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Wyoming State Parks & Cultural Resources

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DEC 15 2008

SUPERINTENDENT'S OFFICE

December 10, 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 continuing to consult with the Wyoming State Historic Preservation Office
(SHPO) regarding the above referenced project.

The issues involved with the design of a new communications installations at Mt.
Washburn that *could* avoid an adverse effect were discussed via telephone on December
4, 2008 with a group of Yellowstone National Park staff members. Our letter of October
22, 2008 expressed concern over the proposed new communications tower on Mt.
Washburn and the visual impact it would have on views to and from the peak. The photo
simulations shared by the park staff indicate that a standard lattice or monopole structure
would introduce a non-compatible element in the viewsheds and vicinity of the historic
district.

We feel that the construction of a new structure based on the following design standards
could result in a moderate impact, and therefore avoid an adverse effect. However, we
have seen neither an actual design based on these standards, nor a simulated view of the
new tower, and consequently are thinking conceptually at this time. We would, of
course, need to consult on the proposed new tower on Mt. Washburn since we need to
have a specific proposal to review in order to be able to concur with a Section 106
finding of no adverse effect.

The following Design Standards and Construction Requirements should be used to
increase the probability of no historic properties adversely affected:



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Milward Simpson, Director

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- The design of the new tower must be compatible with the 1940 structure and make reference to the existing tower in form, height, materials, and other ways.
- To minimize impacts to the viewsheds, the tower should be sited to be some distance from the existing tower and in a location where fencing required for security can be installed. The result of the new tower siting should be a pair of towers sharing the peak area.
- The height of the new tower should be as low as possible. A height of less than twice that of the existing tower is necessary to insure compatibility.
- Some equipment could be placed on the existing tower to limit the height required for the new structure.
- The design of the tower should include a solid masonry base, like that of the existing tower, and an upper open area, comparable to an observation deck. Access to the tower should be through the base only; the base will serve as the equipment cabinet. The observation deck will provide access to equipment at that level.
- Materials should be selected for their performance in extreme exposure and appropriate presence and color.
- The location of the large brown drum antennas should be carefully considered. The roof of the new tower could be an appropriate location since they would read at a distance as the tower roof.
- Fencing should be appropriate; chain-link fencing is probably not appropriate.

This initial conversation about Mt. Washburn was very productive, revealing possibilities and limitations. We assume that more such discussions will be needed on this project. Please refer to SHPO project #1008BHB013 on any future correspondence regarding this project. If you have any questions, please contact me at 307-777-8594.

Sincerely,



Betsy H. Bradley
Historic Preservation Specialist



Dave Freudenthal, Governor
Milward Simpson, Director