

Coalition of Watershed Towns

c/o Delaware County Department of Watershed Affairs

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coalitionofwatershedtowns.org

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April 9, 2021

Online Submission – Motion to Intervene; Ashokan Pump Storage Project

Ms. Kimberly Bose

Secretary

Federal Energy Regulatory Commission

888 First Street NE

Washington, DC 20426

Re: Motion to Intervene, Docket # P-15056 – Ashokan Pump Storage Project

Dear Secretary Bose:

Pursuant to Rule 214 of the Rules, Practices and Procedures of the Federal Energy Regulatory Commission (18 CFR §385.314), the Coalition of Watershed Towns (“CWT”), an intergovernmental organization comprising the towns and villages constituting the west-of-hudson New York City watershed, hereby petitions the Federal Energy Regulatory Commission to grant it full party status in the above-referenced proceeding.

The persons to whom communications should be addressed and to whom service should be made are as follows:

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Grounds for Party Status

The Coalition of Watershed Towns (“CWT”) is an inter-municipal cooperative organization pursuant to Article 5-G of the New York State General Municipal Law.

The CWT is comprised of the approximately 40 towns and villages that make up that portion of the New York

City water supply system that lies west of the Hudson River and consists of the Catskill and Delaware portions of the New York City Water Supply. The CWT was formed in 1991 in response to efforts by New York City to obtain a Filtration Avoidance Determination from the Surface Water Treatment Rule of the Safe Drinking Water Act (42 U.S.C. §300f et seq.; 40 CFR Part 141). At that time, New York City was seeking to avoid having to filter its surface water supply by adopting land-use regulations which would have a draconian impact on the watershed communities. The City also proposed a land acquisition program that sought to acquire hundreds of thousands of acres by the use of eminent domain. The CWT was formed as vehicle for the watershed communities, which are all small municipalities with limited resources, to work collectively to mitigate the impacts of the City's proposed watershed protection program. The CWT's efforts culminated in the historic 1997 New York City Watershed Memorandum of Agreement and a new watershed protection program that included a more focused regulatory program that respected the need to maintain sustainable communities, a land acquisition program that relied upon willing sellers and willing buyers and prohibited the use of eminent domain and an infrastructure improvement program that brought hundreds of millions of dollars to the watershed communities to improve, *inter alia*, septic systems and community wastewater projects throughout the west-of-hudson watershed.

The proposed pump storage project has the potential to have similarly significant impacts on the watershed communities. The preliminary design of the project would involve multiple municipalities and regional impacts demonstrating once again that inter-municipal cooperation and advocacy are some of the best means to assure that small communities have an effective voice in the permitting process. Therefore, the Coalition of Watershed Towns is in a unique position to represent the needs of the Catskill communities that may be affected by this project. Granting this motion will neither disrupt the proceeding nor create any additional burden to any party as a result of granting this motion. For the foregoing reasons, the Coalition of Watershed Towns respectfully requests that the Commission grant this motion to intervene as a full party.

Respectfully submitted,

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

Jeffrey S. Baker
Counsel to the Coalition of Watershed Towns.