Memorandum to Josh Clague Hurricane Mountain Fire Tower Historic Area UMP Initial Draft Review May 29, 2013



MEMORANDUM

TO: Josh Clague

Associate Natural Resource Planner (DEC)

FROM: Kathy Regan

Senior Natural Resource Planner (APA)

DATE: May 29, 2013

RE: Hurricane Mountain Fire Tower Historic Area

Kathy Regan

Initial Draft Unit Management Plan Review

The following are my comments on the March 2013 Hurricane Mountain Fire Tower Historic Area (HMFTHA) Initial Draft Unit Management Plan (UMP) regarding the conformance with the guidelines and criteria of the Adirondack Park State Land Master Plan (SLMP).

In 1972, plans to remove the Hurricane Mountain Fire Tower, a non-conforming structure in a wilderness setting, were outlined in the Adirondack Park State Land Master Plan (SLMP). Prior to 2010, the Hurricane Mountain Fire Tower was located in the Hurricane Mountain Primitive Area. In 1979, the Department of Environmental Conservation (DEC) ended use of the tower as a forest fire observer station. In 2007, because of a growing recognition of the tower's historical significance, the tower was added to the National Register of Historic Places. In 2010, in response to numerous public comments received by DEC and the Adirondack Park Agency (APA) in support of retaining the structure, one half acre of land around the tower was reclassified. The SLMP was amended to create the Hurricane Mountain Fire Tower Historic Area, thereby allowing the tower to remain.

The Department's Initial Draft UMP proposes several management actions to address management challenges and opportunities. These actions include stabilizing and opening the fire tower for public use, developing interpretive materials related to the fire tower as a historic resource, permitting the long term volunteer maintenance of the tower, and monitoring the use of

the fire tower. The last management action listed proposes the addition of a radio repeater, with solar panels as a source of power, on the fire tower.

The repeater itself is approximately 5.5 square feet and would be placed inside the cab of the fire tower. The repeater would not be visible from outside of the cab. State land staff recommend interpretive materials are included inside the cab providing the public with information on how fire towers have been used for communication in the past and how this repeater is being used for current communication purposes.

An antenna would also need to be placed on the corner of the cab roof. The antenna would be between five and six feet long and extend approximately four feet above the peak of the roof. Staff do not believe that a black antenna would detract from the historic purpose of the fire tower.

Additionally, four BP Solar 275 75-watt solar photovoltaic panels (or equivalent), each measuring 46.8 by 20.9 by 1.5 inches would be mounted on the tower below the cab. State land staff have several concerns about these proposed solar panels.

The panels may distract from the historic area purpose of the fire tower under this state land classification category. The State Land Master Plan (SLMP) states that the "primary management guidelines for historic areas will be to preserve the quality and character of the historic resources, that is, to the greatest extend feasible, in a setting and on a scale with the relatively wild and undeveloped character of the Adirondack Park" (page 41). The SLMP continues by stating that "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" (page 42).

The Hurricane Mountain Fire Tower was added to the New York State and National Historic Registers in 2007. The State and National Registers of Historic Places are the official lists of buildings, structures, districts, objects, and sites significant in the history, architecture, archeology, engineering, and culture of New York and the nation. The same eligibility criteria are used for both the State and National Registers. The National Historic Preservation Act of 1966 and the New York State Historic Preservation Act of 1980 established the National and State Registers programs. The following criteria are used to evaluate properties for listing on the New York State and National Registers of Historic Places.

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- a. that are associated with events that have made a significant contribution to the broad patterns of our history; or
- b. that are associated with the lives of persons significant in our past; or
- c. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant distinguishable entity whose components may lack individual distinction; or

d. that have yielded, or may be likely to yield, information important in prehistory or history.¹

The inclusion of the Hurricane Mountain Fire Tower to both the State and Federal Register of Historic Places was a determining factor for the Agency Board when recommending to Governor Paterson that the tower be reclassified as a Historic Area in 2010. At that time, there was no mention of the need for a repeater and solar panel installation or any indication that the tower would be used in any other way than as a historic resource. Although part of the historic use of fire towers were to meet the Department's ongoing and emergency communications needs, the use of solar panels may detract from the historic aspects which led to its reclassification.

The use of solar panels on historic structures in Historic Areas has not been determined to be compliant with the SLMP. The Camp Santanoni Historic Area team revised UMP (draft) recognizes that cell coverage may be an option for their situation and a final determination has not been made at this time.

State land staff have several concerns regarding the addition of solar panels to this historic structure, and this will likely need a SLMP compliance determination from the Agency Board. The additional proposed management actions are compliant with the SLMP.

Cc: Kris Alberga

¹ http://nysparks.com/shpo/national-register/