



United States Department of the Interior

NATIONAL PARK SERVICE

Point Reyes National Seashore
Point Reyes, California 94956

IN REPLY REFER TO:

L7617

June 20, 2013

Re: Request for scoping comments regarding a proposed telecommunication facility on Point Reyes Hill in Point Reyes National Seashore

Dear Interested Party:

The National Park Service (NPS) is preparing an Environmental Assessment in accordance with the National Environmental Policy Act (NEPA) to evaluate an application from Verizon Wireless (the Applicant) for a ten (10) year right-of-way permit to install, operate and maintain a commercial wireless telecommunication facility on Point Reyes Hill within the area zoned "Radio Range Station" at Point Reyes National Seashore in western Marin County. Attachment 1 to this letter provides additional information on the project as proposed by the Applicant.

The NPS is committed to managing natural and cultural resources to support their protection, restoration and preservation while also providing opportunities for visitor use and enjoyment of park resources. The NPS is initiating a 45-day public scoping period to engage the public in this NEPA process which will evaluate the effects of the potential issuance of a right of way permit for the commercial telecommunications facility. The NPS encourages public participation throughout the NEPA planning process and anticipates that an Environmental Assessment (EA) will be the appropriate NEPA document for the proposed project. The NPS invites the public to submit written suggestions, comments, and concerns to help develop the scope of the EA. Scoping comments could address, for example:

- Concerns and potential impacts of the proposal,
- Relevant effects of past actions, or
- Possible alternatives to the proposed project that should be considered.

There are two opportunities for the public to comment: 1) now, during this initial scoping period for the EA (which is initiated with this letter) and 2) during the public comment period following publication of the EA. The results of the NEPA process will be used to inform the decision of whether a permit should be issued.

The NPS will evaluate the application in accordance with the Telecommunications Act of 1996 and other applicable laws, regulations, and policies. The Telecommunications Act of 1996 includes a provision for making Federal property available for placement of telecommunications equipment by duly authorized providers.

When evaluating proposals to locate cellular communications towers in NPS lands, the NPS Management Policies (2006) direct Park Superintendents to consider:

- the potential benefit of having telephone access to emergency law enforcement and public safety services;
- whether the proposal would cause unavoidable conflict with the park's mission;
- the full footprint of a project, including any supporting utility lines and access;
- projects which maximize the potential for future co-location; and
- projects which use the best available technology to minimize the size of the facility or its visibility.

Further guidance for federal agencies is contained in General Services Administration Bulletin FMR 2007-B2 which directs agencies to consider a range of environmental, historic preservation, and legal issues when evaluating cell tower siting requests, including, but not limited to:

- Public health and safety with respect to the antenna installation and maintenance;
- Aesthetic impacts;
- Effects on historic districts, sites, or other objects pursuant to the National Historic Preservation Act of 1966 and its associated agreements;
- Protection of natural and cultural resources (e.g., National Parks and Wilderness areas, National Wildlife Refuge systems);
- Compliance with NEPA and other federal environmental regulations; and
- Compliance with FCC guidelines for radiofrequency exposure.
- NPS regulations regarding the issuance of right-of-way permits are found at 36 C.F.R. Part 14, and additional guidance can be found in Director's Order #53 and Reference Manual 53: Special Park Uses.

How to Comment

There are three ways to submit your comments: online, by regular mail or by hand delivery at the Seashore Headquarters.

- The preferred method for commenting is via the internet through the NPS Planning, Environment and Public Comment site at <http://parkplanning.nps.gov/pore>. From the main page, click on the Verizon Wireless Tower EA link, and then on the "Scoping Letter" link to comment.
- Comments may be mailed to "Verizon Wireless Proposal c/o Superintendent, Point Reyes National Seashore, 1 Bear Valley Road, Point Reyes Station, CA 94956". Comments post marked after August 7, 2013 will not be accepted.
- Comments may be hand-delivered to the Seashore Headquarters at 1 Bear Valley Road, Point Reyes Station. Office hours for hand delivery are Monday through Friday between the hours of 8:30 a.m. and 4:30 p.m.

The scoping period closes on August 7, 2013.

Comments will not be accepted by FAX, e-mail or in any manner other than the three methods previously specified. Bulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can request within your comment that your personal identifying information be withheld from public review, we cannot guarantee that we will be able to do so.

We appreciate your interest and input on this proposed project.

Sincerely,

A handwritten signature in black ink, appearing to read "Cicely A. Muldoon". The signature is fluid and cursive, with the first name "Cicely" written in a larger, more prominent script than the last name "Muldoon".

Cicely A. Muldoon
Superintendent

Attachment

Attachment 1, Project Background

The proposed location on Point Reyes Hill, shown in Figure 1, is within a 4-acre area zoned as a “Radio Range Station” in the 1980 PRNS General Management Plan. There are two existing communication facilities at this location on Point Reyes Hill (see Figure 2, Project Features). A Federal Aviation Administration (FAA) site contains a VORTAC¹ and supporting equipment while a second site contains a Marin Emergency Radio Authority (MERA) free-standing communication tower and supporting equipment.

The Applicant’s goal is to provide enhanced commercial wireless communication and cellular phone service to subscribers within and surrounding Point Reyes National Seashore. According to the Applicant, the proposed facility would have the capacity to co-locate, i.e. support future communication equipment from one additional wireless provider. When issuing a right-of-way permit the NPS retains authority to revoke the permit at any time, at will and without cause.

The Applicant proposes to construct a communications tower and associated facilities within a 30 foot by 40 foot area on Point Reyes Hill adjacent to the existing communications facilities (Figure 2, Project Features). The proposed communications tower is a single, free-standing, steel monopole that is 45 feet tall. Supporting equipment for the communications tower would include a pre-fabricated metal building (12 feet wide by 20 feet long by 10 feet high) placed on a concrete pad and housing radio and switching equipment and a diesel-powered standby generator (for use in case of a power loss) (Figure 3, Simulation(s) of Proposed Verizon Facility). A six to fourteen-foot high, wire mesh fence topped with barbed wire would be installed around the perimeter of the site for security.

Construction of the facility and the access driveway would disturb up to 3,500 square feet of coastal sagebrush scrub vegetation on Point Reyes Hill. In addition, a trench approximately 157 feet long would be excavated to connect the proposed facility to existing utilities. Site access would be via an 18-foot long driveway leading upslope to the site from Mt. Vision Road. The 30-foot by 40-foot site would be excavated to a depth of approximately 2 feet.

¹ VORTAC is an acronym describing a navigational facility housing two types of navigational equipment: a Very high frequency Omnidirectional Range or VOR used by civilian pilots since the 1950’s for positioning and a military TACAN system.