

# MOUNTAIN TOP ARBORETUM

4 Maude Adams Road • PO Box 379, Tannersville, NY 12485

518-589-3903

info@mtarboretum.org

mtarboretum.org

April 6, 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,

Mountain Top Arboretum is writing in response to the proposal by Premium Energy Holdings to build a hydroelectric power plant in New York's Catskill Mountains. We suggest that FERC decline their request for a preliminary permit for the Ashokan Pumped Storage Project P-15056, as it would be extremely harmful to the watershed environment which provides drinking water to 9.5 million New Yorkers, and would be highly disruptive to the economies of local communities.

While we believe that pumped storage and hydroelectric projects will add to the country's renewable resources, proposing to do so within legally protected New York State land is not feasible. 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, 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. The proposed reservoirs also fall within Audubon's Catskill Peaks Important Bird areas. This project seeks to condemn highly valuable habitats and highly preserved lands.

Additionally, as a State Forest Preserve, the Catskills are considered Status 1 land under USGS "Gap Analysis Program." According to the Department of Energy's own Hydropower Vision, "areas with formal protections designated as Status 1 or 2 under USGS Gap Analysis Program are avoided for development."

Within a pumped storage system, the upper reservoir is subject to rapid fluctuations as the water is pumped up and down, leading to destabilization of inter-connected stream ecologies and land habitats. In addition to affecting wildlife, this can alter the sediment regime in connected tributaries. The Ashokan Pumped Storage Project would ultimately affect turbidity and 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 New York City's water supply.

The proposed project's effect on the Catskills' growing tourism economy is also highly detrimental. Tourism 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 severely limit access to hiking, fishing, and other forms of recreation in the Catskills, decrease the area's natural beauty, cut off a major access to skiing and music concerts at Hunter Mountain, Hunter, and Tannersville, and otherwise dampen tourism in the region.

Finally, this proposal does not represent the kind of innovation that the Department of Energy calls for. 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. Premium is misrepresenting this project to be "closed-loop" rather than stating what their project actually is: an "add-on," using an existing body of water as a lower reservoir. Premium Energy Holdings misrepresents its application to FERC.

Mountain Top Arboretum urges FERC to deny Premium Energy's proposal for a preliminary permit for the Ashokan Pumped Storage Project P-15056-000.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc Wolf". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Marc Wolf  
Executive Director