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**Via Email: [RPcomments@apa.ny.gov](mailto:RPcomments@apa.ny.gov)**

January 28, 2026

Milt Adams  
Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977

**Re: APA Project 2025-0084  
Michael Dolhof and Harold & Emilia Bingay  
Pleasant Valley Road  
Town of Greig, Lewis County  
Tax Parcels 292-2-29 & 291-1-24.130**

Dear Mr. Adams:

Protect the Adirondacks ("PROTECT") appreciates the opportunity to provide comments on the above-referenced project, which involves a proposed 11-lot subdivision of a 46.7-acre project site to create 10 building lots between 3.44 and 5.05 acres in size and one access road lot. One single family dwelling together with on-site wastewater treatment system, on-site water supply, driveway and garage is proposed on each of the 10 lots. The private access road is proposed from Pleasant Valley Road to serve the development. The project site is designated as Low Intensity Use on the Adirondack Park Land Use and Development Plan Map.

As discussed below, PROTECT opposes the permitting of the proposed subdivision in its current form because the proposed subdivision fails to follow the principles of conservation design and thus creates needless additional habitat fragmentation and road construction.

**The Proposed Subdivision Fails to Comply With Conservation Design Principles**

Conservation design is a planning approach that preserves natural features and ecological functions while allowing for environmentally responsible development. The key principles of conservation design include identification and protection of natural resources on a project site such as intact forests, wetlands, steep slopes, wildlife habitat and water bodies; clustering

**Protect the Adirondacks**

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development in less ecologically sensitive areas to minimize environmental impacts and preserve large, contiguous tracts of open space; minimizing impervious surfaces and maintaining natural hydrology; providing buffers around wetlands, streams and other ecologically sensitive areas; and maintaining connectivity for wildlife movement and ecosystem function.

The proposed subdivision—with lots ranging in size from 3 to 5 acres, dispersed over approximately 46 acres of land—is a cookie-cutter design that does not reflect these principles. Rather than clustering homes and related infrastructure on a condensed portion of the project site to preserve large, contiguous tracts of open land, the current design spreads impacts throughout the landscape across the entire 46 acres. The figure below shows an example of conservation design in comparison to a tradition subdivision design, such as the one proposed for this project.<sup>1</sup>



<sup>1</sup> <https://www.sewrpc.org/SEWRPCFiles/CommunityAssistance/ConservationSubdivisions/OpenSpaceSubdivisionsDesignProcess.pdf>

By dispersing development across the entire 46-acre site, the current subdivision proposal runs counter to the APA Act's statutory objective to protect open space and avoid fragmentation.

### **Conclusion**

For the reasons outlined above, PROTECT urges the APA to require a redesign of the subdivision to apply conservation design principles—specifically, clustering development and consolidating infrastructure to preserve open space and protect sensitive resources. Additionally, we request that the staff refer this proposed subdivision to the APA Board for review.

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