

9 April 2021

Online submission - Motion to Intervene: Ashokan Pump Storage Docket # P-15056

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

RE: MOTION TO INTERVENE Docket # P-15056 – Ashokan Pumped Storage Project

Dear Secretary Bose:

Pursuant to Rule 214 of the Rules, Practices and Procedures (18 CFR Section 385.314), ADK (Adirondack Mountain Club), a non-profit organization with its primary office in Lake George, Warren County, New York, hereby petitions the Federal Energy Regulatory Commission to grant it full party status in the above captioned proceeding. The persons to whom communications should be addressed and to whom service should be made are as follows:

Cathy Pedler Director of Advocacy Adirondack Mountain Club Lake George, NY 12845 <a href="mailto:cathy@adk.org">cathy@adk.org</a> <a href="mailto:cathypedler.adk@gmail.com">cathypedler.adk@gmail.com</a> 518-449-3870	Michael Barrett Executive Director Adirondack Mountain Club Lake George, NY 12845 <a href="mailto:michael@adk.org">michael@adk.org</a> 518-668-4447
---	--

As grounds for this Motion, ADK states as follows:

Adirondack Mountain Club, a 501(c)(3) non-profit organization, has a vital interest in the Preliminary Permit application submitted to the Commission by Premium Energy Holdings for the Ashokan Pumped Storage Project (P-15056).

Adirondack Mountain Club with 30,000 members, many of whom recreate in the Catskill Park, protects New York's wild lands and waters by promoting responsible outdoor recreation and building a statewide constituency of land stewardship advocates. ADK is a member and volunteer-supported organization which reaches across New York through its 27 chapters, including in the Catskills Region and in New York City, to inspire people to enjoy the outdoors ethically. With a focus on the Forest Preserve of the Adirondack and Catskill Parks, ADK has worked since 1922 to increase access to the backcountry by building trails, conserving natural areas, and developing a stewardship community that supports ethical and safe use of New York's outdoor spaces. The Ashokan Pumped Storage Project (P-15056) is located within the Catskill Park, so it is of special interest to ADK and our

members, and would be surrounded on three sides and directly adjacent to the Slide Mountain Wilderness and Slide Mountain and other popular peaks for hikers and outdoor recreators. To the south of the proposed project is the Sundown Wild Forest and the Ashokan High Point. The Ashokan Reservoir and its New York City Department of Environmental Protection Watershed Recreation lands are also popular recreation areas. All of these public land areas surrounding and directly adjacent to the Ashokan Pumped Storage Project (P-15056) are used by ADK members and the recreation community that ADK represents.

Adirondack Mountain Club seeks to become a party to this proceeding to ensure the public interests of its members and others who recreate in the Catskill Park and in the Slide Mountain Wilderness, the Sundown Wild Forest, and around the Ashokan Reservoir are adequately represented.

Our members stand at risk of serious harms from the construction and operation of the project, as well as from additional infrastructure necessary to service it, such as the Ashokan Switchyard, powerhouse, and transmission lines. Accordingly, Adirondack Mountain Club has a substantial interest in this matter. No other party represents Adirondack Mountain Club's interests, and no other party reasonably could do so. Neither disruption to the proceedings nor any additional burden to any party will result from the granting of this Motion. In light of the foregoing, Adirondack Mountain Club respectfully petitions for intervention.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Barrett".

Michael Barrett  
Executive Director  
[Michael@adk.org](mailto:Michael@adk.org)  
518-668-4447

A handwritten signature in black ink, appearing to read "Cathy Pedler".

Cathy Pedler  
Director of Advocacy  
[cathy@adk.org](mailto:cathy@adk.org)  
[Cathypedler.adk@gmail.com](mailto:Cathypedler.adk@gmail.com)  
518-449-3870