

Reasons to Write No

Write to Protest the Proposed Pump Storage Hydroelectric Plant

(the FERC project number, P-15056)

Over 100 years ago, our valleys were flooded, our towns and destroyed and relocated, and our livelihoods threatened. Write today to stop it from happening again in our Catskill Mountains.

Submit a letter to FERC today. Write your own personal reasons, but include a few highly effective reasons below also in your comments. With good reasoning, we can fight this bad proposal. Sustainable and renewable energy is important, but this plan is not good for our area-our Catskill Mountains. We have until April 12th to change this. Despite the unpopularity of this proposal, only around 300+ comments have been submitted. We can do better than that.

Select the ones that matter the most to you. Change the wording, don't just copy and paste. Make your voice heard. Don't just say don't do it or it is intrusive.

Highly Effective Reasons

- *Impacts on highly preserved land*
 - A Highly Preserved Land
 - The Catskills Forest Preserve created in 1885 in Ulster County
 - Under Article XIV of the NYS Constitution, the lands *"shall be forever kept as wild forest lands. They shall not be leased, sold or exchanged, or be taken by any corporation, public or private."*
 - The Preserve is 700,000 acres of continuous wildlife habitat in an increasingly fragmented environment; the forest around the proposed sites ranks among the top 1% of forest habitats region-wide according to the New York State Forest Condition Index.
 - All proposed reservoirs fall within Audubon's Catskill Peaks Important Bird Area: see [https:// www.audubon.org/important-bird-areas/catskills-peaks-area](https://www.audubon.org/important-bird-areas/catskills-peaks-area)
 - KEY POINT: As a State Forest Preserve, the Catskills are considered Status 1 land under USGS "Gap Analysis Program." According to the Dept. of Energy's own Hydropower Vision, "areas with formal protections designated as Status 1 or 2 under the USGS Gap Analysis Program are avoided for development."
 - *According to The Catskill Park: Inside the Blue Line*-Changes to land management in the State Forest Preserves must be passed by constitutional amendment, voted on by two consecutive sessions in the state legislature, then submitted to the public in a referendum
- *Impacts on Stream Ecology*
 - Pumped storage upper reservoirs are subject to rapid fluctuations of water which wreak havoc on both aquatic and land habitats

- Altering the sediment regime in tributaries to the Esopus will alter the sediment regime in the Esopus, one of the Catskills' most vital trout waters and part of the NYC water supply
 - Valuable trout breeding habitat would be lost
- *Impacts to NYC water supply*
 - According to the DEP-Provides 40% of NYC's water, a water supply that provides 1 billion gallons a day to 9.5 million people
 - The largest unfiltered water supply in the nation, built at the cost of displacing 25 communities
 - A NYC valuable capital asset, representing billions of dollars of investment; \$1.7 billion since the 1990s alone
 - Meets current NYC needs, but climate change produces uncertainty about its future ability to do so: evaporation, heat events, and decreasing snowpack.
- *Impacts on Catskills tourism economy*
 - Tourism is an integral part of the NYS economy and continues to grow
 - Tourism generated 17% of employment in the Catskill region in 2019
 - A \$1.6 billion industry in the region, supporting roughly 20,000 jobs
 - Ulster County represents 43% of that market
 - Second homes generate \$360 million in economic activity
 - Source: *Tourism Economics, "Economic Impact of Tourism in NY, 2019"*
- *This is not the innovation that Department of Energy would want*
 - Closed-loop projects are considered to have smaller environmental impact and are thus eligible for streamlined FERC approval; that's why Premium is claiming to be "closed-loop."
 - • Projects where an upper reservoir is added to an existing lower reservoir are known as "add-on" projects; that's what this really is. They are lying.
 - • "Initial construction impacts" for these projects are lower, but "operational impacts are still likely to be higher than for a closed-loop project because the add-on project's lower reservoir is still continuously connected to, and may affect, the natural flowing water feature that was dammed for its original construction."
 - Source: DoE: "A Comparison of the Env. Effects of Open Loop and Closed-Loop Pumped Storage Hydropower." April 2020

Special Thanks to Ginger Strand for her PPT presentation as well as all the research and information on how best to protest this proposal.