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PRESERVING WATER,  
AIR AND WILDLANDS

September 1, 2022

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## Executive Director

William C. Janeway

Barbara Rice, Executive Director  
Adirondack Park Agency  
1133 State Route 86  
Ray Brook, NY 12977

Dear Executive Director Rice:

The Adirondack Council is pleased that the Adirondack Park Agency has requested more information regarding a proposal to test military canons in the Town of Lewis, Essex County. We recommend that the agency hold an adjudicatory public hearing on this highly controversial permit request. We further recommend that the agency assign staff to immediately develop a policy discouraging military weapons testing by private parties inside the Adirondack Park.

An adjudicatory hearing would allow the agency to collect evidence rather than claims, hear sworn testimony and make a rational decision on whether to allow such an activity inside the Adirondack Park. A new policy would protect birds and wildlife in the Champlain Valley, prevent a degradation of property values for people living near the proposed test site and save the quiet enjoyment of the Adirondacks for the people of Lewis.

The Adirondack Park has already paid a high price to accommodate use of the park's forests and airspace by the Army, Marine Corps, Air Force, National Guard and Air National Guard units. This includes treetop helicopter missions and high-speed jet flights by pilots from across the Northeast and Canada. Over the past half-decade, the intensity and scope of this training increased significantly. So too did its impact on wildlife, communities, private homes, wilderness solitude and the general quiet enjoyment of nature.

Teams of state regulators, military officials and environmental advisors (of which the Adirondack Council is one) have worked well together in the past. Cooperatively, we have managed for 30 years to mitigate conflicts between the nation's need for military readiness and New York's right to practice leading-edge conservation to protect the world's largest intact, temperate deciduous forest.

This permit request is not for a project by the Army. It would involve a private contractor working on a military weapons project. The Army has no need for a canon firing range inside the Adirondack Park. There is a well-established



artillery range at Fort Drum, just west of the Adirondack Park. It has received regular use since the 1980s. But even on an Army post, its use caused conflict initially and forced some residents to move away. The Watertown Daily Times chronicled a series of reimbursement claims by people in the Village of Antwerp in Jefferson County, for example, whose windows and foundations were cracked by the repeated impact of shells on the landscape and bedrock.

Cannon testing could occur at Fort Drum, under military supervision. At the proposed test site in Lewis and nearby, we have grave concerns about the collateral damage that could occur from cannon shell firings, flights and impacts. In addition to noise and impact vibrations, how likely are misfires and missed targets? The Fort Drum range is enormous, so stray shells don't pose much danger to neighbors. How damaging will direct hits on the target be to the surrounding landscape, flora and fauna? What wildlife is likely to make a home in the sandy mound the applicant has proposed to install via truck as a target backstop? The nature of the application seems to presume that there are wastelands within the Adirondack Park where nothing lives or can live. Such places do not exist.

If it receives a completed application, we urge the agency's board to hold an adjudicatory hearing on this proposal, so that it may reject the plan. We further urge the agency to develop a blanket policy against the testing of military-grade weapons by private parties within the Adirondack Park, in an effort to discourage such proposals in the future.

Thank you for your time and attention to this matter.

The Adirondack Council is a privately funded not-for-profit organization whose mission is to ensure the ecological integrity and wild character of the Adirondack Park. It is the largest environmental organization whose sole focus is the Adirondacks.

The Council carries out its mission through research, education, advocacy and legal action. It envisions a Park with clean water and clean air, core wilderness areas, farms and working forests, and vibrant, diverse, welcoming, safe communities. Adirondack Council advocates live in all 50 United States.

Sincerely,



William C. Janeway  
Executive Director  
Adirondack Council

Cc: Chris Cooper, Attorney, APA  
John Burth, Regulatory Programs, APA