



July 9, 2021

Mr. Devan Korn
NYS Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

Re. APA 2021-0075, Red Rock Quarry Project

Dear Mr. Korn:

A variety of concerns have already been expressed by the community of residents adjacent to and near this granite quarry project site about potential impacts to and from:

- White Lake,
- White Lake outlet and adjacent wetlands,
- ground water sources,
- noise, use of blasting of the granite,
- a historic site that may be eligible for the National Register,
- public safety out on Quarry Road and Rte. 28,
- and other concerns

Many of those concerns have not been substantively addressed yet by the applicant. For that reason, among others, APA had previously declared the application incomplete. Adirondack Wild shares the community's concerns which we do not feel are well addressed on the applicant's DEC Environmental Assessment form. In fact, a great many of the questions on the EA form are left blank.

APA has previously announced that this application will be subject to coordinated review between the agency and DEC. So far, we do not see evidence of much coordination. DEC has, incorrectly in our view, classified this project as Type II under SEQRA.

Studies equivalent to those required under an Environmental Impact Statement about White Lake outlet and groundwater that give the APA and DEC sufficient evidence and confidence there will be no impacts are needed. White Lake outlet and adjacent wetlands adjacent to the main access road to the quarry and just below the proposed quarry itself do not appear well protected.

Studies about micro blasting at this location need to test the applicant's unsubstantiated claims about its low level of impacts. Questions from the community and inputs from NYS DOT about public safety and traffic at the intersection of Quarry Road and Rt. 28 have not yet been followed up, to our knowledge.

As coordinating state agencies on this project, an informational meeting at this stage led by the DEC and APA should be held to uncover information and concerns. That information would help the agencies determine whether a more formal public hearing ought to be held as per agency regulations.

While the area around the proposed granite quarry is zoned Moderate Intensity Use and therefore under the APA statute allows for mineral extraction as a secondary use, the primary use here and primary reason for the land use class at this location are the dozens of private homes near or on White Lake and other lakes.

Secondary uses are those which are generally compatible with an area zoned MIU depending upon their particular location and impact upon nearby uses. Therefore, the agency and the department are obliged to substantively analyze the impact of this project at this particular location and on nearby uses and homeowners.

We believe that, given the actual and potential adverse impacts to natural resources like White Lake outlet and to neighbors, the level of public controversy, and the likelihood that new information derived in a hearing could lead to avoidance and mitigation of project impacts, or to a conclusion that the project as proposed poses undue adverse impacts and thus must be denied, a public hearing is called for under agency statute and hearing regulations.

Thank you.

Sincerely,

David Gibson, Managing Partner

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