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April 11, 2021

Online submission – Motion to Intervene: Ashokan Pumped 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 Pump Storage Project

Dear Secretary Bose,

Pursuant to Rule 214 of the Rules, Practices and Procedures (18 CFR Section 385.314), the Catskill 3500 Club, a non-profit organization incorporated in the state of New York, hereby petitions the Federal Energy Regulatory Commission to grant it full party status in the above captioned proceeding.

The individuals to whom communications should be addressed and to whom service should be made are as follows:

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As grounds for this Motion, the 3500 Club, a 501(c)(7) nonprofit 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 3500 Club is a member organization for hikers who climb the designated mountains in the Catskill region. Additionally, the Club sponsors or fund stewardship and educational activities in the region, a search and rescue team and wilderness first aid classes to protect both the wilderness lands and the public.

Our members access and hike trails that are currently in the areas proposed by Premium Energy for the upper reservoir, pipeline and damming for the pumped storage project. This construction and the ensuing structures would negatively impact hikers and trail user experiences, including some of the most popular trails in the region, including Slide Mountain, the highest mountain the Catskills. Even more damaging would be the road closure required for the project. It would shut down entry to some of the most highly used trailheads, including access to Woodland Valley and the Burroughs Range, Devil's Path, Diamond Notch and Becker Hollow. These are areas our members access frequently, contain unique trails and have a deep history in the Catskills.

Additionally, closing these trailheads would force hiker traffic to move to other trailheads and the Catskills is already dealing with significant overuse and the ecological impact from that. Having fewer areas for recreation would make the affect even more evident.

Accordingly, the Catskill 3500 Club has a substantial interest in this matter. No other party represents the 3500 Club'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 3500 Club respectfully petitions for intervention.

Maria Bedo-Calhoun

Maria Bedo-Calhoun
President, Catskill 3500 Club, Inc.