

STATE OF NEW YORK  
ADIRONDACK PARK AGENCY

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In the Matter of the Application of

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

RESPONSES OF INTERVENOR  
ADIRONDACK WILD  
TO APPLICANTS' DEMAND  
FOR PRODUCTION OF  
DOCUMENTS

Project No. 2021-0276

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Intervenor Adirondack Wild: Friends of the Forest Preserve responds to the Applicants' Demand for Production of Documents and Things dated April 8, 2026 as follows:

DOCUMENTS AND THINGS DEMANDED

1. All Documents supporting any contention that the Project will result in adverse environmental impacts.

**Response:** Adirondack Wild objects to this demand as being overbroad, vague, beyond the scope of permissible discovery and not pertinent to the discovery of admissible evidence concerning the Hearing issues. Also, the demand seeks an unlimited universe of documents not in the possession or control of Adirondack Wild.

Without waiver of these objections, Adirondack Wild points to the following:

- a. Our comment to the APA and request to proceed to public hearing, Oct. 30, 2025, attached.
- b. Our petition to intervene in the Hearing, dated Dec. 17, 2025, attached.
- c. Our response to the APA concerning UCI's objection to our party status, dated Jan. 26, 2026, attached.
- d. An update on the hearing dated April 1, 2026 to inform our members about the hearing issues, hearing schedule and status, attached.
- e. Adirondack Park Agency Notices of Incomplete Application, NIPAs 1-6, available at the APA Hearing website, [www.apa.ny.gov](http://www.apa.ny.gov).
- f. Public comments available at the aforementioned APA Hearing website.
- g. Slide Presentation to Proceed to Adjudicatory Hearing by APA staff, November 13, 2025, featured on the APA website.

2. All expert reports, opinions, or analyses prepared or relied upon regarding the Project and for presentation of evidence in the Hearing.

**Response:** Adirondack Wild objects to this demand as being premature during this prehearing period, and overbroad. In the prehearing period, Adirondack Wild has not yet prepared, or relied upon other expert reports, opinions, or analyses for presentation of evidence at the Hearing.

3. All Communications (including but not limited emails) between You and any third party relating to the Project or this Hearing.

**Response:** Adirondack Wild objects to this demand as being overbroad, vague, and not pertinent to the discovery of admissible evidence concerning the Hearing issues. Without waiving our objection, at the request of North Country Public Radio (NCPR) we were interviewed about why the Applicant was appealing to the APA to deny Adirondack Wild's intervenor status. The interview took place on Feb. 19, 2026. Despite a search, we are unable to locate that interview at [www.ncpr.org](http://www.ncpr.org).

4. All Documents relating to any studies, modeling, or data used to evaluate environmental impacts of the Project.

**Response:** Adirondack Wild objects to this demand as being overbroad, vague, and premature during prehearing phase. Without waiving our objection, we point to the Project Application, including Project Notices for Incomplete Application, and related Hearing documents and Public Comments listed at the aforementioned APA website.

5. All Documents supporting any claim that the Project fails to comply with applicable statutes, regulations, or permit criteria.

**Response:** Adirondack Wild objects to this demand as being overbroad, vague, and premature during prehearing phase. Adirondack Wild will identify relevant documents supporting our testimony on a schedule determined by the Hearing Officer.

6. All Documents relating to alternative projects or mitigation measures You contend are preferable.

**Response:** Adirondack Wild objects to this demand as being overbroad, vague, and premature during prehearing phase. Adirondack Wild will identify relevant documents supporting our testimony on a schedule determined by the Hearing Officer.

7. All Documents You intend to rely upon at the Hearing.

**Response:** Adirondack Wild objects to this demand as being overbroad, vague, and premature during prehearing phase. Adirondack Wild will identify relevant documents supporting our testimony on a schedule determined by the Hearing Officer.

8. All Documents reflecting funding sources, sponsorship, or financial support related to Your participation in this proceeding.

**Response:** Adirondack Wild objects to this demand as being overbroad, vague, beyond the scope of permissible discovery and not pertinent to the discovery of admissible evidence concerning the Hearing issues. Our supporters' information is privileged, confidential, and has no bearing on or relationship to the Hearing issues and the presentation and examination of Hearing evidence.

9. All Documents reflecting current and past membership in Your organization, including lists of names of current and past members from 1990 to present.

**Response:** Adirondack Wild objects to this demand as being overbroad, vague, beyond the scope of permissible discovery and not pertinent to the discovery of admissible evidence concerning the Hearing issues. Our members' information is privileged, confidential, and has no bearing on or relationship to the Hearing issues and the presentation and examination of Hearing evidence.

10. The following are to be responded to by Adirondack Council only:

(a) All Documents reflecting current and past membership in Your organization, of Rush Holt, Jr. from 1990 to present.

(b) All Communications between Rush Holt, Jr. and any member, officer, employee, and staffperson of Your organization relating to the Project and Hearing.

**Response:** N/A

Submitted by:

A handwritten signature in black ink that reads "David Gibson". The signature is written in a cursive style with a large, sweeping initial "D".

David Gibson, Managing Partner  
Adirondack Wild: Friends of the Forest Preserve

April 29, 2026