

1 July 2019

John Konior, Chair  
Town of Kingston Planning Board  
906 Sawkill Road  
Kingston NY 12401  
via email: henkle@pbtownkingstonny.us

RE: 850 Route 28 LLC Site Plan / Special Use Permit Application

Dear Chairman Konior and the Town of Kingston Planning Board:  
Thank you for the opportunity to comment on the proposed 850 Route 28 LLC Site Plan Special Use Permit Application.

### ADK (Adirondack Mountain Club)

ADK is dedicated to protecting and advocating for New York State's wild lands and waters while also teaching people how to enjoy natural places responsibly. Since 1922, the organization has offered people opportunities to stay and play in as well as protect, discover, and explore the outdoors. Today, ADK has 30,000 members in 27 chapters statewide and is served by a professional, year-round staff. The organization is recognized as a vital voice in the commitment to environmental stewardship and ethical outdoor recreation in New York State. ADK members hike, camp, snowshoe, cross-country ski, paddle, and cycle the lands and waters of the Adirondack and Catskill Parks and other state lands. Our members are also monitors and maintainers of trails and recreation infrastructure as well as watchdogs of public lands and watersheds to monitor for invasive species or irresponsible and destructive motorized trespass.

We respectfully request that you consider the following concerns and comments outlined below.

ADK is extremely concerned about a proposal before the Town of Kingston Planning Board to construct a large-scale concrete manufacturing facility on land surrounded by the Catskill Park's Bluestone Wild Forest and other property conserved by the Open Space Institute (OSI). These lands are a beloved natural area for Kingston for many of our members who go there to hike, bike, fish, swim, and enjoy the peace of its woodlands. This proposed facility could have significant environmental impacts on the adjacent Bluestone Wild Forest and OSI Property.

The developer, 850 Route 28 LLC, has not fully accounted for numerous potential adverse environmental impacts from the construction and operation of the plant. It proposes to clear 21 acres of trees, blast 405,000 cubic yards of rock, and construct a plant totaling 240,000 square

feet. Construction will take at least five years of work lasting from 6 AM to 7 PM, and nearly 12,500 trucks will be required to remove 162,000 cubic yards of material. After construction, the facility could be run 24 hours a day, seven days a week and would cause over a hundred new vehicles to use Route 28 daily (including 42 trucks).

ADK urges the Planning Board to rescind the Negative Declaration issued in March, require the developer to prepare a comprehensive Environmental Impact Statement, and keep open the public hearing for the site plan/special use permit until a thorough review has been completed.

A comprehensive review of the proposed project must be completed to fully understand what will clearly be adverse environmental impacts to the Bluestone Wild Forest and surrounding community.

These impacts are likely to include:

- **Water Contamination:** The developer's stormwater pollution prevention plan fails to fully address stormwater and other potential impacts to Pickerel Pond.
- **Noise:** Construction will include significant amounts of blasting, rock crushing, and other noisy activities that will affect recreation and wildlife in the Bluestone Wild Forest and in the OSI Property.
- **Hours of Operation:** Impacts related to proposed round-the-clock work were not considered by the Planning Board in the Negative Declaration.
- **Habitat:** A thorough analysis of the impacts of the proposed construction and operations on-site and on the adjacent Bluestone Wild Forest and on the OSI Property has not been conducted.
- **Traffic:** The developer only analyzed the effects of traffic on Route 28. There is no information regarding the effect of truck pollution and noise on the Bluestone Wild Forest or on the OSI Property and to the many residents and visitors using these areas.
- **Views:** No thorough analysis of the visual impacts of the construction of a huge manufacturing plant within the Bluestone Wild Forest nor the OSI Property has been conducted.

The Town of Kingston Planning Board must rescind the Negative Declaration determination and require the developer to examine all potential adverse environmental impacts, as is clearly required under the State Environmental Quality Act. ADK strongly urges the Planning Board to take no further action on this application with respect to the site plan/special use permit until all impacts have been assessed and suitable mitigation techniques and alternatives have been investigated.

Thank you for considering the above comments.

Sincerely,



Neil F. Woodworth  
Executive Director and Counsel  
Adirondack Mountain Club  
neilwoody@gmail.com  
518-449-3870 Albany office  
518-669-0128 Cell  
518-668-4447 x-13 or 25 Lake George office

Cathy Pedler  
Director of Government Relations and Conservation  
Adirondack Mountain Club  
[Cathypedler.adk@gmail.com](mailto:Cathypedler.adk@gmail.com); [cathy@adk.org](mailto:cathy@adk.org)  
518-449-3870 Albany Office