

March 25th, 2021
P.O. Box 119
Phoenicia, NY 12464

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

Re: Project P-15056 Ashokan Pumped Storage

Dear Secretary Bose:

These comments are submitted on behalf of the Ashokan-Pepacton Watershed Chapter of Trout Unlimited, a member of the New York State Council of Trout Unlimited. Our chapter has approximately one-hundred-twenty members, of which over forty percent live in the Towns of Olive and Shandaken, directly impacted by this proposal. Almost all of our members recreate in these towns.

The Ashokan Reservoir is part of New York City's water supply system, meeting approximately forty percent of NYC's water needs. It is the oldest of NYC's six Catskill water supply impoundments, and the second largest. It is also the only NYC Catskill reservoir that was constructed with two separate basins, an east and west basin. The west basin, or upper basin, was constructed to serve as a settling basin allowing the periodic turbid inflows to the reservoir to settle out, thus avoiding a need to filter this drinking water. Since its construction in 1915, over one hundred years of sedimentation have settled in the west basin, where Premium Energy Holdings seeks to construct a pumped storage facility.

To date, water utilized by NYC residents remains unfiltered. If a pumped storage project is built on the Ashokan, there is every reason to believe that turbidity would be created by the pumping and releasing of water from and into the Ashokan. In a similar request before FERC for a license to construct a pumped storage project on NYC's Schoharie Reservoir at Prattsville, Project # 2729, New York City retained Lamont-Doherty Earth Observatory as a consultant. On page 12 of a report produced by NYC's consultant it noted that such the operation of such could "create an unacceptable human health risk." Furthermore, appropriately twenty municipalities draw water from NYC's Catskill aqueduct as water is transferred downstate to NYC residents. These users would be placed at risk also.

To further exacerbate this condition, during summer months, on most typical water years, up to ninety percent of the water in the Esopus Creek comes from water being diverted to the Ashokan via NYC's Shandaken Tunnel. Often during these periods this water tends to be turbid. Hence, the operation of a pump storage facility on the Ashokan will only keep silt suspended in the water column that much longer.

The Ashokan Reservoir currently is a two-story reservoir, that is, it stratifies into warm and cold-water sections throughout the year. As such, it supports a robust population of wild rainbow and brown trout in the cold-water portion. This provides sport fishing within the reservoir, which is an economic draw to recreational based Ulster County economy, and also a source of recruitment for the renowned Esopus Creek trout fishery. This fact has a long, distinguished history of doing such. Theodore Gordon, considered the Father of American Trout Fishing, acknowledged such on May 31st, 1913, when he wrote,

"By the way, the new Shokan dam, in the Catskills, will afford the finest trout fishing in America, if properly treated, and not spoiled by the introduction of other predatory fish. It will be stocked naturally from the Esopus with rainbow and European trout of good size and quality."

Rainbow trout are known zooplankton eaters. A constant turbid state in the Ashokan from operation of this project will adversely impact both zooplankton and rainbow trout. The interconnection of the Ashokan Reservoir and Esopus Creek fisheries has long been recognized. Recently the NYS Department of Environmental Conservation reclassified the Esopus Creek as a Wild-Quality stream, under their newly approved Trout Management Plan. This will benefit both the environment, plus the local economy as anglers come.

Our Trout Unlimited chapter conducted two “Heritage Brook Trout Studies”, in portions of the watershed that could be adversely affected by this proposal. Fin samples of brook trout were taken, and their DNA was analyzed by Dr. Spencer Bruce, of the University at Albany. Dr. Bruce is noted for his work in this field. In 2019 in West Shokan, on South Hollow, Dr. Bruce concluded from data collected that the brook trout were a unique Heritage strain. This tributary is in close proximity to Wittenberg, where one might conclude brook trout there are likewise also. In 2020 we studied a tributary in Stony Clove. Due to Covid, analysis of these fish samples has been delayed, but our chapter expects similar results. This study was done in partnership with the NYS Department of Environmental Conservation, Region 3 Fisheries as part of their ongoing Eastern Brook Trout Joint Venture studies. It is possible the headwaters of all three alternative sites support Heritage brook trout populations, that would be lost should this project be allowed.

In recent years there have been numerous papers and studies acknowledging brook trout--- the New York State fish--- are threatened and on the decline. To name but a few:

E.P.A, 2015. Climate Change in the United States: Benefits of Global Action. United States Environmental Protection Agency. Office of Atmospheric Programs,

EPA. 430-R-15-001, Washington D.C.

Stranko, S. A., Hilderbrand, R. H., Morgan, R. P., Staley, M. W., Becker, A. J., Roseberry-Lincoln, A., ... & Jacobson, P. T. (2008). Brook trout declines with land cover and temperature changes in Maryland. *North American Journal of Fisheries Management*, 28(4), 1223-1232.

Siderhurst, L. A., Griscom, H. P., Hudy, M., & Bortolot, Z. J. (2010). Changes in light levels and stream temperatures with loss of eastern hemlock (*Tsuga canadensis*) at a southern Appalachian stream: implications for brook trout. *Forest Ecology and Management*, 260(10), 1677-1688.

Wenger, S. J., Isaak, D. J., Luce, C. H., Neville, H. M., Fausch, K. D., Dunham, J. B., ... & Williams, J. E. (2011). Flow regime, temperature, and biotic interactions drive differential declines of trout species under climate change. *Proceedings of the National Academy of Sciences*, 108(34), 14175-14180.

There are serious issues with how this proposal will affect the New York State Forest Preserve lands and their established, protected uses for the people of New York.

Noted issues with this proposal will negatively impact drinking water quality, the environment, economy, NYS constitution protecting the Catskill Forest Preserve, history, and well-being of people living in the area of the P-15056. We believe these issues outweigh any potential benefits of the project. The applicant has not established a clearly defined need for such a project. Therefore, we respectfully request that FERC deny approval.

Sincerely,
/s/

Edward D. Ostapczuk
Ashokan-Pepacton Watershed Trout Unlimited,
Board of Directors

Ecc: William H. Wellman, NYSC Trout Unlimited
Ted Hoover, CMC TU