

Correspondence ID: 1 **Project:** 70097 **Document:** 79987
Received: May,19 2017 16:22:40
Correspondence Type: Web Form

Correspondence: Please do not allow these modifications to the Mt. Washburn fire tower. One of the primary purposes of visiting the national parks is to reconnect with nature and escape modern technology. Currently, many hikers climb Mt. Washburn for a once-in-a-lifetime experience, enjoying the views and solitude. I believe the cell phone towers as depicted in the pictures provided by Verizon will materially diminish the enjoyment of this experience. I have personally visited Yellowstone many times over the past 25 years, and it is well worth giving up connectivity for the enjoyment of UNSPOILED nature. Thank you for the opportunity to comment.

Correspondence ID: 2 **Project:** 70097 **Document:** 79987
Received: May,19 2017 16:22:47
Correspondence Type: Web Form

Correspondence: I am 71 years old and retired. Our family moved to Jackson Wyoming primarily because of our love for Yellowstone National Park from multiple vacations. Over the last 30 years we have spent a huge amount of time in YNP and we check every single guest to the Park. The fire tower on mount Washburn is, for me personally and coming for others in the family and visitors one of the more unique and iconic places in YNP. It is come to be blunt, the one place that I think has to be preserved from the travesty of the proposed development. I have read all of the documents, looked at all of the sketches and mock ups and she virtually no rationale for destroying this location, viewed with the naked eye Dia glasses prescription from all over the north east quadrant Rogers Park as unique. The Firetower has already been substantially deteriorated by what has been allowed to go up there so far. The present proposals however are light-years beyond that and will destroy the views of that tower from virtually every approach road. I cannot think of anything less important then these communication facilities at this location. Candidly when I saw the proposal I want to cancel my 20-year-old Verizon contract.

To be clear: please reject this alternative, do not allow these towers for supporting structures to go out, do not prioritize this communications were so many people believe should never have been allowed much less expanded and why am beat. Stop the development alone nothing.

By the way, it was not easy to find my way through the various web links to actually look at the drawings, sketches and documents. A live link on the first page of all the nurses should be inserted in call comment request and communications. Feel free to contact me and please make certain that I am on the list for all future notices, particularly those for meetings. Thank you for your consideration. [REDACTED]

Correspondence ID: 3 **Project:** 70097 **Document:** 79987
Received: May,19 2017 19:38:43
Correspondence Type: Web Form

Correspondence: Based on the photos, I do not see any issue with the addition of the tower. While I do like the idea of 'unplugging' while on my vacation, I cannot imagine the inconveniences this causes to park employees.

Correspondence ID: 4 **Project:** 70097 **Document:** 79987
Received: May,19 2017 19:53:37
Correspondence Type: Web Form

Correspondence: I looked at the photos and I see no issue with a few changes to the tower. It presently has a lot of techie wires etc. Think it won't be that different. Thank you

Correspondence ID: 5 **Project:** 70097 **Document:** 79987
Received: May,21 2017 06:51:48
Correspondence Type: Web Form

Correspondence: I am in favor of improving Wireless Communications inside of Yellowstone National Park. I feel it will have little impact to the Aesthetics of the park

Correspondence ID: 6 **Project:** 70097 **Document:** 79987
Received: May,21 2017 09:45:58
Correspondence Type: Web Form

Correspondence: I would not enjoy hiking Mt. Washburn and finding a giant cell phone tower at the top. I am 21 and I do not want greater cell phone usage in the park. I go to Yellowstone to get away from technology and get away from people that don't understand that I don't want to talk to them if I am on an adventure. People CAN survive without their phones for a few days. Allowing my generation to take more selfies and have their faces glued to their phones is a bad idea. Natural selection moment, but people will just keep doing more stupid crap in the name of Instagram or snapchat or whatever. Keep the park free of technology, how it is supposed to be. Make these people let go of it.

Correspondence ID: 7 **Project:** 70097 **Document:** 79987
Received: May,22 2017 21:40:51
Correspondence Type: Web Form

Correspondence: The modernization upgrades for the YNP Mt. Washburn Fire Lookout needs to move forward. Other than a historic location of the facility, there is nothing especially visually historic about this especially remote site. A person would need to go seriously far out of their way to be visually offended by the proposed modernization. Speaking for a 100 year old Montana family, with property adjoining the Beartooth Wilderness, time and progress marches forward. So must the modernization of YNP march forward. Stagecoaches and horses are no longer used on a daily basis to tour YNP. Smoke signals are no longer used for communications. YNP has been electrified since at least 1903 when a 100-kilowatt water turbine generator was installed near the Mammoth Hot Springs headquarters. Move forward with the communications modernizations for the Mt. Washburn Fire Lookout.

Correspondence ID: 8 **Project:** 70097 **Document:** 79987
Received: May,23 2017 11:24:09
Correspondence Type: Web Form

Correspondence: The University of Utah operates and is responsible for operation and maintenance of the Earthquake recording network in and in the vicinity of YNP. An important part of this operation involves radio communications within the Century Link bladder room on Mt Washburn. It is important that these are not interrupted during any construction activities involved in the new YNP Mt Washburn telecom upgrade. Please feel free to contact me if necessary via email or phone [REDACTED]. Ciao,
[REDACTED]

Correspondence ID: 9 **Project:** 70097 **Document:** 79987
Received: May,23 2017 15:45:48
Correspondence Type: Web Form

Correspondence: Thank you again for giving us the chance to comment on this proposed project. Below are the comments for our the Forest Fire Lookout Association. These are largely similar to the comments we submitted during the first round but felt it worthwhile to re-submit them for the record.

Our organization has had a chance to review the proposed project and while we agree that improving communications reliability and accessibility is a public safety issue, the proposed structure affiliated with the Mount Washburn lookout tower, leaves something to be desired. These comments follow our analysis of the documents provided on the park planning website related to the project as well as key documents related to the 2008 Wireless Plan.

In the original 2008 Finding of No Significant Impact document the working proposal was for a single tower, near the northwest corner of the lookout, to house the new and future telecommunications equipment. Specifically; "While the preferred alternative included construction of a new structure to mount existing antennas already located on the Mount Washburn fire lookout building, the Park will consider all options to reduce visual intrusions on visitors and the historic structure, while at the same time addressing the safety and security aspects of the site's proximity to a highly-used visitor destination." It was also noted that any future development of the project would undertake the appropriate consultation process. Namely with the Wyoming State Historic Preservation Office; "The park will consult with the Wyoming SHPO and utilize the best expertise possible to try and reach an appropriate design for a Mt. Washburn wireless communications facility. The design will consider standards submitted by the Wyoming SHPO during Section 106 consultation."

As stated previously, in reviewing the information provided on the park planning website, and submitted by the wireless contractor, it appears that contrary to the original proposals, the structure now under consideration is a "steel lattice structure" surrounding the north, east, and west sides above the upper floor of the lookout, with support towers in four places around the lookout. While the goal of removing the antennas from being directly attached to the lookout, for historic integrity sakes and safety, is laudable, the following concerns still remain:

- The lattice structure is overly intrusive and with two of the support poles in the middle of the tower the view would appear to be obstructed. Additionally, it is unclear when this new structure approach was developed and what other alternatives were considered and why those alternatives were not presented as a viable option.

- There is also the concern that with the amount of open space remaining on the currently proposed lattice structure, the opportunity to continue to add equipment presents itself. The chief concern from our organization then is that eventually there will be so many pieces of communications equipment attached it will no longer be healthy to staff the lookout, or potentially allow visitors to the summit.

- Once the new communications equipment is installed, what incentive is there to preserve the historic lookout/visitor structure given that it has been kept staffed and maintained to help serve as a communications vista. With many deferred maintenance issues in the National Park Service and at Yellowstone, a concrete building on the top of a 10,000 foot mountain may or may not be a high priority and it may be more expedient to remove the structure at some point if the view shed and accessibility has been impaired, not to mention if the lookout is uninhabitable.

Given the above issues, our organization would advocate for a centralized tower, in the northwest corner near the tower, as far away as possible, consistent with the 2008 Wireless Plan. Additionally, a better option would be to site the tower away from the lookout entirely, potentially at the northern extent of the parking area, at least 100 feet.

In closing, Mount Washburn is the last remaining staffed lookout tower in Yellowstone National Park, and a historically unique structure. It also possesses a commanding view of nearly the entire park and as such draws over 250 visitors every day during the height of the summer season. This is a site then to be respected and dealt with sensitively. Our organization would advocate for the solution that reduces the appearance and footprint of the communications equipment through the most minimal above-ground structure possible. Given the mountains strategic location for communications however we are not advocating for the removal of the equipment and recognize its importance. The need for additional equipment would indicate that now is the time to relocate existing and new equipment to a dedicated tower onsite rather than completely covering the historic lookout.

Correspondence ID: 10 **Project:** 70097 **Document:** 79987
Received: May,26 2017 12:48:41
Correspondence Type: Web Form

Correspondence: Improving cell phone access and data speed can be a significant improvement for park visitor safety, park employee work communication, and park employee quality of life. The proposed additions to Mt. Washburn will prove to be a small cost to park aesthetics for a very desirable improvement to cell phone service in Yellowstone NP.

Correspondence ID: 11 **Project:** 70097 **Document:** 79987
Received: May,28 2017 01:08:35

Correspondence Type: Web Form

Correspondence: Will the telecom upgrade also increase the service for AT&T and not just verizon?

Correspondence ID: 12 **Project:** 70097 **Document:** 79987

Received: May,28 2017 08:54:01

Correspondence Type: Web Form

Correspondence: I think you should build the additional cell tower. The impact to the structure will be negligible, but the benefits it will provide to park employees and visitors alike will be well worth it. Increased cell service will both improve the safety and enjoyment of all people while inside the park. Making sure there are less areas where guest will be out of range of any sort of communication will improve the response time to emergencies. At the same time creating even a slightly faster connection, will increase the enjoyment people receive when using social media to share their experiences of the park.

Correspondence ID: 13 **Project:** 70097 **Document:** 79987

Received: May,30 2017 10:55:12

Correspondence Type: Web Form

Correspondence: Dear Park Planning / Yellowstone National Park: I'm writing to comment on your choice of location for boosting wireless coverage by building a structure at the historic fire lookout at the top of Mount Washburn. I'm a little concerned that, in your haste to try and get this accomplished, you haven't really done your homework. Or maybe you were offered alot of money by the communications companies wanting to build these structures in the park in order to boost their cellular networks. Or maybe you just didn't think things through.

I'm 56 and I understand that today's world is vastly different from my father's world, when there were fewer people in the national parks and thus fewer accidents or stupid actions done by those fewer people, requiring the contacting of a ranger or emergency service. I understand that while we would all like for the national parks to continue remaining wild and unplugged, it's a little more difficult in the 21st century. More visitation means more incidents popping up which might require some sort of communication with an outside entity. I get that. But, couldn't you have made a better choice than the historic fire lookout atop Mount Washburn?? Is Mount Washburn the only higher-elevation area on which you could build that cellular structure? Or is it the only higher-elevation area with a road/trail leading to it, thus making things easier for the construction of this booster?

What concerns me with your choice of building a structure that will practically enclose the area around the historic fire look out is not only one of aesthetics (it's gonna look ugly and it's gonna take away from that Kodak-moment view). I'm also curious as to what the driving need is to build the structure around a place that *you* determined was eligible for nomination to be listed on the National Register for Historic Places. Or, are you going to take away from this fire look out the eligibility for National Register for Historical Places status just like the current administration working on taking away national monument status from other wild places?

I'm not commenting that you shouldn't build a cellular booster. I understand the practical reasons (although in my mind's eye, I can see right now hordes of tourists, cell phones to their ears, busy gabbing away, not even taking the time to really immerse themselves in a national park established so people could experience its very remoteness and wildness). What I'm commenting about is the fact that I think your choice of building this booster around this particular spot is a poorly thought-out choice. Those other cell structures you intend to plant on and around Old Faithful, Canyon, Fishing Bridge and Grant are going to be monstrous enough. Is compromise not within your lexicon? Surely there is somewhere else comparable to Mount Washburn. PLEASE don't damage the looks of or historical significance of places within the park any more than it's already going to be damaged.

Thank you for allowing me this opportunity to voice my concerns.

Correspondence ID: 14 **Project:** 70097 **Document:** 79987

Received: May,30 2017 13:18:57

Correspondence Type: Web Form

Correspondence: I strongly oppose adding communications equipment to Mt. Washburn. This would have a very negative affect on an historic structure. More cell phone coverage is not needed in any National Park. Thank you.

Correspondence ID: 15 **Project:** 70097 **Document:** 79987

Received: Jun,05 2017 15:37:58

Correspondence Type: Web Form

Correspondence: The proposed electronic antenna will severely impact visual quality of the historic lookout, making it appear larger from a distance and replacing the current close up view with a modernist collage effect totally out of character with any lookout ever seen before.

The proposed communications improvements will doubtless have positive effects. But these will be far outweighed by negative effects. Improved Instagram messaging will lead to bigger bear jams, more people lured into sensitive areas by ease of communications, more negative animal- human interaction because people are texting rather than watching, more need for rescue operations, more bicycle trespass, more traffic accidents. Every Park Service employee knows that with the volume of park traffic, this variant of Murphy's law applies to the parks: "If people can do stupid things, they will". Improving digital communications in the park will vastly increase peoples' ability to do stupid things. The National Park Service does not have to prove all over again the corollary to Murphy's law: "Murphy was an optimist."

This bad idea would be permissible only under the following scenario:

1. Upfront payment for the use of this public resource (the lookout) is enough to pay for a fleet of 60 busses and their maintenance for five years.
2. While the electronic system and bus program are being built, the park service limits daily auto visits to the park
3. A bus service is inaugurated which replaces a progressively larger proportion of the auto traffic until bus is the predominant way to travel through Yellowstone, as it is in Denali.

In short, the bus system would give the Park Service greater control over people in the park, which would protect park values far more effectively than they are now. The bus system would reduce much of the misuse which now goes unobserved and unrecorded. The improved communications system would make bus service more efficient. People would have better experiences because there was less opportunity for stupid behavior by the few. While the negative results of improved communications would remain, the positives would vastly outweigh them.

These conditions would then justify the ringing of Mt. Washburn with a belt of giant spears straight out of Wagnerian opera.

Since the above is highly unlikely, we urge no new electronic facility on Mt. Washburn. Sincerely yours, [REDACTED]

Correspondence ID: 16 **Project:** 70097 **Document:** 79987
Received: Jun,09 2017 06:32:20
Correspondence Type: Web Form

Correspondence: I've hiked to the lookout. This wouldn't impact anything. The views are great of the area around it. The building isn't what people take the hike to see. I support the project.

Correspondence ID: 17 **Project:** 70097 **Document:** 79987
Received: Jun,11 2017 13:53:35
Correspondence Type: Web Form

Correspondence: I find the changes to the Mt. Washburn tower totally obtrusive. This lookout is so visible from so many areas. I realize that many visitors are upset that there isn't total cell coverage throughout the park so that they may send their selfies all over the world, but I don't care! A certain amount of infrastructure is inevitable, but there appears to be no way to install the new towers without destroying the appearance of this historic lookout.

Correspondence ID: 18 **Project:** 70097 **Document:** 79987
Received: Jun,20 2017 15:11:07
Correspondence Type: Web Form

Correspondence: No, No, No and NO.

- 1) Wilderness should be wilderness.
- 2) It will endanger people and wildlife. The last thing the park needs is to have flash mobs from twitter and facebook users frantically speeding through the park to the same locations. Accident, injured, dead people and wildlife.

You think it is a problem now with people trying to do selfies just wait until you nut jobs trying to livestream them harassing the wildlife.

Behavior is currently horrendous. This will just enable it to be worse.

Just this will increase the need of at least doubling the number of law enforcement rangers.

Correspondence ID: 19 **Project:** 70097 **Document:** 79987
Received: Jun,22 2017 11:50:35
Correspondence Type: Web Form

Correspondence: Dear Yellowstone National Park,

As a US citizen who has been privileged to visit Mt. Washburn often, I think the proposed telecommunications infrastructure at Mt. Washburn will have a significant adverse impact for many reasons and urge you to avoid adopting this plan to improve wireless communications in Yellowstone National Park.

Mt. Washburn Lookout Tower is a historic landmark, visible from a large swath of Yellowstone. It is the most accessible fire lookout tower in the park and the only one that houses an actual lookout ranger during the fire season. The proposed installation of antennas, and towers to support them, will make the lookout point appear as if trapped in the metal skeleton of a giant transmission tower. The visual character, both up close and from afar, will change entirely for the worse. The historic scale of the tower will be significantly amplified and be obvious to the human eye; it will look modern versus historic. Aesthetics aside, you will not be preserving this resource, visually.

Already, the cell and internet capabilities inside the lookout tower are formidable. This has led to an adverse effect on the audible character for the public visiting the tower's observation areas. The decibel level has increased from both respectful and disrespectful use of cell phones and tablets so that the public area can sound more like a busy airport terminal than a tranquil observation point in a national park. This result is inconsistent with preserving your quiet natural soundscape for the benefit of the people.

While I applaud your resolve to exclude cell towers from recommended wilderness, from along park road corridors, and from minor developed areas such as Norris and Madison so as to restrict towers, antennas, and wireless service to a few developed areas, in order to protect park resources and limit the impact on park visitors, I think adopting this proposed plan on Mt. Washburn will have the opposite result.

Yes, this plan will, for now, keep telecommunication infrastructure out of proposed wilderness areas and out of sight of motorists and the Norris and Madison campgrounds, but it will highlight the increasing presence of cell service and WiFi by significantly altering the visual character of Mt. Washburn Lookout Tower. And it will bring the negative acoustic character of cell and Internet use of some of Yellowstone's developed areas to the Lake and Fishing Bridge areas along with more spots in the park. Expanding cell service will make Yellowstone noisier.

When considering whether to approve this telecomm plan, ask yourself this- -what would preserve Yellowstone's natural resources and benefit the people more: yet more visitors talking on cell phones (sometimes while driving or walking thereby putting resources and other visitors and wildlife at risk) or more visitors observing Yellowstone's splendors and learning about the role of fire from Mt. Washburn's historic lookout tower? That is the question.

I urge you to reject this proposal as it has significant adverse effects per Section 106 of the National Historic Preservation Act, is inconsistent with preserving the original design, location and setting factors enumerated in 36CFR800.5. and, most importantly, puts the benefits of visitors talking on cell phones ahead of the benefits of visitors enjoying a preserved historic resource, Mt. Washburn Lookout Tower and acoustic tranquility across a still wonderful Yellowstone National Park.

Thank you,
[REDACTED]

Correspondence ID: 20 **Project:** 70097 **Document:** 79987
Received: Jun,22 2017 17:27:00
Correspondence Type: Web Form

Correspondence: Yellowstone National Park has asked for comments on whether construction of a three-sided, antenna-mounting structure enveloping Mt. Washburn's historic fire lookout would cause an "adverse effect" on the lookout pursuant to Section 106 of the National Historic Preservation Act.

There is a very simple answer here: Yes!

1. The Unquestionable Adverse Impacts of the Proposal

Anyone who reads the relevant regulations at 36 CFR 800.5(a)(2) will see that two of the "examples of adverse effects" directly apply to the Park's proposal at Mt. Washburn:

(iv): "Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance."

What is this proposal if not a "change... of physical features within the property's setting"? It is simply not possible to wrap a three-sided, 40-foot-tall industrial structure (laden with antennas and microwave dishes) around an historic structure and not change the "physical features within the property's setting."

(v): "Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features."

This proposal introduces "visual elements that diminish the integrity of the property's significant historic features." Just look at the computer simulations posted by the Park at PEPC: the "North Side" (proposed), "Southwest Side" (proposed), "South Side" (proposed), and "Northwest Above" (proposed) are all far worse visually than the current setting. "West Side" (proposed) is dramatically worse. Each simulation shows significant visual deterioration at the site. How could these proposed changes not represent "visual elements that diminish the integrity of the property's significant historic features"?

In case you need further convincing, I will be mailing to Yellowstone officials a few photos of beautifully preserved historic fire lookouts in Glacier National Park. (You can also find many similar images by searching online.) Look at these pictures, and compare them with what is proposed for Mt. Washburn's historic fire lookout. I think that you'll agree that this industrial overlay at Mt. Washburn does not meet the preservation standards that other national parks in the country have used in maintaining their historic fire lookouts.

It's time for the Park to move forward and make a determination of "adverse effect" for this proposal pursuant to 36 CFR 800.5. That will move the process to 36 CFR 800.6 (Resolution of adverse effects). This would entail another public comment period so that members of the public could "express their views on resolving adverse effects of the undertaking."

2. The Park Has Not Presented a Completed Project

Not surprisingly, the Park has failed to provide any specifics about how many antennas and microwave dishes will be on this new "antenna-mounting structure" when it is complete. It can't provide this information because the structure will never be "complete." There will always be changes made to it. If the past is any indication (one antenna at the summit in 1980, and at least 35 in 2017), then the historic property's "setting" is certain to deteriorate further over time, as more antennas and dishes are added to it.

If the Park is likely to approve more antennas in the future for Mt. Washburn, how can the public and WY SHPO judge the project's visual impact if it will be constantly changing, and getting worse over time?

Also, AT&T's antennas at Mt. Washburn will need to be relocated onto the new structure, and these antennas are not included in Verizon's photo simulations of what will exist at the site. How can the public evaluate the impact of a proposal when we do not know all of the important details? Is it even possible to know what a "final structure" will look like when it comes to telecommunications projects?

This is another reason why Wyoming State Historic Preservation Office's suggestion (in a December 2008 letter to the Park) of placing a new telecom structure well away from the historic fire lookout makes sense. Then each new Park action (and future antenna approvals) would not trigger more concern about impacts on this historic structure.

3. Yellowstone Has Been Too Long Out of Compliance with the National Historic Preservation Act at Mt. Washburn

Regardless of how the park proceeds, Yellowstone officials need to be more forthcoming about this proposal's unusual history. The Park should have consulted with WY SHPO when they first considered placing telecom antennas on the structure, back in 1980. Instead, they acted unilaterally, year after year, adding one piece of telecom equipment after another. The first cellular antennas were added in 1996, again without any consultation with WY SHPO (as far as I am aware).

Only in 2008, when the Park was forced to prepare a wireless plan to address the controversial telecom infrastructure already in the Park, did you contact WY SHPO and ask for concurrence with your plan for a separate antenna-mounting structure at Mt. Washburn. (No concurrence has ever been given.) Why did it take 28 years (1980-2008) for the Park to consult with WY SHPO about its actions affecting the historic Mt. Washburn fire lookout?

4. It's Time to Move to Mitigation and Resolution

Now there are at least 35 antennas and microwave dishes on the historic structure, with more proposed. It is true that many of these decisions were made by past park officials, but now the cumulative effects of these decisions have reached a critical level. Even the Park admits (see February 3, 2017 letter to WY SHPO Mary Hopkins) that it's time to "mitigate concerns over too much infrastructure affixed to the exterior of a historic structure"

I agree. And since the Park is already thinking "mitigation," why not just make the formal determination that the proposal for Mt. Washburn will have an "adverse effect" on the historic fire lookout, so we can move on to the resolution and mitigation stage?

5. The Current Proposal is Inconsistent with Yellowstone's Wireless Plan of 2008

As I pointed out in previous comments, the current proposal is inconsistent with the Wireless Plan's Design Standards and WY SHPO's Design Standards. To review:

Yellowstone's Wireless Plan of 2008 provides (p. 43):

"To ensure that impacts are kept at or below 'minor' as described in this EA, WCF would not be located in a manner that adversely affects a building, district, or element eligible for listing on the National Register of Historic Places."

How is the placement of a growing number of microwave dishes at Mt. Washburn (as many as 7 new ones) consistent with this provision?

WY SHPO has also provided YNP with "Design Standards and Construction Requirements" (see Betsy H. Bradley's letter to Superintendent Lewis dated December 10, 2008), and some of these would be violated by the current proposal:

"To minimize impacts to the viewsheds, the tower should be sited to be some distance from the existing tower"

The proposed new wrap-around telecom structure will not be "some distance" away.

6. The Park Has Made No Apparent Attempt to Consider Other Options and Possibilities at Mt. Washburn

In my previous comments, I noted the Park's promise to consider "all options to reduce visual intrusions on visitors and the historic structure" and "other possibilities to minimize or reduce visual intrusions for visitors" (see Wireless Plan FONSI, pp. 3 and 29). The public is entitled to see the documentation of such an effort, and yet nothing on this topic has been posted at PEPC since the end of the original public comment period in mid-March 2017. When will we learn what the Park has done to consider "all options" and "other possibilities"?

7. The Coverage Maps Do Not Meet NPS Requirements

The "Signal Propagation Maps" added to PEPC after the close of the original public comment period fall short of what is required.

Although these maps do not specifically concern potential impacts to the historic fire lookout at Mt. Washburn, I am commenting on them here because these maps should have been posted during the first comment period, but were not. Coverage maps are "fundamental for all [SF-299] applications," according to the procedures "applicable to permitting Wireless Telecommunication Facility (WTF) sites in units of the National Park System." (See RM-53 Special Park Uses, Appendix 5, Exhibit 6, Pages A5-43 and A5-48.)

RM-53 requires "before" and "after" maps, but that is not what is provided here. The Verizon Coverage map for Mt. Washburn is "for the existing signal strengths from Mount Washburn." Perhaps that qualifies as the "before" map. But where is the "after" map, the one that shows us what the coverage will be without the "Canyon" antennas on the Mt. Washburn structure? The public is entitled to know whether it will noticeably reduce spillover coverage to the backcountry, since that is the claim being made by the park. (See the Park's February 3, 2017 letter to WY SHPO Mary Hopkins: "This design [at Canyon] meets the park's goal to provide better cellular service to the Canyon developed area while limiting spillover into the backcountry in accordance with the objectives of Yellowstone's Wireless Communications Services Plan.")

Also, the "existing" coverage map for Mt. Washburn is dated October 8, 2013. How does that represent "existing" coverage in the area? New cellular antennas were added to the site after 2013, replacing older ones. Yellowstone must provide the public with a map of 2017 coverage from the Mt. Washburn cellular facility, not coverage from four years ago that likely does not represent today's on-the-ground reality.

The Canyon coverage maps posted at PEPC show "proposed" coverage from a 70-foot tower and a 90-foot tower, but the Canyon proposal is for a 95-foot tower (according to your February 3, 2017 letter to WY SHPO Mary Hopkins). Five feet of additional tower height makes a difference in coverage. (If it didn't, the wireless company wouldn't be proposing the extra few feet.) Where is the coverage map that shows the probable coverage for a tower of that height?

Also, the Park overlay for the Canyon map is very difficult to read, even if one is familiar with the Canyon area. A new map must be provided that shows a better overlay. (Shouldn't the overlays for the Mt. Washburn and Canyon maps be the same, in order to compare coverage?) The public must be able to compare coverage at Canyon today (from Mt. Washburn's antennas) with the expected coverage if a new tower is approved at Canyon. Only then will the public be able to determine the accuracy of the Park's claims.

8. Signal Spillover Into Yellowstone's Backcountry Contradicts Park's Prior Pledges

As to the extent of cellular coverage shown on the Mt. Washburn map, I find it shocking and directly at odds with the clear language and intent of the Wireless Plan. Most of the park is being provided with "good" coverage from this single cellular facility (the Mt. Washburn fire lookout), and there are four other cell towers in the park. When Yellowstone approved the Plan's FONSI in April 2009, it issued a press release with these words:

"The plan restricts towers, antennas, and wireless services to a few limited locations in the park, in order to protect park resources and limit the impact on park visitors."

"No cell phone service will be allowed in the vast majority of Yellowstone. Cell service is currently limited to the immediate vicinity of Canyon, Grant Village, Mammoth Hot Springs, and Old Faithful"

How is the coverage map for Mt. Washburn consistent with the statement that no cell service will be allowed "in the vast majority of Yellowstone"? It is not. And how are the "proposed" coverage maps for Canyon (including the one detailing "potential overshoot areas") consistent with limiting cell coverage to the "immediate vicinity" of the village? They are not. It is simply indisputable that Yellowstone's package of telecom "infrastructure" changes is directly at odds with the Park's Wireless Plan.

9. Limiting the Scope of Public Comments to Mt. Washburn is Improper

In this extended public comment period, the public has been asked to limit its comments to "potential direct and indirect effects of a project involving the historic Mt. Washburn Fire Lookout." The reason given is that the "park believes the effects from most of the project to improve wireless infrastructure (in other areas) would be negligible based on visual simulations," with the exception "being the visual effects to Mount Washburn."

But the Park may not limit public comments to the Mt. Washburn part of this proposal, for a number of reasons:

- a. The public has the right to comment on any aspect of the Park's proposal, since this is the first time that Yellowstone has specifically invited historic preservation comments on the proposal. This is, in effect, the Section 106 public comment period, and the entire proposal must be open for review.
- b. I question the Park's assessment that the impact of a new Canyon cell tower would be "negligible based on visual simulations." I doubt that they have enough information to make that determination. In any event, Yellowstone may not make the determination unilaterally. Public input must be part of the process. (See 36 CFR 800.5(a), which provides that the agency official "shall consider any views concerning such [adverse] effects which have been provided by the public.")
- c. Finally, the Park has no legal authority to limit the public's right to comment on this proposal. According to 36 CFR 800.2(d)(2), "Members of the public may also provide views on their own initiative for the agency official to consider in decisionmaking."

10. Information Deficiencies Should be Corrected

The Park needs to fill in the following improper data gaps:

- a. According to 36 CFR 800.2(d), the agency official must "provide the public with information about an undertaking and its effects on historic properties." Yellowstone has provided the public with very limited information in this matter, with many facts missing or contradicting others.

For example, no information at all is provided about the historic district that might be affected by the new Canyon cell tower. Until this proposal, I had never heard of the "Canyon Service Area Historic District." I now see that it is eligible for listing on the National Register of Historic Places. Why hasn't Yellowstone posted any information about this historic area at PEPC? What makes it special? When was it proposed for listing? Members of the public should not have to ask for such information to be posted at PEPC. It should simply be part of the process of informing the public, as required by 36 CFR 800.2(d).

- b. The need for more information applies to all eight of the historic districts potentially affected by Yellowstone's proposal: Grand Loop Road HD (48YE520); Mt. Washburn Fire Lookout (48YE946); Chittenden Road HD (48YE826); Canyon Service Area HD (48YE999); Fishing Bridge Museum National Historic Landmark (48YE686); Fishing Bridge HD (48YE675); South Entrance Road HD (48YE823); and 48YE304, "a prehistoric litter scatter with a buried cultural level." Yellowstone needs to provide the public with background information about all of these historic sites before proceeding any further with this proposal.

- c. The Park is well aware that the SF-299 application provides "fundamental" information about a proposal, and is critical to informing the public about what is being proposed. Yet the Park has not posted on PEPC the proper SF-299 for the Canyon proposal. The one posted at PEPC is for a co-location proposal that was apparently withdrawn. Where is the SF-299 for the free-standing cell tower under consideration?

- d. Yellowstone has failed to provide updated information on the factual discrepancies in Verizon's proposal for Canyon. Will 9 trees be removed, or 16? Do the photo simulations take into account the trees to be removed? Will these missing trees and the tower's clear visibility above the treeline create an "adverse effect" on the Canyon Service Area Historic District? Nobody (not WY SHPO or the public or even Yellowstone) could possibly make that determination without knowing how many trees are going to be removed, the specific trees to be removed, and the impact that will have on the visibility of the proposed tower.

- e. Yellowstone has also failed to clarify how far above tree height the proposed tower will be. You have written that the "mono pine will extend approximately 20' above the dense canopy of trees" and that it would be "approximately 25 feet taller than the existing telecommunications tower." "Approximately" 20' above the canopy of trees is not precise enough. The tower cannot be more than 20' above the surrounding tree height without requiring a "detailed explanation of why a shorter installation is not feasible" (see p. 44 of the Wireless Plan).

- f. Finally, there is inadequate information provided about the visual impacts of the proposed upgrade to the Old Faithful cell tower. In YNP's February 3, 2017 letter to Mary Hopkins (p. 3), the park states that "[p]roject specifications for these towers and structures and visual simulations [at Grant and Old Faithful] are enclosed for your review." The Park may have provided this information to WY SHPO, but they have not provided it to the public. I do not see any "project specifications" or "visual simulations" for the Old Faithful proposal posted at PEPC. This information needs to be provided to the public before any further action is taken on this proposal.

11. It would be Improper for Yellowstone to Issue a Categorical Exclusion for this Proposal.

Yellowstone's January 30, 2017 press release states that a "Categorical Exclusion would be prepared for any changes requiring additional National Environmental Protection [sic] Act (NEPA) compliance." I have been told that the CE under consideration is "Changes or amendments to an approved plan, when such changes would cause no or only minimal environmental impact."

I object to such an action by the Park.

First, you have not indicated the precise "changes or amendments" that you intend to make to the Wireless Plan.

Second, use of a CE for this multi-faceted telecom project would represent a serious circumvention of the requirements of the Wireless Plan. For example, page 37 of the Plan provides that "[a]ny proposed project will be subject to compliance with applicable laws, regulations, and NPS policies," including that:

Park staff "will comply with NPS DO-53 and its implementing guidance in NPS Reference Manual 53 (RM-53), (Appendix 5, Exhibit 6)."

It is indisputable that the proposal for a free-standing cell tower at Canyon has not gone through the normal RM-53 process. Consider just one aspect of that process: the SF-299 application. Yellowstone has never received the proper SF-299 application for this proposal. (If the application has been received, it should have been provided to the public as part of the current process, and it hasn't been.)

I will await further clarification on this issue before describing any additional objections.

Correspondence ID: 21 **Project:** 70097 **Document:** 79987
Received: Jun,17 2017
Correspondence Type: Letter

Correspondence: Dear Yellowstone,

I urge you not to construct a cell tower on Mount Washburn. It would completely ruin the experience of anyone who sees it, particularly those who venture up to the fire lookout. It would be an abrupt and jolting experience to anyone who appreciates the beauty of the natural landscape of the park as well as its human history. Distinct from the proposed cell tower, the fire lookout invokes thoughts on the relationship between fire and its role in the Yellowstone ecosystem. In its time, the lookout was necessary, but a cell tower?

I am a regular cell phone user, but when I come to Yellowstone, I appreciate not having cell phone service, and I appreciate others not having it as well. It seems inconsistent with the park's mission. In fact, the park is already in grave danger of Disneyfication as people demand that the park protect them from its many dangers (e.g., thermal pools, grizzlies, and bison). All that should be needed is for people to simply read the ample warnings, given to them clearly in writing on the papers they're handed at the entrances as well as signage.

We shouldn't go to Yellowstone to be coddled. We shouldn't expect to be in electronic communication 24/7 in all places. I love Yellowstone. I have visited with my family since I was a child, and four years ago I retired in Bozeman. I visit the park, take YF classes, and occasionally volunteer. It is sad and unbelievable that such an eyesore is even being considered on the magnificent peak of Mount Washburn.

Correspondence ID: 22 **Project:** 70097 **Document:** 79987
Received: Jun,20 2017
Correspondence Type: Letter

Correspondence: It is my understanding that the permitting/building of a tower in the area of Mount Washburn is under

consideration. For safety reasons, as well as environmental reasons, I am vehemently opposed to the same. People come here to enjoy the beauty of nature and are awestruck by the geo-thermal features, the mountains and the wild life. People take millions of pictures and want to share their excitement of the magnificence of nature they observe. Fortunately they are unable to do that while driving around in the park. You can make it illegal to operate a cell phone or to text while driving in the park but look at the tragedies from not obeying the law. Eleven members of a church were murdered by a pick-up driver texting. It is all too frequent that you hear about and read about accidents involving a driver texting or talking on the cell phone. It is a lie for a person to say they can talk on the phone and give full attention to the road. By its very nature a person cannot give 100% attention to hrvto things at the same time. I don't have access to the statistics but I am certain the majority of vehicle accidents in the park are attributable, at least in part, to inattentive driving. You add another source of distraction they are accustomed to using at home (regardless of laws or common sense) and that is an engraved invitation for deadly consequences. This is my 10e summer in the park (6 months at a time) and personally have been a victim of three accidents that involved inattentive driving. In two cases my vehicle was parked in an authorized spot. Ln the third case it involved an RV being driven left of the center line and forcing me off the road. I strongly believe the beauty and magnificence of the park will not be enhanced by the permitting/building of a tower and a tower will in fact be a recipe for dead animals and mangled people.

Correspondence ID: 23 **Project:** 70097 **Document:** 79987
Received: Jun,19 2017
Correspondence Type: Letter

Correspondence: To whom it may concern:

I have briefly looked at the proposed plans and photographs to add communication antenna and equipment to three sides of Mt Washburn Fire Lookout. I would urge the NPS to NOT implement this proposal for the following reasons:

1. In my opinion and as expressed within other on-line comments, this would be an adverse effect to an Historic National Register property. The visual impacts from this undertaking are detrimental to the character of the structure. [Historic Structure #0290; Determined Eligible for Individual Listing on May 5, 2009; Category 1bl]
2. Mt Washburn Fire Lookout is part of, and not separated from, the Yellowstone back country experience. As a frequent park visitor, it is my observation that the site is steadily visited during the tourism season even though access requires a fairly arduous hike up the Chittenden road.
3. The primary attraction as the Lookout is currently used is the magnificent view. However, if the fire lookout quarters were further developed interpretively, the facility also has the potential to be an attraction as one of the few remaining Fire Lookouts in the region that demonstrates the story of fire detection within the park's boundaries. The visibility of this structure, view from the lookout, and established access to Mt Washburn make it a natural choice for this story. Allowing public access to the top level of the lookout proper would require modification to the final flight of stairs, and would require a virtual tour for those who are not ambulatory; both actions would have minimal impact to the significance of this remarkable site.
4. The Lookout is currently experiencing degradation from the elements. Adding more attachments to the structure could further complicate access to the fundamental structure for maintenance / restoration activities.
5. The plans that I reviewed on-line do not include any provision for stabilization / restoration of the basic structure. The focus appears to be on the communication equipment only, without regard to the Lookout.
6. It is not clear from the plans whether or not the stone retaining wall along the final pitch of the access road is impacted by the 'microwave pockets'. This may be of concern from a landscape architecture point of view as well as an archaeological point of view. The concept of microwave pockets is interesting and I commend the designer for taking the initiative to limit visual impact from the equipment; however, it is not clear how the access ladders could be used during periods of snow coverage or the extent of impact to Chittenden road.

It is not my intent to ask that you minimize efforts to improve communication capability of the various communications firms that YNP partners with, and I acknowledge as a frequent visitor to YNP that better communications have the potential to be beneficial to the safety of park visitors, concessionaire employees, and NPS staff. However, I believe that there may be a solution that would provide the same benefit without negatively impacting the Mt Washburn Fire Lookout and its surroundings. Please reconsider.

Correspondence ID: 24 **Project:** 70097 **Document:** 79987
Received: Jun,13 2017
Correspondence Type: Letter
Correspondence: Dear Yellowstone National Park Mount Washburn Committee:

I am a very enthusiastic supporter of Yellowstone National Park, and have been a member of the old Faithful Society for the past three years. Yellowstone is so unique, a spiritual place where millions of visitors can enjoy something found nowhere else on earth! There are two particular memories from my recent visit to the park that I wish to share with you. On the evening of May 30 my wife and I joined 8 fellow visitors on a hill between Buffalo Ranch and the Hitching Post turnout to watch seven wolves on a bison calf carcass. Suddenly the calf's mother appeared. For the next 45 minutes there was an encounter featuring bison attempting to chase off the wolves, and the wolves responding by going after the bison. A bald eagle and ravens soon were in the vicinity. Eventually the wolves ran off with most of them carrying parts of the carcass in their mouths. The bison held a vigil over the carcass, and the grizzly bear that arrived seemed disappointed that there was not much left for it to eat.

Throughout our watching this dramatic encounter it was relatively quiet, with no one attempting to make or receive a phone call. There is nowhere on this planet that this specific type of encounter would have occurred in such a quiet setting!

The other memory is watching a young woman running back to the car park area near Petrified Tree. She passed us as we were taking the hike from the parking area. She was carrying a cell phone someone had dropped. She seemed almost frantic in her effort to return the phone to its owner. A few minutes later the very frantic owner ran by us looking for his phone. The obsessed look on his face said it all.

Increasing cell phone access throughout the park is sure to increase noise levels for visitors, as well as encourage those hooked on cell phone use to start making calls every time they see something unusual in the park. Think of restaurants and airports you have been at where the din of people talking on their phones detracts from your paying attention to what is important to you.

Please do not add an eyesore on Mount Washburn that serves to increase cell phone access. Preserve the beautiful, unique treasure that is Yellowstone National Park and encourage visitors to be in the moment of what they are experiencing!
