

# PROTECT THE ADIRONDACKS!

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## Via Email

January 20, 2026

Hon. David N. Greenwood  
Administrative Law Judge  
New York State Department of Environmental Conservation  
Office of Hearings and Mediation Services  
625 Broadway, First Floor,  
Albany, NY 12233-1550

**Re: In the Matter of the Application of Unconventional Concepts, Inc. and Michael Hopmeier  
APA Project No. 2021-0276**

Dear Judge Greenwood:

I write on behalf of the four intervenor parties in the above-referenced proceeding (Protect the Adirondacks, Adirondack Council, Adirondack Wild: Friends of the Forest Preserve, and Sierra Club) in response to the January 14, 2026 letter from Matthew Norfolk, Esq. counsel for the applicants.

We believe that a critical threshold matter is the need for a single, updated project application to be placed in the administrative record that incorporates the numerous modifications and revisions to the application that have occurred over the past four years. As the record currently stands, the numerous revisions and differing versions of the application and supporting documents renders it unduly burdensome to parse out what exactly is being proposed and what the applicants are claiming the impacts of the project will be. We therefore respectfully request that the applicants be required to submit an updated, comprehensive application along with updated supporting documentation.

In addition, we agree with Mr. Norfolk that it would be helpful for an administrative docket, such as those used in adjudicatory proceedings of the Public Service Commission and the Office of Renewable Energy Siting, to be established for this proceeding.

Protect the Adirondacks

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Thank you for your consideration of these requests.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Christopher A. Amato".

Christopher A. Amato, Esq.  
Conservation Director and Counsel

Cc: Matthew Norfolk, Esq.  
Shane Kelly, Esq.  
Grace Sullivan, Esq.  
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