



In the Matter of the Application of

**UNCONVENTIONAL CONCEPTS, Inc., and
MICHAEL HOPMEIER**

ISSUES RULING

APA Project No. 2021-0276

I. Introduction and Proceedings

This ruling arises from the November 14, 2025, Adirondack Park Agency (APA or the Agency) Project Order No. 2021-0276 (Project Order) wherein the Agency ordered this matter to public hearing pursuant to Executive Law Section 809 and State regulations at 9 NYCRR 580.2. In November 2021 Unconventional Concepts, Inc. and Michael Hopmeier (the Applicant or Project Sponsor) submitted an application to undertake a Class B Regional Project in the Town of Lewis, Essex County, New York to the APA, which proposes to develop a weapons range for testing the internal ballistics of 155 mm howitzer cannon barrels over a 5-year period (the proposed "howitzer testing range") (Project Application or Proposed Project).

Four organizations submitted petitions for intervention and party status in December 2025 and I granted each organization party status in a ruling dated January 12, 2026. The four organizations are: (i) Sierra Club Atlantic Chapter (Sierra Club); (ii) Adirondack Wild: Friends of the Forest Preserve (Adirondack Wild); (iii) Adirondack Council, Inc. (Adirondack Council); and (iv) Protect the Adirondacks. The Project Sponsor appealed the ruling granting party status to Adirondack Wild to the Agency's Executive Director and a review of the transcript of the February 19, 2026, APA Board meeting reveals that the Agency voted to uphold the ruling granting party status to Adirondack Wild.

Additionally, the Project Sponsor has initiated a Civil Practice Law and Rules (CPLR) Article 78 proceeding in New York State Supreme Court seeking to vacate the determination of the Agency to conduct a public hearing on the Project Application and to vacate the determination of the Agency's Executive Director to deny the Project Sponsor's motion to disqualify this hearing officer from presiding over the public hearing on the Project Application (*Matter of Michael Hopmeier v. Bd. of New York State Adirondack Park Agency*, et al, Index. No. CV26-0063 [Sup. Ct. Essex Cnty]). At the time of this writing that matter has a return date of April 20, 2026.

In the Project Order, the Agency directed three issues to be considered at the public hearing that can be summarized as follows: (Issue 1): Whether the proposed howitzer testing range is compatible with the Adirondack Park land use and development plan; (Issue 2): Whether the proposed howitzer testing range is a compatible use within the Rural Use land area classification including but not limited to whether the proposed use should be considered a

"commercial use" and, if not, whether the proposed howitzer testing range is a compatible use; and (Issue 3): Whether the proposed howitzer testing range would have an undue adverse impact upon the natural, scenic, ecological, wildlife, recreational or open space resources of the Adirondack Park in consideration of the development considerations contained in APA Act Section 805(4) and State regulations at 9 NYCRR 574.5.

This ruling addresses several requests from the intervenors to modify the three issues set forth in the Project Order to be considered in the public hearing. In a letter dated January 20, 2026, the Adirondack Council, on behalf of itself and the other intervenors, proposed revisions and suggested additions to the issues to be considered at the public hearing (*see Appendix*). A prehearing conference was conducted on January 21, 2026, wherein it was determined that conducting a further prehearing conference to discuss hearing issues would be beneficial.

An issues conference was scheduled for February 4, 2026. On February 3, 2026, Adirondack Council sent an email to the parties that included APA hearing staff's edits to the intervenors' proposed issues. Also on February 3, 2026, Protect the Adirondacks submitted an offer of proof with respect to adding a proposed issue to read: "Issue #2: Whether the applicant has contractual or other legal arrangements with persons or other legal entities for testing howitzers on the proposed range and substantiation of national security concerns, if any, with respect to such proposed testing." (Offer of Proof).

An issues conference was conducted on February 4, 2026. During the issues conference some consensus was reached on the proposed modifications to the hearing issues among APA hearing staff, the Applicant, and the intervenors (*see generally* February 4, 2026 Recording 38:00-52:00, 1:12:00-1:22:00).¹ After the issues conference a stipulation modifying the issues to be considered at the hearing was circulated but was never executed by the parties or forwarded to the Hearing Officer for ordering.

On February 24, 2026 Adirondack Council moved for an order revising the existing hearing issues for the stated purpose of ensuring that "an orderly and understandable record is developed through the adjudicatory herring for the APA Board's consideration." Adirondack Council proposed to modify the three existing hearing issues into five that can be briefly summarized as follows: (Issue 1): Whether the proposed howitzer testing range is a commercial use; (Issue 2): Whether the howitzer testing range would have any adverse impacts upon the natural, scenic, ecological, wildlife, recreational or open space resources of the Adirondack Park considering the development considerations contained in the APA Act; (Issue 3): Whether the howitzer testing range would be consistent with the Adirondack Park land use and development plan; (Issue 4): Whether the howitzer testing range would be compatible within the Rural Use land area classification; and (Issue 5): Whether the howitzer testing range would have any undue adverse impact upon the natural, scenic, aesthetic, ecological, wildlife, historic, recreational or open space resources of the Adirondack Park or upon the ability of the public to provide supporting facilities and services made necessary by the Proposed Project, taking into account the commercial, industrial, residential, recreational or other benefits that might be derived from

¹ Representatives of Protect the Adirondacks made it clear during the issues conference that they objected to the failure to include proposed issues Nos. 2 and 3 (compliance with existing permits and existence of a contract) in any stipulation that resulted from the issues conference (Feb. 4, 2026 Recording 50:00 – 53:00).

the Proposed Project.

On March 2, 2026, Agency hearing staff submitted an email with attached letter in support of Adirondack Council's proposed revisions to the issues to be considered at the public hearing.

On March 4, 2026, the Applicant submitted a Cross-Motion that included a section arguing that the issues order in the Project Order should not be modified. On March 6, 2026, Protect the Adirondacks submitted a letter in further support of its Offer of Proof that included documents obtained from a Freedom of Information Act (FOIA) request made upon the "U.S. Department of the Army."

In response to the requests to modify the issues to be considered at the public hearing, the parties submitted additional input and position comments as follows: (i) an email dated March 5, 2026 from Adirondack Wild; (ii) an email with attached letter dated March 11, 2026 from Adirondack Council; (iii) an email with attached letter dated March 11, 2026 from APA hearing staff; and (iv) an email with attached letter dated March 12, 2026 from the Project Sponsor (*see* Appendix).

For the reasons discussed below, Adirondack Council's motion to modify the issues for consideration at the public hearing is granted. Protect the Adirondacks' request with Offer of Proof to add an issue to the public hearing regarding the Applicant's contractual or other legal arrangements for testing howitzers on the proposed howitzer testing range is denied.

II. Positions of the Parties

In both its original proposal brought on behalf of itself and the other intervenors as well as its latest motion, Adirondack Council asserts that the purpose of the proposed revisions is to ensure that an orderly and understandable record is developed through the public hearing for the Agency's consideration. The motion is based on the version of the issues modification proposal as "marked up" by APA hearing staff that was under discussion at the issues conference. The motion seeks to re-order the issues presented and break them out into five issues with the intention of addressing the facts and opinion evidence concerning the Proposed Project's potential impacts in the first two issues, before turning to the three legal determinations that the APA Board must address in the final three numbered issues. Importantly, the question of whether the Proposed Project can be considered a "commercial use" would be moved to the top of the list as Issue 1 as Adirondack Council contends that fact and opinion evidence on that issue will provide a basis for the Agency to determine if the proposed howitzer testing range is or is not presumed to be a compatible use. The motion proposes other alterations to the hearing issues to more closely follow the language of the APA Act, including the addition of wording related to considering the benefits the Proposed Project may provide in weighing "undue" adverse impact as set forth in APA Act Section 809(10)(e). Adirondack Council asserts that it is within the Hearing Officer's authority to order the proposed revisions to the hearing issues based upon the Agency's Project Order, which granted the Hearing Officer the discretion to simplify, define, limit or resolve the scope of issues. Adirondack Council issued a further letter in support of its motion on March 11, 2026.

Protect the Adirondacks supports the proposed revisions to the hearing issues brought jointly by the intervenors in the January 20, 2026 letter request, which included re-ordering the issues as set forth above and included two new issues concerning the Applicant's contractual or other legal arrangements to test howitzers on the proposed range and whether the Applicant had violated the APA Act or its existing APA permit. In its February 3, 2026 letter request for ruling and its March 6, 2026 letter supplementing the request, Protect the Adirondacks does not oppose the revision of the issues as presented in Adirondack Council's motion. Rather, Protect the Adirondacks contends that adding a discrete issue to consider whether the Applicant has contractual or other legal arrangements to test howitzers on the proposed range and substantiation of national security concerns, if any, with respect to such proposed testing is "vital to ensuring a complete record by allowing discovery and testimony concerning . . . claims in the application that the proposed project is being undertaken pursuant to a contract with the United States military." Protect the Adirondacks quotes portions of the Project Application wherein the Applicant contends that the benefits of the Proposed Project include providing support to the United States military and protecting national security, and Protect the Adirondacks asserts that the parties should be provided the opportunity to conduct discovery and elicit testimony concerning these purported benefits so that the Agency has a complete record. In its March 6, 2026 letter supplementing the request, Protect the Adirondacks submits an email obtained pursuant to a FOIA request that it contends "contradicts the application's repeated claims that the proposed howitzer firing range is being undertaken pursuant to a contract with the United States military and is essential to the national security of the United States." Protect the Adirondacks argues that the Agency's Project Order grants the authority to add the proposed issue to those identified in the Project Order.

In its March 5, 2016 email, Adirondack Wild expressed support for Adirondack Council's February 24 motion to revise the existing hearing issues and stated that "[w]e also look forward to your ruling on the motion of Protect to add to those issues." Sierra Club and Adirondack Wild were part of the January 20, 2026, letter submitted by Adirondack Council, on behalf of itself and the other intervenors that proposed revisions and suggested additions to the issues to be considered at the public hearing and during the issues conference both of those organizations expressed support for a consensus to revise the hearing issues.

In its March 2, 2026 letter APA hearing staff notes that Adirondack Council's motion requests an order on the restructured issue list as proposed by the intervening parties and revised by APA hearing staff prior to the February 4, 2026 issues conference. APA hearing staff supports the proposed revisions to the hearing issues and the sequencing of adjudication as set forth in the motion because "they will promote the orderly development of the record."

In the attorney affirmation submitted with its March 4, 2026 Notice of Cross-Motion, the Applicant argued that the issues as set forth in the Project Order should not be modified because a Hearing Officer does not have the authority to "add or reorder issues" and only has the power to "limit or simplify" issues as set forth in State regulations at 9 NYCRR 580.9 and 9 NYCRR 580.14(4). Thus, in the Applicant's view, the authority to "add an issue if not expressly excluded" granted to the Hearing Officer in the Project Order was an "extra-judicial determination." The Applicant further contends that a Hearing Officer can only revise the issues upon consent of the parties and the Applicant does not consent to the revisions currently proposed and no stipulation

between the parties was executed after the issues conference. Lastly, the Applicant contends that "the issues should not be reordered or deemed to require the presentation of evidence in the order listed in the Project Order" because the Applicant bears the burden of proving the allegations in the Project Application, and has the right to present their case, introduce their evidence and proceed with their legal strategy.

In its March 11, 2026 letter, APA hearing staff reiterated its support for Adirondack Council's motion seeking to revise and reorder the public hearing issues and addressed the question of the basis of the authority to grant the motion, arguing that the Hearing Officer has the authority to modify the hearing issues without consent of the parties under Agency regulations and that the Agency was authorized to extend that authority through its Project Order. Specifically, APA hearing staff asserts that, pursuant to 9 NYCRR 580.3, the Agency may or may not determine to limit the issues to be considered at the hearing, and, in the absence of doing so, the Hearing Officer would have the authority to determine which issues may be considered at the hearing. In this instance, the Agency chose to exclude issues related to shoreline restrictions and intensity guidelines and preserved the Hearing Officer's authority to "add an issue if not expressly excluded and for which a party makes an offer of proof to ensure that the record covers substantive and significant issues relating to the findings or determinations required of the Agency." APA hearing staff asserts that State regulations at 9 NYCRR 580.9 and 580.14(g) are not intended to limit the Hearing Officer's authority to broaden the scope of issues or to add an issue that was not included in the Project Order. Rather, those provisions are "intended to prevent the [H]earing [O]fficer from unilaterally resolving an issue identified by the Board for which the parties have not reached consensus on." APA hearing staff asserts that Adirondack Council's motion does not seek to limit or resolve any issues, but proposes modifications to the order of the issues and minor language revisions that do not alter the substantive issues identified by the Agency in the Project Order, changes that Applicant's counsel consented to at the February 4, 2026 prehearing conference.

In its March 12, 2026 letter in opposition to modify and reorder the hearing issues, the Applicant argues against APA hearing staff's interpretation of the regulations concerning the limitation of hearing issues and against the inclusion of an issue relating to whether the Applicant has government contracts as requested by Protect the Adirondacks. First, the Applicant asserts that State regulations at 9 NYCRR 580.3 do not allow a Hearing Officer to add issues, the regulation instead allows the Agency to limit the issues in the notice of hearing. In the Applicant's view, if the Agency does not limit the issues for the hearing then 9 NYCRR 580.9 and 580.14(4) allow a Hearing Officer to "establish the scope and define the issues that are consented to by the parties."

Second, the Applicant asserts that adding a discreetly numbered issue relating to whether the Applicant has government contracts is unnecessary and redundant because "it is already covered by Issue No. 3." Specifically, the Applicant contends that the existing issue already contemplates presentation of evidence relating to the factors listed in APA Act Section 809(10)(e) that includes whether the proposed howitzer testing range would have an undue adverse impact in light of the Proposed Project's potential benefits. The Applicant contends that the email submitted as supplemental proof by Protect the Adirondacks "does not conclusively demonstrate the Applicants do not have a military contract," and that confidentiality "prohibits

further discussion of the matter." The Applicant further asserts that Unconventional Concepts, Inc. is a research and development company and that the existence of one contract or another may change over time or in the event the Project Application is approved.

III. Discussion

The Hearing Procedures in State regulations for the APA at 9 NYCRR 580.3 state:

Limitation of Issues. The agency may determine to limit the issues to be considered at the hearing, in which case it will advise the project sponsor of its determination and the notice of hearing will specify the issues to be considered.

(8 NYCRR 580.3).

The Agency's delegation of authority in the Project Order to the Hearing Officer with respect to the issues for consideration at the public hearing states:

[T]he hearing officer shall have all the authority provided in 9 NYCRR 580.9, and the hearing notice shall direct potential parties to address the issues stated above in any petition for party status. The hearing officer may in their sole discretion simplify, define, limit, or resolve the scope of issues, or add an issue if not expressly excluded and for which a party makes an offer of proof to ensure that the record covers substantive and significant issues relating to the findings or determinations required of the Agency under APA Act § 805(4) and § 809(10).

(Project Order).

Two additional sources of authority with respect to hearing issues are in State regulation on APA hearings at 9 NYCRR 580.9 which states:

The hearing officer may direct the parties to appear for a conference to simplify, define, limit or resolve issues. The hearing officer shall summarize for the record the action taken at the conference and any admissions, stipulations or agreements which were made by the parties.

(9 NYCRR 580.9).

And at 9 NYCRR 580.14 which states in relevant part:

The hearing officer shall have power to: (i) direct the parties to appear and confer at any time prior to or during the course of the hearing to consider the simplification of issues by consent of the parties.

(9 NYCRR 580.14[4]).

As an initial matter, I do not agree with the Applicant's view with respect to the power of the Hearing Officer to simplify, define, limit, or resolve issues. Rather, as argued by APA hearing staff and the intervenors, the Agency has the power to limit or define the issues for consideration at the public hearing and the Agency's partial, limited delegation of that authority to the Hearing Officer in this instance is consistent with the Agency's hearing regulations. Accordingly, adding a hearing issue that has not been expressly excluded in the Project Order and for which a party makes an offer of proof would be within that authority. Similarly, amending and re-ordering the issues in the Project Order to support a more orderly and understandable record for the Agency's consideration would also fall within the authority to simplify, define, limit, or resolve the scope of the issues.

I find that the proposed hearing issue revisions as moved for by Adirondack Council in the February 24, 2026 motion, and recommended by APA hearing staff and Adirondack Wild, to be appropriate and should provide a more orderly and understandable record for the Agency's consideration. The proposed revisions do not materially alter the scope of issues in the hearing and do not alter the substantive issues identified by the Agency in the Project Order. Furthermore, the proposed modifications do not limit or resolve any of the issues identified by the Agency. Sierra Club supported the amendments during the issues conference and Protect the Adirondacks has not specifically opposed the amendments within the February 24 motion, rather it requested additions to the issues therein. The Applicant verbally joined the consensus to amend the hearing issues during the issues conference but has since noted that, despite cooperation and productive discussion during the issues conference there was no formal agreement stipulated to by the parties. True enough, but the Applicant's opposition now is based solely upon its view that the Hearing Officer cannot amend or expand the hearing issues, which I disagree with, and it has voiced no material opposition to the specific changes to the issues moved for by Adirondack Council. In light of the above, I find that there is sufficient support for the proposed hearing issues amendments in the February 24 motion to grant the motion. Attached to this ruling please find a list of five issues to be considered at the public hearing.²

Nonetheless, I agree with the Applicant that adding an issue to address the question of whether the Applicant has contractual or other legal arrangements with persons or other legal entities for testing howitzers on the proposed range and substantiation of national security concerns, if any, with respect to such proposed testing is unnecessary. At the conceptual level, each of the existing hearing issues, as well as the proposed issues in Adirondack Council's motion, explicitly relate to a finding or legal determination that the Agency will make in rendering its decision on the Project Application, while the proffered contract issue is one step

² This ruling and the amended issues list should not be interpreted to rule that the Applicant or any other party must present its case in any particular order. Rather, the ruling herein amends the list of the issues to be considered at the public hearing found in the Project Order.

removed and relates instead to a single line of evidence that can be applied to the existing hearing issues. The evidence of a contract, or lack thereof, fits into the purview of proposed Issue 5 which calls for "taking into account the commercial, industrial, residential, recreational or other benefits that might be derived from the project." As Protect the Adirondacks points out, the Applicant makes assertions in the Project Application and the responses to the various notices of incomplete applications (NIPAs) related to a subcontract awarded by the U.S. Army and the national security benefits of the Proposed Project. Because the "burden shall be on the project sponsor to present testimony concerning the matter alleged in the application" those assertions in the Project Application are clearly relevant to the hearing and are fair game for testimony and documentary evidence submitted by the parties (*see* 9 NYCRR 580.11[b]). For those reasons, I find it is unnecessary to add the issue presented by Protect the Adirondacks as a discrete issue for consideration in the public hearing.

IV. Ruling

For the reasons discussed above, the February 24, 2026 motion for an order revising the existing hearing issues in APA Project No. 2021-0276 is GRANTED.

The February 3, 2026, Offer of Proof and request to add an issue to the hearing issues in APA Project No. 2021-0276 is DENIED.

After this ORDER please find the attached Revised Hearing Issues for APA Project 2021-0276.



David N. Greenwood
APA Hearing Officer

Dated: March 24, 2026
Albany, New York

To: Attached Service List
Attached: Revised Hearing Issues for APA Project 2021-0278
Appendix: Issues Ruling Record

Revised Hearing Issues for APA Project 2021-0276

March 24, 2026

- Issue #1:** Whether the proposed howitzer testing range is a commercial use (APA Act § 810[2][c][16]), another use in APA Act § 810(2)(c), or a use that is not “included on either the list of primary uses or the list of secondary uses for rural use areas” (APA Act § 810[2][c][16]).
- Issue #2:** Whether the howitzer testing range would have any adverse impacts upon the natural, scenic, ecological, wildlife, recreational, or open space resources of the park considering the development considerations contained in APA Act § 805(4) and 9 NYCRR 574.5, including, but not limited to the following:
- i. Whether the howitzer testing range involves any potential discharges, residues, or other pollutants that may adversely affect water resources, land resources, or air resources (APA Act § 805[4][a][1] – [3]).
 - ii. Whether the howitzer testing range would have any adverse impacts to land resources within the park, such as soils, forest, and open space resources, including the quality and availability of nearby lands for outdoor recreational purposes (APA Act § 805[4][a][1] and [2]).
 - iii. Whether the Applicant has provided a reliable, comprehensive and accurate modeling of the noise that would be produced by the howitzer testing range and whether such noise will have any adverse impacts upon the Park's resources or nearby uses (APA Act § 805[4][a][1]).
 - iv. Whether noise mitigation measures exist that are feasible to implement that would minimize or avoid any adverse impacts to the Park's resources from the howitzer testing range (APA Act § 805[4][a][1]).
 - v. Whether the howitzer testing range would create any ecological impacts or disruption to native or migrating wildlife and their habitats at or near the howitzer testing range, considering species' sensitivities (APA Act § 805[4][a][5] and [6]).
 - vi. Whether the howitzer testing range could have adverse health and safety impacts relating to the operation, storage, and transport of military equipment (APA Act § 805[4][c][2][a]).

- vii. Whether the howitzer testing range would adversely impact nearby Wilderness and Wild Forest areas or their use and enjoyment (APA Act § 805[4][c][2][a]).
- viii. Whether the howitzer testing range would have an adverse economic impact on adjoining and nearby land uses, such as property values (APA Act § 805[4][c][2][a]).

Issue #3: Whether the howitzer testing range would be consistent with the Adirondack Park land use and development plan, including, but not limited to, whether the howitzer testing range would be consistent with the purpose of insuring overall conservation, protection, preservation, development and use of the unique scenic, wildlife, recreational, open space, ecological, and natural resources of the Adirondack Park (APA Act § 809[10][a]).

Issue #4: Whether the howitzer testing range would be compatible within the Rural Use land area classification, and whether it would be compatible with the character description and purposes, policies and objectives of the Rural Use land area classification (APA Act § 809[10][b]).

Issue #5: Whether the howitzer testing range would have any undue adverse impact upon the natural, scenic, aesthetic, ecological, wildlife, historic, recreational or open space resources of the park or upon the ability of the public to provide supporting facilities and services made necessary by the project, taking into account the commercial, industrial, residential, recreational, or other benefits that might be derived from the project (APA Act § 809[10][e]).

APPENDIX

APA Project No. 2021-0276 Public Hearing Issues Ruling Record

1. Email with attached letter from Adirondack Council on behalf of other intervenors to Hearing Officer dated January 20, 2026.
2. Prehearing Conference Recording Dated January 21, 2026.
3. Email from Adirondack Council to Parties dated February 3, 2026 with attachment
4. Email with attached letter Offer of Proof from Protect the Adirondacks to Hearing Officer dated February 3, 2026.
5. Issues Conference Recording dated February 4, 2026.
6. Email with attached letter Motion for Order from Adirondack Council to Hearing Officer dated February 24, 2026.
Exhibit 1: Proposed Hearing Issues for APA Project 2021-0276.
7. Email with attached letter from APA hearing staff to Hearing Officer dated March 2, 2026.
8. Notice of Cross-Motion Dated March 4, 2026.
Attorney Affirmation of Matthew D. Norfolk, Esq. dated March 4, 2026.
Exhibit A: Hon. Allison M. McGahay Scheduling Order dated February 13, 2026.
9. Email from Adirondack Wild to Parties dated March 5, 2026.
10. Email with attached letter from Protect the Adirondacks to Hearing Officer dated March 6, 2026.
Exhibit A: February 3, 2026 Offer of Proof.
Exhibit B: Email from (REDACTED) to (REDACTED) dated February 8, 2023 Subject: UCI Firing Range – Path Forward Direction.
11. Email with attached letter from Adirondack Council to Hearing Officer dated March 11, 2026.
12. Email with attached letter from APA hearing staff to Hearing Officer dated March 11, 2026.
13. Email with attached letter from the Applicant to Hearing Officer dated March 12, 2026.

Service List
APA 2021-0276 Public Hearing
Unconventional Concepts, Inc. and Michael Hopmeier

**Project Sponsor / Applicant
Representatives**

Matthew M. Norfolk
Norfolk Beier PLLC
1936 Saranac Ave, Suite 106
Lake Placid, NY 12946

Shane Kelly
Norfolk Beier PLLC
1936 Saranac Ave, Suite 106
Lake Placid, NY 12946

APA Hearing Staff

Grace Sullivan
Adirondack Park Agency
PO Box 99
1133 NYS Route 86
Ray Brook, NY 12977

Intervenors

Todd D. Ommen
David Ramirez
Sierra Club Atlantic Chapter
Pace Environmental Litigation Clinic
78 North Broadway
White Plains, NY 10603

David Gibson
Managing Partner
Adirondack Wild: Friends of the Forest
Preserve
P.O. Box 9247
Niskayuna, NY 12309

Paul Van Cott
Philip H. Gitlen
Anna V. Seitelman
Attorneys for Adirondack Council, Inc.
Whiteman Osterman & Hanna LLP
One Commerce Plaza
Albany, NY 12260

Christopher Amato
Conservation Director and Counsel
Protect the Adirondacks
P.O. Box 48
North Creek, NY 12853

David N. Greenwood
Administrative Law Judge
NYS DEC
Office of Hearings and Mediation Services
625 Broadway, 1st Floor
Albany, New York 12233-1550