

TOWN OF WOODSTOCK, NY



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MOTION TO INTERVENE: PROJECT P-15056 ASHOKAN PUMPED STORAGE PROJECT

Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington DC 20426

April 12, 2021

Dear Secretary Bose,

The Town of Woodstock strongly objects to the Ashokan Pumped Storage application before FERC by Premium Energy Holdings, LLC. The Town of Woodstock is in full agreement with the Town of Olive. I have attached a copy of Supervisor Jim Sofranko's letter for your convenience. Supervisor Sofranko points out many deficiencies in the application as well as short comings with the project itself. There are several items the Town of Woodstock will expand upon.

The Town of Woodstock is concerned about the rapid fluctuation in the lower reservoirs created by this project. This causes dangerous conditions for the ecosystems and especially the ecologically rich riparian areas where the freshwater meets the land and which would be especially vulnerable to these rapid changes. Additionally, the cycling or rapid soaking followed by exposure will loosen the soil along the banks of the nearby streams, causing soil erosion which could be severe to very severe. The sediment crumbling into the streams will add to the already problematic issues of turbidity in the area which threaten drinking water quality, trout habitat, and recreation and tourism. If the repeated flooding of the buffer zones takes place in areas where vegetation is left or planted, the erosion could be less severe but the anaerobic environment created would release methane which is a potent greenhouse gas.

The Catskills Forest Preserve was created in 1885 and is protected under Article XIV of the New York State Constitution, stating the 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 Catskills are considered Status 1 land under the USGS "Gap Analysis Program" which are areas the Department of Energy avoids for development, per their *Hydropower Vision*.

We would point out the creation of the Preserve hastened an end to many of the area's economic engines; logging, farming and quarrying to name a few. The Town of Woodstock and County of Ulster have now come to rely on tourism as huge part of our economy. The natural beauty of the area draws visitors from around the world. A large commercial project such as this would be detrimental.

The area is home to a number of rare and endangered species as well as being some of the top quality (top 1%) forest in New York State, according to the New York State Forest Condition Index, which measures criteria such as size, connectivity, biodiversity, habitat value, and ecosystem value. A core forest, which is what we have in this area, is over 500 acres. In addition to supporting biodiversity of interior species, a forest such as the one at the proposed site is a valuable carbon sink.

The proposed areas all fall within Audubon's Catskill Peaks Important Bird Area, home to many NY Species of Greatest Conservation need including the Black-Throated Blue Warbler, Scarlet Tanager, Wood Thrush, species of Raptors, and the NY Threatened Long-Eared Bat. The forest interior is home to many sensitive Bat species as well as snake species. Because this is a protected ecosystem, any human interference (and especially an intrusive and lengthy project like the one proposed) would have a deleterious effect on these habitats virtually untouched by humans. Furthermore, the fragmentation and damage caused to a core forest would decrease the quality of the habitat, making it vulnerable to invasive species, disrupting the movement of wildlife, and causing the spread of disease, such as Lyme Disease. It would also threaten the forest's ability to sequester carbon.

The stream ecosystems which would be affected by this proposal are similarly important ecosystems, many designated as Trout Waters and Trout Spawning Waters, and home to the Brook Trout, the state Freshwater Fish of New York and a Species of Greatest Conservation Need in NYS. The disturbance to these habitats from turbidity and increased water temperature would have a negative impact on these protected species, which are also an important food source for the Bald Eagles in the area.

The Town of Woodstock respectfully asks the Commission to take these points into consideration and deny the requested permit.

Sincerely,



Bill McKenna
Supervisor, Town of Woodstock