed precedent for protected lands across the country.

Even once construction is complete, there would be further environmental devastation due to the interconnectedness of the Ashokan watershed and its tributaries. Pumped storage is notorious for wreaking havoc on nearby stream ecology and on both aquatic and land habitats, because within a pumped storage system, the upper reservoir is subject to rapid fluctuations as the water is pumped up and down. In addition to affecting wildlife, this can 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, which is one of the Catskills’ most vital trout breeding waters, and one of the key creeks feeding into the Ashokan Reservoir, which supplies 40% of NYC’s water supply, serving 1 billion gallons of water a day to 9.5 million people. Plus, Premium Energy’s proposal is not a closed-loop system as they claim—it is in fact an “add-on,” and the water fluctuations would no doubt increase turbidity within the Ashokan and its watershed. Taking all this into account, it would be reckless to allow a project to proceed that would threaten such a valuable asset as the Ashokan Reservoir, which is the largest unfiltered water supply in the nation, and represents over $1.7 billion of investments since the 1990s alone.

In addition to its negative effects on the environment and water supply, 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—a process that already displaced thousands when the Ashokan was constructed 100 years ago. Residents displaced by the Ashokan Pumped Storage Project would likely have a hard time securing new housing, as there is currently a housing shortage in Ulster County, and for homes that are available, prices are through the roof. 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 concerts at Hunter Mountain, 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 even 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, and are thus eligible for streamlined FERC approval. This is why Premium is claiming this project to be “closed-loop” rather than being honest about what their project actually is: an “add-on,” using an existing body of water as a lower reservoir. This kind of project carries with it significantly higher risks, even 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 sources must not come at the cost of environmental and community devastation. 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

Carrie Garfinkel