



WOODSTOCK LAND CONSERVANCY

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April 9, 2021

VIA ELECTRONIC MAIL

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

Directors

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Maxanne Resnick
Executive Director

Ellie Reese
Program and Outreach

Re: Project P-15056 Ashokan Pumped Storage

Dear Secretary Bose:

Woodstock Land Conservancy requests that FERC withhold approvals for a Preliminary Permit requested by Premium Energy Holdings, LLC. The proposed siting of the project would have a significant detrimental impact to both New York City's drinking water supply, as well as a number of other communities whose water supply is dependent on this region, and would greatly impact the NYS Constitutionally-protected lands located in the Catskill Park, two hours north of New York City. The Catskill Park economy to a great degree is supported by its recreational offerings and the tourism that its natural beauty engenders. Among the recreational offerings are world-class trout fly-fishing with the Esopus River designated as a Wild-Quality stream by NYS's Department of Environmental Conservation.

The Catskill Park is one of two such parks in New York State, the other being the Adirondack Park. The State has committed enormous taxpayer resources to these parks in constitutoinally protecting them and their important forests, habitats for a variety of species, some endangered, important waterways and recreational uses, and the appeal they have to the millions of annual visitors. The Catskill Park's conserved lands account for more than half of its 700,000 acres. It is notable that the local topography in the proposed project area is a mountainous one with narrow valleys that have two-lane roadways and settlements. Any displacement of towns, residences, and infrastructure would be quite challenging as there is little valley land to accommodate these changes.

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The proposed project would cause great impact on the lands, and create increased erosion into the waterways which flow to the Ashokan Reservoir, which is an unfiltered drinking water system supplying 40% of NYC's drinking water. NYC's Department of Environmental Protection which operates the drinking water supply system has numerous staff to control and protect these waterways. Sediment in the water is a huge issue to the water supply. And NYC is committed to a multi-billion dollar capital infrastructure project planned for the coming 10 years to continue its protection of this unfiltered water system. Adding another large-scale infrastructure project may not be possible to be coordinated with NYC's plans, and certainly seems improbable for the local roadways to accommodate in their narrow valley corridors.

In the past year, with the challenges of COVID-19, this area has also experienced tremendous growth, with many more NYC dwellers seeking full-time housing, some of them weekenders previously, and large visitation numbers from people seeking a respite in nature. A newly-opened (October 2019) rail trail along the Ashokan Reservoir's north shore has had more than 275,000 visitors, with a daily-total high of nearly 2,000 visitors. This trail, known as Ashokan Rail Trail, with its significant beauty is becoming known nation-wide and world-wide, and will only see an increase in these numbers in the coming years.

As the project comments roll in from a number of agencies, organizations and individuals, I imagine a clearer picture is being painted as to how the proposed project is ill-advised for this area – and reflects the challenges that would have been apparent to the applicant had they visited the area, rather than planning it from afar. In conclusion, we respectfully request a denial of this preliminary permit. If not, I am sure that there will be many court challenges, at a great expense for all, and will carry on well into the future.

With appreciation for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Maxanne Resnick". The signature is written in a cursive, flowing style.

Maxanne Resnick
Executive Director