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July 22, 2022

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NYS Department of Environmental Conservation  
232 Golf Course Rd.  
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**RE: Public comments on APA Project 2021-245 Barton Mines major expansion**

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Dear Mr. Lore and Ms. Magee:

Protect the Adirondacks submitted comments to the Adirondack Park Agency in June 2021 concerning the proposed expansion of the 850+/- acres Barton Mines in the Town of Johnsburg, Warren County. Since that time, Barton Mines submitted a permit application in October 2021. The APA issued a Notice of Incomplete Application (NIPA) on November 16, 2021. At this point, Barton Mines has not fully responded to the NIPA. Barton Mines is planning a wide-ranging expansion of its mining operations. The company is seeking to expand its mining footprint by more than one-third from 194.5 acres to 267 acres. The company is seeking to raise the elevation of its tailings/debris piles, now clearly visible above the tree tops from a number of locations, 100 more feet in height to 2,375 in total elevation. These piles are expected to bury 40 acres. The open pit will reach 17 acres. Barton Mines wants to run its industrial equipment 24 hours a day, which provides no relief for neighbors. Barton Mines is seeking to triple its truck loads driving up and down a steep and twisting County Route 78. Blasting levels will be doubled or tripled. These are all major issues that are critical to local neighbors in the Garnet Hill community that are seeking to live a peaceful rural life. These are also major issues to the many people who seek wilderness experiences in the Siamese Ponds Wilderness area, which borders the mine and is one of the great Wilderness areas in the Adirondack Park.

Peter Bauer  
**Executive Director**

Barton Mines has a storied history in Warren County and the Adirondack Park. We wish the company every good fortune as it moves ahead with its expansion plans. We do, however, believe that the company needs to take seriously the concerns of local residents who live nearby its Ruby Mountain mine, and it needs to do more to protect the

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*The picture at the top shows the Barton Mines on Ruby Mountain in 1998. The picture above shows the mines in 2021. The growth in the mine operations has been substantial over the years. The growth of this mine, and its off-site impacts, has not been adequately regulated and reviewed.*



*The picture shows the tailings pile as evident from County Route 78. Note the extensive exposed area. Note that visibility of industrial equipment on the right side of the pile.*

Forest Preserve. In short, Barton Mines needs to be a good neighbor. Many of the Barton Mine's changes, and growth of its mining operations, have been gradual since the mid-1980s. Yet, in the summer of 2022, this modest operation has grown into a large mountaintop mining operation that runs 24 hours a day and seven days a week, which is causing great distress for local residents who are simply trying to enjoy a decent rural quality of life and degrades the surrounding Forest Preserve.

There are many issues where Barton Mines needs to improve its management and mining operations. These include community outreach, visual impacts, noise, hours of operation, water quality, fugitive dust, truck traffic, light pollution, impacts to the Forest Preserve, climate change, and final closure design. Additionally, we provide relevant examples from APA permits that required various studies and long-term monitoring of mining impacts on nearby private residences.

**Visual Impact:** The visual impacts of the existing tailings pile has grown over the years as the tailings pile has grown in elevation. The tailings pile today is visible above the treetops from a number of locations, some as far away as Moxham Mountain. Often, the visual impact is exacerbated by large equipment at work on the pile. Whereas noise pollution cannot be seen, negative visual impacts are clear to the naked eye. The existing negative visual impact is unacceptable, yet Barton Mines is seeking to increase the height of the tailings pile by 100 feet.

It cannot be understated and must be front and center for regulatory agencies that 90% of the materials that Barton Mines removes from the ground is processed and then discarded as waste. The company tells us that just 4% of the material it removes from the ground is high-value "fine" material and

another 7-8% is usable. This is an incredibly destructive process that is slowly tearing apart Ruby Mountain just to remove less than 10% of the material mined. These discarded “waste” materials are causing a negative visual impact.

The proposed measures by Barton Mines fall short of what is needed to mitigate the visual impacts. The existing visual impacts analysis is incomplete.

The NIPA issued by the APA cites that Barton Mines is seeking to increase the tailings pile from 2,275 to 2,375 feet in elevation, which will expand the open face of the tailings area considerably. This alone will make the visual impacts significantly greater for the surrounding community. APA-DEC must consider:

- The Barton Mines visual impact analysis is inadequate because it seeks to limit the area of the exposed tailings pile to 4.13 acres. APA notes in its NIPA that “the 4.13-acre face view estimate does not account for side slope areas on the east or west nor lateral expansion below 2,275 feet. Given the RM pile is currently located on land designated Resource Management and is proposed to be expanded within the Wilderness Critical Environmental Area, please evaluate other alternatives that could reduce the proposed expansion of the RM pile.” The NIPA also notes “Mining of the southern highwall as proposed would result in the removal of a 2,100 foot forested ridgeline to an elevation of 1,950 feet, increasing the face view visibility of the quarry by an area approximately 150 feet tall by 1,400 feet long, totaling 4.82-acres of potential visibility increase.” These are all factors for which new information is needed and the record needs to be corrected.
- Many of the pictures provided by Barton Mines in its application are blurry or taken from locations that seek to minimize the impacts of the tailings pile. Regulatory agencies should demand better visual analysis.
- Barton Mines is also seeking to make considerable changes to the “entrance road” off of County Route 78. Little information is provided in the application about the visual impacts from the reconstruction of this roadway. APA-DEC need to request and assess visual a visual impacts assessment of the new roadway.
- The tree planting plan by Barton Mines is inadequate. First of all, it is a phased activity that falls near the end of the process. The existing visual impacts are unacceptable and there should be tree planting measures required in the short-term to mitigate the impacts of the existing tailings pile. Robust tree growth will go a long-ways towards mitigating the current negative visual impacts. Towards this end, Barton Mines should be required to undertake a vigorous tree planting program where seedlings and saplings are planted on a reconstructed exposed face of the tailings pile. Barton Mines will need an irrigation program and should be made to monitor tree growth and replant in areas where there is mortality. Any increases in the elevation of the tailings pile should be tied to the success of Barton Mines in reforesting the lower levels. The amount of tailings pile that is exposed and unfor-ested should be absolutely minimized and future elevation increases should be tied to performance standards for revegetation of the lower levels.
- The NIPA states “that the residual mineral storage area will be reclaimed in a manner consistent with the reports titled ‘Revegetation Testing Program Monitoring, Summer 1998’ and ‘Revegetation Test Program Monitoring, Summer/Fall 1999.’ These materials should be evaluated for their efficacy.
- The five mile visual impacts rule is inadequate to evaluate impacts in the Adirondack Park. The



*The picture shows the tailings pile at Barton Mines on Ruby Mountain with Thirteenth Lake and the Siamese Ponds Wilderness in the background. The mine is projected to grow to a point where the tailings pile on the mountaintop will be visible from Thirteenth Lake. Such visual intrusions to the Wilderness Area is unacceptable.*

visual impacts of this open pit mountaintop mine on Ruby Mountain are clearly seen from the Gore Mountain Ski Area and Moxham Mountain, two areas that are popular with the public. We agree with the comments of the Friends of Siamese Ponds that “The applicant’s viewshed analysis should include views from the Log House at Garnet Hill Lodge and the remnants of Hooper Mine. The Hooper Mine, a popular destination, may have the most direct visual and audible impacts from mine operations in the Forest Preserve.”

- The Forest Preserve is listed on the National Register of Historic Places. As such, the visual analysis provided by Barton Mines is inadequate to evaluate visual impacts to this historic natural resource area of national importance.
- Additionally, the applicant cites that this expansion will make the mine visible from Thirteenth Lake. This is unacceptable. This mine expansion should not be allowed to destroy the public’s wilderness views and experience from Thirteenth Lake. As mentioned above, the Forest Preserve, including Thirteenth Lake, is part of the National Register of Historic Places.
- The final design of the tailings pile that Barton Mines has submitted needs additional analysis and options. What Barton Mines has submitted looks like a capped industrial facility. It should be the goal of APA-DEC that the final state is that Ruby Mountain looks like an undulating completely forested mountain, like all the other mountains and ridges nearby. The final design should be a property that completely blends in with the surrounding forested landscape of the Siamese Ponds Wilderness area. The applicant must provide different options for how it proposes to achieve these ends.

**Noise Impacts:** One of the greatest impacts, and perhaps the greatest complaint that we hear from local residents, is the near-constant noise coming from the Barton Mine on Ruby Mountain. Long-time local residents tell us that the noise from the mine has grown considerably since the mid-1980s as the mine has moved to 24-hour mining activities. The soundscape of the open pit mountaintop mine on Ruby Mountain has changed considerably and Barton Mine materials say that the mine now has an “amphitheater” effect that projects noise outward from the mine onto the residential community throughout Garnet Hill.

The negative impacts from noise pollution from Barton Mines on the rural quality of life of the Garnet Hill and Essex County Route 78 communities are significant and must be remedied. In addition, the negative impacts from noise pollution from Barton Mines on public Forest Preserve must be remedied. APA-DEC need to strengthen its evaluations of noise impacts.

- The APA’s NIPA identified numerous shortcomings in the Barton Mines noise study. These must all be addressed and new, more accurate data provided by the applicant. The Noise Analysis submitted failed to take measurements at a number of local area residences and businesses through the Garnet Hill community. This study needs to be greatly expanded.
- The application does not provide any information about noise impacts in rural areas. One of the great benefits of life in the Adirondack Park is the quiet that residents and visitors enjoy. For many in the Garnet Hill and Essex County Route 78 communities, living a life with the pleasure of rural quietness is not an option. The mine next door runs 24 hours a day and seven days a week and industrial mining activity noise is a constant presence. APA-DEC need to evaluate noise impacts in a rural landscape.
- The December 2021 letter from the Friends of the Siamese Ponds enumerates a number of issues and deficiencies in the Barton Mines application. These issues should be fully examined by APA-DEC and additional information requested from Barton Mines.
- The noise study submitted by Barton Mines fails to address noise impacts on wildlife adequately. This is especially acute for animals, such as bats and owls, that rely upon noise evaluations to hunt for prey. Neither the APA NIPA or DEC correspondence with the company has adequately raised the issue of noise impacts on wildlife. Specific information is needed about noise impacts on vulnerable birds species in Siamese Ponds Wilderness Area.
- See section “Precedent for Long-Term Monitoring Conditions in an APA Permit” below for how in past APA permits the agency required long-term noise monitoring for a mining operation’s impacts of nearby residences.

**Enclose Industrial Equipment/Operations to Mitigate Noise Impacts:** The APA NIPA and DEC correspondence have not adequately pressed Barton Mines for information on enclosing buildings where industrial equipment operates or building enclosures where there are currently none. The applicant is seeking a massive expansion and should be made to undertake all measures to mitigate negative noise impacts that disrupt the rural quality of life of many dozens of local residents. Building enclosures should be examined for their benefits to help mitigate noise pollution.



*The picture shows the industrial operations at Barton Mines on Ruby Mountain. The conveyor belt from the mine and processing area to the tailings piles runs for 24 hours a day and seven days a week. Barton Mines needs to do much more to mitigate the relentless noise which plagues local residents throughout the Garnet Hill community.*

**Mandatory Blasting Notifications:** Barton Mines is seeking to double or triple the number of blasts per month. The APA NIPA notes “Given the area surrounding the project site is heavily residential to the south and east and includes state land designated Wilderness to the west and north, to ameliorate noise concerns from nearby landowners, please consider amending the blasting plan to exclude blasting on Saturdays.” This response from the APA is inadequate. APA-DEC should require information for how Barton Mines will develop a notification system by email/texts about its blasting schedule with 24-hour and 1-hour notifications. Such schedules have been APA permit requirements in the past and the company should be asked about how it would organize a blasting notification plan. Such a notification plan was done in the NYCO Minerals, Inc. permits (APA Project 96-76) in Lewis, NY.

**Hours of Operation:** The applicant seeks to increase its hours of operation by one hour per day. While this may seem like a minor adjustment, how hours of operation are calculated fails to address the whole issue. Protect the Adirondacks does not see how some mining operations are listed as only allowable during daytime “business” hours, while other industrial activities are somehow exempt for hour/day restrictions and are allowed unfettered 24 hours a day and seven days a week. The APA-DEC must evaluate the “Hours of Operation” issue to include all mining activities.

**24 Hours a Day/Seven Days a Week:** APA-DEC correspondence with Barton Mines notes that mining operations on Ruby Mountain will run 24 hours a day and seven days a week. The APA NIPA states “The

existing operation on the project site operates a mill 24 hours a day, 7 days a week.” Somehow, the 24-hour-7-days-a-week operating schedule is not part of the hours of operation section. We fail to see how only some mine activities are allowable during certain hours, while other activities are in effect, unregulated and continuous. With the applicant seeking a permit for another 75 years of mining activities, negative noise impacts from 24-hour-7-days-a-week operations must be addressed and resolved. It is unacceptable for local residents and the Forest Preserve to have to endure another 75 years of relentless noise pollution from the mine.

The 24-hour mining activities are the source of perhaps the most significant complaints that we hear from local members and residents on Garnet Hill and up and down County Route 78. We hear complaints of grinding unrelenting noise in the middle of the night and on weekends. With mining activities that run 24 hours a day and seven days a week there is no break for local residents.

The continuous mining activities on Ruby Mountain are one of the major changes from mining activities in the mid-1980s. The decision to expand mining activities to 24 hours a day has never been effectively scrutinized for impacts. Neither the APA NIPA or DEC correspondence has questioned the need for, and impacts of, 24-hour-7-day-a-week mining activities. Neither agency has requested information or plans for how the company will mitigate noise impacts from 24-hour-7-day-a-week mining activities.

**Water Quality Impacts:** 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 Thirteenth Brook may be hydraulically connected to the stream and could have deleterious impacts on stream flows. The APA-DEC should examine this issue and a full hydrology study is necessary.

The APA NIPA fails to require a water quality monitoring study for Thirteenth Brook. The company should undertake a water quality study of its main tributary that leaves the mine at the point just above where it enters Thirteenth Brook, upstream on Thirteenth Brook, and downstream below where the mine tributary enters. This is critical for fully understanding long-term water quality monitoring impacts.

See section “Precedent for Long-Term Monitoring Conditions in an APA Permit” below for how in past APA permits the agency required long-term water quality monitoring for a mining operation’s impacts of associated streams.

**Fugitive Dust and Airborne Particulate:** Residents across the Garnet Hill community 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.

The APA NIPA is weak on a full evaluation of dust impacts on nearby residences. 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.

See section “Precedent for Long-Term Monitoring Conditions in an APA Permit” below for how in past APA permits the agency required long-term fugitive dust monitoring for a mining operation’s impacts of nearby residences.

**Truck Traffic:** The application seeks to use both bigger trucks and to use more of them. The company is seeking to double truck traffic on County Route 78. The APA NIPA states “The applicant proposes to reduce its off-site trucking hours from 7am to 10pm, Monday through Friday, to 7am to 5pm, Monday through Friday, and increase the daily truck trips from 5 to 16 per day.” At its maximum operation, that’s one large truck passing (16 round trips = 32 truck passes) a residence on County Route 78 every 18.75 minutes. The application fails to provide a meaningful traffic study or analysis of the condition of County Route 78 to handle this level of truck traffic.

The significant increase in large truck traffic, along with the ongoing impacts from noise pollution and light pollution, are major detriments to the rural quality of life for local residents. Unfortunately, the tripling of truck traffic, and use of bigger trucks, has not been fully addressed by the applicant or the APA-DEC.

**Dark Skies and Light Pollution:** Dark skies are one of the joys of life in 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. The application remains weak for plans to curb light pollution. The APA NIPA also fails to adequately address this issue. This issue merits greater attention from the APA-DEC.

**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.

The APA NIPA states: “Given the RM pile is currently located on land designated Resource Management and is proposed to be expanded within the Wilderness Critical Environmental Area (CEA), please evaluate other alternatives that could reduce the proposed expansion of the RM pile.” The applicant has not provided alternatives to encroaching on the Forest Preserve. APA-DEC must continue to press the applicant on the importance of remaining outside of the Wilderness CEA.

The APA NIPA also fails to address impacts on the Forest Preserve more broadly. These include visual impacts from Thirteenth Lake and area hiking trails/peaks, noise, dust, and light pollution.

**Climate Change:** Under the 2019 Climate Leadership and Community Protection Act (CLCPA), state agencies are mandated to weigh the impact of climate change in their decisions. Section 7(2) of CLCPA requires all State agencies to determine whether their administrative approvals are consistent with the attainment of, or will interfere with the attainment of, the statewide greenhouse gas emission limits in ECL Article 75. If inconsistent, they are required to explain why, and to identify alternatives or mitigation



*The picture shows the location of the Ruby Mountain mountaintop open pit mine surrounded by the Siamese Ponds Wilderness area. This impacts of this mine on the Forest Preserve needs to fully assessed.*

measures. In this case, the directive to the APA from CLCPA is to assess the impacts of forest clearing and climate change impacts from a major industrial mining operation. The application materials fail to address this matter.

Protect the Adirondacks is concerned about the APA's compliance with the Climate Leadership and Community Protection Act. We urge the APA to detail and quantify the climate change impacts of this project, the steps the APA took to mitigate these impacts, and how the APA has complied with the letter and spirit of the Climate Leadership and Community Protection Act. To date, the APA has failed to take into consideration long-term carbon pollution in its review of major projects.

**Final Closure Design:** In the Barton Mines application, the company wrote "During the final phase of mining, fine-grained residual minerals will be deposited in the northernmost portion of the mine (area that enters the CEA). Once the mined-out area is filled with fines it will be reclaimed with topsoil and vegetation." It is our understanding that state and federal mine lands reclamation laws govern the final disposition of the Ruby Mountain mine. We have included aerial pictures of the former Barton Mine near Gore Mountain where, apparently, no such laws governed the final disposition of those lands. These pictures show open strip mines and unrestored/reforested tailings piles. Given that the company did relatively little to properly close its former mine, we're hopeful that state agencies will be vigilant to ensure quality restoration and reforestation of the Ruby Mountain mine.



*The picture shows the former Barton Mine. Note that the open pit and tailings piles have never been reclaimed or restored. This mine pre-dated the Mine Lands Reclamation Act.*

**Precedent for Long-Term Monitoring Conditions in an APA 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 Protect 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.

Since the late 1990s, the APA has changed its permit form and limited permit conditions in recent years. Protect the Adirondack believes that a number of permit conditions in APA Project 96-76 serve as a template for the way that a new permit for Barton Mines should be structured in the event one is issued. Here are highly relevant examples for the APA staff to investigate:

For “Water Quality” APA permit 96-76 (9c) states, in part:

The applicant shall monitor the water quality of Patterson and Derby Brooks at two points at each brook on or adjoining the applicant's property, one point upstream of the mine and the second point downstream of the mine. Each point selected by the applicant to be monitored shall receive written approval from the Agency prior to commencement of any pre-production operations authorized by this permit. The water shall be incidentally sampled and analyzed prior to commencing operations and at least once a year thereafter during July or August when the mine is being operated at or near full capacity for evidence of changes in water turbidity; B.O.D.; alkalinity; pH; bacterial (including coliform) and chloride content; total suspended solids, conductivity, settleable solids, and ammonia nitrogen.

The applicant shall submit a report of its findings, including the methods used, an interpretation of the data, and the persons and firms performing the analysis, to the Agency within 30 days of its initial testing and once a year thereafter. If, in the opinion of the Agency, there exists evidence of significant deterioration in water quality caused by applicant's operations, such that human health or aquatic life may be threatened, the Agency shall require the applicant to submit for approval and implementation a plan to rectify such threats. (p 47-48)

Certainly the water quality of Thirteenth Brook should be monitored by Barton Mines. The APA-DEC need to set up an independent water quality monitoring program for Thirteenth Brook to evaluate possible impacts from Barton Mines. The APA has done this before with other projects and this action is merited in APA project 2021-245.

For "Noise" APA permit 96-76 (7a, b) states, in part:

Except for noise generated by blasting, development activities on the project site shall be undertaken so as to limit the one hour equivalent noise level (Leg) emanating from the site to 57 dBA as measured at the residences located on tax map parcels 46.21-36.00, 46-2-141.000, 47.1-1-1.120, 46.2-1-35.0W and 46.2-1-43.0W. After site development activities are completed, all activities on the project site (except for noise generated by blasting) shall be undertaken so as to limit the one hour equivalent noise level (Leg) emanating from the site to 54 dBA at these five residences) These residences are shown on Hearing Exhibit 106G.

The following is a protocol for the measurement of outdoor sound levels at properties surrounding the Oak Hill mine. (p 39)

One reasonable permit condition is an independent noise monitoring paid for by Barton Mines developed jointly through some form of advisory group of local residents and Barton Mines. The APA-DEC need to set up an independent noise monitoring program for the surrounding Garnet Hill community. The APA has done this before with other projects and this action is merited in APA project 2021-245.

For "Fugitive Dust" APA permit 96-76 (8b) states, in part:

1) Pollutants to be monitored - Monitoring shall be conducted for particulate matter with a diameter of less than 10 micrometers (PM10).

2) Type of monitor - Monitoring shall be conducted using the DataRam<sup>0</sup> Real-Time Aerosol

Monitor. If the applicant believes other equivalent monitoring equipment should be used, it shall first obtain approval of the Agency.

3) Monitoring sites - The monitoring sites shall be those specified in Hearing Exhibit 106G. Subject to equipment availability, monitoring shall be conducted simultaneously at all three monitoring sites.

The exact location at each monitoring site shall be determined in conformance with good monitoring practice such that the sampling device *is* not obstructed with respect to air flow from the major sources on the NYCO property and is representative of the ambient air conditions at the site location. In the event that monitors cannot be operated at these locations, alternative representative sites will be chosen with the concurrence of the Agency. (p 44)

One reasonable permit condition is independent fugitive dust monitoring paid for by Barton Mines developed jointly through some form of advisory group of local residents and Barton Mines. The APA-DEC need to set up an independent fugitive dust monitoring program for the surrounding Garnet Hill community. The APA has done this before with other projects and this action is merited in APA project 2021-245.

**Conclusion:** Barton Mines is a longstanding mining operation and processing plant in the Town of Johnsburg, operating for 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 decades to come, must take into consideration these negative impacts and develop a permit that protects 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.

As a regulatory agency, the APA needs to serve as a honest broker in this project review process. The APA needs to fully assess this project. This project is highly controversial and ripe for an official adjudicatory public hearing.

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,



Peter Bauer,  
Executive Director

B. Rice, NYS APA  
C. Cooper, NYS APA