

## St. Regis Canoe Area UMP/St. Regis Mountain Fire Tower Public Meeting Comments

My name is Steven Engelhart. I am the executive director of Adirondack Architectural Heritage and I am here to express our continued support for the retention and preservation of the fire observation tower on St. Regis Mountain and our objection to NYSDEC's plans to remove the fire tower from the mountain.

Adirondack Architectural Heritage (AARCH) is the nonprofit, historic preservation organization for the Adirondack Park with a mission to promote better public understanding, appreciation, and stewardship of the region's architecture, historic sites, and communities. With a membership of more than 1000, AARCH fulfills its mission through educational programs and publications, by providing technical assistance, through advocacy, and by restoring and managing historic sites through partnership arrangements. AARCH has encouraged the preservation of fire observation towers in the region for many years, beginning with our involvement with the Blue Mountain Fire Tower Restoration Committee more than ten years ago. In 2000, we successfully nominated ten New York State fire towers to the National Register of Historic Places and made it possible for other towers in the region to be added to the Register, including the Hurricane Mountain fire tower, which was added in 2007. We have also been actively involved in the preservation of four regional fire towers – on Poke-O-Moonshine Mountain, Mt. Arab, Bald Mountain, and Azure Mountain – through our past sponsorship of the *Friends of Poke-O-Moonshine*, *Friends of Mt. Arab*, *Friends of Bald Mountain*, and *Azure Mountain Friends*.

I would like to first make the following points:

- **The fire tower is an historic structure.** *The St. Regis Mountain fire tower is listed on the State and National Registers of Historic Places and this designation is based on its great historic and engineering significance.* It was made by the Aeromotor Corporation of Chicago and was erected by the state in 1918. The station was one of more than fifty in the region that were developed during the early 20<sup>th</sup> century to detect and protect the forested land of the Adirondacks. This detection and protection system, which included state forest rangers, fire observers, other state personnel, local fire departments, and thousands of other individuals, was an innovative and effective means of protecting the region's great natural resources. The observers played an important role in detecting and fighting forest fires and were often effective conservation educators for the public who hiked to these mountaintops. *That it has been designated as historic by state and federal agencies is important because this helps it to meet the Environmental Conservation Law (9-0109) test for historic sites in the Forest Preserve and helps it to be seen as compatible and conforming even within a wilderness setting.*
- **This fire tower is valued by the public.** The preservation of this fire tower also has broad public support, as evidenced by the more than 2500 signatures gathered by the "Friends of St. Regis Mountain Fire Tower," by resolutions by Franklin County, several towns, the Adirondack Park Local Government Review Board, many nonprofit organizations, and others. All of this shows that there is more than sufficient public interest in preserving and maintaining this station and in using it for public educational purposes and that NYSDEC would have active partners to do so.

- **The fire tower has present and future uses that are compatible with its Forest Preserve setting.** The fire tower can continue to have an important public recreation and education value. Like the preserved fire towers on Poke-O-Moonshine, Goodnow, Blue, Hadley, Cathedral Rocks, Snowy, Mt. Arab, Kane, and others, a restored fire tower on St. Regis Mountain could be used to interpret the natural and cultural history of the Forest Preserve to visitors to the mountain. In this it meets or could meet another of the Environmental Conservation Law tests for an historic site in the Forest Preserve. NYSDEC Region 5's *Wildland Fire Protection Management Plan* (2004) also anticipates developing a staffing program for its fire towers, during higher fire danger periods. Both of these uses – public education and appreciation of the Forest Preserve and the protection of the Forest Preserve itself - justify retaining the tower.
- **The retention and preservation of the tower could also be accomplished within the legal framework of the State Land Master Plan,** if the immediate area around the tower were reclassified as Historic or Wild Forest. This is an effective, legal mechanism for preserving historic sites within the Adirondack Forest Preserve and, in the case of an historic designation, is the same classification used at Camp Santanoni, John Brown's Farm, and the Crown Point State Historic Site. Because the tower would be used for public recreation and education purposes, its presence would not be in conflict with other public uses of the surrounding area. Note that there is 2.6 million acres of state land in the Adirondack Forest Preserve and only about 500 acres of this is designated as Historic and most of this is at the Crown Point State Historic Site. Not only is this a tiny fraction of the Forest Preserve (two one-hundredths of one percent) but these are finite resources. Given the current restrictions on acquiring historic sites into the Forest Preserve, the sites that exist there today are about all the historic areas that are ever likely to be part of the Forest Preserve. There's no slippery slope here.
- **The continued existence of the fire tower in the Forest Preserve meets the "test" of Environmental Conservation Law** for historic structures in the Forest Preserve, in that (1) it's officially designated as historic, (2) it has or could have a public purpose related to the Forest Preserve, and (3) it could be determined as being consistent with Article 14 of the state constitution.

I also want to challenge some of DEC's basic assumptions about this issue and the way that DEC is interpreting the State Land Master Plan and other guiding documents that bear on this matter. In the Department's fire tower study, management plan language, and in your presentation to the public, you use the terms inconsistent, nonconforming, not essential, and incompatible throughout and we do not accept or agree with how you apply these to the St. Regis Mountain fire tower.

**Who says they are inconsistent and incompatible?** It seems that at least part of the justification to remove the tower is a basic wish to remove what DEC calls "inconsistencies" within the Forest Preserve. It is a huge disappointment that DEC continues to see this fire tower and the wild lands around them as different and separate things. This fire tower and the wild lands around it are wedded together in a pretty amazing way and understanding one helps to understand the other better and more profoundly. Progressive wilderness thinkers and academics, like William Cronon, are increasingly recognizing that natural and cultural resources are equally important to any full understanding of place and that the juxtaposition of a man-made

object, like a fire tower, within the wild landscape may teach us more about the value of wild places and about the complex relationship between humans and nature than the natural world by itself can. In this regard, DEC's wish to remove the tower as a means of "purifying" the wilderness is unenlightened and backward thinking.

I also suspect that the vast majority of the general public and users of this Canoe Area would not see the tower as an inconsistency. I note that DEC did not do a study of public attitudes about the existence of the fire tower on St. Regis Mountain, which could have been done by surveying visitors to the mountain or to this Canoe Area. Had they done such a visitor survey, I suspect you would have found, as we did in a 1991 survey at Camp Santanoni that the vast majority (98.5%) of visitors would say that the presence of the fire tower either did not conflict with their Forest Preserve experience or that it actually enhanced it. This is not to say that DEC's decision should solely be based on votes for or against this proposition, it's just that if you claim such a conflict or inconsistency exists, you'd think it would be reflected in the views of users and this has not been demonstrated.

**Now let's look at nonconforming.** If you read the strict definition of what makes a wilderness area a wilderness area you see four main criteria. They are:

- That the wilderness area has 10,000 contiguous acres of land and water. The St. Regis Canoe Area is 19,000 acres in size.
- That the area be without significant improvement or permanent human habitation. Note that the term "significant" is used here. It does not say "no" improvements. I think most people would agree that the existence of the fire tower within the 19,000 acre Canoe Area is, in fact, insignificant in terms of impact and that the area still has its essential wilderness quality.
- That the area be characterized primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. Again, the term "substantially unnoticeable" is key here. Is the fire tower visible? Of course it is but in the context of the larger 19,000 acres, it's still miniscule in its impact. Also note that this impact is visual and that there are no ecological impacts associated with the tower.
- But to me the most interested part of the wilderness criteria, and this was conveniently left out of DEC's presentation, is that wilderness areas "may also contain ecological, geological, or other features of scientific, educational, scenic or historical value." I am delighted that the crafters of this language did recognize that such features did have value and could have a place within a wilderness area.

I suspect that one of the things at work here is that when this original nonconforming language was written that neither the general public nor DEC recognized fire towers as historic or of value. They were simply seen as obsolete structures. But the world has changed over the last twenty-five years. The general public now recognizes these structures as historic, as having value, and, through the work of fire tower "friends" organizations, other nonprofits, and with support from DEC, it's also been demonstrated that they have a clear value to the Forest Preserve. Even within the language of the primitive/wilderness/canoe area classification, it seems that there's room for this historic structure.

**DEC needs to see the tower as essential.** DEC could also justify the retention of the tower if it would deem to classify the tower as “essential,” the same way that it has deemed as essential, wilderness areas: trails, foot bridges, dams, parking areas, trail registers and signs, lean-tos, and fire pits, to name a few. All of these are man-made and all are “essential” in that they accommodate visitors and enhance the visitors’ experiences. One doesn’t ask the question – could we do without them because, in most cases, we could. People could be left to fend for themselves without trails, signs, and camping areas but we have them because they are relatively “insignificant” and “substantially unnoticeable” in terms of substance and impact and they do add to our enjoyment of the Forest Preserve. The same could certainly be said for the fire observation towers.

Lastly I want to expose what is I think a huge flaw in this process. It seems that the ultimate fate of the fire towers on Hurricane and St. Regis Mountains was contingent on the Department drafting and adopting a comprehensive fire tower plan. So where’s the plan? What DEC has produced is a 433 page study that is a compilation of existing information about regional fire towers and the Forest Preserve issues relating to them, ***but it is not a plan***. A plan is an affirmative action document; a plan sets on paper a public policy and a strategy for achieving this public policy; and, except for the expressed wish by DEC to remove the fire towers on Hurricane and St. Regis Mountains, I don’t see any other agency policy set here. So since DEC has not done a plan, as promised, as required, it has failed to meet its obligations to itself, to the Adirondack Park Agency, and the public and it should not be allowed to move forward with this action. In addition, in the absence of a real plan, the future of all the fire towers in the Adirondack Park is still uncertain at best.

In summary, this fire tower is historic, it is highly valued by the public, it has a public purpose related to the public enjoyment and understanding of the Forest Preserve, and there is a clear legal mechanism to preserve it. We urge the Department not to remove this fire tower but, instead, to undertake the necessary land reclassification to allow for its preservation and public use.

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