



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:

On behalf of the Catskill Mountains Chapter of Trout Unlimited I would like to submit comments regarding Project P-15056 Ashokan Pumped Storage. The Catskill Mountains Chapter of Trout Unlimited is the oldest TU Chapter in New York State, beginning in 1964 and has been working for clean cold water for trout since then. CMCTU has approximately one hundred and seventy members and is a member of the New York State Council of Trout Unlimited.

The proposal indicates that the Ashokan Pump would operate in a “closed loop”. This is inaccurate as the Esopus Creek flows into and out of the Ashokan reservoir in addition to serving the needs for New York water supply. A 2020 Department Energy Report (<https://www.energy.gov/sites/default/files/2020/04/f73/comparison-of-environmental-effects-open-loop-closed-loop-psh-1.pdf>) confirms this distinction as an open loop design and highlights increased environmental concerns that are associated with the design.

Storage Research on open-loop hydro energy storage projects have noted relatively higher impacts on fish and other aquatic ecology. Examples include but are not limited to:

- An increase in sedimentation and deposits. due to rapid water level fluctuations
- Changes in reservoir water circulation patterns due to pumping and generating operations
- Potential impact to thermal stratification
- Oxygen and nutrient cycling within the water column
- Loss of juvenile fish due to pump mortality
- Impact aquatic food and invertebrates essential for fish populations

This proposal would have a significant impact of the wild trout fishery in the reservoir in addition to the headwaters of Esopus Creek and tributaries that flow into the reservoir. In 2020, the Esopus Creek was classified by the NY State Department of Environmental Conservation as a wild quality trout fishery as it maintains a self-sustaining brown and rainbow trout population that live and spawn in the Ashokan and Esopus Creek watershed. The proposed pump storage solution would disrupt temperature, sediment, and aquatic habitat that supports wild, naturally spawning fish populations.

It is worth noting that the Ashokan Reservoir is also highly managed source of water for New York City whose management plan is focused on water quality and clarity. This limits direct recreational use (no motorized boating, camping, swimming, etc.) to maintain the highest level of water quality. The proposed Ashokan pump storage station would negatively impact water quality and would increase the negative impacts of sedimentation.

Finally, this proposal would require the use of land for this proposal would be contained within the NY State Forest Preserve. Article XIV of the NY State Constitution explicitly designates the land and forever wild.

Issues with this proposal will impact the environment, drinking water quality, and recreational economy far outweighing any benefits. Therefore, we respectfully request that FERC deny approval.

Regards,

Ted Hoover
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