



Greene County Watershed Assistance Program

PO Box 996, Tannersville, NY 12485
Phone (518) 589-6871 Fax (518) 589-6874

April 12, 2021

Kimberly D. Bose
Federal Energy Regulatory Commission
888 First St. NE Room 1A
Washington, D.C. 20426

Re: PROJECT P-15056 ASHOKAN PUMPED STORAGE PROJECT

Dear Ms. Bose,

The Greene County Soil and Water Conservation District Watershed Assistance Program respectfully submits these comments in response to Premium Energy Holdings' application for a preliminary permit to build a hydroelectric facility to produce 800 MWs of electricity.

It is clear the applicant does not have a full grasp of the complexity of the region in which they propose the pumped storage project. The geology of and impacts to the drinking water supply for millions of New Yorkers alone should be enough to prevent the application from advancing. In order to remain an unfiltered water supply, the NYC Department of Environmental Protection must meet stringent water quality standards dictated by NYS public health law and federal Surface Water Treatment Rule criteria. The project would seriously affect the operation of the Ashokan Reservoir, which provides 40% of the daily water intake by NYC and surrounding communities.

Other noteworthy problems with the project, and covered by many, include the devastating impacts to the environment (wildlife, fish and protective bird habitat), the infringement of the protective status of the Catskill Park Forest Preserve, the social and economic impacts to the region which relies heavily on outdoor-based recreation tourism, the destruction of the hamlet of Lanesville and State Route 214 which is a NYS-designated Scenic Byway, the cutting off of Rte. 214 as a major thoroughfare between Greene and Ulster Counties, and the poorly presented information in the application. There should be a standard applicants must meet when applying for a preliminary permit, one that requires a sound basis and understanding of a proposed project in relation to its geographic location. The applicant does not appear to have any idea how problematic the project is given its location within NYS constituently protected land and the NYC drinking water supply.

It would behoove the Commission to deny this preliminary permit on the basis that is has too many problems associated with it, will require significant resources to process them, and in the end, is not in the public's benefit. Thank you for the opportunity to comment.

Sincerely,

Michelle Yost
WAP Coordinator