



Board of Directors

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June 6, 2024

James McMartin Long
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Benjamin Amos
Adirondack Park Agency
PO Box 99
1133 NYS Route 86
Ray Brook NY 12977

Barbara Rottier
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Re: Application by Cellco Partnership d/b/a Verizon Wireless for 149-foot telecommunications tower (Chestertown, Warren County); APA Project No. 2024-0013

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Dear Benjamin:

Protect the Adirondacks (“PROTECT”) offers these comments for your consideration regarding the application for a 149-foot-tall telecommunications tower to be located on Kohl Road/Olmstedville Road in the Town of Chester (Warren County). A new tower in the Adirondack Park must not have an “undue adverse impact upon the natural, scenic, aesthetic . . . or open spaces resources of the park” (Adirondack Park Agency Act, Executive Law § 809[10]), and it must be “consistent with the Agency’s Policy on Agency Review of Proposals for New Telecommunications Towers and Other Tall Structures in the Adirondack Park (Towers Policy)”. According to the Towers Policy (pages 3 to 4), a proposed telecommunications tower must be “substantially invisible”. Therefore, any tower approved by APA must incorporate design elements and conditions that ensure that the towers are “substantially invisible”.

Staff

Peter Bauer
Executive Director

Claudia K. Braymer, Esq.
Deputy Director

Christopher Amato, Esq.
*Conservation Director
and Counsel*

The proposed “monopine” tower at a height of 149 feet is not “substantially invisible” as demonstrated by the applicant’s visual simulations. The proposed tower is situated in a large expanse of forest land in an area with the protective Rural Use classification. Even with the monopine design, the proposed 149’ tower is too tall to “blend with the background vegetation” as required by the Towers Policy (page 3). The top of the existing natural tree canopy is 90 feet (according to the applicant), which means that the proposed tower will be nearly 60 feet taller than the surrounding forest. Under no circumstances can such a visual intrusion be considered “substantially invisible.”

Protect the Adirondacks

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The tower should be reduced in height to the 120' option with a "monopine" design. Notably, a 120' monopine option was not shown by applicant, only a 120' monopole tower was shown. Lowering the monopine to 120 feet will still allow the telecommunications equipment (and the branches of the monopine) to be higher than the natural tree canopy, allowing for effectiveness of the telecommunications equipment, while limiting the visual intrusiveness of the tower.

In addition, the applicant is relying on existing trees as its plan for vegetative screening (see Sheet TR-1). Since the applicant is relying on the continued existence of those trees, there must be a condition in any APA permit granted for this tower explicitly prohibiting the cutting of the existing trees around the tower site. Moreover, there should be a condition requiring the planting of new trees in the event that the existing trees are destroyed, such as by storm or disease.

On behalf of the Board of Directors of Protect the Adirondacks, we thank you for considering our comments regarding this application.

Sincerely,

A handwritten signature in black ink that reads "Claudia K. Braymer". The signature is written in a cursive, flowing style.

Claudia K. Braymer,
Deputy Director

cc: David J. Plante, AICP CEP, APA Deputy Director, Regulatory Programs