NEW YORK STATE

Department of Environmental Conservation

DIVISION OF LANDS & FORESTS

Saint Regis Mountain Fire Tower Historic Area

Unit Management Plan

Final Environmental Impact Statement

Town of Santa Clara

Franklin County

ANDREW M. CUOMO
Governor

JOSEPH J. MARTENS
Commissioner

Lead Agency:

New York State Departement of Environmental Conservation
625 Broadway
Albany, NY 12233

For Further Information Contact:

Josh Clague
New York State Department of Environmental Conservation
625 Broadway, 5th Floor
Albany, NY 12233
Phone: (518) 473-9518
adirondackpark@dec.ny.gov

October 2014

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ANDREW M. CUOMO
GOVERNOR

JOE MARTENS
COMMISSIONER

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
ALBANY, NEW YORK 12233-1010

M E M O R A N D U M

TO: The Record

SUBJECT: Saint Regis Mountain Fire Tower Historic Area

DATE: OCT 22 2014

The Saint Regis Mountain Fire Tower Historic Area Unit Management Plan has been completed and the Adirondack Park Agency found it to be in conformance with the Adirondack Park State Land Master Plan.

The UMP is consistent with the State Constitution, Environmental Conservation Law, and Department Rules, Regulations and Policies and is hereby approved and adopted.

Joseph J. Martens

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RESOLUTION ADOPTED BY
THE ADIRONDACK PARK AGENCY
WITH RESPECT TO ST. REGIS MOUNTAIN FIRE TOWER HISTORIC AREA
UNIT MANAGEMENT PLAN

May 9, 2014

WHEREAS, Section 816 of the Adirondack Park Agency Act directs the Department of Environmental Conservation to develop, in consultation with the Adirondack Park Agency, individual management plans for units of land classified in the Master Plan for Management of State Lands and requires such management plans to conform to the general guidelines and criteria of the Master Plan; and

WHEREAS, in addition to such guidelines and criteria, the Adirondack Park State Land Master Plan prescribes the contents of unit management plans and provides that the Adirondack Park Agency will determine whether a proposed individual unit management plan conforms with such general guidelines and criteria; and

WHEREAS, the Department of Environmental Conservation has prepared a unit management plan for State Lands in the Town of Santa Clara, Franklin County which includes proposed management actions for the St. Regis Mountain Fire Tower Historic Area dated February, 2014; and

WHEREAS, the Department filed a notice of acceptance of the Draft Environmental Impact Statement published in the Environmental Notice Bulletin (ENB) on October 10, 2013 and a notice of acceptance of the Final Environmental Impact Statement published in the ENB on May 7, 2014; and

WHEREAS, the Department of Environmental Conservation is the lead agency, and the Adirondack Park Agency is an involved agency whose staff have been consulted in the preparation of the proposed plan; and

WHEREAS, the Agency is requested to determine whether the final St. Regis Mountain Fire Tower Historic Area Unit Management Plan (the Plan), dated February, 2014, conforms with the standards and guidelines of the Adirondack Park State Land Master Plan; and

WHEREAS, the Adirondack Park Agency has reviewed the proposed Plan; and

WHEREAS, the Plan recognizes the area will be managed in compliance with Article XIV, Section 1 of the New York State Constitution, the Adirondack Park State Land Master Plan, and the State Historic Preservation Act (SHPA);

WHEREAS, the Plan recognizes the need to improve public use and enjoyment of the area, avoid user conflicts and prevent overuse according to the guidelines and criteria of the Adirondack Park State Land Master Plan; and

WHEREAS, the Plan's objectives include opening and maintaining the fire tower for public use and education; and

WHEREAS, the Plan recognizes that volunteer “Friends” groups are a valuable resource to assist with the stewardship of this Area; and

WHEREAS, the Plan recognizes the long term volunteer maintenance and interpretation of the fire tower through a Volunteer Stewardship Agreement will include the establishment of a Tower Steward position; and

WHEREAS, the Plan recognizes that the addition of interpretive materials related to the fire tower, including interpretive signs in the fire tower and materials to be located at the trailhead kiosks and on the Department’s website will enhance the public’s experience of this Historic Area; and

WHEREAS, the Plan recognizes the need to monitor the fire tower and the summit of St. Regis Mountain for overuse and take necessary steps to address the impacts of overuse if such are detected; and

WHEREAS, the Plan recognizes that a helicopter, if one is needed to deliver materials to the tower, would not be allowed between May 15 and August 1 to avoid any impacts to the Bicknell’s Thrush during its nesting season; and

NOW, THEREFORE, BE IT RESOLVED, that pursuant to Section 816 of the Adirondack Park Agency Act, the Adirondack Park Agency finds the Hurricane Mountain Fire Tower Historic Area Unit Management Plan, dated February, 2014, conforms with the general guidelines and criteria of the Adirondack Park State Land Master Plan; and

BE IT FINALLY RESOLVED, that the Adirondack Park Agency authorizes its Executive Director to advise the Commissioner of

Environmental Conservation of the Agency’s determination in this matter.

Ayes: Art Lussi, Presiding Chair, Karen Feldman, William Thomas, William Valentino, Dan Wilt, Brad Austin (DED), Dierdre Scozzafava (DOS), Robert Stegemann (DEC)

Nays: None

Abstentions: None

Absent: Leilani Ulrich, Chairwoman, Richard Booth, Sherman Craig

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Executive Summary

This Unit Management Plan (UMP) represents the culmination of a long, dynamic, and at times, controversial planning process surrounding the fire observation tower atop Saint Regis Mountain. An historic structure dating back to 1918, the tower, and many others like it throughout the state, played a critical role in helping the Department of Environmental Conservation (DEC) and its predecessors fulfill their mission to protect the state's natural resources.

The tower was formally discontinued for use by DEC for its intended purpose in 1990. Even before being closed, the tower had been identified in the 1972 Adirondack Park State Land Master Plan (SLMP) as a non-conforming structure in a wilderness setting. In 2010, because of a growing recognition of the tower's significance under the State Historic Preservation Act (SHPA), and in response to numerous public comments received by DEC and the Adirondack Park Agency (APA) in support of the structure, the SLMP was amended and the land around the tower was reclassified to create the Saint Regis Mountain Fire Tower Historic Area, thereby allowing the tower to remain in its original location.

While the SLMP now allows for the mere existence of the Saint Regis Mountain fire tower, this UMP takes the next step of proposing the maintenance of the tower in a manner that complies with SHPA and allows for safe public access of the structure while maximizing its interpretive and educational potential. The tower already attracts thousands of visitors to the peak of Saint Regis Mountain every year, and allowing the public to fully access the cab of the tower would represent a new level of historic interpretation of the structure.

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Acknowledgements

Plan Contributors:

Josh Clague	Lead Author and Natural Resources Planner, DEC Division of Lands and Forests
Steve Guglielmi	Forester, DEC Division of Lands and Forests—Region 5
Rob Daley	Supervising Forester, DEC Division of Lands and Forests—Region 5
Carole Fraser	ADA Coordinator, DEC Division of Lands and Forests
John Strief	Forest Ranger Captain, DEC Division of Forest Protection—Region 5
Tom Martin	Natural Resources Supervisor, DEC Region 5 Administration
Kris Alberga	Regional Forester, DEC Division of Lands and Forests—Region 5
Chuck Vandrei	Historic Preservation Officer, DEC Division of Lands and Forests
Sandra Garlick	Senior Attorney, DEC Office of General Counsel
Ken Hamm	Associate Attorney, DEC Office of General Counsel
Kathy Regan	Natural Resources Planner, Adirondack Park Agency

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Preface

The Saint Regis Mountain Fire Tower Historic Area Unit Management Plan has been developed pursuant to, and is consistent with, relevant provisions of the New York State Constitution, the Environmental Conservation Law (ECL), the Executive Law, the Adirondack Park State Land Master Plan, Department of Environmental Conservation (Department) rules and regulations, Department policies and procedures and the State Environmental Quality and Review Act. This UMP also complies with the State Historic Preservation Act (SHPA), found at Parks, Recreation, and Historic Preservation Law (PRHPL), Article 14 and implementing regulations at 9NYCRR Parts 426-428.

The state land which is the subject of this Unit Management Plan (UMP) is Forest Preserve land protected by Article XIV, Section 1 of the New York State Constitution. This Constitutional provision, which became effective on January 1, 1895 provides in relevant part:

> "*The lands of the state, now owned or hereafter acquired, constituting the Forest Preserve as now fixed by law, shall be forever kept as wild forest lands. They shall not be leased, sold or exchanged, or be taken by any corporation, public or private, nor shall the timber thereon be sold, removed or destroyed.*"

ECL §§3-0301(1)(d) and 9-0105(1) provide the Department with jurisdiction to manage Forest Preserve lands, including the Hurricane Mountain Fire Tower Historic Area.

The Adirondack Park State Land Master Plan (SLMP) was initially adopted in 1972 by the Adirondack Park Agency (APA), with advice from and in consultation with the Department, pursuant to Executive Law §807, now re-codified as Executive Law §816. It is the SLMP that classifies the lands subject to this UMP as the Saint Regis Mountain Fire Tower Historic Area, and it is the SLMP that provides the overall framework for the development and management of all state lands in the Adirondack Park**,** including the Saint Regis Mountain Fire Tower Historic Area. Furthermore, the Department is obligated under SHPA to fully explore all feasible and prudent alternatives that would avoid or mitigate impacts to historic resources within the unit.

In 1983, legislation was enacted at ECL § 9-0109(4) which authorized the maintenance of historic structures owned by the State prior to June 21, 1983 and located in the Adirondack and Catskill parks, provided three criteria are satisfied. First, the Commissioner of Parks, Recreation and Historic Preservation must find that such structures and improvements are listed or are eligible to be listed on the State Register of History Places pursuant to PRHP § 14.07. Second, the Commissioner of Environmental Conservation must find that such structures and improvements can be maintained for public enjoyment and understanding of the Forest Preserve or for DEC activities necessary in protecting Forest Preserve lands in the parks in a manner that will not disturb the existing degree of wild forest character of land on which the pre-existing structures or improvements are located or the wild forest character of land adjacent thereto. Third, such maintenance must be in accordance with reasonable regulation of the Forest Preserve in the Adirondack and Catskill parks consistent with Article XIV of the State Constitution.

Executive Law §816 requires the Department to develop, in consultation with the APA, individual UMPs for each unit of land under the Department's jurisdiction. The UMPs must conform to the guidelines and criteria set forth in the SLMP. Thus, UMPs implement and apply the SLMP's general guidelines for particular areas of land within the Adirondack Park. Executive Law 816(1) provides in part that "(u)ntil

amended, the master plan for management of state lands and the individual management plans shall guide the development and management of state lands in the Adirondack Park."

State Environmental Quality Review (SEQR) Act

The State Environmental Quality Review Act requires that all agencies determine whether the actions they undertake may have a significant impact on the environment. The intent of the legislation is to avoid or minimize adverse impact on the resource. The guidelines established in the SLMP for developing unit management plans express these same concerns. Any management actions proposed for the Saint Regis Mountain Fire Tower Historic Area must take into consideration environmental factors to ensure that such actions do not degrade that environment. The overall intent of this UMP is to identify mitigating measures to avoid or minimize adverse environmental impacts to the natural resources of the State within the unit. Any reconstruction within the confines of this unit will take environmental factors into account to ensure that such development does not degrade the resource.

In addition to environmental considerations, SEQR also takes into account historic resources. The preferred alternative in this UMP proposes the preservation of the fire tower as an historic resource; however, there is a long history of policy, guidance, and management proposals that have identified the tower for removal. While a recent amendment to the SLMP has reversed this direction, the importance of the tower remains significant to a variety of stakeholders. For this reason, and in order to fully vet a range of management alternatives in light of these recent policy changes, the Department has issued a Positive Declaration and prepared this document as an Environmental Impact Statement (EIS).

State Historic Preservation Act (SHPA)

The State Historic Preservation Act (SHPA) of 1980 declares it to be the policy of the State to promote the protection, enhancement, use, reuse and conservation of historic resources. Similarly, the New York State Public Buildings Law Article 4-B declares it to be the policy of the State for State agencies to act as good stewards of historic properties under their jurisdiction and to hold those properties in trust for future generations.

The National Historic Preservation Act of 1966 and SHPA established the National and State Registers of Historic Places, which 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 Commissioner of the Office of Parks Recreation and Historic Preservation (OPRHP) makes the determination whether a property meets the criteria for listing found in 9 NYCRR §427.3. The same eligibility criteria are used for both the State and National Registers.

In consultation with the OPRHP, State agencies are required to consider potential impacts to historic properties listed or eligible for listing in the National and/or State Register for Historic Places early in the planning process and prior to undertaking, approving, permitting or funding of any project. State agencies must fully explore all feasible and prudent alternatives that avoid or mitigate adverse impacts to historic properties (9 NYCRR Part §428.1).

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Saint Regis Mountain Fire Tower Historic Area

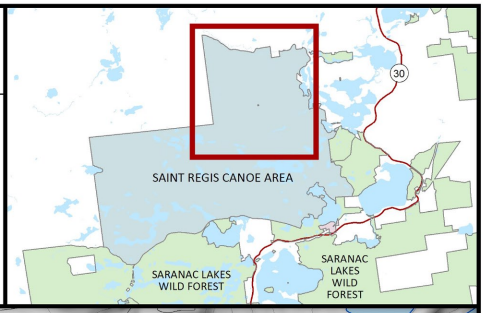
February 2012

N W E S

0 0.25 0.5 1 Mile

jdc

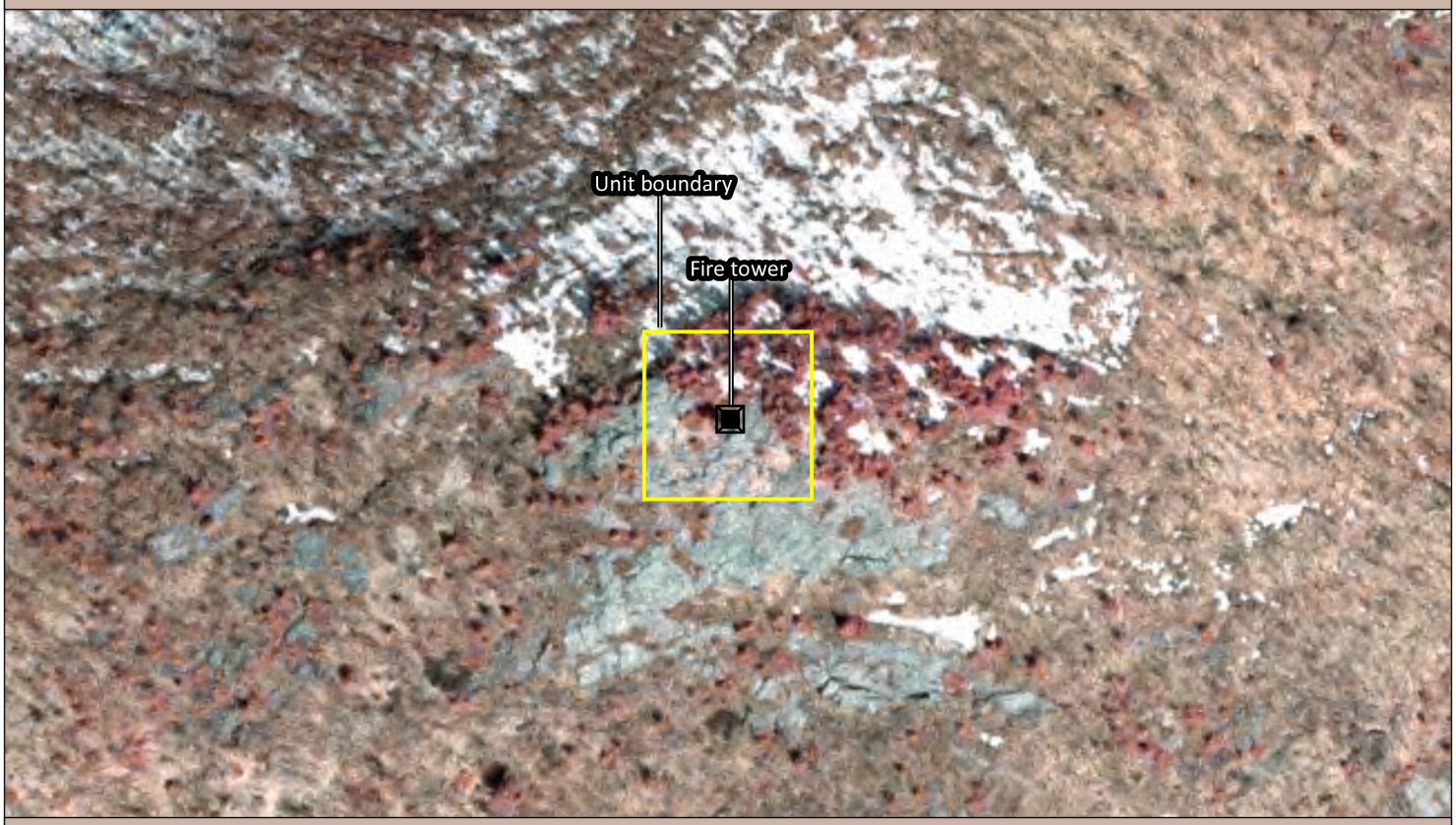
Public motor vehicle road
DEC administrative road
Recreational trail
Elevation contour (50 ft.)
Parking area



Keeses Mill Rd.
Saint Regis River
Black Pond
ST. REGIS
CANOE
AREA
2000
2500
Saint Regis Mountain Trail
Teddy Roosevelt Trail
Spectacle Ponds
Upper St. Regis Lake
ST. REGIS MOUNTAIN FIRE TOWER HISTORIC AREA
Fish Pond
Mud Pond
Fish Pond Truck Trail
Ochre Pond
Little Long Pond
Saint Regis Pond
Green Pond

Saint Regis Mountain Fire Tower Historic Area

Area Detail



Orthoimagery taken Spring 2003.

0 50 100 200 Feet

N W E S

View of the St. Regis Mountain summit and fire tower, looking east.

Close-up of the fire tower

I. Introduction

Planning Area and Resource Overview

The Saint Regis Mountain Fire Tower Historic Area (SRMFTHA) is a 0.5-acre, square parcel that sits at the peak of Saint Regis Mountain in the Town of Santa Clara, Franklin County. As the name suggests, the primary feature within the area is a fire observation tower used by the New York State Department of Environmental Conservation (DEC, the Department) and its predecessor agency, the Conservation Department, for fire observation throughout most of the 20th century. The fire tower is a 35-foot tall Aermotor LS-40, a common model and by far the most used by the Department throughout the state.

Today, the fire tower is no longer used for fire observation purposes. While still standing, the tower has not been maintained for over 20 years and is no longer safe for public use. To discourage climbing of the structure, the two lowest sections of stairs have been removed. Despite being closed to the public, the presence of the fire tower has made the unit one of the most popular recreational destinations in the area. As such, the value of the tower has shifted away from fire detection and more toward one of recreational, historical, and educational significance.

The summit of Saint Regis Mountain sits at 2,874 feet, and the land within the SRMFTHA is partially free of vegetation. Species in the spruce-fir rocky summit plant community exist in the northern half of the unit, and extend into a small portion of the surrounding Saint Regis Canoe Area that sits above 2,800 feet. As such, the partially-bald summit of Saint Regis Mountain offers stunning views of the surrounding landscape. Similarly, the summit and fire tower are visible from much of the surrounding public and private lands, including the Saint Regis Canoe area and Paul Smith's College.

The SRMFTHA is only accessible by foot trails, which enter the unit from two different locations: 1) from the northeast, beginning at the Keeses Mill Road trailhead, along the Saint Regis Mountain Trail; and 2) from the east, beginning at a dock on Upper Saint Regis Lake, along an unofficial trail sometimes called the Teddy Roosevelt or "TR" Trail.

History of the Fire Tower

Over several years during the early 1900s, wildfires burned across nearly one million acres of Adirondack forestland. The summer and fall seasons of 1903 and 1908 were particularly bad, and much of Saint Regis Mountain burned during those years.

One result of this devastation was the creation of a state-wide fire detection system in 1909. In 1910, the first public fire observation stations under the state system were established on eight Adirondack peaks—including Saint Regis—with many more peaks added over the next several years. Wooden towers were built on many of the summits, and although such a structure was permitted by the then landowner of Saint Regis Mountain, the lack of vegetation at the summit precluded the need for one.

Extreme weather took a toll on these early wooden towers, and in 1916 the Conservation Department began to replace them with the more durable steel structures that still stand today. Saint Regis Mountain received its first—and only— fire tower in 1918.

In 1919, an Osborne Fire Finder—a topographic map with sighting apertures—was installed in the Saint Regis fire tower, improving the ability to accurately locate fires.

In 1925, a 12' x 16' observer's cabin was built near the junction of the Saint Regis Mountain Trail and the Teddy Roosevelt Trail. The following year, the State purchased Saint Regis Mountain and some of the surrounding land from William Rockefeller. The cabin was replaced in 1939 with a 16' x 20' model, which remained standing until its removal in the late 1990's.

Beginning in the 1930s, Conservation Department aircraft patrols were added as a method of fire detection. Fire towers continued to play an important role, however, and Civilian Conservation Corps (CCC) laborers were employed to construct and maintain several fire observation sites during that same decade.

In the 1970s, private contractors took over aerial detection of forest fires for the State. In 1971 DEC closed 62 of its 103 operating fire towers. The Saint Regis Mountain Fire Tower remained in operation until 1990, making it the longest-operating fire observation station in New York State.

Historic Designation of Forest Preserve Fire Towers

In recognition of the fire towers' role in the conservation legacy of New York State, the Department sponsored the nomination of several fire towers within the Adirondack and Catskill Parks to the National Register of Historic Places (NHRP) and State Register of Historic Places.

In 2001, ten fire towers—Arab, Poke-O-Moonshine, Azure, Kane Mountain, Blue Mountain, Snowy, and Hadley in the Adirondack Park as well as Balsam Lake Mountain, Mount Tremper and Red Hill in the Catskill Park— were listed. Hunter Mountain, also in the Catskills, had been previously listed in 1997. Subsequently, Wakely Mountain (2003), St. Regis Mountain (2005) and Hurricane Mountain (2007) were added. More specifically, the St. Regis Mountain Fire Observatory was listed on the State Register of Historic Places on January 5, 2005 and on the National Register of Historic Places on March 15, 2005 (see Appendix H).

II. Public Use

The primary use of the SRMFTHA is passive, day-use recreation such as hiking and picnicking. The presence of the fire tower and the amazing views offered on Saint Regis Mountain encourage visitors to linger, and the lack of vegetation at the summit allows for easy access to most of the unit for this purpose.

Because of the remote location of the SRMFTHA, public use of the unit is un-monitored and difficult to measure. There is currently no regular staff or volunteer presence at the summit of Saint Regis Mountain, and there are no other mechanisms in place within the unit for tracking the number of visitors.

The best indicator of use can be found in the trailhead register for the Saint Regis Mountain Trail at Keeses Mill Road. While this trailhead is located well outside the SRMFTHA near the outer boundary of the Saint Regis Canoe Area, the summit of Saint Regis Mountain lies at the end of the trail, provides the best views in the area, and is likely the destination of a majority of the users that hike the trail.

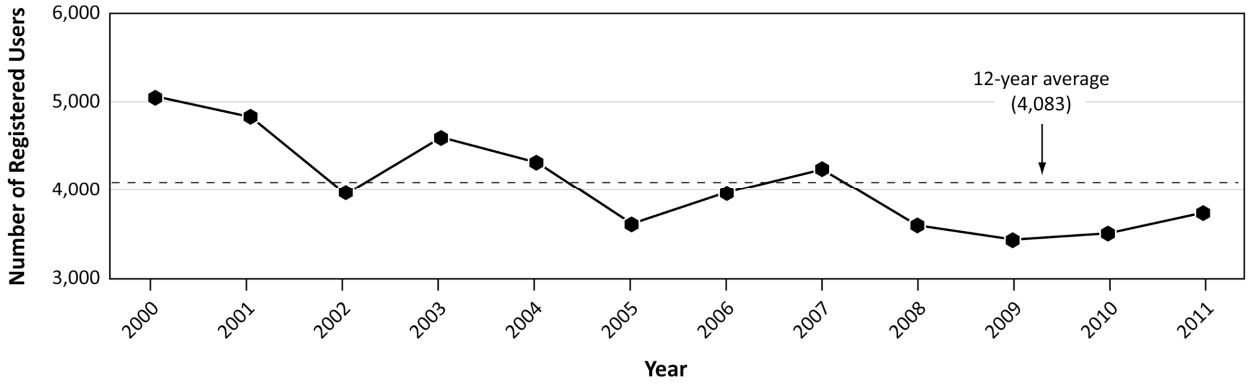
Trail register data has been collected from the Keeses Mill Road Trailhead for at least the last twelve years. The table below shows the number of trailhead registrations there since 2000.

Number of Trailhead Registrations for the Saint Regis Mountain Trail, 2000-2011

Year	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Registrations	5,060	4,833	3,940	4,608	4,301	3,662	3,927	4,234	3,661	3,411	3,572	3,797

Although there has been fluctuation in the numbers of users from year to year, there was an overall downward trend from 2000 to 2011. The average annual number of registrations over the entire 12-year period was 4,083. This information is summarized in the figure below.

Registrations for Saint Regis Mountain Trailhead, 2000-2011



In 2008, the SUNY College of Environmental Science and Forestry completed the *St. Regis Canoe Area Visitor Use and Campsite Study*. In the study, the authors compared data collected from trail counters to numbers collected from the trailhead register at the Keeses Mill Road trailhead. Based on their estimates, the authors found that a high percentage of hikers—89%—actually registered at the trailhead.

Capacity to Withstand Use

As shown by the trailhead registrations, the SRMFTHA likely experiences a high level of public use. The layout of the unit—ans historical structure and mountain summit at the end of a trail—encourages high visitation by its very design. The physical and biological characteristics of the unit are such that the area has been able to withstand the public use it has experienced since the fire tower was first placed on Saint Regis Mountain. The bare rocky summit makes it challenging to contain people to a limited area, but at the same time the harder surfaces can withstand the regular walking and climbing they receive. The spruce-fir rocky summit plant community on the northern half of the unit is generally avoided by the public, as the better views and more comfortable sitting can be found on the bare stone.

When considering the social carrying capacity of the SRMFTHA, there are several good examples of other fire towers across the Adirondacks that suggest the unit can withstand at least as much use as it has received in recent years. Fire towers on the peaks of Snowy, Blue, Azure, Poke-O-Moonshine, Hadley, Adams, Wakely, and Vanderwhacker have all been restored or stabilized for public use. In some instances those towers receive many more visitors per year than Saint Regis, and the summits near those towers did not see a noticeable increase in use after the stabilization of the structures.

III. Policy and Management Considerations

Policy, Guidance and Planning History of the Area

In the last forty years, numerous guidance, policy and planning decisions have been directed towards or referenced the fire tower on Saint Regis Mountain. In many instances, these decisions have been directly related to and dependent upon previous decisions or policies. The following timeline provides a brief synopsis of the policy, guidance, and planning documents that have led to the need for this Unit Management Plan.

Adirondack Park State Land Master Plan – 1972

The Saint Regis Mountain Fire Tower Historic Area (SRMFTHA) is completely surrounded by the 18,400-acre Saint Regis Canoe Area. Prior to December 2010, the land in the Historic Area existed as part of the Canoe Area. The classification scheme that originally designated these areas as Canoe and Historic comes from the original 1972 Adirondack Park State Land Master Plan (SLMP), which defined Canoe Areas as such:

> A canoe area is an area where the watercourses or the number and proximity of lakes and ponds make possible a remote and unconfined type of water oriented recreation in an essentially wilderness setting.

The SLMP expanded the comparison to wilderness areas under the Guidelines for Management and Use for Canoe Areas, stating that "All Structures and improvements that conform to wilderness guidelines will be permitted in canoe areas." Under the Guidelines for Management and Use of Wilderness Areas, fire towers and observer cabins were listed as non-conforming, thereby making them non-conforming in Canoe Areas as well. Furthermore, the Area Description for the Saint Regis Canoe Area in the original SLMP specifically listed the fire tower on Saint Regis Mountain as a non-conforming structure.

Slight modifications to this language occurred in the 1979 revision of the SLMP; however no substantive changes affecting fire towers would come until the 2010 SLMP amendment (see page 7).

The State Historic Preservation Act (SHPA) and Original Fire Tower Letter of Resolution between OPRHP and DEC – 1994

As previously noted SHPA and SEQR require public agencies to avoid or mitigate impacts to Historic Resources to the fullest extent practicable. SHPA also requires agencies to consult with the OPRHP before taking actions that might affect an historic property to determine ways to avoid or mitigate impacts to that historic resource, and reconcile conflicts between agency policy and programs.

By 1994, the fire tower on Hurricane Mountain was eligible for listing on the State and National Registers of Historic Places. At the same time, the removal of several fire towers, including Saint Regis, was still necessary to bring certain areas of state land into compliance with the SLMP. In order to reconcile the respective requirements of the SLMP and SHPA, officials from DEC and OPRHP engaged in a consultation process regarding 35 fire towers under DEC's jurisdiction pursuant to 9NYCRR 428.8.

The result of this consultation was a Letter of Resolution (LOR, see Appendix B), signed by both agencies, listing which of the 35 fire towers would be retained, and which of them could be removed or transferred by DEC without further consultation with OPRHP.

Unfortunately, the original LOR incorrectly listed the Saint Regis fire tower as NHL, even though it was not yet on the register at that time. Also, the tower was placed on the "Retain" list, even though the intent of the LOR was to allow certain fire towers to be removed that had been identified as non-conforming structures in the SLMP. Discussions with Department staff indicate that the LOR was amended to put the Saint Regis tower on the "Remove" list, but no documentation of this correction has been located at this time.

Saint Regis Canoe Area Unit Management Plan – June 2006

In 2001 DEC formally began the process for developing a UMP for the Saint Regis Canoe Area. In July 2005, a Draft Unit Management Plan was released for a 30-day public comment period, and a public meeting for the UMP was held at Paul Smith's College the following month.

The most significant management proposal in the Draft UMP involved the future of the fire tower on Saint Regis Mountain. Various alternatives were analyzed regarding the tower's fate, including a recommendation that the APA formally propose a reclassification of the land around the tower to Wild Forest or Historic, thereby making the tower a conforming structure. The preferred alternative in the Draft UMP, however, was to "(r)etain the fire tower until such time as the APA considers whether the land surrounding the tower should be reclassified as Historic." The intent of the preferred alternative was that the SLMP be re-assessed in terms of the importance of fire towers as historic structures, particularly in light of SHPA and ECL §9-0109.4.

As described in the plan, the fire tower was "…the highest profile issue in this UMP…", and the number and type of public comments received on the Draft UMP reflect this statement. Some of the comments were in favor of removing the fire tower, either because it would bring the area into compliance with the SLMP after many years of non-compliance, or because its potential relocation would make it accessible to more people. Many of the comments also expressed opposition to the tower's removal because of its educational and historic value.

After consideration of the public comments and consultation with APA staff, the Department submitted a Proposed Final UMP to the APA for their SLMP compliance determination. In this version of the plan, the same alternative proposals were considered for the fire tower; however a new preferred alternative was identified, which was to "…develop a comprehensive Adirondack fire tower management plan…" that would "…address all State owned fire towers in the Adirondack Park" due to the high public interest in fire towers.

In their resolution for the Saint Regis Canoe Area UMP, the APA took a more direct stance, stating that removal of the Saint Regis fire tower "…should occur within three years from the adoption of this Unit Management Plan or other alternatives based on recommendations identified in the proposed study of fire towers in the Adirondack Park (should be considered)…" The full APA resolution for the UMP can be found in Appendix D.

In June 2006, then DEC Commissioner Denise Sheehan approved the Final UMP, the final step in formally adopting the plan.

Fire Tower Study for the Adirondack Park – February 2010

In February 2010 the Department released the Fire Tower Study for the Adirondack Park, as recommended by the 2006 Saint Regis Canoe Area UMP and the 2006 Blue Ridge Wilderness/Wakely Mountain Primitive Area UMP. The study contained a detailed inventory of all remaining fire towers in the Park, both public and private, along with their individual histories. The study also examined management and policy constraints surrounding the towers, and recommended the removal of the Saint Regis Mountain fire tower in order to bring the Saint Regis Canoe Area into compliance with the SLMP.

Draft Amendment to the 2006 Saint Regis Canoe Area UMP – February 2010

In February 2010, in conjunction with the release of the Fire Tower Study for the Adirondack Park, a Draft Unit Management Plan Amendment/Draft Environmental Impact Statement (DEIS) for the Saint Regis Canoe Area was released for a 45-day public review and comment period. A public meeting was held for the UMP Amendment at Paul Smiths College.

The sole purpose of the UMP Amendment was to analyze alternatives surrounding the fire tower on Saint Regis Mountain. As stated in the APA resolution for the original UMP, removal of the Saint Regis fire tower "…should occur within three years from the adoption of this Unit Management Plan or other alternatives based on recommendations identified in the proposed study of fire towers in the Adirondack Park (should be considered)…" In the time that had passed since the completion of the original UMP, the SLMP had not changed in regards to the fire tower; therefore the Fire Tower Study recommended the removal of the tower. The preferred alternative in the Draft UMP Amendment reflected this recommendation.

Some of the comments received during the public comment period for the Draft UMP Amendment were in favor of removing the fire tower, primarily because it would bring the area into compliance with the SLMP after many years of non-compliance. The majority of the comments, however, expressed opposition to the tower's removal. The most common reasons for the opposition involved the fire tower's recreational, cultural, educational, and historic value. Some comments encouraged the department not only to leave the tower standing, but also to stabilize it so that the public could safely use it. It was suggested that a local volunteer organization take on that role.

For reasons explained in the following paragraphs, the Department did not advance the Amendment to the Saint Regis Canoe Area UMP beyond the draft stage.

Amendment to the Adirondack Park State Land Master Plan – December 2010

In response to the overwhelming public support for the Saint Regis Mountain and Hurricane Mountain fire towers received during their respective UMP public comment periods, the APA Commissioners, at their April 2010 meeting, directed Agency staff to explore alternatives that might lead to minor revisions to the SLMP specific to classifications of the lands surrounding the two fire towers. Agency staff then developed a draft Supplemental Environmental Impact Statement (DSEIS), in which the preferred alternative was to "Reclassify 0.5 acres around the base of the fire towers on St. Regis and Hurricane Mountains to Historic Area classification under the State Land Master Plan."

The DSEIS was released for public review in July of 2010, and three public hearings were held during the 30-day comment period. Similar to the UMP public comment period earlier in the year, the majority of the comments received expressed support for retention of the fire towers in their existing locations.

A final Supplemental Environmental Impact Statement (FSEIS) was prepared which retained the preferred alternative to reclassify the lands surrounding the towers to Historic. At their October 2010 monthly meeting, the APA board unanimously approved the reclassification recommendations found in the FSEIS (the full APA resolution can be found in Appendix E). In December of that same year, then Governor Paterson approved the land reclassifications, thereby creating the Saint Regis Mountain Fire Tower Historic Area and the Hurricane Mountain Fire Tower Historic Area.

Revised Fire Tower Letter of Resolution between OPRHP and DEC – 2014

When the original Letter of Resolution (LOR) was signed in 1994, public interest in fire towers was minimal. The structures were generally seen as defunct assets, and the consultation process between DEC and OPRHP concluded that some of the towers would eventually be removed so long as that disposal was done properly from an historic preservation standpoint.

Today, there is a strong public interest in fire towers generally, and many individual towers have associated volunteer or "friends" organizations that have "adopted" them. Additionally, this UMP proposes that the Saint Regis Mountain fire tower be opened and maintained for public use. The original LOR, however, does not provide any guidance on how to perform this maintenance in compliance with SHPA. Also, the 1994 LOR contains outdated information, specifically in terms of towers to be removed.

In conjunction with the release of this UMP, DEC and OPRHP have issued a Revised Fire Tower Letter of Resolution (see Appendix C) which expands upon the 1994 LOR by providing the appropriate guidelines ("Fire Tower Checklist") related to tower maintenance for public use. Additionally, a new list has been generated that includes fire towers throughout all of New York in which the state as an interest. This updated list no longer recommends the removal of any fire towers, but includes the status of ownership and the national/state historic register listing for each tower.

As noted above, ECL § 9-0109(4) authorizes the maintenance of historic structures in the Adirondack Park owned by the State prior to June 21, 1983 if three criteria are satisfied. First, the St. Regis Mountain Fire Observatory Station was listed on the State Register of Historic Places on January 5, 2005 and on the National Register of Historic Places on March 15, 2005. Second, the Commissioner of Environmental Conservation must issue a Statement of Findings concluding that the fire tower can be maintained for public enjoyment and understanding of the Forest Preserve in a manner that will not disturb the existing degree of wild forest character of land on which the fire tower is located or the wild forest character of land adjacent to the fire tower. Third, the Commissioner's Statement of Findings must also find that maintenance of the fire tower will be in accordance with reasonable regulation of the Forest Preserve in the Adirondack Park consistent with Article XIV of the State Constitution. A Statement of Findings can be found in Appendix H.

Other Policies, Guidance, and Management Considerations Relevant to the Management of SRMFTHA

Administrative Use of Motor Vehicles & Aircraft in the Forest Preserve (CP-17)

CP-17 is a Commissioner Policy that requires the department to maintain records for all administrative use of motor vehicles on roads closed to the public as well as aircraft on Forest Preserve lands in both the Adirondack and Catskill Parks.

The intent of the policy is to minimize such use, and specific provisions are provided for lands in the Adirondack Park classified as Wilderness, Primitive, Canoe, and Wild Forest, and in Wild, Scenic and Recreational River Areas. For Historic Areas, however, the policy states that "…such use in these areas will not be subject to the compulsory review and the mandatory recordkeeping and reporting standards set forth below."

Due to the remote location of the SRMFTHA, a helicopter may be necessary to deliver materials for maintenance of the fire tower should they be needed. While CP-17 would not require the tracking of such motorized use because of the area's Historic Area classification, it has been the Department's practice to track administrative motor vehicle/aircraft use in other Historic Areas on which it has day-to-day management responsibilities (Camp Santanoni). Also, given the close proximity of the SRMFTHA to the Saint Regis Canoe Area, any potential helicopter use would have the same impact on the Canoe Area as it would on the Historic Area, and should be documented accordingly. A discussion of potentially significant environmental impacts and associated mitigation measures is found in Section IV.

Volunteer Stewardship Agreements (VSA) (CP-58)

CP-58 is a Commissioner's Policy that enables DEC to enter into agreements with individuals or organizations allowing them to do volunteer work for the Department.

If maintenance of any kind is performed on the Saint Regis Mountain Fire Tower, the Department will likely seek assistance from an existing volunteer organization that has expressed an interest in performing such work. If the tower can be stabilized to the point where it can accommodate safe public access, volunteers could also play a critical long-term role by maintaining a regular presence on Saint Regis Mountain for the purpose of education and interpretation.

DEC Staff oversight would be required during any maintenance activity on the fire tower, and the Department would likely incur at least some of the costs of materials and transportation. A general outline of the costs associated with rehabilitating a fire tower can be found in Appendix A.

Americans with Disabilities Act (ADA)

Unlike most UMPs, which cover a diverse array of management objectives, this plan has been developed for the specific purpose of addressing the future management of the fire tower on Saint Regis Mountain. During the planning process, DEC considered accessibility options for both within the unit and the trails leading to it, despite their remote location.

The purpose of the tower today is to provide an historical interpretation of the experience of the former DEC staff who climbed the tower many times per day. The fire tower is 35 feet in height with no

electrical power within the unit to provide alternate means of scaling the tower. In addition, the trail to the tower contains environmental barriers that are severe and so numerous that they cannot be modified to meet the intent and objectives of an accessible hiking opportunity.

As interpretive materials related to the fire tower are developed, they will be delivered in a manner that is accessible to people of all abilities. This may include web based materials, a wheelchair accessible kiosk at the trailheads, and written educational materials.

Use of Aircraft and Motorized Equipment in the Adirondack Sub-Alpine Forest Bird Conservation Area

The New York State Bird Conservation Area (BCA) Program was established in 1997 to safeguard and enhance bird populations and their habitats on State lands and waters. Specifically, the Adirondack Sub-Alpine Forest BCA was designated to facilitate the protection of the Bicknell's thrush (a species of Special Concern), the Blackpoll warbler, and the Swainson's thrush, as well as their habitat, which consists of dense, subalpine coniferous forests on mountain summits over 2,800 feet in elevation.

While Bicknell's thrush nesting locations have not been confirmed on Saint Regis Mountain in the past, the summit does contain the vegetation type that makes up Bicknell's habitat. Future recreational use of the SRMFTHA and the trail that leads to it, however, is not expected to vary greatly from past use, and therefore is not likely to impact these species. Similarly, most maintenance activities that may occur on the tower would not be different, in terms of impact, from the recreational use in the unit.

This UMP does not propose any vegetation management or other physical alterations that could affect Bicknell's thrush habitat; however if the use of aircraft or motorized equipment should be needed for maintenance of the fire tower, it should not occur between May 15 and August 1 in order to avoid the Bicknell's thrush nesting period.

IV. Management Recommendations

Compared to other state land management units in the Adirondack Park, the SRMFTHA is extremely small and limited in the type of recreational experience it provides. Additionally, the Saint Regis Mountain fire tower is the centerpiece of the unit, both physically and in regards to public use. For these reasons, all of the management needs addressed in this UMP are directly related to the tower, and in some instances, to one-another.

In this section, these potential management options are discussed in the context of the following objectives:

Management Objectives

- Manage the area in compliance with Article XIV, Section 1 of the New York State Constitution, the Adirondack Park State Land Master Plan (SLMP), the State Historic Preservation Act (SHPA), Environmental Conservation Law §9-109 (4) and the State Environmental Quality Review Act (SEQR).
- Maximize the interpretive and educational potential of the fire tower as an historic resource.
- Leverage the Department's staff and fiscal resources to the fullest extent possible.

Alternatives Analysis

Because of the interrelated nature of the management actions proposed for the SRMFTHA, and pursuant to SHPA and SEQR, the Department considered several alternative management scenarios for the future of the unit. These alternatives are presented below.

- ***Alternative 1 – "No Action"***

  This alternative proposes no action, which would leave the future of the fire tower in doubt. The tower would remain unused as a fire observation platform or radio communication link, would have no proposed utility for Forest Preserve management since the wood steps have been removed, and would increasingly become a safety concern. The un-maintained structure would fall into disrepair and eventually become a public safety hazard. While this alternative would require very little of the Department's resources in the short term, it does not meet any of the Department's other management objectives for the area, particularly meeting SHPA's mandate to act as a steward of the fire tower as a historic resource. Therefore, this alternative is not supported by this plan.

- ***Alternative 2 – "Tower Removal"***

  This alternative proposes to have the fire tower dismantled and removed from Saint Regis Mountain. The Department would identify another location, possibly on the Forest Preserve, on which it could still serve an educational purpose, but be more accessible by the public and the Department (or its volunteers). If the tower were no longer in the SRMFTHA, the unit would most probably become part of the Saint Regis Canoe Area. In the 2010 Saint Regis Canoe Area Draft UMP Amendment, this scenario was the Department's preferred alternative because at the time the SLMP had identified the tower as a non-conforming structure. Today, however, this alternative would not meet any of the Department's management objectives for the area, nor is it required by the SLMP. For these reasons, it is not supported by this UMP.

- ***Alternative 3 – "Minimal Maintenance"***

  This alternative would retain the tower in its current state to preserve its historical value, but limit maintenance of the structure to only those activities that ensure its structural integrity. This would not include any work to make the stairs and cab safe for public access and it would not include any on-site interpretation of the fire tower. While this alternative would not be inconsistent with the Guidelines for Management and Use of Historic Areas found in the SLMP, and would require very little of the Department's staff and fiscal resources, it does nothing to improve the historic interpretation of the area or the use of the fire tower as an educational tool. Therefore, this alternative is not supported by this plan.

- ***Alternative 4 – "Full Public Access" – PREFERRED ALTERNATIVE***

  In this alternative, the tower would be maintained in a manner that would accommodate full public use of the structure. The stairs and cab would be made safe for public access, and the appropriate interpretive materials would be strategically placed within the unit so as to be informative but not intrusive. Under a Volunteer Stewardship Agreement, the Department would engage with a local volunteer organization to perform much of the maintenance, as well as to retain a presence on Saint Regis Mountain to educate the public and monitor use during the busiest months of the year.

  The only potentially significant environmental impact associated with this alternative was identified in the discussion about Bird Conservation Areas in Section III. As noted there, if a helicopter is necessary for the delivery of materials, it would not be allowed between May 15 and August 1 to avoid any impacts to the Bicknell's thrush during its nesting period.

Proposed Management Actions

The "Full Public Access" option was selected as the preferred alternative because it meets all of the Department's management objectives for the Saint Regis Mountain Fire Tower Historic Area. The following management actions expand upon the concepts outlined in the preferred alternative:

- Open and maintain the fire tower for public use according to the process and specifications outlined in the Fire Tower Rehabilitation Checklist, found in Appendix C. Work with a volunteer organization to assist in this process through a Volunteer Stewardship Agreement.
- Develop interpretive materials related the fire tower as an historic resource. This includes appropriately located interpretive signs in and around the tower, as well as information and interpretive materials to be located at the trailhead kiosk on Keeses Mill Road and on the Department's public website.
- Permit the long-term volunteer maintenance and interpretation of the fire tower through a Volunteer Stewardship Agreement. This includes the establishment of a Tower Steward position to maintain a presence on the mountain during periods of peak use.
- Monitor the fire tower, the summit of Saint Regis Mountain, and the two trails that provide access to the unit for overuse. As mentioned in Section II, it is not anticipated that maintenance of the fire tower will result in visitor use beyond current levels. If impacts of overuse are detected, BMPs should be employed, including the installation of water bars, stepping stones, and/or dry tread, and the re-routing of trails.

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Appendix A – APA Staff Memo on Fire Tower Rehabilitation Costs

M E M O R A N D U M

TO: Jim Connolly

FROM: Kevin Prickett

DATE: May 6, 2010

RE: Fire Tower Rehabilitation Costs

It the interest of finding out more about the cost of rehabilitating a fire tower, I talked today with Tom Martin, NYS DEC Regional Forester regarding the costs. The following are notes from our conversation.

Tom expected the cost for necessary materials, delivery of materials via helicopter and engineering study was $50,000. This estimate did not include labor. There have been cases, such as Azure Mt. fire tower were this was done with less capitol, but required significant devotion by a friends group, the Student Conservation Association and DEC staff.

Tom made it clear that the rehabilitation of a fire tower cannot be done without tax dollars. Because DEC has the custody and control of Forest Preserve lands, it has the obligation to be involved. Usually, the first step in the process is to have an engineer examine the structure. The basis for costs estimation begins with the results of that analysis. Tom expected private engineer costs, with site visit and report, would be close to $10,000. Tom provided me with a fire tower rehabilitation checklist (attached). This list addresses both the necessary safety features and the aesthetic steps to restore the tower's appearance.

Tom provided some specific costs and resources necessary for restoration from previous efforts.

- Poke-O-Moonshine rehabilitation: required the replacement of eight cross braces on the second and third levels. The total material cost for the task was $5,000. One bolt, washer and nut was a total of eight dollars. These prices are from ten years ago.

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Jim Connolly
May 6, 2010
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- Helicopter transportation: Flight time is $1,500 per hour. Usually 2 to 3 days of trips are required. Each trip transports 600-800 pounds of material, ranging from concrete and water to replace footings, wood for steps and cap viewing platforms to tools to accomplish maintenance. Additional costs are incurred because the helicopter has come from Albany.
- Comfort with working in a high elevations: From replacing the cab roof to painting the structure, working comfortably and safely well above the ground is necessary to restoring a fire tower.

Appendix B – 1994 Fire Tower Letter of Resolution

LETTER OF RESOLUTION
BETWEEN
THE OFFICE OF PARKS, RECREATION, AND HISTORIC PRESERVATION
AND
THE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Whereas, the Department of Environmental Conservation (DEC) has completed an assessment of thirty-five fire towers under DEC jurisdiction which are either eligible for inclusion in the State and National Registers of Historic Places (NRE), or have been designated as a National Historic Landmark (NHL) (see attachment 1),

And whereas the DEC determined that the removal of eight fire towers and the transfer of four fire towers is an undertaking which will have an impact on those properties and has consulted with the office of Parks, Recreation, and Historic Preservation (OPRHP) pursuant to the New York State Historic Preservation Act (PRHPL §14.09) ;

Now, therefore, the DEC and the OPRHP agree that the undertaking shall be implemented in accordance with the following stipulations, in order to take into account the impact of the undertaking on historic properties.

Stipulations

The DEC will ensure the following stipulations are carried out:

The disposition of subject fire towers under DEC jurisdiction will be conducted according to attachment 1.

DEC shall make its best efforts to ensure that the instrument of conveyance for the transfer of fire towers to another public, or private entity shall include a protective covenant to ensure that the historical or architectural aspects of the fire towers will be preserved and maintained.

The OPRHP shall not object to the disposition of the subject fire towers by the DEC if such dispositions are carried out consistent with this agreement.

NEW YORK STATE HISTORIC PRESERVATION OFFICER

BY: _____ DATE: 13 Dec. '94

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

BY: _____ DATE: 5/12/94

Attachment 1

Fire towers eligible for inclusion in the State and National Registers of Historic Places or designated as a National Historic Landmark to be removed or transferred.

FIRE TOWER	STATUS	DISPOSITION
Adams	NRE	Remove
Azure	NHL	Remove
Beacon	NRE	Remove
Hurricane	NRE	Remove
Loon Lake	NHL	Remove
Lyon	NRE	Remove
Palmer Hill	NRE	Remove
Poke-O-Moonshine	NHL	Remove
Spruce	NRE	Transfer
Stillwater	NRE	Transfer
Stissing	NRE	Transfer
Swede	NRE	Transfer

Fire towers eligible for inclusion in the State and National Registers of Historic Places or designated as a National Historic Landmark to be retained.

FIRE TOWER	STATUS	DISPOSITION
Arab	NHL	Retain
Balsam	NRE	Retain
Berry Hill	NRE	Retain
Blue	NHL	Retain
Clove	NRE	Retain
Colfax	NRE	Retain
Hunter	NRE	Retain
Kane	NHL	Retain
Ninham	NRE	Retain
Pillsbury	NHL	Retain
Red Hill	NRE	Retain
Rock Rift	NRE	Retain
Rondaxe	NHL	Retain
Snowy	NHL	Retain
Sterling	NRE	Retain
St. Regis	NHL	Retain
Tremper	NRE	Retain
Utsayantha	NRE	Retain
Vanderwhacker	NHL	Retain
Wakely	NHL	Retain
Woodhull	NHL	Retain
Owls Head	NRE	Retain

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Appendix C – 2014 Fire Tower Letter of Resolution

LETTER OF RESOLUTION
REGARDING
FIRE OBSERVATION TOWERS
UNDER THE JURISDICTION OF THE
DEPARTMENT OF ENVIRONMENTAL CONSERVATION

BETWEEN THE

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
AND THE
OFFICE OF PARKS, RECREATION AND HISTORIC PRESERVATION

WHEREAS, the Department of Environmental Conservation (Department) has care, custody and control of the Forest Preserve, state reforestation areas and various other classes of public lands and holds easement rights relating to public recreational use on certain private lands, and;

WHEREAS, certain fire observation towers (fire towers) which are listed in or eligible for listing in the State and National Registers of Historic Places in accordance with the National Historic Preservation Act or the State Historic Preservation Act, are situated on these lands, and;

WHEREAS, the New York State Historic Preservation Act and the Public Building Law mandate that state agencies act as stewards of historic properties under their jurisdiction, and;

WHEREAS, the Adirondack Park State Land Master Plan defines certain structures as non-conforming in certain land classifications, and;

WHEREAS, the Department and the Office of Parks, Recreation and Historic Preservation (Office), in 1994, executed a Letter of Resolution that created a mechanism for resolving conflicts between the forgoing and that this goal has been achieved, and;

WHEREAS, in response to public interest in fire towers as recreational and historic resources to be appreciated and enjoyed, the Department has undertaken an effort to re-open many of these fire towers, and;

WHEREAS, the Department, in consultation with the Office, desires to undertake this work in a manner that takes into account their historical significance.

NOW, THEREFORE, the Department shall ensure that the following STIPULATIONS, agreed to by both parties as indicated by appended signatures, shall be implemented in compliance with the State Historic Preservation Act of 1980 and 9 NYCRR 428.

OTHER TERMS AND CONDITIONS:

- Modification, amendment, or termination of this agreement as necessary shall be accomplished by the signatories in the same manner as the original agreement.
- Disputes regarding compliance with the terms of this agreement shall be resolved through application of the consultation process established in Article 14 PRHPL and 9 NYCRR Part 428.

STIPULATIONS:

- The terms of this agreement shall apply to the fire towers listed in Attachment 1.
- Maintenance undertaken in accordance with the Fire Tower Maintenance Checklist which is made a part of this agreement as Attachment 2 shall require no further consultation under the State Historic Preservation Act.
- For actions above and beyond those listed in Attachment 2, the Department shall consult with the office in accordance with Article 14 PRHPL and 9 NYCRR Part 428.

New York State Office of Parks, Recreation and Historic Preservation

By: Rose Harvey

Title: Commissioner

Date: 10/4/14

New York State Department of Environmental Conservation

By: Joseph J. Martens

Title: Commissioner

Date: 10/22/14

Attachment 1 – List of Fire Towers

OWNERSHIP / STATUS	NAME	REGISTER STATUS	REG	TOWN	COUNTY
STATE OWNED / LISTED OR ELIGIBLE					
PHOENICIA WILD FOREST	MOUNT TREMPER	LISTED	3	SHANDAKEN	ULSTER
BALSAM LAKE MOUNTAIN WILD FOREST	BALSAM LAKE MOUNTAIN	LISTED	3	NEW PALTZ	ULSTER
SUNDOWN WILD FOREST	RED HILL	LISTED	3	NEW PALTZ	ULSTER
HUNTER-WEST KILL MOUNTAIN WILDERNESS	HUNTER MOUNTAIN	LISTED	4	STAMFORD	GREENE
TAYLOR POND WILD FOREST	POKE-O-MOONSHINE MOUNTAIN	LISTED	5	CHESTERFIELD	ESSEX
SAINT REGIS MOUNTAIN FIRE TOWER HISTORIC AREA	ST. REGIS MOUNTAIN	LISTED	5	SANTA CLARA	FRANKLIN
HURRICANE MOUNTAIN FIRE TOWER HISTORIC AREA	HURRICANE MOUNTAIN	LISTED	5	ELIZABETHTOWN	ESSEX
BLUE MOUNTAIN WILD FOREST	BLUE MOUNTAIN	LISTED	5	INDIAN LAKE	HAMILTON
SARGENT PONDS WILD FOREST	OWLS HEAD MOUNTAIN	LISTED	5	LONG LAKE	HAMILTON
BLUE RIDGE WILDERNESS	WAKELY MOUNTAIN	LISTED	5	LAKE PLEASANT	HAMILTON
HAMMOND POND WILD FOREST	BELFRY MOUNTAIN	LISTED, NHL	5	MORIAH	ESSEX
VANDERWHACKER MOUNTAIN WILD FOREST	VANDRWHACKER MOUNTAIN	LISTED, NHL	5	MINERVA	ESSEX
WILCOX LAKE WILD FOREST	HADLEY MOUNTAIN	LISTED	5	HADLEY	SARATOGA
DEBAR MTN. WILD FOREST	LOON LAKE MOUNTAIN	LISTED	5	FRANKLIN	FRANKLIN
DEBAR MTN. WILD FOREST	AZURE MOUNTAIN	LISTED	5	WAVERLY	FRANKLIN
JESSUP RIVER WILD FOREST	SNOWY MOUNTAIN	LISTED	5	INDIAN LAKE	HAMILTON
JESSUP RIVER WILD FOREST	PILLSBURY MOUNTAIN	LISTED	5	ARIETTA	HAMILTON
SHAKER MOUNTAIN WILD FOREST	KANE MOUNTAIN	LISTED	5	CAROGA	FULTON
HORSESHOE LAKE WILD FOREST	MOUNT ARAB	LISTED	6	PIERCEFIELD	ST. LAWRENCE
BLACK RIVER WILD FOREST	WOODHULL MOUNTAIN	LISTED	6	WEBB	HERKIMER
FULTON CHAIN WILD FOREST	RONDAXE (AKA BALD) MOUNTAIN	LISTED	6	WEBB	HERKIMER
MCDONOUGH STATE FOREST	BERRY HILL	ELIGIBLE	7	MCDONOUGH	CHENANGO
STATE EASEMENTS / LISTED OR ELIGIBLE					
OPEN SPACE CONSERVANCY	MOUNT ADAMS	LISTED	5	NEWCOMB	ESSEX
LYME ADIRONDACK TIMBERLANDS LLC	STILLWATER MOUNTAIN	ELIGIBLE	6	WEBB	HERKIMER
STATE OWNED / UNEVALUATED					
OVERLOOK MOUNTAIN WILD FOREST	OVERLOOK MOUNTAIN		3	WOODSTOCK	ULSTER
NIMHAM MOUNTAIN MUA	NIMHAM MOUNTAIN		3	NEW PALTZ	PUTNAM
ROOSA GAP STATE FOREST	ROOSA GAP MOUNTAIN		3	MAMAKATING	SULLIVAN
GRAHAM MOUNTAIN STATE FOREST	GRAHAM MOUNTAIN		3	HOPE	ORANGE
BEEBE HILL STATE FOREST	BEEBE HILL (AKA L&F)		4	AUSTERLITZ	COLUMBIA
LEONARD HILL STATE FOREST	LEONARD HILL		4	BROOME	SCHOHARIE
PRIVATE PROPERTY	COLFAX MOUNTAIN		5	JACKSON	WASHINGTON
CHAZY HIGHLANDS WILD FOREST	LYON MOUNTAIN		5	SARANAC	CLINTON
SUGAR HILL STATE FOREST	SUGAR HILL		8	ORANGE	SCHUYLER

STATE OWNED / INELIGIBLE

LAKE GEORGE WILD FOREST	BLACK MOUNTAIN		5	DRESDEN	WASHINGTON
GORE MOUNTAIN INTENSIVE USE AREA	GORE MOUNTAIN		5	JOHNSBURG	WARREN

OWNED BY OTHERS

PRIVATE	STISSING MOUNTAIN		3	PINE PLAINS	DUTCHESS
PRIVATE	CLOVE MOUNTAIN		3	UNION VALE	DUTCHESS
OPRHP LANDS	MOUNT BEACON	LISTED	3	FISHKILL	DUTCHESS
OPRHP LANDS	STERLING MOUNTAIN	ELIGIB LE	3	WARWICK	ORANGE
NYC LANDS	ROCK RIFT FIRE		3	TOMPKINS	DELAWARE
OPRHP LANDS	DICKINSON HILL		4	GRAFTON	RENSSELAER
PRIVATE	MOUNT UTSAYANTHA		4	STAMFORD	DELAWARE
PRIVATE	CATHEAD MOUNTAIN		5	BENSON	HAMILTON
PRIVATE	PALMER HILL		5	BLACK BROOK	CLINTON
SARATOGA COUNTY	SPRUCE MOUNTAIN		5	CORINTH	SARATOGA
PRIVATE	SWEDE MOUNTAIN		5	HAGUE	WARREN
WANAKENA RANGER SCHOOL	TOOLEY POND MTN (FORMER)		6	FINE	ST LAWRENCE
PRIVATE	PAGE POND MOUNTAIN		7	SANFORD	FROOME

Attachment 2 – Fire Tower Maintenance Checklist

New York State Department of Environmental Conservation Guidelines for Historic Fire Tower Maintenance

The Department's goal in maintaining historic fire towers is to provide a safe, enjoyable recreational and educational experience to the visiting public through access to an historic structure that, insofar as practicable, retains the appearance and character of an in-service fire observation tower. These Guidelines are intended to provide Department staff and volunteer partners with the information and direction necessary to achieve this goal. The following discusses the details of the areas where experience has shown that repair or replacement of materials is necessary. Replacement of materials is assumed to be in-kind in order to maintain integrity of appearance and function. Questions regarding the implementation of these guidelines should be referred to the Regional Forester who will resolve them in consultation with appropriate Department staff.

The following list represents a compilation of typical repairs, recommendations and observations made from past fire tower inspections. The use of this list is not a substitution for an inspection by a licensed engineer, but serves as a guideline for what to expect when looking to rehabilitate a fire tower.

1. Inspect existing base pads and anchors. Concrete should be inspected for cracks and spalling – metal anchors for corrosion. Cracked anchor pads should be removed to inspect and clean the anchor within. Clean and paint anchor assemblies. Cast new concrete base pads with a loop of #3 reinforcing steel to same size and shape as the original. The pads will serve to protect the integrity of the original anchor bolts.

2. Inspect all structural members of the tower. Replace obviously bent, broken, and/or severely corroded members as recommended and specified by the Engineer. Drill new members only as required to fasten as original. Replace all end fasteners in new members with A325 Type I galvanized high strength bolts and washers. Replace interior fasteners with Grade 5 hardware or better.

3. Inspect for missing, corroded or loose bolts. Depending on the age of the tower it may be necessary to replace many of the bolts and washers. All structural bolts shall be A325 Type I galvanized high strength bolts except for diagonal bracing midpoints which may be Grade 5 bolts.

4. Inspect all wooden members of the cabin, stairs, and platforms. Replace obviously weak, worn, or broken planks with pressure treated lumber.

5. Inspect/replacement the hardware (ends only) that attaches the steel angle supporting the cabin floor decking to the tower frame.

6. Inspect existing handrail top to bottom at all levels. Replace lost or damaged rails and securely fasten loose members at all locations.

7. Galvanized welded wire fence at all platform landings and handrails should be installed where missing or replaced as necessary. Fasten securely on all sides at even intervals. Avoid sharp burrs and exposed ends of fence fabric and tie wires.

8. Replacement/repair of roof and other missing cabin components. Use Grade 5 or better bolts and washers in all locations unless noted otherwise.

9. Replacement/repair of windows and window frames in cabin.

10. Install a 42" safety rail w/ mid-rail, chain, and clasp at entrance to cabin. Chain off opening between rail and wall when occupied.

11. Mount signs (posted occupancy limit, interpretive, etc, if applicable) with clamps to structure or on posts independent of structure. Confirm that existing signs are no installed in a deleterious manner. No unnecessary/unauthorized drilling of tower members. For standard cabins (7 ft x 7 ft) the maximum occupancy is 8 persons. The landings should be limited to an occupancy of 4 persons.

12. Clear footprint of the tower of all leaves, branches, and debris and grade to drain. Anchors should be high and dry and monitored at regular intervals to insure that water does not pond at the corners. Some locations may require careful chipping of the natural rock to create a path for passive drainage.

13. Inspect existing base pads and anchors. Concrete should be inspected for cracks and spalling – metal anchors for corrosion. Cracked anchor pads should be removed to inspect and clean the anchor within. Clean and paint anchor assemblies. Cast new concrete base pads with a loop of #3 reinforcing steel to same size and shape as the original. The pads will serve to protect the integrity of the original anchor bolts.

14. Routine painting is recommended to preserve the appearance and integrity of structure. When required, paint all exposed structural steel with an appropriate coating (MC Urethane). Corroded or peeling areas should be prepared beforehand by power tool cleaning and primed.

15. Painting of the floor treads and landings with a slip resistant paint should be considered for safety.

16. All structural repairs should be made by qualified individuals. Removal/replacement of structural members and bolts needs to be done in a manner that will not jeopardize the towers integrity nor the installer's health and safety. The installation of A325 bolts need to be properly torqued.

17. Proper direction and supervision should be provided to any volunteer groups or other individuals assisting with the rehabilitation.

A visual inspection of the tower should be performed on an annual basis in perpetuity. This inspection should check the general condition of all components for deterioration, damage, missing or loose fasteners, base drainage, and coating performance. Any significant changes in expected use or otherwise questionable findings should be reported to the Engineer for further investigation.

Appendix D – APA Resolution on Saint Regis Canoe Area Unit Management Plan

RESOLUTION ADOPTED BY
THE ADIRONDACK PARK AGENCY
WITH RESPECT TO THE ST. REGIS CANOE AREA
UNIT MANAGEMENT PLAN
MAY 11, 2006

WHEREAS, Section 816 of the Adirondack Park Agency Act directs the Department of Environmental Conservation to develop, in consultation with the Adirondack Park Agency, individual management plans for units of land classified in the Master Plan for Management of State Lands and requires such management plans to conform to the general guidelines and criteria of the Master Plan; and

WHEREAS, in addition to such guidelines and criteria, the Adirondack Park State Land Master Plan prescribes the contents of unit management plans and provides that the Adirondack Park Agency will determine whether a proposed individual unit management plan complies with such general guidelines and criteria; and

WHEREAS, the Department of Environmental Conservation has prepared a unit management plan for the St. Regis Canoe Area dated April, 2006; and

WHEREAS, this action is a Type 1 actions pursuant to implementing regulations of the State Environmental Quality Review Act, 6 NYCRR Part 617, and the Department has made a negative determination of significance on May 10, 2006; and

WHEREAS, the Department of Environmental Conservation is the lead agency, and the Adirondack Park Agency is an involved agency whose staff have been consulted in the preparation of the proposed plan; and

WHEREAS, the Agency is requested to determine whether the final St. Regis Canoe Area Unit Management Plan, dated April, 2006, is consistent with the Standards and Guidelines of the Adirondack Park State Land Master Plan; and

WHEREAS, the Adirondack Park Agency has reviewed the proposed St. Regis Canoe Area Unit Management Plan; and

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St. Regis Canoe Area Unit Management Plan
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WHEREAS, the Plan explicitly recognizes the primary value of the St. Regis Canoe Area as an area for water based recreation which provides unique opportunities for the recreating public to experience a high degree of solitude in an essentially wilderness setting; and

WHEREAS, Article 9-0109 (4)(a) of the Environmental Conservation Law allows for maintenance of historic structures within the Adirondack Park provided that the Commissioner of Parks, Recreation and Historic Preservation finds that such structures are listed on the state register of historic places and provided that the DEC Commissioner finds that such structures can be maintained for the public enjoyment and understanding of the Forest Preserve in a way which will not disturb the existing degree of the wild forest character of either the adjacent land or the land on which the structure is located; and

WHEREAS, the St. Regis Mt. Fire Tower is listed on the State Register of Historic Places; and

WHEREAS, the Plan commits to development of a comprehensive Adirondack fire tower management plan which will address all State owned fire towers in the Adirondack Park; and

WHEREAS, the Plan commits to the implementation of strategies for prevention, targeted containment and/or eradication of invasive plant infestations and to expand the Paul Smith's College Watershed Stewardship program to the ponds within the St. Regis Canoe Area; and

WHEREAS, the Plan proposes management intended to restore and perpetuate indigenous fish species, provide recreational angling as part of a larger wilderness experience, and maintain and perpetuate annual hunting and trapping activities as legitimate uses of the wildlife resources compatible with wilderness recreation; and

WHEREAS, the Plan proposes management to monitor and afford protection to species which are endangered, threatened, or of special concern, including management actions to monitor loon populations and nesting activity and restore populations of round whitefish; and

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WHEREAS, the Plan commits to providing visitors with a trail system that offers access to ponds within and in close proximity of the St. Regis Canoe Area while keeping major sections of the SRCA "trailless" to preserve a sense of remoteness and solitude; and

WHEREAS, the Department has agreed to defer any cutting for the purpose of creating or maintaining views on Long Pond Mt. until compliance with the Master Plan for this activity is resolved; and

WHEREAS, the Plan proposes to inventory the campsites within the five-year planning cycle of this UMP, monitor the condition of the campsites to identify problems from site over-use, develop a campsite plan and identify campsites which need to be closed or relocated and to give priority attention to campsites which are experiencing serious negative impacts from use and campsites which do not comply with Master Plan separation distance requirements; and

WHEREAS, the Department has agreed to continued consultation with Agency staff on the design of primitive tent sites in the Unit, including the Keese Mill Rd. area, and to provide the Agency with the final campsite plan for the St. Regis Canoe Area as an amendment to this Unit Plan within the next year; and

WHEREAS, the Plan commits to managing mountain bike use to ensure that it does not negatively impact the natural resources or create conflicts with other user groups; and

WHEREAS, the Plan commits to providing visitors with a ski trail system that offers opportunities for loop trips of varying distances for various user ability levels; and

WHEREAS, the Plan commits to provide adequate trailhead facilities to protect natural resource values and to accommodate visitor needs, and to monitoring parking usage over the course of this UMP to determine future needs; and

WHEREAS, the Plan commits to initiation of a Limits of Acceptable Change approach to assessing carrying capacities and to monitor the levels of visitor use through visitor trail registration sheets, conducting visitor surveys, using trail counters, and other sources to determine the number of people visiting the SRCA, the activities they enjoy, and the type of experience they have; and

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WHEREAS, the Plan commits to development of regulations for group size limits which will impose a limit of 8 people per camping group and limit day use to 15 people per party; and

WHEREAS, the Plan proposes specific actions to increase the number of facilities that are accessible to persons with disabilities;

NOW, THEREFORE, BE IT RESOLVED, that the St. Regis Fire Tower does not currently meet the criteria of an essential use for the Department of Environmental Conservation and it removal should therefore either occur within three years from the adoption of this Unit Management Plan or other alternatives based on recommendations identified in the proposed comprehensive study of fire towers within the Adirondack Park and in conformance with Adirondack Park State Land Master Plan, should be identified within one year and submitted to the Agency through a UMP amendment; and

BE IT FURTHER RESOLVED, that pursuant to Section 816 of the Adirondack Park Agency Act, the Adirondack Park Agency finds the St. Regis Canoe Area Unit Management Plan, dated April, 2006, conforms with the general guidelines and criteria of the Adirondack Park State Land Master Plan except in regards to a final action on the St. Regis Fire Tower which will be further clarified through the proposed comprehensive study on Fire Towers and in regard to the proposal for the maintenance of views on Long Pond Mt. pending further discussion between Agency and DEC staff; and

BE IT FINALLY RESOLVED, that the Adirondack Park Agency authorizes its Executive Director to advise the Commissioner of Environmental Conservation of the Agency's determination in this matter.

AYES: R. Beach (DED) S. Buchanan (DEC),
R. Hoffman (DOS), F. Mezzano, D. Rehm,
J. Townsend, L. Ulrich, R. Whaley

NAYS: None

ABSTENTIONS: None

ABSENT: K. Roberts, C. Wray

Appendix E – APA Resolution on 2010 SLMP Amendment

RESOLUTION
WITH RESPECT TO THE
RECLASSIFICATION OF LANDS ASSOCIATED WITH THE FIRE TOWERS ON HURRICANE AND ST. REGIS MOUNTAINS
AND RECLASSIFICATION OF
THE HURRICANE MOUNTAIN PRIMITIVE AREA TO WILDERNESS
OCTOBER 14, 2010

WHEREAS, the Adirondack Park State Land Master Plan adopted pursuant to Section 816 of the Adirondack Park Agency Act (Executive Law, Article 27) provides guidelines for classifying State lands within the Adirondack Park; and

WHEREAS, the St. Regis Mountain and Hurricane Mountain fire towers are listed on both the State and Federal Register of Historic Places; and

WHEREAS, it is the policy of New York State, as established by the NYS Historic Preservation Act, to promote the use, re-use and conservation of listed historic properties for the education and enrichment of the public; and

WHEREAS, the NYS Historic Preservation Act requires agencies to explore and give due consideration to feasible and prudent alternatives which avoid or mitigate adverse impact on such properties; and

WHEREAS, the NYS Office of Parks, Recreation and Historic Preservation has been consulted pursuant to 9 NYCRR Part 428.1 and via letters dated April 10, 2010, and July 8, 2010, and indicated a preference for consideration of reclassification of land around the fire towers in accordance with guidelines and criteria of the Adirondack Park State Land Master Plan; and

WHEREAS, the action involves three State Land reclassification proposals which includes one-half acre on the summit of St. Regis Mountain, one-half acre on the summit of Hurricane Mountain, each proposed for reclassification to Historic, and 13,948 acres of the Hurricane Mountain Primitive Area proposed for reclassification to Wilderness; and

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WHEREAS, the Agency authorized staff to proceed with public hearings on the proposed classification and reclassification alternatives at its April, 2010 meeting; and

WHEREAS, the Adirondack Park Agency and the Department of Environmental Conservation have consulted on the proposed reclassification of the lands associated with the St. Regis Mountain and Hurricane Mountain fire towers, and the Hurricane Mountain Primitive Area, in accordance with the Memorandum of Understanding regarding the implementation of the State Land Master Plan; and

WHEREAS, Agency staff have considered the guidelines and criteria of the State Land Master Plan and the Programmatic Environmental Impact Statement regarding amendments to the Master Plan; and

WHEREAS, the primary guideline for Historic classification under the Master Plan is "to preserve the quality and character of the historic resources to the greatest extent feasible"; and

WHEREAS, the reclassification action will also achieve the long-standing goal of creating the Hurricane Mountain Wilderness Area; and

WHEREAS, the Adirondack Park Agency held three public hearings in Albany, Keene and Paul Smiths, between August 9 and August 11, 2010, including a public comment period through August 25, 2010; and

WHEREAS, a Final Supplemental Environmental Impact Statement has been completed and filed pursuant to the State Environmental Quality Review Act and 6 NYCRR Part 617 and 9 NYCRR Part 586 with respect to the proposed reclassifications and amendments to the State Land Master Plan; and

WHEREAS, the reclassifications and amendments are consistent with the guidelines of the State Land Master Plan and the Final Programmatic Environmental Impact Statement - Guidelines for Amending the Adirondack Park State Land Master Plan, filed in 1979; and

WHEREAS, the Agency recognizes the fiscal constraints which currently exist within State government and the future disposition of the towers will be addressed by the Department and outlined in a Unit Management Plan; and

- 3 -

WHEREAS, the St. Regis Mountain and Hurricane Mountain fire towers have remained unused for over a decade, and there has been no structural assessment or estimate of the cost of rehabilitation; and

WHEREAS, the cost of rehabilitation of the fire towers may be borne by community fund-raising efforts; and

WHEREAS, the action enables maintenance and potential restoration of the St. Regis Mountain and Hurricane Mountain fire towers consistent with their Historic Register status, but does not require, obligate or anticipate expenditure of State funds for restoration;

NOW, THEREFORE, BE IT RESOLVED, that the Adirondack Park Agency recommends that the reclassifications to Historic for the lands associated with the St. Regis Mountain and Hurricane Mountain fire towers, and the reclassification of the Hurricane Mountain Primitive Area to the Hurricane Mountain Wilderness Area, as described in the attached proposed revisions to the Adirondack Park State Land Master Plan and maps, be approved by the Governor; and

BE IT FINALLY RESOLVED, that the Agency Chairman is authorized to forward these reclassification recommendations to the Governor for his approval.

AYES: R. Booth, A. Lussi, F. Mezzano, C. Stiles, w. Thomas, L. Ulrich, J. Fayle (DED), E. Lowe (DEC), R. Morgiewicz (DOS)

NAYS: None

ABSTENTIONS: None

ABSENT: F. W. Valentino, C. Wray

JEC:lhb
Att.

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Appendix F – Historic Areas: Guidelines for Management and Use (SLMP)

Definition

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.

Guidelines for Management and Use

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.

Designation of Historic Areas

Two historic areas, Crown Point and John Brown's Farm, result from the application of the above criteria and are delineated on the map forming part of this master plan.

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Appendix G – Adirondack Sub-Alpine Forest Bird Conservation Area Management Summary

Site Name: Adirondack Sub-alpine Forest Bird Conservation Area

State Ownership and Managing Agency: Department of Environmental Conservation

Location: Adirondack Mountain summits above 2,800 feet in Clinton, Essex, Franklin, Hamilton and Warren counties. Surveyed and confirmed nesting locations for Bicknell's thrush (Atwood and Rimmer, et al. 1996) include: Mount Marcy, Algonquin Peak, Blue Mountain, Cascade Mountain, Giant Mountain, Kilburn Mountain, Hurricane Mountain, Lower Wolfjaw Mountain, Lyon Mountain, Mount Haystack, Phelps Mountain, Porter Mountain, Rocky Ridge Peak, Santanoni Peak, Snowy Mountain, Vanderwhacker Mountain, Wakely Mountain, Whiteface Mountain, Wright Peak.

Size of Area: Approximately 69,000 acres

DEC Region: 5

General Site Information: Adirondack Mountain summits over 2,800 feet in elevation, more specifically, those with dense subalpine coniferous forests favored by Bicknell's thrush. Bicknell's thrush prefers dense thickets of stunted or young growth of balsam fir and red spruce. Found less frequently in other young or stunted conifers, and heavy second growth of fir, cherry and birch.

Vision Statement: Continue to maintain the wilderness quality of the area, while facilitating recreational opportunities in a manner consistent with conservation of the unique bird species present.

Key BCA Criteria: Diverse species concentration site; individual species concentration site; species at risk site (ECL §11-2001, 3.f, g, and h). Peaks over 2,800 feet with dense subalpine thickets provide habitat for a distinctive bird community, which includes Bicknell's thrush (special concern), blackpoll warbler and Swainson's thrush.

Critical Habitat Types: Dense subalpine coniferous thickets. To a lesser degree, young or stunted and heavy second growth of cherry or birch.

Operation and Management Considerations:

- *Identify habitat management activities needed to maintain site as a BCA.*
  None identified for certain, although human access and acid rain could be impacting.

- *Identify seasonal sensitivities; adjust routine operations accordingly.*
  The BCA is comprised of lands that are within the Adirondack High Peaks Wilderness Area, and other lands within the broader Adirondack Forest Preserve. The Adirondack High Peaks Wilderness Area portion is subject to relatively stringent regulations and use limitations. Portions of the BCA that are not within the High Peaks Wilderness Area may have less stringent use limitations.

  Access to wilderness areas is completely limited to foot trails and non-motorized access, including horse trails. Access in wild forest and intensive use areas may include motorized forms of access. Examples include a road up Blue Mountain to transmitters, and a road up Whiteface. The road up Blue Mountain is used largely for administrative access to the transmitter towers. Whenever possible, routine maintenance on these towers or the access road should be scheduled outside the nesting season for Bicknell's thrush (May through July). The road up Whiteface sees considerable use by the public.

  Trail and road maintenance activities have the potential to disturb nesting activities of high altitude birds (in particular, Bicknell's thrush). Whenever possible, routine maintenance should be planned so that it can be completed outside of the normal nesting season. Should maintenance be needed during the nesting season, the use of non-motorized equipment would help to minimize the impacts.

- *Identify state activities or operations which may pose a threat to the critical habitat types identified above; recommend alternatives to existing and future operations which may pose threats to those habitats.*
  Ensure that bird conservation concerns are addressed in the Adirondack Park State Land Master Plan, individual unit management plans, and other planning efforts. For those areas where plans have already been completed, incorporate concerns for subalpine bird communities at the earliest opportunity.

  On May 18, 2000, Emergency Regulations were adopted for the High Peaks Wilderness Area, which comprises part of the BCA. These regulations prohibit camping above 4,000 feet; limit camping between 3,500 and 4,000 feet to designated areas; prohibit campfires above 4,000 feet, and require the leashing of pets above 4,000 feet.

- *Identify any existing or potential use impacts; recommend new management strategies to address those impacts.*
  There has been little research on what effect normal use of hiking trails has on nesting birds. Recreational use in some areas of the BCA is relatively high. More research is needed on whether there is a significant impact to bird populations from the current level of human visitation. The Adirondack High Peaks Wilderness portions of the BCA are remote locations and access is largely limited to foot trails. Motorized vehicles are not normally allowed. Those areas of the BCA outside of the High Peaks Wilderness Area allow the use of motorized vehicles and have fewer restrictions on other uses. The Unit Management Planning process for these areas should assess the effects of current levels of recreational use, and the need for new trails (including placement, timing, and construction method) on subalpine bird species (in particular, Bicknell's thrush).

Consideration should be given to prohibiting motorized vehicle access to subalpine forests above 2,800 feet.

Education, Outreach, and Research Considerations:

- *Assess current access; recommend enhanced access, if feasible.*
  Recreational use in some areas of the BCA is relatively high. Further study or research would help to assess impacts of recreational activities on nesting high altitude species. The need for protective measures will be discussed and incorporated as part of the planning process for the Adirondack Forest Preserve and Wilderness Areas that form the BCA, or at the earliest opportunity.

- *Determine education and outreach needs; recommend strategies and materials.*
  There is a need to identify to the public the distinctive bird community present in subalpine forests over 2,800 feet. The potential impacts of human intrusion need to be portrayed to the public, and a "please stay on the trails" approach may be beneficial. Continue partnerships with the National Audubon Society, High Peaks Audubon Society, Adirondack Mountain Club and other groups involved in education and conservation of birds of the Adirondack High Peaks.

- *Identify research needs; prioritize and recommend specific projects or studies.*
  Acid rain deposition may be having an impact on nesting success of songbirds at high elevations by causing die-offs of high altitude conifer forests, and killing snails and other sources of calcium needed for egg production. More research is needed on this. The curtailment of sulphur dioxide emissions and the reduction of acid rain is currently a significant New York State initiative.

  A detailed inventory and standardized monitoring of special concern species is needed for the area. In particular, all peaks above 2,800 feet should be surveyed for Bicknell's thrush.

  The impact of the current levels of human use on nesting success needs to be assessed.

Contacts:
DEC Region 5 Wildlife Manager, 518-897-1291

DEC Region 5 Forester, 518-897-1276

Sources:
Atwood, J. L., C. C. Rimmer, K. P. McFarland, S. H. Tsai, and L. R. Nagy. 1996. *Distribution of Bicknell's thrush in New England and New York.* Wilson Bulletin 108(4):650-661.

Bull, John L. 1998. *Bull's Birds of New York State*. Comstock Publishing Associates, Ithaca, NY.

NYSDEC Division of Lands and Forests. 1999. *High Peaks Wilderness Complex Unit Management Plan*. NYSDEC, Albany, NY.

Rimmer, C. C., Atwood, J., and L. R. Nagy. 1993. *Bicknell's Thrush - a Northeastern Songbird in Trouble?* Vermont Institute of Natural Science, Woodstock, VT.

State of New York Endangered Species Working Group. 1996. *Species Dossier for Bicknell's Thrush.* New York State Department of Environmental Conservation.

Wells, J. V. 1998. *Important Bird Areas in New York State.* National Audubon Society, Albany, NY.

Date BCA Designated: 11/16/01

Date MGS Prepared: 12/6/01

Appendix H – ECL §9-0109 Statement of Findings

STATEMENT OF FINDINGS

In the Matter of the Preservation of the Saint Regis Mountain Fire Tower in the Town of Santa Clara, Franklin County Pursuant to Environmental Conservation Law §9-0109

WHEREAS, in 1926, the People of the State of New York, acting through the Conservation Department, acquired the lands in the Town of Santa Clara, Franklin County comprising the summit of Saint Regis Mountain, including a fire observation tower thereon; and

WHEREAS, upon acquisition, such lands, structures and improvements were incorporated into the Forest Preserve and became subject to the "forever wild" mandate and other provisions of Article XIV, §1 of the State Constitution; and

WHEREAS, the summit of Saint Regis Mountain and the fire observation tower thereon were acquired by the State of New York prior to June 21, 1983, which is the effective date of ECL §9-0109; and

WHEREAS, ECL §9-0109(4) provides that structures and improvements on lands acquired by the State prior to such effective date may be maintained provided that: (a) the Commissioner of Parks, Recreation and Historic Preservation finds that such structures and improvements are listed on the state register of historic places pursuant to subdivision one of §14.07 of the Parks, Recreation and Historic Preservation Law; (b) the Commissioner of Environmental Conservation finds that such structures and improvements can be maintained for public enjoyment and understanding of the Forest Preserve or for departmental activities necessary in protecting Forest Preserve lands in the Adirondack Park and that such maintenance will not disturb the existing degree of wild forest character of land on which the preexisting structures or improvements are located or the wild forest character of land adjacent thereto provided the Commissioner of the Department; and (c) such maintenance will be in accordance with reasonable regulation of the Forest Preserve in the Adirondack Park consistent with Article XIV of the New York State Constitution;

WHEREAS, the St. Regis Mountain Fire Observatory Station was listed on the State Register of Historic Places on January 5, 2005 and on the National Register of Historic Places on March 15, 2005; and

WHEREAS, maintenance of the fire tower will enhance public enjoyment and understanding of the Forest Preserve by enabling the public to better appreciate the size and vastness of the Forest Preserve, the type and density of its forest cover, and the ruggedness of its terrain; and

WHEREAS, maintenance of the fire tower will occur without removing or destroying any timber or other vegetative growth and without taking any other administrative action which will adversely impact the wild forest nature of adjacent Forest Preserve land or the Forest Preserve land on which the fire tower is located.

NOW THEREFORE, I hereby make the following FINDINGS pursuant to ECL §9-0109(4):

1. The Saint Regis Mountain fire observation tower was erected in 1918, and is an excellent example of a model of fire tower that was once commonly found throughout New York State. In addition to its historic value, this structure is valuable from a cultural and educational standpoint, as it reflects the protection of New York's natural resources by the statewide fire detection program throughout much of the 20th century;

2. I also find that the Saint Regis Mountain fire observation tower is listed on the State Register of Historic Places pursuant to §14.07 of the Parks, Recreation and Historic Preservation Law;

3. I further find that the Saint Regis Mountain fire observation tower can be maintained for public enjoyment and understanding of the Forest Preserve or for departmental activities necessary in protecting Forest Preserve lands in the Adirondack Park in a manner that will not disturb the existing degree of wild forest character of the land on which the Saint Regis Mountain fire observation tower is located or the wild forest character of land adjacent thereto;

4. In addition, I find that such maintenance can occur in accordance with reasonable regulation of the Forest Preserve in the Adirondack Park consistent with Article XIV, §1 of the State Constitution;

5. These findings are supported by the Final Unit Management Plan/Environmental Impact Statement for the Saint Regis Mountain Fire Tower Historic Area;

6. For these reasons, I find the requirements of ECL §9-0109(4) have been met.

7. I also find that the adoption of a Unit Management Plan ("UMP") for the Saint Regis Mountain Fire Tower Historic Area can ensure that maintenance of the Saint Regis Mountain fire tower will comply with applicable provisions of State law, including but not limited to, Article XIV, §1 of the New York State Constitution, the Adirondack Park State Land Master Plan, ECL §9-0109(4) and Department rules and regulations.

Joseph J. Martens
Commissioner
New York State Department of Environmental Conservation

10/22/14
Date

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New York State Office of Parks, Recreation and Historic Preservation

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Andrew M. Cuomo
Governor

Rose Harvey
Commissioner

21 February 2013

Charles E. Vandrei
Agency Historic Preservation Officer
New York State Department of Environmental Conservation
Division of Lands and Forests
Historic Preservation Unit
625 Broadway
Albany, New York 12233

Re: Statement of Findings
St Regis Mountain Fire Observation Station
Santa Clara, Franklin County

Dear Mr. Vandrei:

I am writing to inform you that the St. Regis Mountain Fire Observation Station was listed on the State Register of Historic Places on 5 January 2005 and on the National Register of Historic Places on 15 March 2005. Please feel free to call me at 518.237.8643 x 3261 if you have any questions.

Sincerely

Kathleen LaFrank

Kathleen LaFrank
National Register Coordinator
New York State Historic Preservation Office

An Equal Opportunity/Affirmative Action Agency

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Appendix I – National Register of Historic Places Registration Form

(Page 1 of 11)

NPS Form 10-900
(Oct. 1990)

OMB No. 10024-0018

United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in *How to Complete the National Register of Historic Places Registration Form* (National Register Bulletin 16A). Complete each item by marking "x" in the appropriate box or by entering the information requested. If an item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. Place additional entries and narrative items on continuation sheets (NPS Form 10-900a). Use a typewriter, word processor, or computer, to complete all items.

1 Name of Property

1. Name of Property

historic name St. Regis Mountain Fire Observation Station

other name/site number

2. Location

street & town St. Regis Mountain ☐ not for publication

city or town Santa Clara ☐ vicinity

state New York code NY county Franklin code 033 zip code 12970

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended, I hereby certify that this ☒ nomination ☐ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60. In my opinion, the property ☒ meets ☐ does not meet the National Register criteria. I recommend that this property be considered significant ☐ nationally ☒ statewide ☐ locally. (☐ See continuation sheet for additional comments.)

SHPO/Commissioner, NYS Office of Parks, Recreation and Historic Preservation — Date 1/5/05

New York State Office of Parks, Recreation and Historic Preservation

In my opinion, the property ☐ meets ☐ does not meet the National Register criteria. (☐ See continuation sheet for additional comments.)

Signature of certifying official/Title — Date

State or Federal agency and bureau

4. National Park Service Certification

I hereby certify that the property is:
- ☐ entered in the National Register.
  - ☐ See continuation sheet.
- ☐ determined eligible for the National Register
  - ☐ See continuation sheet.
- ☐ determined not eligible for the National Register.
- ☐ removed from the National Register.
- ☐ other, (explain:)

Signature of the Keeper — Date of Action

(Page 2 of 11)

St. Regis Mountain Fire Observation Station
Name of Property

Franklin County, New York
County and State

5. Classification

Ownership of Property
(check as many boxes as apply)

- ☐ public-local
- ☐ private
- ☒ public-State
- ☐ public-Federal
- ☐ public-Federal

Category of Property
(check only one box)

- ☐ district
- ☐ building(s)
- ☐ site
- ☒ structure
- ☒ structure
- ☐ object

Number of Resources within Property
(Do not include previously listed resources in the count.)

Contributing	Noncontributing	
		buildings
2		sites
1		structures
1		structures
		objects
3		Total

Name of related multiple property listing
(Enter "N/A" if property is not part of a multiple property listing.)

Fire Observation Stations of the NYS Forest Preserve

Number of contributing resources previously listed in the National Register

0

6. Function or Use

Historic Function
(Enter categories from instructions)

GOVERNMENT/fire observation station

Current Function
(Enter categories from instructions)

NOT IN USE

7. Description

Architectural Classification
(Enter categories from instructions)

NO STYLE/utilitarian (fire tower)

Materials
(Enter categories from instructions)

foundation
walls
roof
other Metal/steel (tower)

Narrative Description
(Describe the historic and current condition of the property on one or more continuation sheets.)

Description

The **St. Regis Mountain Fire Observation Station** is located at the 2,874' summit of the St. Regis Mountain in the town of Santa Clara, Franklin County in the Adirondack Forest Preserve of New York State. The fire observation station includes a 35-foot tall, steel frame lookout tower erected in 1918, the site of the former observer's cabin, and nine-tenths of a mile foot trail between the cabin site and the summit. The original jeep trail to the summit and the lower portion of the foot trail, between the cabin site and the trailhead, have been excluded from this nomination due to lack of historic integrity and/or owner objection (portions of the earlier trail now pass through private property). The boundary for the nominated property is drawn to include a 500 square foot area surrounding the tower, the site of the observer's cabin, the trail connecting them, and related historic features (e.g., culverts, swales, support and retaining walls) along the trail.

Contributing Resources: 3 (tower, foot trail, site of former observer's cabin)
Non-Contributing Resources - 0

The St. Regis Mountain fire tower is located in the area between the three US Geological Survey Markers on the highest point, off to the north side, of the large open summit of St. Regis Mountain. The St. Regis summit is mostly open rock face with occasional areas of grass and moss. There is encroachment of various evergreen varieties on the north and northeast portion of the summit of generally less than ten feet in height. The summit of the mountain is mostly bare rock due to a fire that was started in 1876 by surveyors and their guides when they decided to get rid of some of the brush that loggers left behind on the mountain. The fire got out of control and destroyed most of the vegetation on the summit. (1)

In 1918, the state erected a 35- foot tall, steel frame lookout tower on the St. Regis Mountain summit to give the observer a better view. (2) The tower and its 9-foot high cab were fabricated by the Aermotor Company. This tower is typical of the "heavier type" tower, with integral staircase, built by the NYS Conservation Commission/Department between 1917 and 1950. The square, steel and glass cab atop the tower, which encloses the observation platform, has a riveted and bolted frame of angular steel and a hip roof. Steel stair risers, supporting wood stair treads, divided into five flights and four landings, provide access to the cab from the ground. The four tower legs are anchored by standard coupling plates atop concrete footings, placed on the exposed bedrock. These plates are anchored into the bedrock by two ¾ inch steel threaded rods that pass through the concrete footings. In 1919, a "Panoramic Map" was installed in the St. Regis fire tower. (3)

☐ See continuation sheet

The first fire observer assigned to the St. Regis Fire Observation Station only had a tent until 1925 when the NYS Conservation Commission built a standard-sized observer's cabin at the station. (4) In 1939, this cabin was replaced by the CCC with a 1936 style cabin (5), which was destroyed by vandals sometime after 1990. Today, only the site of these cabins and the foundation from the last cabin remains. At the site of the observer's cabin, the foot trail intersects with a small steam, which, when the cabin was in use, would have provided a good year-round source of water.

The current St. Regis Mountain trailhead is located 2.5 miles off of the Keese Mills Road, which intersects with Route 30 less than 100 feet from the main entrance to Paul Smiths College. The current foot trail leading to the St. Regis Mountain summit is approximately 3 miles long with 1,235 feet of vertical rise and is oriented north (trailhead) to southwest (tower) up the mountain. Originally, the trail traveled through private land owned by Marjorie Merriweather Post and Paul Smith's College. Over the years, the first part of this trail has been rerouted several times, and in 1934, a new foot trail on state land was cut to the summit by the CCC. (6) In the summer of 1999, a new parking area at the trailhead and the first two-thirds of the trail were rebuilt by a professional Adirondack Mountain Club (ADK) trail crew under NYS Department of Environmental Conservation auspices. (7) However, the only portion of the original trail that remains unchanged, and is included in this nomination, is the nine-tenths of a mile stretch from the site of the observer's cabin up to the summit.

The St. Regis Mountain Fire Observation Station was decommissioned by the state in 1990, but, the trail remains in active recreational use and is maintained by the NYS Department of Environmental Conservation.

End Notes:

(1) O'Kane, Walter Collins. Trails and Summits of the Adirondacks. Boston: 1928, Pg. 255.
(2) Conservation Commission: Report for the year 1918. Albany. J.B. Lyon Co. 1919. Pg. 118.
(3) Conservation Commission: Report for the year 1919. Albany. J.B. Lyon Co. 1920. Pg. 138.
(4) Conservation Commission: Report for the year1925. Albany. J.B. Lyon Co. 1926. Pg. 197.
(5) Conservation Department: Report for the year 1939. Albany. J.B. Lyon Co. 1940. Pg. 82.
(6) Conservation Department: Report for the year 1934. Albany. J.B. Lyon Co. 1935. Pg. 101.
(7) John P. Freeman. Views from on High: June, 2001 Pg. 111.

☐ See continuation sheet

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St. Regis Mountain Fire Observation Station
Name of Property

Franklin County, New York
County and State

8. Description

Applicable National Register Criteria
(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- ☒ A Property is associated with events that have made a significant contribution to the broad patterns of our history.
- ☐ B Property is associated with the lives of persons significant in our past.
- ☒ C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- ☐ D Property has yielded, or is likely to yield, information important in prehistory or history.

Criteria Considerations
(Mark "x" in all the boxes that apply.)

Property is:

- ☐ A owned by a religious institution or used for religious purposes.
- ☐ B removed from its original location.
- ☐ C a birthplace or grave.
- ☐ D a cemetery.
- ☐ E a reconstructed building, object, or structure.
- ☐ F a commemorative property.
- ☐ G less than 50 years of age or achieved significance within the past 50 years.

Narrative Statement of Significance
(Explain the significance of the property on one or more continuation sheets.)

Areas of Significance
(enter categories from instructions)

Engineering
Recreation
Conservation
Architecture
Architecture

Period of Significance
1918 - 1954

Significant Dates
1918; 1925; 1939

Significant Persons
(Complete if Criterion B is marked above)
N/A

Cultural Affiliation
N/A

Architect/Builder
Aermotor Corporation (tower manufacturer)

9. Major Bibliographical References

Bibliography
(Cite the books, articles, and other sources used in preparing this form on one or more continuation sheets.)

Previous documentation on file (NPS):

- ☐ preliminary determination of individual listing (36 CFR 67) has been requested
- ☐ previously listed in the National Register
- ☐ previously determined eligible by the National Register
- ☐ designated a National Historic Landmark
- ☐ recorded by Historic American Buildings Survey #
- ☐ recorded by Historic American Engineering Record #

Primary location of additional data:

- ☒ State Historic Preservation Office
- ☒ Other State agency (NYSDEC)
- ☐ Federal agency
- ☐ Local government
- ☐ University
- ☐ Other Name of repository:

NPS Form 10-900-a OMB Approval No. 1024-0018

United States Department of the Interior
National Park Service

National Register of Historic Places Continuation Sheet

St. Regis Mountain Fire Observation Station
Franklin County, New York

Section number 8 Page 1

The **St. Regis Mountain Fire Observation Station** is a component in the multiple property submission, Fire Observation Stations of the NYS Forest Preserve. It was identified as a historic resource in an unpublished inventory prepared by NYSDEC in 1991. Subsequently, with assistance from the NYS Office of Parks, Recreation and Historic Preservation, Field Services Bureau, the St. Regis Mountain Forest Fire Observation Station was identified as meeting the criteria for listing on the State/National Registers of Historic Places. Additional contextual information for the St. Regis Mountain Forest Fire Observation Station can be found in **Sections E:1D *Rethinking Forest Fire Protection, 1909 – 1915*; E:1F *"Conservation as a Social Service": Managing Recreation and Resources, 1909 – 1916*; E: 2C *Standardized Fire Observation Stations, 1916 – 1932;* E: 2E *Decommissioning and Abandonment of the Fire Observation Stations, 1992 – 2000*** of the Multiple Property Documentation Form. Additional associated property type information can be found in **Sections F:1 *Steel Towers*; F:2 *Observer Cabins and Outbuildings***; and **F:3 *Trail and Road Features*** of the Multiple Property Documentation Form.

Statement of Significance

The St. Regis Mountain Forest Fire Observation Station is significant under criteria A and C for its association with the New York State Forest Preserve and as an example of an early-20th century forest fire observation tower and related historic resources.

In April of 1910, the state placed the first fire observation station on St. Regis Mountain, which was comprised of an observer and a tent, which served as the observatory. A tower was not initially built on this site because the observer could see 449,209 acres by merely standing on the cleared summit. From there he could see 12 miles to the east, 15 miles to the south, 30 miles to the west and 15 miles to the north. The type tent that served as the first observatory on St. Regis Mountain can be seen in the image below of a 1910 observation tent on Pharaoh Mountain. (1)

☐ See continuation sheet

Fire Observation Tent on Pharaoh Mountain 1910

The state spent a total of $294.77 for the construction of the first observation station. (2), and built a three-mile telephone line to the summit to connect the station. This observation station also had an excellent radio relay link to areas unreachable by repeater towers.

The first fire observer assigned to St. Regis Mountain was George F. Brown, who reported 55 fires the first year. (3) Within the first few years, there were a few dangerous fires in the area of the St. Regis Mountain Fire Observation Station. On the afternoon of May 31, 1915, a small fire, that was probably left by fishermen in the town of Santa Clara, was fanned by swift winds and destroyed 1,550 acres of state land. Most of this land had been burned over from a previous fire. (4)

There is a significant history of hikers enjoying their visit with the observer and the panoramic views from the tower. In 1921, the Conservation Reports began to record the number of visitors at the fire towers. That year there were 944 visitors to the St. Regis fire tower. In 1934, there were 1,639(5), and in 1973, there were 1,400 visitors. In 1990, the state decommissioned the St. Regis Mountain Fire Observation Station.

☐ See continuation sheet

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United States Department of the Interior
National Park Service

National Register of Historic Places
Continuation Sheet

St. Regis Mountain Fire Observation Station
Franklin County, New York

Section number 8 Page 3

End Notes:

(1) State of NY Forest, Fish and Game Commission, Sixteenth Annual Report [for the Year 1910] (Albany: JB Lyons, 1911), p. 27 insert.
(2) Conservation Commission: Report for the year 1910. Albany. The Argus Co. 1911. Pg. 26.
(3) Conservation Commission: Report for the year 1910. Albany.. The Argus Co 1911. Pg. 25.
(4) Conservation Commission: Report for the year 1915. Albany. The Argus Co 1916. Pg. 89.
(5) Conservation Department: Report for the year 1934. Albany. J.B. Lyon Co. 1935. Pg. 100.

☐ See continuation sheet

Major Bibliographical References

Besanceney, Laurie. "Supporters rally to save St. Regis Mt. Fire tower." *Adirondack Daily Enterprise* Dec. 6, 2003.

Briggs, James. "Interest in Adirondack Fire Towers Growing". *Hamilton County News.* April 13, 1993. Pg. 10.

Freeman, John P. *Views from on High* . June, 2001. Pg. 111.

Karlin, Rick. "Renovating Adirondack Lookouts A Tall Order". *Albany Times-Union.* Aug. 2, 1998. Pg. A-3.

Russell, Matthew. "New Use For Fire Towers Could Include Educational Initiative". *Daily Enterprise.* Feb. 4, 1993. Pp. 1, 10.

Williams, Stephen. "Lookout Lore" *The Sunday Gazette.* May 20, 2001. Pp. H-1, H-2.

Other Sources:

"Adirondack Fire Towers Get New Lease on Life", *Adirondack Explorer,* Aug. 1998. Pp. 14-15

"Room with a View" *Adirondack Life.* June 1993. Pg. 16.

Steven Englehart to Steven Guglielmi; Letter to DEC. from A.A.R.C.H. supporting retention of the St. Regis Mt. fire tower. Oct. 21, 2003

☐ See continuation sheet

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St. Regis Mountain Fire Observation Station
Name of Property

Franklin County, New York
County and State

10. Geographical Data

Acreage of Property less than one acre

UTM References

1) 18 553345 4917270
Zone Easting Northing

2) 18 554525 4917864
Zone Easting Northing

3) 18
Zone Easting Northing

4) 18
Zone Easting Northing

☐ See continuation sheet

Verbal Boundary Description
Boundary includes a 500 square foot area surrounding the tower; the site of the observer's cabin; and a 15-foot buffer from the center line on either side of the nine-tenths mile foot trail between the site of the observer's cabin and the tower

Boundary Justification
Boundaries have been drawn to include the extant resources historically associated with the observation station.

11. Form Prepared By

name/title David Petreili (with research assistance from Marty Podskoch & William Starr)
Ed. By L. Garofalini, NYSOPRHP, Peebles Island, Waterford, NY 518-237-8643 ext. 3267

organization Saving St. Regis Tower date 12/6/04

street & number 108 County Route 25 telephone 518-483-3767

city or town Malone state NY zip code 12953

Additional Documentation

Continuation Sheets
Maps
A **USGS map** (7.5 or 15 minute series) indicating the property's location.
A **Sketch map** for historic districts and properties having large acreage or numerous resources.
Photographs
Representative black and **white photographs** of the property.
Additional Items
(Check with the SHPO or FPO for any additional items)

Property Owner
(Complete this item at the request of SHPO or FPO.)
name/title New York State Department of Environmental Conversation (NYSDEC)

street & number 625 Broadway telephone 518-457-7433

city or town Albany state NY zip code 12233-7020

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C. 470 *et seq.*).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 18.1 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Chief, Administrative Services Division, National Park Service, P.O. Box 37127, Washington, DC 20013-7127; and the Office of Management and Budget, Paperwork Reductions Projects (1024-0018), Washington, DC 20503.

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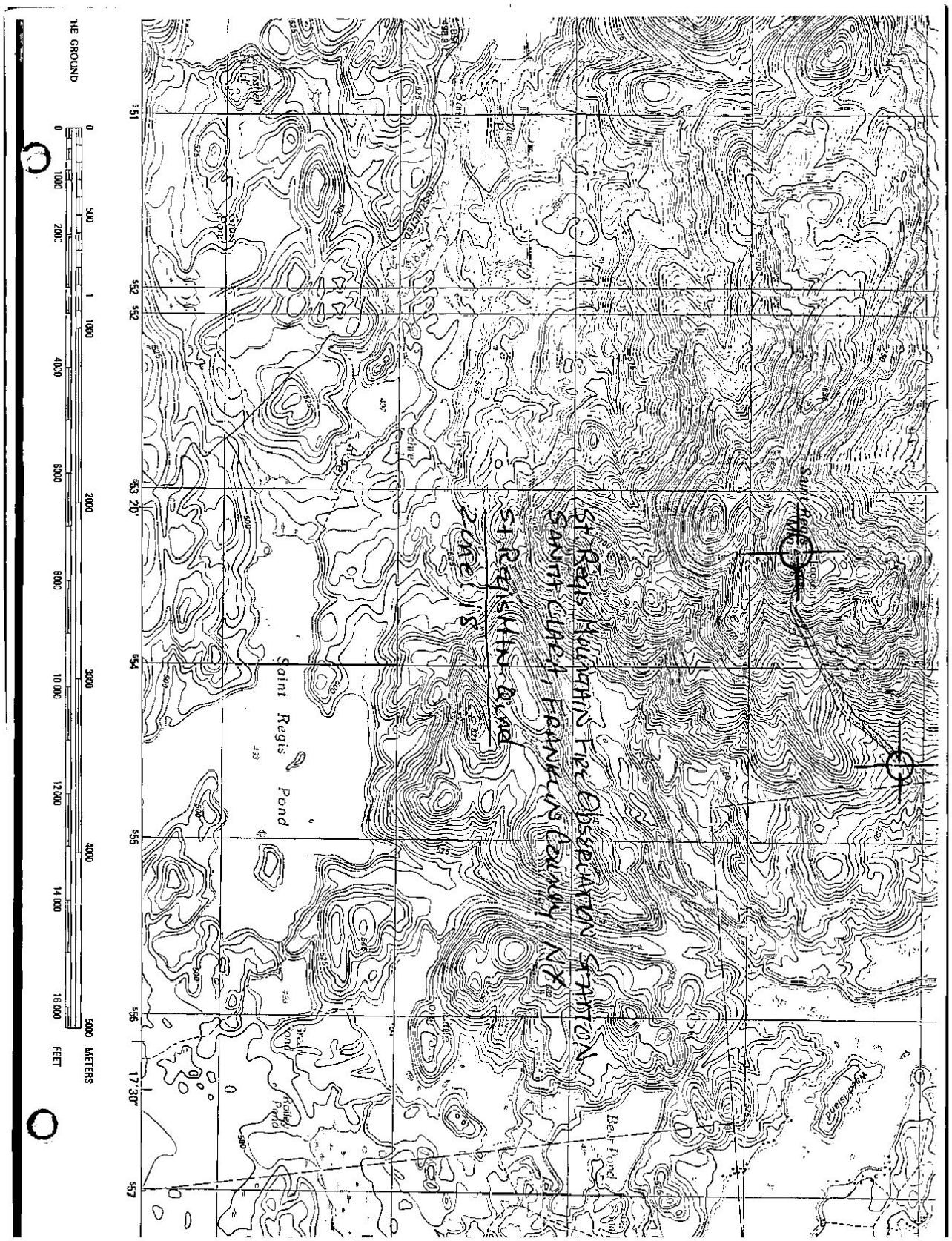
St. Regis Mountain Fire Observation Station
Santa Clara, Franklin County, NY
St. Regis Mtn. Road
Zone 18
Saint Regis Pond
Saint Regis Mtn.
Bear Pond
Weed Island
Great Pond
Rabbit Pond
Restricted
551
552
553 20'
554
555
556
557
17 30'
0
500
1000
2000
3000
4000
5000 METERS
0
1000
2000
4000
6000
8000
10 000
12 000
14 000
16 000
FEET
THE GROUND

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Appendix J – Response to Public Comment

A public comment period for the Draft UMP for the SRMFTHA was held from October 16 to November 15, 2013. During that time, the Department received over 80 written comments as well as several oral comments via telephone. Below is a summary of those comments requiring a response from the Department.

- Public money should not be used to restore the tower.

  While local friends groups or other organizations may be able to raise funds for maintenance of the fire tower, the Department is obligated to provide staff and fiscal resources where needed since the tower is a Department facility.

- Volunteers should be sought for the tower restoration effort.

  A volunteer organization, "The Friends of the St. Regis Fire Tower", has expressed an interest in participating in the maintenance of the tower. The Department will continue to support such volunteer efforts.

- No state jobs should be created for this project.

  This UMP does not propose the creation of any new staff positions. It does, however, advocate for the use of volunteers in the maintenance of the tower.

- Restoration of the fire tower will not attract more people to the summit.

  As with other fire towers maintained by the Department for public use, it is not expected that opening the tower in and of itself will increase use of the area. If local municipalities and other organizations begin to promote the tower as a tourism destination, then public use may increase.

- Removing the fire tower would be appropriate if it weren't for the cost.

  The Department considered several alternatives for the fire tower, including removal of the structure. Ultimately, all of the alternatives have a cost associated with them. Even if the tower were left standing with no further maintenance, it would eventually become a threat to public safety and have to be removed.

- The easiest course of action would have been to amend the Adirondack Park State Land Master Plan (SLMP) to make the tower a conforming structure.

  In 2010 the Adirondack Park Agency analyzed alternatives related to state land classifications. Their preferred alternative was the creation of a Historic Area to make the tower a conforming structure. The proposals in this UMP are consistent with that alternative.

- The tower should be removed to allow for Canoe Area Classification.

  While the Adirondack Park State Land Master Plan allows for this course of action, the Department's primary objective for the tower is to maximize its interpretive and educational potential as an historic resource.

- Adoption of this UMP would perpetuate an ongoing violation of the spirit of the Adirondack Park State Land Master Plan (SLMP), including the Canoe and Historic Area guidelines.

  Being a Historic Area UMP, this plan was written to be consistent with the Historic Area guidelines of the SLMP. It is up to the Adirondack Park Agency to determine whether or not the UMP conforms to the SLMP.

- The state failed to commit financial resources to the permanent management of the towers when the land was classified as Historic in 2010.

  Funding for the management of recreational facilities is typically allocated on an annual, not permanent basis. In terms of initial maintenance requirements, there is existing state money dedicated for fire towers that will likely be used if private funds cannot be secured.

- The Adirondack Park Agency's 2010 Environmental Impact Statement (EIS) regarding the reclassification of land under the fire tower failed to evaluate the alternative of relocating the tower to a nearby community.

  Management actions proposed in this UMP are consistent with the preferred alternative identified in the 2010 EIS.

- The spot zoning required for the Historic Area is a contradiction to the SLMP.

  This UMP was written to be consistent with the Historic Area guidelines in the SLMP.

- Ongoing maintenance of the Historic Area should conform to the standards of the surrounding Canoe Area.

  Because the land is classified as Historic, the maintenance of the area will conform to Historic Area guidelines.

- A remote meteorology station should be installed in the tower.

  There are several weather stations already present in the vicinity of the fire tower. Also, the presence of a weather station would not be consistent with the Department's objectives for the fire tower.