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August 12, 2025

Via Email

Virginia Yamrick  
Adirondack Park Agency  
PO Box 99  
1133 NYS Route 86  
Ray Brook NY 12977

**Re: Application by NY RSA2 Cellular Partnership d/b/a Verizon  
Wireless for 109-foot telecommunications tower (Town of Indian Lake);  
APA Project No. 2024-0351**

Dear Ms. Yamrick:

Protect the Adirondacks (“PROTECT”) offers these comments for your consideration regarding the application by Verizon Wireless for a 109-foot-tall telecommunications tower to be located on New York State Route 28 in the Town of Indian Lake (Hamilton County). The location of the proposed tower is in an area classified Rural Use, one of the most protective private land classifications in the Adirondack Park.

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 it is “substantially invisible”.

The proposed monopole tower is not “substantially invisible” as demonstrated by the applicant’s visual simulations. The Visual Resource Evaluation provided by the applicant shows that the proposed monopole will be visible from several locations on NYS Route 28. The simulated view of the tower from point 1 (S-1) shows that it will not be screened from NYS Route 28 by the existing vegetation due to trees being removed for the proposed driveway

**Protect the Adirondacks**

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at the currently planned location (Tree Removal Plan, Sheet L-1) and because the utility right of way that is devoid of trees is located between the road and the proposed tower. The site plan (Sheets C-1A and C-2) does not show any new landscaping proposed around the tower facility or the driveway. The simulated views of the tower from points 2 and 3 (S-2 and S-3) show that its unnatural colors and lack of camouflage design elements (e.g., monopine), does not “blend with the background vegetation” as required by the Towers Policy (page 3). The trees surrounding the proposed tower site have an estimated height of 40 to 70 feet, so the 109-foot tower will be at least 30 to 60 feet above the height of the tallest trees and thus easily visible.

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 proposed tower should be lowered in height and converted to a naturally colored “monopine” or other simulated tree design in order to blend in with the surrounding trees. In addition, vegetative landscaping should be added and/or the position of the driveway should be moved to retain the existing trees that would screen the tower from NYS Route 28.

To the extent that the applicant is relying on existing 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. Finally, there should be additional screening required by APA to block the view of the tower.

Furthermore, APA staff advised the applicant that the project site is within 5 miles of a Northern Long-Eared Bat hibernaculum. The applicant responded that it had enclosed a Letter of No Jurisdiction from the “NYS DEC dated April 3, 2025” regarding the Northern Long-Eared Bat. The letter from the New York Department of Environmental Conservation (DEC) dated April 3, 2025 that was provided in response to our Freedom of Information Law request was for a proposed telecommunications tower located in the Town of Fort Ann, Washington County. The applicant must be required to provide a letter from DEC regarding endangered species for this proposed location.

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 cursive script that reads "Claudia K. Braymer".

Claudia K. Braymer,  
Executive Director