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November 13, 2024

Ariel Lynch
Adirondack Park Agency
PO Box 99
1133 NYS Route 86
Ray Brook NY 12977

Re: Application by Verizon Wireless for 105-foot telecommunications tower
(Town of Schroon); APA Project No. 2024-0199

Dear Ms. Lynch:

Protect the Adirondacks (“PROTECT”) offers these comments for your consideration regarding the application by Verizon Wireless for a 105-foot-tall telecommunications tower to be located on North Shore Road in the Town of Schroon (Essex 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”.

The Visual Resource Evaluation provided by the applicant indicates that the proposed monopole will be visible from Paradox Lake and from points on the eastern side of the lake. The applicant’s photographs of the site were taken when the trees had 100% leaf on conditions, so for the times in the year when the trees do not have leaves the proposed tower will be even more visible.

The proposed “monopole” tower at a height of 105 feet is not “substantially invisible” as demonstrated by the applicant’s visual simulations. The proposed tower is located across the lake from an area with the protective Rural Use classification. The proposed 105’ tower, located in an area with mature trees,

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does not “blend with the background vegetation” as required by the Towers Policy (page 3).

The visibility of the proposed tower as currently designed will have an undue adverse impact on the natural, scenic, aesthetic and open spaces resources of the Adirondack Park. The top of the existing natural tree canopy is 60 to 90 feet according to the applicant. The 105-foot monopole tower should be converted to a “monopine”/simulated pine tree design in order to blend in with the surrounding trees.

In addition, the applicant is relying on the surrounding 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. The permit should also require replacement of any simulated branches that break or fall off of the tower.

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