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Via Email

July 25, 2025

Bart Haralson
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

**RE: Koller Mine Expansion
Town of North Hudson, Essex County
Tax Map No.: 104.2-1-3.100, 104.2-1-2.100, 104.4-1-20.000
APA Project No.: 2025-0077**

Dear Mr. Haralson:

Protect the Adirondacks (PROTECT) appreciates the opportunity to provide comments on the above-referenced project, which is the proposed expansion of an existing hard rock quarry located on a 142-acre parcel of land in the Town of North Hudson, Essex County, classified Low Intensity Use and Resource Management by the Adirondack Park Land Use and Development Plan (the "Project Site").

Project Description

The proposed expansion area covers an additional 19.7 acres of the Project Site to the west and north of existing mining operations and will be lateral with no significant vertical expansion.

The proposed expansion will be subject to setback restrictions, including a 100-foot setback from an intermittent stream in the northeast portion of the Project Site; a 100-foot setback from a mapped and delineated wetland; a 200-foot setback from the existing on-site cell phone tower; and certain specified property line setbacks. The southwestern edge of the mine will have 40-ft high benches, while the rest of the mine generally will have 20-ft high benches. The extreme northeastern end of the mine will have a single 40-ft highwall. The difference in bench height is designed to maximize extraction while maintaining the property line setback requirements, where needed.

The applicant has agreed to an APA request that the western mine boundary be moved eastward to the ridgetop so that the potential view of the quarry from

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Interstate I-87 will be minimized. The proposed western boundary now coincides with the ridgetop, as requested by APA. Shifting the western boundary eastward has resulted in a 4.8-acre reduction in the proposed expansion.

In compliance with the current mine permit, the applicant planted a grove of pines along a chain link fence that is located at the property boundary between the High Peaks rest area on I-87 and the quarry. The pine grove is nearly 100 ft wide and has apparently grown sufficiently to help minimize noise impacts of the quarry operation to the rest area.

The proposed expansion area would add approximately 11.6 acres to the excavated area within the Project Site. Most of the stormwater runoff from the proposed western expansion currently flows eastward downslope to the permitted excavation area in accordance with the existing Stormwater Pollution Prevention Plan for the mine. Additional runoff that makes its way into the former mine pit seeps downward into highly permeable sand and gravel.

The applicant is also proposing to increase from 20 trucks per day as currently authorized to 35 trips per day.

Comments

The application is missing several critical components necessary for a thorough review. First, while the application references both a Visual Impact Analysis and a Noise Impact Analysis, neither of these documents was included in the APA's response to PROTECT's Freedom of Information Law (FOIL) request. Without access to these analyses, it is impossible to properly evaluate the potential visual and noise impacts of the proposed mine expansion.

Second, the application fails to include any assessment of the traffic, noise, or greenhouse gas (GHG) emissions resulting from the proposed increase in truck traffic—from 20 to 35 trips per day—representing a 75% increase. The absence of this analysis significantly limits the ability to understand and address the broader environmental and community impacts associated with the project.

Conclusion

PROTECT respectfully urges APA to require the applicant to (i) provide the Visual Impact and Noise Impact reports and (ii) provide an assessment of the traffic, noise and GHG impacts of the proposed increase in truck traffic. We further request that APA make these crucial application materials available for public review and comment after they are submitted.

On behalf of the Board of Directors of PROTECT, please accept our gratitude for the opportunity to share our comments on this proposed project.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Amato", with a stylized flourish at the end.

Christopher Amato
Conservation Director and Counsel