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Via Email

November 7, 2025

Chairman Mark Hall and Members
Adirondack Park Agency
P.O. Box 99
1133 NYS Route 86
Ray Brook, NY 12977

**Re: Michael Hopmeier
Unconventional Concepts, Inc.
Proposed Military Ballistic Testing Range
Hale Hill Lane, Town of Lewis, Essex County
APA Project 2021-0276**

Dear Chair Hall and Adirondack Park Agency Members:

Protect the Adirondacks (PROTECT) has reviewed the proposed Order presented by staff to the Board regarding the above-referenced application by Unconventional Concepts, Inc. ("UCI"), which seeks approval to construct and operate a howitzer firing range on a 197-acre parcel of land classified as Rural Use on the Adirondack Park Land Use and Development Plan Map. While the applicant has claimed that this proposed project will support military preparedness, there is no evidence to support such a claim, and the applicant has stated in a letter dated November 6, 2025 that this should be reviewed as "a request to use firearms in the park".

In addition to our public comment letter regarding the application, we would like to take this opportunity prior to the Adirondack Park Agency ("APA") Board meeting on November 13-14, 2025 to urge the Board to adopt the staff's recommendation to order this proposed project to undergo an adjudicatory hearing, with the addition of one issue. We suggest that the Board add as one of the issues for adjudication the applicant's claim that this project is critical for the national security of the United States.

As we commented in our October 30, 2025 letter to staff, a "military weapons testing range has no place in the Adirondack Park". Firing an excessively loud 155mm howitzer cannon in close proximity to residences, within 350 feet of the Taylor Pond Wild Forest, and in close proximity to

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the Jay Mountain Wilderness, and the Hurricane Mountain Wilderness is incompatible with the statutory goals for the Adirondack Park and is also inconsistent with the purposes and policies applicable to Rural Use areas.

We agree with the proposed Order's Findings stating that the criteria for holding an adjudicatory hearing have been met. We also support the proposed Order stating that three issues need to be considered at the hearing, summarized as follows:

1. Whether the proposed howitzer firing range is compatible with the Adirondack Park;
2. Whether the proposed howitzer firing range is a compatible use within the Rural Use land area classification; and
3. Whether the proposed howitzer firing range would have an undue adverse impact upon the natural, scenic, ecological, wildlife, recreational or open space resources of the Adirondack Park.

As noted above, we suggest that the Board identify as an issue for adjudication the applicant's claim that this project is essential for the national security of the United States.

We note that without an adjudicatory hearing, this Board cannot make the findings required by the Adirondack Park Agency Act. The application contains inaccurate and misleading information, fails to include comprehensive natural resources information, and fails to provide complete information as requested by APA staff. Without all of this information, APA cannot fully, accurately, or lawfully assess the environmental impacts of the proposed project, as required by the Adirondack Park Agency Act and its implementing regulations.

Conclusion

PROTECT respectfully requests that APA deny UCI's application to site a weapons firing range in the Adirondack Park. To do so, APA must hold an adjudicatory hearing to comply with the APA Act's procedural requirements.

Respectfully submitted,

A handwritten signature in black ink that reads "Claudia K. Braymer". The signature is written in a cursive, flowing style.

Claudia Braymer
Executive Director