



April 10, 2014

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Kathy Reagan
NYS Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977

RE: Public comments on the draft UMP for Hurricane Mountain Historic Area

Dear Kathy Reagan,

Protect the Adirondacks has reviewed the draft Hurricane Mountain Unit Management Plan (UMP). PROTECT understands that this draft UMP is not the forum to revisit issues around spot zoning on the Forest Preserve. Our comment will focus on the decision by the Adirondack Park Agency (APA) and Department of Environmental Conservation to utilize the "historic" Hurricane Mountain firetower as a modern-day communications tower equipped with solar panels and communication transmission devices.

The Adirondack Park State Land Master Plan (SLMP) defines Historic Areas as:

"Historic areas are locations of buildings, structures or sites owned by the state (other than the Adirondack Forest Preserve itself) that are significant in the history, architecture, archeology or culture of the Adirondack Park, the state or the nation; that fall into one of the following categories;

-- state historic sites;

-- properties listed on the National Register of Historic Places;

-- properties recommended for nomination by the Committee on Registers of the New York State Board For Historic Preservation; and that are of a scale, character and location appropriate for designation as an historic area under this master plan and the state has committed resources to manage such areas primarily for historic objectives."

The SLMP then lists under Historic Areas Guidelines for Management and Use four "Basic Guidelines":

1. *The primary management guidelines for historic areas will be to preserve the quality*

and character of the historic resources, that is, to the greatest extent feasible, in a setting and on a scale in harmony with the relatively wild and undeveloped character of the Adirondack Park.

2. All historic areas will be designed, managed and interpreted so as to blend with the Adirondack environment and have the minimum adverse impact possible on surrounding state lands and nearby private holdings.

3. Construction and development activities in historic areas will:

- avoid material alteration of wetlands;*
- minimize extensive topographical alterations;*
- limit vegetative clearing; and,*
- preserve the scenic, natural and open space resources of the historic area.*

4. Each historic area will be designed, managed and interpreted in conformity with a special historic area unit management plan for the area, filed with and approved by the Agency after public hearing as being consistent with this master plan.

Special unit management plans will be prepared in consultation with the Agency for the two existing historic areas as soon as possible. No new structures or improvements at existing or proposed historic areas will be constructed prior to the approval of such special unit management plans. Such structures and improvements will conform to this master plan and special historic area unit management plans.

PROTECT does not see how the mounting of solar panels and communication transmission devices on the Hurricane Mountain firetower will “preserve the quality and character of the historic resources ... to the greatest extent feasible, in a setting and on a scale in harmony with the relatively wild and undeveloped character of the Adirondack Park.”

It seems to us that if the “primary management guidelines for historic areas will be to preserve the quality and character of the historic resources” then the use of these structures as communications towers is not permissible.

The APA undertook the spot zoning approach to create mountaintop Historic Areas to preserve the firetowers on the summits of Hurricane and St. Regis Mountains. New uses of these towers as communications towers undermines the integrity of Historic Areas.

If the APA approves the outfitting the Hurricane Mountain firetower with solar panels and communications equipment, then should we expect various dish antennas at Camp Santanoni for wifi or cell service or emergency communications?

On behalf of the Board of Directors of Protect the Adirondacks, please let me extend our appreciation for the opportunity to submit these public comments on this important project.

Sincerely,



Peter Bauer
Executive Director