

Lake Cell Tower Substantive Issues Report

CR4000 Cultural Resources: Impact Of Proposal And Alternatives (Substantive)

Comment Text: "The tower would be partially visible from one location along the historic Grand Loop Road."). Does this visibility constitute "impairment" of the Park's special scenery under the NPS Organic Act? It's a question that NPS must answer (according to the D.). 12 handbook, p. 26), but did not in the National Historic Preservation Act (NHPA)

REPLY: *Impacts to the Park's scenery would not be considered "impaired". The prohibited impairment is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. An impact to any park resource or value may, but does not necessarily, constitute an impairment. An impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:*

- *necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;*
- *key to the natural or cultural integrity of the park; or*
- *identified as a goal in the park's general management plan or other relevant NPS planning documents.*

Comment Text: The proposed project will have an effect on adjacent historic properties of religious and cultural significance to the Confederated Tribes of the Umatilla Indian Reservation, including the Nez Perce National Historic Trail.

REPLY: *Additional consultation with the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) satisfied the tribes that the tower would not have a visual effect on several areas associated with the Nez Perce National Historic Trail.*

Comment Text: Cultural Resources Protection Program (CRPP) of the CTUIR has concerns about the impacts that this project may have on the proposed undertaking's viewshed. The CTUIR considers the Yellowstone National Park area a cultural landscape. The proposed project will have an effect on adjacent historic properties of religious and cultural significance to the CTUIR, including the Nez Perce National Historic Trail.

REPLY: *Additional consultation with the CTUIR satisfied the tribes that the tower would not have a visual effect on several areas associated with the Nez Perce National Historic Trail.*

Comment Text: The Park provided a decent map to WY SHPO in May 2012, but that map,

showing the proposed tower locations and the boundaries of two nearby historic districts (Lake Fish Hatchery HD, and Lake HD), has not been provided to the public. Even this map, though, leaves out the nearby Fishing Bridge Historic District, an area that I have never seen delineated on any map, but which is relevant to the visual impacts of this proposed cell tower.

REPLY: *Section 106 of the NHPA requires that agencies identify historic properties within the area of potential effect (in this case the viewshed of the tower). The Fishing Bridge Historic District is not within the viewshed of the proposed tower.*

Comment Text: there is not a single map of the nearby historic districts provided to the public

REPLY: *Section 106 of the NHPA requires that agencies identify historic properties within the area of potential effect (in this case the viewshed of the tower). The 2009 environmental assessment identified and evaluated the effect of the proposed tower on historic properties – specifically historic structures and cultural landscapes.*

Comment Text: Why are there no photos from historic Fishing Bridge itself (an "eligible" structure within the "Fishing Bridge Historic District"), or from higher elevations in the extensive Lake Historic District?

REPLY: *The proposed tower would not be seen from the historic Fishing Bridge, therefore, no visual simulations from this location were prepared. Extensive evaluation of the visibility of the tower from the Lake historic district were undertaken.*

GA1000 Impact Analysis: Impact Analyses (Substantive)

Comment Text: The Park needs to analyze more precisely the impacts of the proposed Verizon cell tower on the special soundscapes of the Lake area (such as the lakeshore).

REPLY: *An analysis of the potential impact to the soundscapes associated with a proposed increase in wireless service for the Lake developed area was addressed on pages 95 and 96 of the "Wireless Communications Services Plan EA". As part of the application process the NPS received signal propagation maps by the service provider. The NPS will work with the service provider to minimize spillover signals in to Yellowstone's backcountry in accordance with the Wireless Communications EA.*

Comment Text: The Cultural Resources Protection Program (CRPP) of the CTUIR has concerns about the impacts that this project may have on the proposed undertaking's viewshed

REPLY: *Additional consultation with the Umatilla Tribe satisfied the tribe that the tower would not have a visual effect on several areas associated with the Nez Perce National Historic Trail.*

Comment Text: The effects to the viewshed from this project from this development should be considered.

REPLY: *Additional consultation with the Umatilla Tribe satisfied the tribe that the tower would not have a visual effect on several areas associated with the Nez Perce National Historic Trail.*

Comment Text: In a new EA for the Lake cell tower, original solutions for keeping the historic hotels at Lake free of electronic devices must be considered and analyzed.

REPLY: *The Wireless Communications Plan Environmental Assessment (EA) as associated Finding of No Significant Impact (FONSI) stated that WiFi coverage would not be approved for the Lake Hotel. The EA and FONSI did allow for cell phone coverage in the Lake developed area, including the location of the hotel.*

Comment Text: A new EA for the proposed Lake tower must describe how the Park will comply with the Lake Area Plan, so as to keep the sounds of the lakefront (and the rest of the Lake region) natural.

REPLY: *As mentioned earlier, an analysis of the potential impact to the soundscapes associated with a proposed increase in wireless service for the Lake developed area was addressed in the "Wireless Communications Services Plan EA". The decision to provide wireless cell service in the Lake area was documented in the Finding of No Significant Impact (FONSI) for the Wireless EA. No aspects of that plan or decision have changes.*

GR4000 Geologic Resources: Impact Of Proposal And Alternatives (Substantive)

Comment Text: Could there be too many electromagnetic frequency waves affecting or igniting an active and unpredictable natural mass as the world's largest active volcano?

REPLY: *Radio frequency waves generated by an 850mhz wireless telecommunications transmitter will not trigger seismic disturbances.*

IC100 ISSUES - Cultural resource issues (Substantive)

Comment Text: I would also ask that you invite the Advisory Council to review your "finding" if you continue to believe, after reviewing all public comments, that the tower will have "no adverse effect" on the various historic districts in the area.

REPLY: *The park, after additional consultation with interested parties regarding the park's Section 106 process have requested a review of finding per 36 CFR 800.5(c)(3). In a letter dated April 10, 2013, the Advisory Council on Historic Preservation (ACHP) concurred with the Park's finding of "no adverse effects to historic properties".*

NH1000 Concerned about the microwave or any other frequencies affecting the natural habitats/migration patterns of wildlife. (Substantive)

Comment Text: I am concerned about the microwave or any other frequencies affecting the natural habits of the wildlife. We don't need our electronics interrupting the normal migratory patterns.

REPLY: *The Lake Wireless Communications Facility (WCF) will be located primarily near a developed and already disturbed area of the park, minimizing the potential for adverse impacts to birds. The proposed location is in an area that is not considered a main area of habitat for avian species. Short-term minor adverse impacts would be expected to occur from the temporary habitat loss and disturbance during construction; however, implementation of the U.S. Fish and Wildlife Service guidance for communications towers should minimize habitat disturbance and inadvertent deaths of birds, thereby limiting habitat fragmentation and other adverse effects. Cumulative impacts to migratory birds and bird species of management concern would be short- and long-term, negligible to minor, and adverse. Because there would be no major, adverse impacts to migratory birds or species of management concern whose conservation is necessary to fulfill purposes identified in Yellowstone's establishing legislation; key to the natural and cultural integrity of the park; and identified as a goal in other park or NPS planning documents; there would be no impairment to this resource. Implementation of wireless service to this area will comply with Federal Communications Commission regulations which take into account exposure limits and would not result in any unacceptable impacts to avian species consistent with §1.4.7.1 of NPS Management Policies (2006).*

Comment Text: to not have the building/construction of a tower that could effect the surrounding wildlife for an extended period. The EMPs alone could have an effect on hunting/territorial domains.

REPLY: *The "Wireless Communications Services Plan EA" stated the needed for additional cell phone service in the Lake developed area. The Environmental Assessment addressed the impacts of proposed facilities on park wildlife including federally listed species and migratory birds and birds of management concern. The selected alternative, including the proposal of constructing a cell tower at Lake determined that the location of wireless communications facilities would occur near park developed areas thereby minimizing potential adverse affects to wildlife and wildlife habitat. The park would also implement construction of towers using U.S. Fish and Wildlife Service guidance for communication towers to minimize habitat disturbance and inadvertent deaths. Long-term impacts to wildlife would be therefore adverse, and negligible to minor. The U.S. Fish and Wildlife Service concurred with the determination of "may affect, but is not likely to adversely affect " for threatened and endangered species in their letter dated October 22, 2008.*

PN3000 Purpose And Need: Scope Of The Analysis (Substantive)

Comment Text: The information provided for the Lake site provides no further detailed information regarding the demonstrated need for additional wireless communication based on essential needs associated with the function of Yellowstone.

REPLY: *The “Wireless Communications Services Plan EA” stated the needed for additional cell phone service in the Lake developed area. One objective of the plan was to improve operational effectiveness of wireless communications in the park and safety for park visitors, employees, residents, contractors, and concessioners. Current 911 emergency coverage was considered insufficient in the park and improvement was needed for enhanced life, health, and safety response.*

PROC1000 Question the effectiveness and adequacy of the process (Substantive)

Comment Text: The October 15, 2012 press release issued by YNP gives the false impression that public input is being solicited on the appropriateness of the Lake-area Cell Tower Proposal

REPLY: *The press release stated: “The proposed 100 foot tall gray steel lattice tower and accompanying ground facilities would be erected at an existing utility site, next to existing telephone and electric lines.” ...” The Lake area is the only location in the park where construction of a new cell tower was permitted under the park’s Wireless Communications Services Plan Environmental Assessment (Wireless Plan EA).”*

Comment Text: It is likely that another floating of balloons and crane evaluations will be necessary to gather the necessary photo documentation.

REPLY: *The NPS conducted a visual assessment of the proposed tower by flying balloons and raising a 100-foot crane at various sites proposed for a cell site in the 2008 Environmental Assessment. The NPS photos from this effort were used to prepare the visual simulations posted for the public to view in order to get an informed idea of what the tower would look like from various vantage points where it could be seen. The NPS is of the opinion that the visual simulations prepared reflect a true representation of what the proposed tower would look like if constructed.*

Comment Text: The right way to proceed is with a new Lake tower EA:

REPLY: *Because the 2008 Wireless Communications Services Plan Environmental Assessment already analyzed the potential impacts, alternatives and mitigation measures associated with the proposed WCF, no further review of the construction project is necessary under the National Environmental Policy Act (NEPA). There is no significant new information that requires additional NEPA analysis.*

Comment Text: The park cannot simply state the location, height, coverage, and other details they they've chosen without showing the public the NEPA and NHPA analysis that they've done. Perhaps the existing lattice tower NW of Fishing Bridge is sufficient for providing a basic level of cellular coverage at Lake. The public has a right to know why this option was rejected.

REPLY: *Visual simulations, coverage areas, proposed design drawings, have all been made available to the public via documents posted on the PEPC website, in addition to the resource impacts analysis in the Wireless Communications EA.*

Comment Text: the Park erroneously assumes that the tower would not be visible from the Grand Loop Road Historic District. (It will be.) It even states with assurance that the tower would not be visible from more parts of Lake (any part of the "developed areas" and "area hiking trails").

REPLY: *The NPS states in the draft categorical exclusion (posted for the public on the PEPC website), that the proposed tower would be partially visible from one location along the historic Grand Loop Road, although it would be one half mile from the road at that location and visible only through a break in the trees.*

Comment Text: NPS has never analyzed, in a public document, the three alternative Lake-area locations identified in the Wireless Plan EA

REPLY: *Chapter 4 (Environmental Consequences) of the 2008 Wireless Communications Services Plan Environmental Assessment discusses the impacts, to park resources, of a wireless communications facility located at the existing lattice tower site just northwest of Fishing Bridge junction, near the wastewater treatment facility, or near the water tank in the Lake administrative area.*

Comment Text: "The NPS evaluated the potential visual impact of a 100-foot tower at the site using weather balloons and later with a crane." Why wasn't this NPS "evaluation" provided to the public?

REPLY: *The information from the flying a balloon and raising a crane was used in the preparation of the visual simulations posted for public review. All information related to this effort has also been forwarded as part of past Freedom of Information Act (FOIA) requests regarding this project to all who have requested it.*

Comment Text: The NEPA Handbook, Section 6.3 E, (p.81) states that "section 106 compliance must be completed before a FONSI can be signed." If the Park in 2012 is still in the process of complying with Section 106, how can you use the 2009 Wireless Plan FONSI for this current cell tower proposal?

REPLY: *Section 106 compliance is often a collaborative process that proceeds as projects are developed and specific designs are produced.*

Comment Text: Because placement of a new cell tower is in an irrevocable commitment of

resources and will have an impact on park visitors-not only through visual impacts, but also in terms of visitor behavior-we urge NPS to commit to a full EA process instead of a Categorical Exclusion.

REPLY: *Alternative C described in “The Wireless Communications Services Plan/EA” specifically discussed the introduction of wireless cellular service in the Lake/Fishing Bridge developed areas of the park. The Plan/EA also included numerous criteria for the placement of a facility, mitigation measures to minimize impacts, analyzed the impacts of three different locations where the facility could be located. The proposal to construct a WCF was reviewed to determine if the project’s impacts were adequately analyzed in the original documents. The park’s interdisciplinary team determined that the proposed action results in no or minor impacts, and that no extraordinary circumstances apply, as documented in a categorical exclusion posted on the PEPC website.*

Comment Text: The Wireless Communications plan did not provide the level of depth of detail necessary,

REPLY: *See response listed in previous comment.*

Comment Text: It would be most helpful were the Park to undertake an EA which analyzes different alternatives instead of doing this through a Categorical Exclusion.

REPLY: *Three different locations in the Lake/Fishing Bridge area were analyzed for a proposed wireless communications facility (WCF) in the 2008 Wireless Communications Plan/EA.*

Comment Text: why have the concerns of the Wireless Committee been over-ruled at every step of the process?

REPLY: *The Wireless Committee review process includes a form completed by the proponent of the service at the end of initial discussions. This allows the Committee the opportunity to ensure that the proposal adheres to the Wireless Communications Plan and the ability to make recommendations to the superintendent regarding any action to be taken. The Wireless Telecommunications Committee included the following remarks to the Superintendent in response to the April 17, 2012 Digital Skylines Inc., proposal for a facility and tower at the Lake water tank site: “The proposed tower is not visible from the historic districts at Fishing Bridge, Lake Lodge, and Lake Hotel. The proposed action at the preferred site was covered in the FONSI (NEPA) and the impacts have not changed.”*

The Superintendent concurred with the recommendations of the Committee and approved continued actions towards permitting rights-of-way as described in Appendix 5 of RM-53 Special Park Uses.

Comment Text: If the current public comment period is intended to satisfy the requirements of NEPA and NHPA, you have failed to provide the necessary documents at the PEPC site to allow the public to comment intelligently (see 36 CFR 800.11).

Comment Text: When Verizon submitted a specific proposal to the Park earlier this year, the public (and "consulting parties") should have been consulted in the same manner and at the same time that WY SHPO was. Section 106 starts with a specific proposal, not before

REPLY: *Consultation with the public regarding the effects of the proposed tower to historic properties was conducted as part of the NEPA process.*

Comment Text: The Park has failed to comply with the procedural requirements of Section 106.

REPLY: *The park has complied with Section 106 of the National Historic Preservation Act and provided an administrative record to Wyoming State Historic Preservation Office and the Advisory Council on Historic Preservation. In a letter dated April 10, 2013, the Advisory Council on Historic Preservation (ACHP) concurred with the Park's finding of "no adverse effects to historic properties".*

Comment Text: the "Categorical Exclusion Form" posted on PEPC, the Park insists that "alternatives, impacts, and mitigation measures were analyzed in the 2008 [Wireless Plan]/EA and subsequent FONSI. I strongly disagree

REPLY: *As stated in an earlier reply, Alternative C described in "The Wireless Communications Services Plan/EA" specifically discussed the introduction of wireless cellular service in the Lake/Fishing Bridge developed areas of the park. The Plan/EA also included numerous criteria for the placement of a facility, mitigation measures to minimize impacts, analyzed the impacts of three different locations where the facility could be located. The proposal to construct a WCF was reviewed to determine if the project's impacts were adequately analyzed in the original documents. The park's interdisciplinary team determined that the proposed action results in no or minor impacts, and that no extraordinary circumstances apply, as documented in a categorical exclusion posted on the PEPC website.*

Comment Text: the 2008-09 Wireless Plan/EA/FONSI did not describe and analyze a specific cell tower proposal for the Lake area, it falls short of what is required under NEPA, NHPA, and the Organic Act

REPLY: *The Wireless EA contemplated two potential sites for a WCF in the Lake/Fishing Bridge area. Impacts from both sites were evaluated in the EA. The Park eventually chose to locate the proposed tower at one of those sites (Lake Administrative Site).*

Comment Text: The Park should then follow the established procedures for review of EAs, including placing a notice in the Federal Register announcing the EA's availability, and taking and considering public comments.

REPLY: *Environmental Assessments and Federal Register notices for telecommunications right-of-way permits are required for projects where an agency did not previously analyze the alternatives, evaluate the potential impacts, and identify mitigation measures. Because alternatives, impacts, and mitigation measures were analyzed in the 2008 Wireless Communications Services Plan EA and subsequent FONSI, no Federal Register notice is required by NPS policy. The Lake cell tower was the only cell tower approved in the FONSI for*

the 2008 Wireless Service Plan EA. Public notice for the Lake Cell Tower proposal was done through a press release for the proposed cell tower and Wireless Communications Plan amendment, and posting of the project and draft categorical exclusion on the PEPC website for review.

Comment Text: officials should prepare a separate EA for the proposed 2012 Lake cell tower.

REPLY: *See previous responses on this topic.*

Comment Text: amending the Wireless Plan and short-circuiting the public participation process

REPLY: *During the preparation of the Wireless Services Plan/EA, the public was provided with opportunities to provide input on the plan/EA, specifically during the public scoping for the EA and during the EA review and comment period. The Park additionally prepared a press release that announced a public comment period on the service provider's specific proposal to construct a wireless communications facility (cell site) located at the water tank site in the administrative area at Lake.*

Comment Text: YNP should make certain that Federal Register notices are published for any such projects.

REPLY: *Because alternatives, impacts, and mitigation measures were analyzed in the 2008 Wireless Services Plan EA and subsequent FONSI, no Federal Register notice, for this proposed project, is required by NPS policy.*

Comment Text: "This CE does not apply to new WTF". Moreover, the DO-12 Field guide bars use of a CE for any project which has "the potential to be controversial because of disagreement over possible environmental effects"

REPLY: *The decision to allow a Wireless Telecommunications Facility to be constructed in the Lake/Fishing Bridge area of the park was made in the FONSI for the Wireless Communications Plan/Environmental Assessment, not the categorical exclusion (CE).*

Comment Text: Categorical Exclusion Is Inappropriate for This Construction Project.

REPLY: *See previous response.*

Comment Text: By precluding required Section 106 public review, YNP has not only broken federal law but taken a cavalier "trust us" position with respect to protecting park resources.

REPLY: *Consultation with the public regarding the effects of the proposed tower to historic properties was conducted as part of the NEPA process. The WYSHP and the ACHP both concurred with the NPS determination that the project as proposed would not adversely affect historic properties.*

Comment Text: This project has not been subject to any public input on its impact on historic resources - and these impacts are undeniable. NPS acknowledges that the top 30 ft of the tower (the part with the antennas and microwave dishes) will be visible from the Grand Loop Road Historic District. How can this not be an adverse effect?

REPLY: *Consultation with the public regarding the effects of the proposed tower to historic properties was conducted as part of the NEPA process. The park determined, and WYSHPO concurred, that the visual effect to the Grand Loop road would not be adverse as it did not affect those character-defining aspects of the road which convey its significance and therefore make it eligible for the National Register of Historic Places.*

Comment Text: Waiver of a management Policy requires action by the NPS Director. Thus, absent a waiver of national Management Policies, this project must be rejected in its current form. In a broader context, it is readily apparent that YNP never seriously explored any non-tower alternatives in any of its wireless communications planning, including the Lake area. Alternatives such as placing 911 -only antennas on existing structures or providing walkie-talkies to visitors who choose to step away from the telephone-rich hotels, lodges, and visitor centers were never considered, let alone analyzed.

REPLY: *An alternative to install 911 only service was explored and was found to require the same infrastructure requirements as that of a cell site providing full cellular service to the public. Family Radio Service (FRS) and General Mobile Radio Service (GMRS) radios are available, inexpensive, and the public is free to use them in Yellowstone though transmission distance depends on power and terrain, and the NPS is not licensed to use them, and does not monitor their frequencies.*

Comment Text: Naked Lattice Tower Violates NPS Management Policies. The cell tower in the Lake area will be a 100-foot tall "gray steel lattice tower" (according to the NPS press release) with no attempt to camouflage its appearance. NPS Management Policies on "Telecommunication Sites" (8.6.4.3) clearly state that "traditional towers (i.e., monopole or lattice) should be approved only after all other options have been explored."

REPLY: *Camouflage of the tower would occur from existing vegetation (trees) that would screen most of the tower from public view. View points at a long distance from the tower would make the tower nearly invisible, and non-reflective surfaces would mitigate visibility issues when the tower is in bright sunlight.*

Comment Text: NPS Completely Ignored Public Input in Its 2009 FONSI Decision. It is obvious that the public's input had no impact on the contours of the plan that YNP had already pre-decided for expanding wireless communications. Similarly, it seems apparent that public comment is irrelevant window dressing to YNP decision-making on this project.

REPLY: *Two public comment periods, public open houses, resulted in over 2100 pieces of correspondence being received on this project. All comments were considered prior to a decision being made to allow cellular service in the Lake area.*

Comment Text: The central thesis propelling NPS's convoluted position is that this tower proposal was already analyzed four years ago in its comprehensive Wireless Services Communications Plan EA. That is plainly not the case. First, NPS did not have a specific proposal to analyze in 2008. In fact, it did not have a specific proposal until 2012. The EA, Plan, and FONSI were written in 2008-2009.

REPLY: *Cellular service and its required supporting infrastructure were analyzed in the Environmental Assessment prepared in 2008. Three potential locations for this service were also discussed in the document, one being the proposed site near the existing water tank in the Lake Administrative area. A number of mitigation measures and criteria were also included in the EA which would allow the public to know the types, materials, actions that would be used to ensure impacts identified in the EA were not exceeded.*

PSALT001 Cell tower should support all cell phone users not just Verizon. (Substantive)

Comment Text: Please require that Verizon build a multi-use tower that permits GSM roaming. As Verizon's CDMA does not exist outside of the US, at least half of our American and all of the rest of the world's visitors to our park cannot access Verizon's network.

REPLY: *Providing for cell coverage in the Lake developed area will require the permittee to build a single mounting structure that will provide collocation opportunities for competing service providers. Four tenants; two cellular companies, one NPS land mobile radio (LMR), and one NPS LAN, are expected to reside on the proposed tower. The NPS is requiring all tenants to manage with the minimum separation of ten feet to preserve aesthetic resources and facilitate collocation. This requirement was the basis and justification for Verizon's proposal of an additional ten feet of height above the guidelines in the Wireless Communications Environmental Assessment. A GSM provider has expressed interest in submitting a request for a right-of-way for collocation once the tower is erected.*

Comment Text: Yes a phone tower would be nice, as so much of the park has coverage. However, I would prefer it be an ATT tower. I am for a tower, please consider ATT

REPLY: *A letter was sent to all FCC license holders, including AT&T within 10 days of the receipt of the application from Verizon. This action is outlined in Resource Manual 53 Special Park Uses with the intent being a courtesy notification mostly aimed at other telecommunication companies who may have similar interests.*

Comment Text: Whatever is provided should be accessible to all guests with cell phones, not just to those who use Verizon as a carrier.

REPLY: *The requirements for collocation should allow all CDMA and GSM technology wireless customers to have service in the proposed area. Whether customers will be in or out of their provider's home airtime rates depends upon the provider. With the limited footprint, Yellowstone cannot accommodate all licensed cellular providers at this site.*

PSALT017 Encourage competition between cell phone providers. (Substantive)

Comment Text: Get competing designs and access bids if the NPS has not already done so. This can address whether or not the proposed height is really needed

REPLY: *In accordance with the guidelines of DO-53 Special Park Uses, the park notified all FCC license holders in the area and encouraged co-location of sites. The intended effect is consolidation of the multiple entities that the park has to deal with for compliance and other reviews. Each company on the same tower would ultimately receive its own right-of-way permit. Two cellular companies, one NPS land mobile radio, and one NPS LAN, are expected to reside on the proposed tower. The NPS is requiring all tenants to manage with the minimum separation of ten feet to preserve aesthetic resources and facilitate collocation.*

PSALT020 Park should consider use of satellite phones only. (Substantive)

Comment Text: Sat. Phones: These are usable in Yellowstone.

REPLY: *Resource protection rangers report that their experience with satellite phones in Yellowstone has proven them to be unreliable and inefficient. For the visiting public they are impractical and unaffordable.*

Comment Text: might also address whether or not alternate technologies (direct satellite communication) are really too far out in the future to consider.

REPLY: *At this time no new technologies exist that are practical and common for use by the general public. As new technologies evolve, Yellowstone will review each technology with consideration towards the impact to the resource, public safety, and public accessibility.*

PSVQ001 Park should consider and encourage camouflaging tower/antenna/repeater structures through siting, location, and/or appearance. (Substantive)

Comment Text: I would feel more comfortable with the cell tower being built if it was required to blend in to the National Park with some sort of camouflage.

REPLY: *Several different types of camouflaged designs have been reviewed by the Wireless Committee. In this case the Wireless Committee decided that camouflage towers draw more attention, require more upkeep, and have greater adverse environmental impact than non-reflective galvanized lattice towers do. The desirable features of a lattice tower in this case include the visibility of the natural seasonal foliage through the structure and the enhanced safety of Yellowstone radio technicians when accessing Yellowstone radio antennas on the tower.*

Comment Text: An appropriate way to minimize the project's effects to historic properties in the area would be to install a concealed cell tower at this location, like a monopine or other camouflaged cell tower type.

REPLY: *Monopine towers require regular maintenance including sandblasting, painting, and replacing needles and branches to maintain their look. Relatively quickly and with or without maintenance they begin to have the appearance of aging infrastructure. Considering the concealed location of this site from the visiting public and the translucent nature of the specified design, we feel that this choice is the best trade-off from an environmental (NEPA) and aesthetic (NHPA) perspective.*

Comment Text: create tower with disguise

REPLY: *See previous responses.*

Comment Text: An appropriate way to minimize the project's effects to historic properties in the area would be to install a concealed cell tower at this location, like a monopine or other camouflaged cell tower type.

REPLY: *See previous responses.*

Comment Text: Make the tower look more like a tree and not a metal tower.

REPLY: *See previous responses.*

Comment Text: it should blend in better with the area: Other cell towers that the big companies put up are at least disguised as "trees" with fake green branches--this kind of amendment should be made to the structure so that it is not an eyesore for hikers and others who wish to enjoy the nature of Yellowstone. The fake tree look is not optimal, but it is much better than a grey steel lattice tower. Please require a different, more blending-in-to-the-background type of structure before granting final approval to this project.

REPLY: *This site is out of view from hikers on all nearby trails (including the elephant back trail) and will be difficult to spot from areas open to visitors. Since the intention is only to cover the developed area of Lake Hotel and Lodge with service, the water tank site on the lower third of the Elephant Back ridge in a service area is ideal as it is not skylined like most sites that whose intention is to cover the widest area possible.*

Comment Text: I would recommend looking at the location and seeing what would be the background color as viewed from an area that the tower would most likely be seen. Instead of

having a gray tower, perhaps paint it to match the background.

REPLY: *The Park Wireless Telecommunications Committee researched other sites including painted towers and found that non –reflective, acid washed, galvanized steel is the least conspicuous. Foliage color changes through the seasons from spring green, to late summer ambers and fall reds, and winter white. The Committee felt that a translucent design was the best alternative to preserve the view.*

Comment Text: I recommend putting in a cell tower disguised as a tree instead.

REPLY: *See previous responses.*

Comment Text: If you have severe complaints about the tower disfiguring the Park's appearance think about configuring the tower like one is done next to I-25 on the top of Monument Hill just north of Monument Colorado. It just looks like a giant pine tree and is very well done.

REPLY: *See previous responses.*

Comment Text: Maybe disguising the tower like a pine tree would be a good idea.

REPLY: *See previous responses.*

Comment Text: The 100-ft tall lattice tower structure is required to have a non-glare finish. An array of antennae will be attached to the tower. Should not these surfaces also be required to be non-glare to the greatest extent possible?

REPLY: *Yellowstone has asked providers to apply durable anti-reflective matte finishes in neutral colors on panels in the past with positive results. This is a good reminder and suggestion.*

Comment Text: I would not be opposed IF THERE IS ONE TOWER ONLY AND IT IS MADE TO LOOK LIKE A PINE TREE OR OTHER TREE.

REPLY: *Although the Wireless Communications Services Plan, Finding of No Significant Impact (FONSI) makes reference to “antennas for this new cell coverage at Lake”, the Park is not considering proposals for additional towers or sites at this time.*

Comment Text: I would suggest camouflaging the cell tower, something Verizon has already done elsewhere around the country. I have seen towers that were disguised as trees so as to be inconspicuous.

REPLY: *See previous responses.*

Comment Text: is it not possible to build on those disguised cell towers, where it reasonably resembles its surroundings? For example, there is a cell tower east of Coeur d'Alene, Idaho, on a hill overlooking I-90 that has been designed to resemble the pine trees that surround it. By no means is it perfect camouflage, but it is more appealing than a metal lattice tower.

REPLY: See previous responses.

Comment Text: If it is built --then it should have fake green branches on it. I have seen one over near Hebgen Lake. It is not noticeable as a regular tower.

REPLY: See previous responses.

Comment Text: Visual Aspect: Yellowstone's natural look is what makes it so amazing. While there may be some hidden towers, 20ft over the treeline will NEVER be hidden, disturbed area or not.

REPLY: The service area where the water tank site is located is between .6 and 1 mile from the Grand Loop Road with heavy vegetation between the road and the site. The Grand Loop road is at 7,900 feet in elevation, the water tank site is 200 feet higher at 8,100 feet. The elephant back ridgeline is at 8,600 feet. If you add a 100 foot tower to the 8,100 foot water tank site, the top of the tower is still 400 feet below ridgeline or skyline. The seventy foot high trees along the Grand Loop Road completely obscure the tower from sight from the visitor in all but a very narrow frame.

Comment Text: Make the cell tower invisible like the cell tower the BLM/USFS allowed on Lake Couer de Alene. It looks like a tree and no one notices unless you go looking for it. The cell tower looks like an evergreen tree.

REPLY: The Park is also confident that this tower will not be seen by the public unless.

Comment Text: Perhaps the tower(s) can be built to resemble trees or other natural features.

REPLY: See previous responses.

Comment Text: I am not opposed to the tower project but I am opposed to the 100-foot tall grey steel lattice tower proposed. The proposed tower should be a pine tree tower designed to blend in with the lodge pole and white pines native to the park and the specific project location. The park should be kept as natural as possible; whenever and wherever possible.

REPLY: See previous responses.

Comment Text: I support a cell tower in the Lake District of Yellowstone but please consider a 'monopine' design for the cell tower and not a steel lattice structure.

REPLY: See previous responses.

Comment Text: Surely there can be some compromise to this tower that would fly high over the tree line. I've seen communications towers disguised as trees before. Perhaps this method would make this tower look less like an invasion of the modern world?

REPLY: See previous comments. This tower will be 400 feet below skyline. The 30 feet above adjacent tree canopy is necessary for radio equipment to transmit and receive signals without interference.

PSVQ002 Consider wireless structures such as emergency call boxes and issuance of free or rental 2-way radio, walkie-talkie or GPS unit to visitors. (Substantive)

Comment Text: make two-way radios easy to rent and drop off at the hotels and visitor centers

REPLY: Family Radio Service (FRS) and General Mobile Radio Service (GMRS) radios are available, inexpensive, and the public is free to use them in Yellowstone. FCC licensed UHF and VHF channels used by the National Park service for law enforcement, emergency dispatch, and search and rescue are not authorized for use by the general public. FRS and GMRS radios have limited use for communication and emergency use and are incapable of making telephone calls.

Comment Text: For those with medical concerns, a portable CB radio could suffice. Have a Emergency only band and let people rent them for a minimal amount.

REPLY: Yellowstone National Park Dispatch center does not monitor citizen's band channel 9. Cellular 911 calls transmit Automatic Number Identification (ANI) to the console at the 911 call center or Public Service Answering Point (PSAP) which corresponds to the subscriber's seven digit telephone number. Cellular 911 calls also transmit Automatic Location Identification (ALI) which provides a display of the location that a subscriber is calling 911 from. With ANI and ALI information, dispatch can return calls to specific individuals and track their location for quicker emergency response. Emergency calls placed on CB radio channels often are prank calls with no accountability or tracing ability for 911 dispatchers.

SE2000 Socioeconomics: Methodology And Assumptions (Substantive)

Comment Text: ensure in the proposals for installing such a tower on public land does not unduely benefit a single company

REPLY: *The requirements for collocation should allow all CDMA and GSM technology wireless customers to have service in the proposed area. Whether customers will be in or out of their provider's home airtime rates depends upon the provider. With the limited footprint, Yellowstone cannot accommodate all licensed cellular providers at this site but the requirement for collocation prevents one company from being the sole service provider.*

VQ1000 Support as long as the tower is not visible from road or byways. (Substantive)

Comment Text: I have no issue with the tower as long as the tower is not visible from the byways.

Comment Text: As long as the tower is not visible from the lake hotel or any of the most popular hikes in that area then I see no problem with it. I think they need to make sure that back country hikers won't have to see it either.

Comment Text: using existing facilities and infrastructure, because if its location, it reduces the number of towers and decreases park impacts, and is not visible from most of the major historic districts--I say why not

Comment Text: My primary concern would be to have the tower in as unobtrusive a location as possible. From the document, it sounds like that is the plan

REPLY: *The proposed tower location would not break the skyline when viewed from the Grand Loop Road or developed areas of the park. The only maintained trail in the vicinity of the proposed tower is the Elephant Back Trail, which is mostly located within mature forest cover. The materials of the tower would be of a non-reflective material. One location on the Grand Loop Road would allow visibility of a portion of the tower for a few seconds, through a break in the trees, if one were looking to the west and away from the Lake.*

**WH4000 Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives
(Substantive)**

Comment Text: As shown by the 'Lake Cell Tower Map.pdf', a wetland and drainage extend west and east from the base of the existing service road, north of the housing units. This wetland appears to be potentially vulnerable to conduit placement activities as described.

Comment Text: Columbia spotted frogs use the wetland immediately west of the existing service road to the water tank, north of the large permanent building at the northwest corner of the housing area. In May or early June, frogs typically lay their egg immediately adjacent to the service road along the shallow edge of the wetland, at the base of the road berm. I think the eggs, tadpoles, and breeding adult frogs could be highly at risk if excavation occurs in the area, if debris falls or is pushed into the wetland, if water pollution inadvertently occurs, if loud construction activity and vibrations occur during breeding season, or, most certainly, if the wetland is filled in this vicinity.

REPLY: *None of the proposed infrastructure (the tower, the associated equipment hut, the trenched cable) would be placed in wetland or pond areas. The communications cable is proposed to be trenched under the existing road in the area where wetland is found adjacent to the road. Any material displaced during trenching of the cable would be kept out of wetland areas. Construction activities in this area would occur after the breeding season of May and June for the Columbia spotted frogs.*