



New York State  
Parks, Recreation and  
Historic Preservation

KATHY HOCHUL  
Governor

ERIK KULLESEID  
Commissioner

01 August 2022

Donald Serotta, Planning Board Chair  
Town of Chester  
1786 Kings Highway  
Chester, New York 10918

Re: ARX Wireless, LLC Site Plan Application

Chairman Serotta,

The New York State Parks Office of Parks, Recreation, and Historic Preservation (OPRHP) writes to share our concerns about visual impacts from the ARX Wireless, LLC site plan as currently proposed. Specifically, potential impacts upon the scenic viewsheds enjoyed from Goosepond Mountain State Park, a public park located within ½-mile of the applicant's project site.

The Town of Chester's Comprehensive Plan states that *"placement of new wireless towers must be planned to mitigate potential visual impacts and should be designed to be inconspicuous in nature through tower placement or stealth design."* The Plan's telecommunication facilities policy further explains that *"[n]ew wireless communication towers should be designed to be inconspicuous in nature through tower placement or stealth design (e.g. silo or stealth tree)."* As such, OPRHP urges the Planning Board to closely review the application for its visual impacts upon surrounding natural and recreational areas, and to recommend design modifications that will mitigate adverse impacts.

A cursory viewshed analysis conducted by OPRHP staff suggests that the proposed monopole—at its current height and design—may be visible at points across more than 660 acres of Goosepond Mountain (which is more than 32% of the Park's total acreage); tree coverage may screen the structure in certain areas. Given this preliminary assessment, OPRHP encourages the Board to ask the applicant to supplement their current application with balloon test or other visual assessment for review by the Board as well as interested local stakeholders. A thoughtful conversation about the proposed monopole's size/height and appearance is encouraged. If a stealth structure is recommended, tree density, type of tree, and seasonal changes in vegetation around the tower location should be discussed. OPRHP encourages the Board to set conditions whereby the applicant shall modify the monopole design to the maximum extent practicable to reduce visual pollution while still providing the Town with the highest level of broadband network service.

OPRHP is entrusted by the people of New York to responsibly steward their valuable natural, historic, and cultural resources. Our concerns about the visual impacts of this proposal are shared by the

Palisades Interstate Park Commission, a stakeholder in immediate proximity to the proposed project area, and significant stewardship partner to our agency. OPRHP respectfully requests that the Planning Board condition the application's approval upon changes to the infrastructure that will protect scenic viewsheds to the greatest degree practicable.

Thank you for your consideration and engaging our agency as part of your planning process.

Sincerely,



Gabriella M. Cebada Mora

Acting Director, Division of Environmental Stewardship and Planning

CC:

Ron Rausch, Deputy Commissioner for Environmental Stewardship

Diana Carter, Assistant Division Director for Planning and Analysis

Joshua Laird, Executive Director Palisades Interstate Park Commission

Matthew Shook, Director of Development & Special Projects Palisades Interstate Park Commission