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May 21, 2021

Sarah Staab (sarah.staab@apa.ny.gov)
NYS Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977

RE: Public comments on APA Project 2021-0075 White Lake Granite Quarry

Dear Sarah Staab:

Protect the Adirondacks has a number of concerns about the newly proposed White Lake Granite Quarry (APA Project 2021-0075) in the western Adirondack Park in the Town of Forestport, Oneida County. We have been contacted by a number of area residents and landowners near the mine and around White Lake. They have many concerns about the disruptive impacts of a new industrial use in a largely residential area.

The project is on a largely forested 56-acre tract on Stone Quarry Road, south of Route 28. Around 27 acres of this site will be actively mined over the life the proposed new mine. The site has not been a functioning mine for decades. More importantly, the site has not been active in recent decades while there has been significant residential development around the area's lakes.

The applicant proposes to start with a 5-acre area where the trees, flora and soils will be removed to expose the granite bedrock layer. Soil will be stockpiled on site. Large pits, with 40-foot high walls, will be opened as the mine pits are steadily enlarged. Large granite "bricks" will be cut using "diamond wire saws" and then loaded on trucks. Blasting will be necessary at times to break apart or break open the bedrock for mining operations.

This tract has history. Nearly 20 years ago there was an effort to open a new mine at this site, which was very controversial, and the applicant eventually withdrew the application. This was followed by an effort to develop the tract for residential properties. We believe that the lands in question should be used for residential purpose or for sustainable forest management. For a variety of reasons, Protect the Adirondacks opposes this project and finds it unsuitable for the residential White Lake area.

Land Characteristics: The 56 acres in question for the proposed White Lake Granite Quarry include lands classified as Moderate Intensity Use and Rural Use under the Adirondack Park Agency (APA) Land Use and Development Plan. Most of the Rural

Use lands will be dedicated to a buffer along the railway corridor on the south side of the project. All of the mining activities will be located on the Moderate Intensity Use (MIU) areas. In the Land Use and Development Plan, Section 805 3d (1) lists the character description of MIU areas as “those areas where the capability of the natural resources and the anticipated need for future development indicate that relatively intense development, primarily residential in character, is possible, desirable and suitable.”

Section 805 3d (2) states “Moderate intensity use areas will provide for development opportunities in areas where development will not significantly harm the relatively tolerant physical and biological resources. These areas are designed to provide for residential expansion and growth and to accommodate uses related to residential uses in the vicinity of hamlets where community services can most readily and economically be provided. Such growth and the services related to it will generally be at less intense levels than in hamlet areas.”

Whereas single family dwellings used for residential purposes are a “primary use” on Moderate Intensity Use areas “mineral extraction” and “mineral extraction buildings” are a secondary use. Residential use is the dominant use of MIU areas across the Adirondack Park.

The proposed White Lake Granite Quarry facility and operation is best suited for an Industrial Use area under the APA Act. In the 50 years of the APA Act, local officials in Forestport have never sought to change the land classification for the mine site to Industrial Use to pave the way for modern intensive mining activities. The proposed mine is not appropriate for a Moderate Intensity Use Area.

Noise: The noise data submitted is inadequate to evaluate the potential impacts of this project. The applications states:

A list of the simultaneously operating noise sources at the proposed mine site is as follows.

Sound levels of operating equipment measured at 50 feet (noise sources):

1. Front-end loader = 82.8 dB(A) Caterpillar 988F
2. Portable rock drill = 98.0 dB(A) Tam Rock 120 or equivalent
3. OTR flat-bed truck in operation = 71.2 dB(A)
4. Diamond wire saw w/portable generator = 84.0 dB(A)
5. Combined sound level at the source = 98.3 dB(A)

The application states that the “ambient sound level” around the property is estimated at 58 db(A) from traffic on Route 28. This is based on the traffic levels from Route 28 at around 2,500 cars per day. This assessment did not take into account the speed limit at 45 mph. The 58 db(A) level for the current noise level would not likely survive scrutiny from an independent noise assessment, and the surrounding residential neighborhoods are much quieter.

The noise impacts from potential mining activities are all over the 20 db(A) thresholds for new activities that the mining application states are “objectionable or intolerable” when changed from current conditions. The project seeks to introduce new noise levels 40 db(A) higher. The noise impacts from the mining activities will be intensely disruptive and change the character of the surrounding residential neighborhoods.

The noise attenuation models and projections provided are unlikely survive scrutiny from an independent noise assessment. The application projects that the topography of the land will mitigate industrial activities because they will be separated from residential areas by a small ridge, though the closest residence is within 600 feet. Much more information is necessary.

Blasting: The application talks about “microblasting” but provides no information on the frequency or the noise generated by these blasts. Much more information is needed to assess the impacts of blasting associated with this project.

Fugitive Dust and Airborne Particulate: The application states that the surrounding forest and ridge will somehow protect area residents from fugitive dust. While some dust may be filtered out by the forest there is a high likelihood that dust will be carried by prevailing winds above the tree line and to White Lake, the highway, and nearby residences. Much more information is needed about how the dust will be controlled during mining activities.

Truck Traffic: The application states that materials produced in this mine will be hauled off site by trucks. The application is weak about the number of truck trips per day, the route these trucks will take to access the property, the make and model of these trucks, and the noise from these trucks. Much more information is needed about truck traffic that is associated with the projected mining activities.

Hours of Operation: The application proposes a schedule to work long hours Monday to Friday from April to November as well as Saturday mornings. The application proposes hours of operation from 6AM to 7PM Monday to Friday and 7AM to noon on Saturdays. Given the negative impacts of a new industrial operation in a residential area, which will be the only industrial operation in the area, these long hours proposed by the applicant are just plain mean.

Conclusion: As stated above, the location of the White Lake Granite Quarry has not been an active industrial site for many decades, and the greater White Lake area has changed dramatically in that time and is now dominated by vacation homes and residential uses. The lands in this project were zoned under the APA Land Use and Development Plan primarily for residential uses as a Moderate Intensity Use area. The application as it currently exists is inadequate to fully assess the disruptive impacts of a new industrial facility in a residential neighborhood. The best use of these lands is for either residential development or sustainable forestry.

The APA needs to fully assess this project. The information in the application should be independently verified, and new information provided, through an official adjudicatory public hearing if this project is to move forward. Thank you very much.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer". The signature is fluid and cursive, with a large initial "P" and "B".

Peter Bauer,
Executive Director