

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK
ALBANY DIVISION**

STATE OF WEST VIRGINIA, et al.,

Plaintiffs,

v.

LETITIA JAMES, et al.,

Defendants,

and

WEST HARLEM ENVIRONMENTAL
ACTION, INC., BLACK FARMERS UNITED-
NEW YORK STATE, INC., CITIZENS
CAMPAIGN FOR THE ENVIRONMENT, and
CATSKILL MOUNTAINKEEPER,

*Proposed Defendant-
Intervenors.*

Civil Action No. 1:25-cv-168 (BKS/DJS)

DECLARATION OF RAMSAY ADAMS

I, Ramsay Adams, declare as follows:

1. I am the Executive Director of Catskill Mountainkeeper, a role I have held since founding the organization in 2006. Catskill Mountainkeeper's mission is to protect the Catskill Park and Region by supporting policies and strategies that safeguard its natural environment and promote sustainable, resilient, and just communities. The Catskill region stretches across a portion of Southeast New York State between Albany and New York City. The heart of the region is the Catskill Park, which is made up of 700,000 acres in four counties: Sullivan, Delaware, Greene, and Ulster.

2. Catskill Mountainkeeper has eight staff members, including me. As a 501(c)(3) nonprofit organization, we rely on support from more than 700 individuals, foundations, and other donors.

3. The Catskill region is one of the nation's most heavily visited recreation sites. It also provides 90% of all drinking water for New York City.¹ Our six reservoirs in the Catskill-Delaware Watershed are the largest unfiltered source of drinking water in the United States.

4. The Catskill region has been extensively harmed by the effects of climate change. Last November, for example, a severe drought led to a pause in the final phase of a critical project to repair the Delaware Aqueduct, which delivers half of New York City's water supply coming from the Catskill region.² This \$2 billion project is the largest in the history of the New York State Department of Environmental Protection. The aqueduct is in desperate need of improvements to avoid resource depletion: until the repairs are complete, each day nearly 35 million gallons of drinking water are lost to leaks.

5. The drought also contributed to wildfires that historically are uncommon in the region. The Catskills bore the brunt of the damage caused by the wildfires that tore through the state last November.³

6. The drought and wildfires last year are just two of many examples of the climate-induced disasters that have increasingly put our community and resources in peril. In the last ten years, several floods have devastated the Catskill region, including many categorized as "500-year floods" (meaning floods with a 0.2% chance of occurring in any given year). In 2011, the Town of Prattsville in Greene County was almost entirely wiped out by floods stemming from Hurricane Irene.⁴ Roscoe and Livingston Manor, two towns in Sullivan County, have been the

¹ <https://catskillsvisitorcenter.org/catskills-watershed-resources/>

² <https://www.nyc.gov/office-of-the-mayor/news/839-24/mayor-adams-elevates-drought-level-warning-pauses-delaware-aqueduct-repair-project-orders-city>

³ <https://www.newyorkupstate.com/catskills/2024/11/30-ny-counties-at-high-risk-of-wildfires-as-crews-battle-blazes-what-you-should-know.html>

⁴ <https://www.nytimes.com/2011/08/30/nyregion/storm-leaves-catskill-towns-little-but-debris.html>

victim of multiple catastrophic floods that have ravaged homes, destroyed downtown regions, and even killed members of our community.⁵

7. The impacts of flooding are personal for Catskill Mountainkeeper. In 2017, one of the floods that devastated Livingston Manor swept through our office. The flood destroyed our audiovisual equipment, which was essential for our programs and documented our work and history. The flood also destroyed all our file cabinets, resulting in the loss of important historic files, collectibles, and artifacts we have collected since the organization's start. The damage from the flood contaminated our office with mold, making the space uninhabitable and forcing us to relocate our base of operations.

8. The Catskill region is not built to withstand the climate disasters that are increasingly unpredictable and persistent. Our community cannot afford to continue relying on infrastructure that dates to the early 20th century and was not planned to withstand the climate-induced stressors we have struggled with in the last decade.

9. Catskill Mountainkeeper has been on the frontlines of the fight to mitigate the climate crisis-related risks to our region by challenging our state and local governments to join New Yorkers in building a safer, more resilient future. We were one of the founding members of the New York Renews coalition, a group of over 300 organizations that advocates for climate justice. We played a pivotal role in urging the New York State Legislature to pass the 2019 Climate Leadership and Community Protection Act, which commits the state to binding greenhouse gas emission reduction limits. We were part of the fight to ban natural gas hydraulic fracturing or "fracking" in New York and along the four-state Delaware River Basin. And we have opposed proposed new natural gas pipelines and power plants that would increase greenhouse gas emissions in New York.

⁵ *E.g.*: <https://vinnews.com/2011/08/28/sullivan-county-ny-evacuations-ordered-in-roscoe-livingston-manor/>

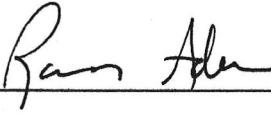
10. Catskill Mountainkeeper is also deeply invested in initiatives to provide clean energy alternatives as we fight dirty energy sources that are polluting our communities. We led Solarize Sullivan, a community-led, solar energy campaign, to ramp up solar deployment across the county. We also helped lead a “HeatSmart” campaign to make it easier for Catskill residents to install clean heating and cooling technology, including geothermal and heat-pump water heaters.

11. Even as we work to combat the climate crisis, we know that the Catskill region will continue to confront climate change-induced disasters. But there are steps we can take now to make the region more resilient to climate harms. One key step is to update the region’s infrastructure, such as its culverts and pipes. Our infrastructure is chronically and dangerously underfunded and is not built to tolerate additional storms. This includes critical infrastructure that supplies the majority of New York City’s drinking water.

12. Catskill Mountainkeeper supports New York’s Climate Change Superfund Act because the Catskill region desperately needs funding to update its infrastructure to better withstand the risks from climate crisis-related disasters. Our community is already suffering from the consequences of unpredictable storm patterns, and climate change threatens the region’s resources, including the reservoirs and infrastructure that supply drinking water to New York City. This law provides an opportunity to spur essential funding for overdue infrastructure projects to modernize our drinking water systems, homes, and businesses to become more resilient to climate change.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 3/28/25

A handwritten signature in cursive script, appearing to read "Ramsay Adams", is written above a solid horizontal line.

Ramsay Adams