

**The Adirondack Council Position Statement on Wireless
Telecommunications in the Adirondack Park
March 2005**

Background:

Today, more than two-thirds of Americans carry a wireless telephone. The exponential growth in communications technology has transformed society, and it is common to see people talking on their wireless phones nearly everywhere, even on the tops of high peaks in the middle of an Adirondack wilderness area. While 'cell phones' provide numerous benefits, especially for public safety and emergency first-responders, their rapid proliferation requires an expanding network of transmission technology.

Wireless telecommunications towers will have significant impacts within the Adirondack Park. Problems arise when new towers, often over one hundred feet high, are built without considering the environmental impacts of the roads and power infrastructure needed to service them, or the visual impacts on historic buildings, scenic rural areas, on mountain tops, or in wilderness settings. However, reliable wireless communication systems along principal existing road corridors and in the villages and hamlets could improve public safety by reducing the response time needed by police, fire and emergency medical services, as well as permitting simultaneous communications among these first-responders.

Congress designed the Telecommunications Act of 1996 to promote the growth of new technologies and provide fair access to telecommunications services for everyone. The Act also gave telecommunication companies broad powers to build their networks and prohibited communities from prohibiting towers.

In response to the Telecommunications Act, the Adirondack Park Agency developed a 'Policy on Agency Review of Proposals for new Telecommunications Towers and other Tall Structures in the Adirondack Park', which was approved on February 15, 2002 (Appendix 1.) The policy is consistent with the APA Act and the Adirondack Park State Land Master Plan. The Council provided input during the development of this policy.

Most recently, the U.S. Justice Department began the development of a nation-wide Integrated Wireless Network (IWN) that will replace the government's patchwork of law enforcement radio systems with a seamless voice and data network to let federal law enforcement officials link wirelessly with state and local counterparts. New York State's Wireless Network (SWN), designed to also meet Homeland Security standards, specifies that the system will have 97 percent coverage along roadways and 95 percent coverage of the entire landscape, and achieve the 'interoperability' among emergency responder communication systems that the federal network requires.

Council Position on Telecommunications Infrastructure in the Park:

The Adirondack Council understands that official emergency wireless telecommunications coverage is vitally important for public health and safety and is currently inadequate in many populated sectors of the Park. At the same time, commercial wireless companies are seeking to increase telecommunications coverage for

private users. The Council believes that reliable emergency wireless coverage, and other private wireless uses, can be achieved while ensuring the environmental and scenic resources that the Park possesses, which serve as assets not only to the ecosystem but to the regional economy, can remain intact and reasonably undisturbed. We submit the following guidelines for consideration by policymakers, engineers, and regulators for the design and construction of new wireless communication infrastructure in the Park.

- When planning for new wireless communication coverage in the Adirondack Park, focus should be directed toward principal road corridors including: Interstate Highway 87 and NYS Routes 3, 28, 30, 8, and 9. In addition to road corridors, hamlet areas and centers of development should also be primary candidates for new coverage. These areas are most in need of coverage as they are population centers or routes traveled by the majority of the population, and they often have existing infrastructure on which new antennae and arrays could be sited.
- Designs for new infrastructure should exhaust every possibility to collocate new infrastructure on existing towers or other structures before suggesting the construction of new towers. There have been successful examples of collocation of wireless infrastructure both in the Park and throughout the nation. Sites inside the Park and nationwide are currently collocating wireless antennae on churches, water towers, buildings, utility structures, and existing towers. Some of these have simply entailed attaching an antenna to the structure, while others have concealed the technology as part of the building – a chimney for example. With so many existing structures in the Park’s hamlets, towns, villages, and along roadways, it is feasible that wireless coverage could be drastically increased without adding new towers which obscure scenic vistas and diminish the Park’s wild character.
- While wireless coverage is important in population centers and along road corridors, the Council does not believe that wireless coverage in Forest Preserve areas is necessary and therefore construction of new towers on those constitutionally protected lands would be inappropriate.
- With regard to private land not in hamlet areas including resource management lands, the Council urges the Adirondack Park Agency to mandate that applicants exhaust all opportunities for collocation before deeming applications for new towers complete. If collocation is not possible, the applicant must comply with all provisions of the Adirondack Park Agency towers policy. Additionally, these applications should be reviewed to ensure the applicant has obtained all proper permits required outside of the APA, including NYS DEC storm water State Pollutant Discharge Elimination System (SPDES) permits for pollution created during and after construction.