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June 4, 2021

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Rob Lore (robert.lore@apa.ny.gov)
NYS Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977

RE: Public comments on the Barton Mines expansion project currently in pre-application

Dear Robert Lore:

Protect the Adirondacks has a number of concerns about the new plans being developed by Barton Mines in the Town of Johnsbury, in Warren County. Barton Mines is currently in pre-application meetings with the Adirondack Park Agency (APA) on perhaps the biggest expansion of its Ruby Mountain mining operation in North River. This is the only mountaintop removal mining operation in the Adirondack Park and merits close scrutiny. Protect the Adirondacks has been contacted by a number of local residents and organizations who have complained about intrusions from the mine on the rural quality of life of the greater Garnet Hill area during routine mining operations. After a review of recent APA permits for Barton Mines, Protect the Adirondacks believes that the APA must require a number of mining mitigation measures to protect the quality of life of local residents.

Noise: Residents across Garnet Hill on Harvey Road, Ruby Mountain View Road, 13 Lake Road, Beach Road, Lakeview Lane, Brookview Terrace, 4H Road, and Birch Mountain Road, among other places, report increased instances of noise from mining operations reaching their residences. Many of these houses are a mile away or more. The noise from mountain-top in-pit mining and onsite processing operations, including 24/7 operations, has significantly increased in recent years to a point where it is a constant nuisance to local residents and local businesses. Barton Mines needs to address noise mitigation measures in its new permit application and set up independent noise impacts studies.

Visual Impacts: The tailing piles at Barton Mines have been growing through the years. They are now visible over the treetops from stretches of 13th Lake Road and other locations. They are visible from nearby hiking peaks on the Forest Preserve. This is unacceptable. Barton Mines should not be allowed to degrade the local quality of life, or the

public experience on the Forest Preserve, with highly visible and intrusive tailings piles. Barton Mines needs to develop a program for commercial use of the tailings or company needs to begin restoration of disturbed areas so that the visual impacts of tailings piles can be mitigated. Barton Mines must include a visual impact analysis and mitigation plan so that its mining operations has no negative visual impacts of local residents or users of the Forest Preserve.

Water Quality: Many local residents have reported instances and sent us pictures of Thirteenth Brook running white due to debris or effluent from Barton Mines. Local anglers report the loss and degradation of the brook trout fishery in the stream. There needs to be an independent scientific analysis of the stream habitat and water quality of Thirteenth Brook. The company also needs to finance a multi-year study of the streams by an independent scientific institution or agent. Proposed groundwater extraction wells adjacent to 13th Brook may be hydraulically connected to the stream and could have deleterious impacts on stream flows. This should be examined by the APA and a full hydrology study is necessary.

Fugitive Dust and Airborne Particulate: Residents across Garnet Hill on Harvey Road, Ruby Mountain View Road, 13 Lake Road, Beach Road, Lakeview Lane, Brookview Terrace, 4H Road, and Birch Mountain Road, among other places, report frequent instances of their porches and windows covered with a white dust from the mines. Many of the residences are quite far from the mine, yet they find their property covered with mine dust. Dust plumes emanating from mine operations are frequently observed on area roads and from the Siamese Ponds Wilderness vistas. The potential for airborne respirable silica to impact human health needs to be evaluated. There needs to be an independent study of fugitive dust and particulate emanating from the mine and much more stringent mitigation measures put in place. Much more information is needed about how the dust will be controlled during mining activities.

Truck Traffic: Truck traffic at the mine appears to be increasing. Information needs to be provided on the number of truck trips and the makes/models of vehicles used. There needs to be limits set with hours of operation.

Hours of Operation: Given the noise intrusions on local residents' quality of life, there needs to be a reduction in the hours of operation. If Barton Mines cannot figure out a way to lessen the variety of negative impacts on local residents then the hours of operation at the mine must be reduced.

Impacts on the Forest Preserve: Barton Mines borders the Siamese Ponds Wilderness Area, one of the grand Wilderness Areas in the Adirondack Forest Preserve. The mine exports fugitive dust and noise onto the Forest Preserve as well as a visual blight. This is unacceptable. The APA must assess the negative impacts to the Forest Preserve from the Barton Mine activities.

Dark Skies and Light Pollution: Dark skies is one of the joys of life in the Adirondack Park. The mine is often illuminated at night and exports light pollution. The negative impact on dark skies should be assessed as part of the new application and permit.

NYCO Permit 96-76 is Model for New Barton Mines Permit: In the late 1990s NYCO Minerals, Inc. went through a joint APA-DEC official adjudicatory public hearing. At that time, NYCO minerals operated a mine on Seventy Mountain, sought a new mine on Oak Hill, and operated a trucking route from the mines in Lewis to the processing plant in Willsboro. This is similar to the Barton Mines operation on Ruby Mountain and its factory on the banks of the Hudson River.

A community group intervened in the public hearing, as did one of the groups that merged to form Pro-

tect the Adirondacks. The active participation from local residents was successful in a number of permit conditions that should be used as a model for the new APA permit for Barton Mines. These includes measures to monitor and limit noise, set hours of operation, water quality monitoring, noise monitoring, a citizens council that is provided with information, among many other measures to mitigate negative impacts on the rural residential quality of life. The APA and Barton Mines should look at this issue.

Conclusion: Barton Mines is a longstanding mining operation and processing plant in the Town of Johnsbury and Indian Lake, operating more than 100 years. In much of that time they operated as a good neighbor with area residents. But something has changed. The mine appears to be bulging at the seams and is now causing major negative impacts on the quality of life of local residents. The new APA permit, which will likely govern mine operations for years, must take into consideration these negative impacts and develop a permit that protect the environment and residential rural quality of life of neighboring property owners. Unfortunately, Barton Mines has not been forthcoming with information with neighboring landowners and has taken an aggressive position to dismiss their concerns.

The APA needs to fully assess this project. The information in the pre-application should be independently verified, and new information provided. This project is already highly controversial and ripe for an official adjudicatory public hearing if this project is to move forward.

On behalf of the Board of Directors of Protect the Adirondacks, please let me express our gratitude for the opportunity to submit these comments.

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

CC Barton Mines
Garnet Hill Association