

## **Summary of Public Scoping Comments Received on Verizon Wireless Point Reyes Hill Telecommunication Tower Project**

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.

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. In conformance with NEPA, the NPS solicited comments from the public on issues that should be addressed and alternatives that should be considered in the upcoming Environmental Assessment that will evaluate potential environmental impacts of the proposed facility. That 49-day public scoping period ran from June 20, 2013 to August 7, 2013. Scoping input was received from 28 individuals, 1 political organization, 2 non-profit organizations and three governmental agencies.

This document summarizes the issues raised and alternatives proposed during the scoping period. The comments are solicited to ensure that important issues and alternatives are considered early in the preparation of the Environmental Assessment (EA). The EA is currently being written and will be published through the NPS Planning, Environment and Public Comment (PEPC) website for public review and comment. The public will be notified about the availability of the EA through the Point Reyes National Seashore's mailing list, the Seashore website and local newspapers. The scoping comments received by the NPS are grouped below by general topic headings.

### **Topic 1. Commenters are requesting additional general information be included in the EA to further develop the project description, its conformance with regulations, plans and policies, or the project purpose and need:**

- Comment A.** The EA should provide a complete project description and site plan including roads and staging areas for construction. The description should include acreage permanently developed and any additional acreage disturbed for the construction process including utility emplacement and staging. Acreage disturbance should be described by habitat type for each major project component.
- Comment B.** The EA should describe the need for the project and describe existing telecommunication facilities in the park and explain why this facility is needed.
- Comment C.** Are there potential co-locators? Would this require an additional support facility? Would the second supplier be limited in operation or able to operate an equivalent facility to that proposed?
- Comment D.** Would service actually be enhanced? Define the degree of enhancement this facility would afford within the Seashore and for the nearby communities? Provide map for predicted service area coverage.
- Comment E.** Is this commercial use, which also will increase electromagnetic radiation in the park, in conflict with the PRNS mission? Unlike MERA and FAA which are public facilities, this commercial use is not appropriate for a national park and does not conform with NPS Policies, including MP 4.9, Soundscape Preservation.

- Comment F.** Nonconformance of this project with the intent of Congress in amending the Telecommunications Act in regards to national parks.
- Comment G.** Would the fuel tank for the backup generator have a leak alerting system and what would be the procedures and facilities stored at the site for spill containment?
- Comment H.** The EA should address permitting and consistency requirements for the proposal under the Coastal Zone Management Act administered by the CA Coastal Commission.
- Comment I.** The proposal is considered an undertaking as defined by the National Historic Preservation Act (NHPA). The EA should address the consultation process between the NPS and the State Historic Preservation Officer required in conformance with Section 106 of the NHPA.
- Comment J.** What would be the financial arrangement between the Applicant and the federal government? If there will be a lease payment, what would be payment be?
- Comment K.** Is there a limit to the number of similar facilities that can be built in the Seashore?

## **Topic 2. Possible Alternatives to Consider in the EA**

- Comment A.** No action alternative, as indicated by comments similar to 1.c. inappropriate for a national park. Existing emergency communications are adequate. The proposed action would improve cell phone service and impact a historic family business selling maps of wireless reception locations.
- Comment B.** Satellite service rather than tower.
- Comment C.** If existing service is inadequate for visitors; consider local hot spots or limited cell service repeaters near the visitor centers.
- Comment D.** Use of several sites instead of one to improve coverage.
- Comment E.** Alternative site that does not impact the viewshed.
- Comment F.** Locate the facility in an area where it not visible from any road, trail or any point in the Seashore.
- Comment G.** Co-locate the proposed facility with one of the adjacent facilities or another vicinity existing facility in the area.
- Comment H.** Proposal Alternatives and/or possible visual impact mitigation:
- i. Reduce effects with a wooden shroud over facilities,
  - ii. Reduce height of proposed tower,
  - iii. Mimic natural feature, and
  - iv. Require all structures to be painted to minimize visibility.
- Comment I.** Recommendations for mitigating project adverse effects:
- i. Avoidance of impact,
  - ii. Combining the proposed use with an existing facility,
  - iii. Reducing the footprint of the proposed facility, and

- iv. Restoration of an equivalent area of similar habitat near the project site.

**Topic 3. Effect on Vegetation to Consider in the EA**

- Comment A.** Loss of vegetated area by vegetation community type for the development of the facility, both short-term (construction) and long-term. Effects of construction and the permanent facility on adjacent vegetated areas.
- Comment B.** Electromagnetic radiation and radio frequency effects on vegetation in the project proximity.

**Topic 4. Effects on Wildlife to Consider in the EA**

- Comment A.** Temporary (construction) and long-term loss of habitat and sensitive habitat due to the construction and operation of the facility.
- Comment B.** Effects of electromagnetic radiation, including non-thermal effects, and radio frequency on wildlife in proximity to the facility and on migratory birds and butterflies, and bee colonies.
- Comment C.** Possibility of raptors and smaller birds, migratory flocks, night birds, bats, Northern spotted owls or Great horned owls flying into tower.

**Topic 5. Effects on Visual Resources and the Visitor Experience to Consider in the EA** See also comments listed at 2.g, Alternatives.

- Comment B.** Increasing commercial uses in the National Seashore.
- Comment C.** Visual impacts of the 45-foot high tower on viewshed including that of vicinity residents and coastal views.
- Comment D.** Effects of lighting on the proposed support structure and tower on night sky.
- Comment E.** Effects of glare from lighting on vicinity residents.
- Comment F.** Cumulative effect of this and the many other towers throughout the Seashore and on US Coast Guard property.
- Comment G.** Effects should be demonstrated on-site using story boards.
- Comment H.** Effects on the park soundscape and the visitor experience in a national park and conformance with management policy 4.9 (soundscapes) when others are talking on cell phones and using phones for other functions that have intrusive elements.
- Comment I.** Effects of the project on public access and recreation.

**Topic 6. Effects on Public Health and Safety to Consider in the EA**

- Comment A.** Radiation impacts on people:
  - i. Effects of EMF, including non-thermal effects, on park visitors (proximity to trails, duration in proximity).
  - ii. Effects on vicinity residents (occupants of closest residences).
- Comment B.** Improvements to cell coverage and emergency response within the Seashore, throughout Tomales Bay and for the adjacent communities.
- Comment C.** Would the facility increase fire danger?

**Comment D.** Potential of the proposed facility to disrupt, alter or diminish the FCC authorized directional pattern of the publically-supported radio station KWMR signal that provides emergency information to the listening area.

**Comment E.** Potential of the proposed facility to effect the operation of Marin Emergency Radio Authority's facility in the project vicinity. Concerns about the shadow areas for MERA antennas and the reduction in the amount of radio frequency at ground level due to the very low height of the MERA antennas. The following studies are requested by MERA:

- i. Wave Propagation Study,
- ii. Non-Ionizing Electromagnetic Radiation Study,
- iii. Frequency Intermodulation Study for: Public Safety T-Band, Public Safety 700 MHz and Public Safety 800 MHz,
- iv. Address the National Telecommunication & Information Administration Study which looks into front end receiver over load,
- v. Ensure compliance with FCC Rule 90.672, and
- vi. Ensure Compliance with TIA Telecommunications System Bulletin TSB-88.3 (Current version is TSB-88.3-C-1 draft version D is being circulated).

**Topic 7. Effects on Park Operations to Consider in the EA**

**Comment A.** Effects of project construction on the park infrastructure. Contractor should grade and resurface Vision Road and Inverness Ridge Trail to park specifications once the construction for the project is completed.

**Topic 8. Effects on designated Wilderness to Consider in the EA**

**Comment A.** Effects on preservation of Wilderness and Wilderness character, and loss of spirit of place.

**Comment B.** Visibility of the proposed facility from the Wilderness areas of the Seashore.

**Topic 9. Effects on Water Quality to Consider in the EA**

**Comment A.** Consider effects on water quality.

**Topic 10. Effects on Cultural Resources to Consider in the EA**

**Comment A.** Consider effects on cultural resources.