



New York Chapter of Backcountry Hunters & Anglers
“The sportsmen’s voice for our wild public lands, waters and wildlife”
www.backcountryhunters.org

April 11, 2021

Online submission

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

**RE: MOTION TO INTERVENE
Docket # P-15056 – Ashokan Pumped Storage Project**

Dear Secretary Bose:

Pursuant to Rule 214 of the Rules, Practices and Procedures (18 CFR Section 385.314), New York Chapter of Backcountry Hunters & Anglers (“NY BHA”) hereby petitions the Federal Energy Regulatory Commission to grant it full party status in the above captioned proceeding. The persons to whom communications should be addressed and to whom service should be made are as follows:

Glen Stratton, NY BHA Chair
725 W Alder, Suite 11
Missoula, MT 59802
newyork@backcountryhunters.org

John L. Barone, NY BHA Board Member
Tooher & Barone, LLP
313 Hamilton Street
Albany, NY 12210
Jbarone789@gmail.com

As grounds for this Motion, NY BHA states as follows:

Backcountry Hunters & Anglers seeks to ensure North America's outdoor heritage of hunting and fishing in a natural setting. Backcountry Hunters & Anglers is a non-profit 501(c)(3) corporation with NY BHA as the New York Chapter of the organization.

NY BHA a dedicated group of conservation-minded hunters and anglers in the State of New York. As a nonprofit organization with approximately 1,000 members in New York State, many

of which who reside in the Catskill Mountains, NY BHA has a vital interest in the Preliminary Permit application submitted to the Commission by Premium Energy Holdings for the Ashokan Pumped Storage Project (P-15056) (the "Project"). NY BHA acts on behalf of its members to protect and promote our region's extraordinary natural heritage, while promoting hunting and angling throughout the State and therefore, the organization has an interest in the preservation of New York's fisheries and hunting habitat. The Ashokan Reservoir and the surrounding waters (e.g., the Esopus Creek) are noted cold water fisheries important to the angling community. Additionally, the surrounding lands are pristine habitat for flora and fauna (including deer, bear, turkey and other game species) that act as a key piece of the fishery ecosystem. These resources are important to the hunting and angling community and thus, NY BHA has a special interest in their preservation.

Many of NY BHA's members reside, work and/or recreate: (i) at and within 15 miles of the Ashokan Reservoir, (ii) at and within 15 miles of the proposed alternative sites for the Ashokan Pumped Storage Project's Upper Reservoir, or (iii) in New York City or in other towns and cities served by the Ashokan Reservoir as a source of drinking water. NY BHA seeks to intervene regarding the Project to ensure the interests of its members and the mission of the organization are adequately represented and well preserved. Our members stand at risk of serious harms from the construction and operation of the Project, as well as from additional infrastructure necessary to service it, such as the Ashokan Switchyard, powerhouse and transmission lines.

No other party represents NY BHA'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. NY BHA and its members have a unique and substantial interest in this matter. In light of the foregoing, NY BHA respectfully petitions for intervention.

Very truly yours,

A handwritten signature in cursive script, appearing to read "John L. Barone".

John L. Barone
NY BHA Board Member