



Board of Directors

June 12, 2025

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Via Email

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Adirondack Park Agency
PO Box 99

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1133 NYS Route 86
Ray Brook NY 12977

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Re: Application by Hamilton County et al. for 110-foot telecommunications tower (Town of Arietta); APA Project No. 2024-0074

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Dear Ms. Yamrick:

Protect the Adirondacks (“PROTECT”) offers these comments for your consideration regarding the application by Hamilton County, NY RSA2 Cellular Partnership d/b/a Verizon Wireless and Hudson Valley Wireless for a 110-foot-tall telecommunications tower to be located on New York State Route 8 in the Town of Arietta (Hamilton County). The proposed monopine tower will support Hamilton County public safety radio antennas (at 110 feet above ground and 80 feet above ground), Verizon Wireless antenna array (at 100 feet above ground level), and Hudson Valley Wireless internet antenna (at 75 feet above ground level). The location of the proposed tower is in an area classified Low Intensity Use.

Staff

Claudia K. Braymer, Esq.
Executive Director

Christopher Amato, Esq.
**Conservation Director
and Counsel**

Peter Bauer
Fundraising Coordinator

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 the Adirondack Park Agency (“APA”) must incorporate design elements and conditions that ensure that the towers are “substantially invisible”.

The proposed tower uses consolidation (or co-location) of multiple sets of equipment (including public safety equipment) on a single tower as well as other methods, such as the monopine design, to blend the tower with the

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visual setting as seen from public viewing points. The applicant's visual simulations have been provided in accordance with the Towers Policy as a means to document that the proposed monopine tower, at a height of 110 feet, would satisfy the "substantially invisible" requirement. The photo simulations and Tower Elevation materials provided by the applicant in its May 12, 2025 submission to the Agency provide the Agency with required documentation about the proposed monopine's visual impacts from public viewing locations on New York State Route 8 and from various locations around Piseco Lake, including public recreation sites at Point Comfort and Little Sand Point (part of Piseco Lake Campground and Day Use Area) and Poplar Point Day Use Area.

The applicant has provided information that the proposed 110' monopole tower, located in an area with existing forest canopy will "blend with the background vegetation" as required by the Towers Policy (page 3). The trees surrounding the proposed tower site are approximately 70 feet tall, so the Verizon Wireless and Hudson Valley Wireless equipment (at 100 feet and 75 feet) will be five to 30 feet above the height of the tallest trees. As shown in the applicant's Tower Elevation, Sheet C-201 (revised 5/7/25), the Hamilton County public safety radio antennas are the only parts of the tower that will be above the top of the monopine and this equipment will be relatively narrow and slender. Additionally, per the application materials, the existing trees are not mature and will continue to grow in height to further blend the proposed monopine with the surrounding trees.

Since the applicant is relying on the surrounding trees as its plan for vegetative screening, 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 "monopine" or simulated "tree" tower. Additionally, any future proposed expansion or modification of the proposed tower must also ensure that the tower continues to be "substantially invisible" and does not have an undue adverse impact on the Adirondack Park.

In conclusion, we appreciate the thorough APA staff review that was conducted in accordance with statutory authority and APA's Towers Policy, and the documentation provided by the applicant in this matter. We believe that such reviews, and comprehensive application materials, will result in tower locations and designs that will not have an undue adverse impact on the natural, scenic, aesthetic and open spaces resources of the Adirondack Park.

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 script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Claudia K. Braymer,
Executive Director