

In the Matter of the Application of

**INTERVENORS' COMBINED
INTERROGATORIES AND
DEMANDS FOR DISCOVERY
AND INSPECTION**

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

for a Permit pursuant to Section 809 of the
Adirondack Park Agency Act and
9 NYCRR Parts 573 and 574

APA Project No. 2021-0276

Intervenors Sierra Club Atlantic Chapter, Adirondack Council, Inc., and Protect the Adirondacks, by and through their attorneys, Todd D. Ommen, Philip H. Gitlen, Anna V. Seitelman, Paul Van Cott and Christopher Amato, and Intervenor Adirondack Wild: Friends of the Forest Preserve, through David Gibson (collectively referred to herein as “Intervenors”), submit the following to Adirondack Park Agency (“APA”) Hearing Staff as combined demands for discovery and inspection pursuant to 9 NYCRR Part 580 and the Administrative Law Judge’s March 13, 2026 Second Revised Scheduling Order (the “Scheduling Order”).

Definitions

“Applicants” means Unconventional Concepts, Inc. and Michael Hopmeier.

“Application” means the permit application submitted to the Adirondack Park Agency for APA Project No. 2021-0276, including the original submission dated November 19, 2021, and all amendments, revisions, supplements, and responses to Notices of Incomplete Permit Application submitted thereafter.

“Communication” means the transmittal, transfer, offer, or exchange of information (in the form of facts, ideas, inquiries or otherwise) by any means, whether formal or informal, at any place or under any circumstances, including paper documents, electronic documents, email, facsimiles, or video or audio recordings.

“Document” has the same meaning and is equal in scope to the usage of the phrase “documents or electronically stored information” in Federal Rule of Civil Procedure 34(a)(1)(A), and includes any communications, writings, drawings, graphs, charts, photographs, sound recordings, images, and any other data compilations stored in any medium from which information can be obtained. A draft or nonidentical copy is a separate document within the meaning of this term.

Without limiting the aforementioned definitions, the term “Documents” includes both hard copy documents and electronically stored information (“ESI”).

“Project” means APA Project No. 2021-0276.

“Project Site” means the properties located at 87 Hale Hill Lane, Lewis, New York, and 195 Hale Hill Lane, Lewis, New York.

Demands

1. Provide an updated list of APA approvals for commercial uses consistent with the list provided by APA Staff pursuant to APA Freedom of Information Law request # F000398-123025 that extends to and includes the required date of response to these demands.
2. Identify and produce all documents or communications pertaining to the environmental review of military operations in the Adirondack Park, including any environmental impact statements and supporting reports, studies, documents and further including but not limited to any and all APA Staff review memoranda, correspondence and APA Board resolutions.
3. Identify and produce all documents or communications with respect to any information requested by APA Staff through Notices of Incomplete Application (NIPAs) to the Applicants that the Applicants have not provided, including any NIPAs, APA Staff emails, memoranda or other documents pertaining to the same.
4. Identify and produce all documents or communications to or from any federal, state or local agency pertaining to any alleged or potential violations at the Project Site of any federal, state or local law, regulations or other requirements.
5. Identify and produce all documents or communications relating to any APA staff analysis of the alleged “commercial, industrial, residential, recreational or other benefits” of the Project pursuant to APA Act § 809(10)(e).
6. Identify and produce all documents or communications relating to any APA staff analysis regarding the Project’s potential adverse impact on the economic value of adjoining or nearby properties.

Production in response to these demands shall be made by serving responsive materials upon Intervenors’ counsel within the time set forth in the Scheduling Order.

These demands are continuing in nature, and APA Hearing Staff shall supplement their responses as additional responsive information becomes available during the pendency of this proceeding.

In the event of any failure or refusal to comply with these demands, Intervenors reserve the right to seek appropriate relief from the Administrative Law Judge, including an order compelling disclosure and such other, further or different relief as may be proper.

Respectfully submitted,



Paul Van Cott
On behalf of the Intervenors

Dated: April 8, 2026

TO: APA Hearing Staff
Service List