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Wyoming State Parks & Cultural Resources

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SUPERINTENDENT'S OFFICE

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October 22, 2008

Suzanne Lewis
Superintendent
Yellowstone National Park
P.O. Box 168
Yellowstone NP, WY 82190-

RE: Review and Comment on the Wireless Communications Services Plan
Environmental Assessment for Yellowstone National Park and request for Concurrence
with Yellowstone National Park's Determination of No Historic Properties Adversely
Effected (SHPO File # 1008BHB013)

Dear Ms. Lewis:

Thank you for consulting with the Wyoming State Historic Preservation Office (SHPO) regarding the above referenced project. We find that the Yellowstone National Park Wireless Communications Services Plan Environmental Assessment to be an impressive document. The analysis of various intensity levels seems particularly well conceived and the thinking could be applicable to other types of undertakings that have visual effects. Our reading of the plan was directed to the consideration of historic resources and landscapes and the avoidance of adverse effects.

One of the complex set of considerations in assessing impacts on historic properties, both historic buildings and cultural landscapes, will be the weighing of the relative impact of communications facilities as seen in views of these resources and from them. The Mt. Washburn lookout tower is a case in point. While it is not ideal to have communication equipment on the historic building, the view from and of the building and peak are also important to consider when planning for change at this site.

Point 5 under Appropriate Siting Examples on page 46 is a strong statement about avoiding the use of historic structures and buildings as the sites of WCF installations. There are many significant historic resources in Yellowstone National Park that this policy would protect and we see why this point was firmly addressed. However, this policy may become somewhat dated as communications devices become smaller in size and perhaps be more able to penetrate building materials. A very small penetration of a historic structure may be a good solution to a siting problem.



Dave Freudenthal, Governor
Milward Simpson, Director

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We agree with the analysis of the impacts of the adoption of Alternatives C and D. The conclusion that Alternative C would result in long term, minor adverse cumulative impacts and also beneficial impacts, with the overall result of a long-term no adverse effect seems likely. Alternative D raises concern with the analysis that it is likely to result in long-term, moderate adverse cumulative impacts to the park's visual quality and viewsheds, and therefore have greater potential for adversely affecting historic properties due to the larger number of installations. The analysis of Alternative A indicates that some of the existing installations indeed have adverse effects. We would have no concerns if Alternative B were to be selected. We feel it is appropriate to comment on the overall plan once an alternative has been selected and an implementation plan is available for review.

The specific plans for changes to installations on Bunsen Peak and at Old Faithful will reduce the visibility of these elements and we concur would not constitute an adverse effect. The mock-up of the proposed relocation of equipment at Mt. Washburn Lookout points out the challenges of this site and we cannot concur on the effect of that project without a more specific plan to review.

Please refer to SHPO project #1008BHB013 on any future correspondence regarding this project. If you have any questions, please contact Betsy Bradley at 307-777-8594.

Sincerely,


Betsy H. Bradley



Dave Freudenthal, Governor
Milward Simpson, Director