



United States Department of the Interior

NATIONAL PARK SERVICE
YELLOWSTONE NATIONAL PARK

P.O. Box 168
Mammoth, Wyoming 82190-0168



H3015 (YELL)

CERTIFIED

SEP 11 2017

Ms. Mary Hopkins
Wyoming State Historic Preservation Officer
2301 Central Avenue
Barrett Building, Third Floor
Cheyenne, Wyoming 82002

SUBJECT: Determination of Adverse Effect to the Mt. Washburn Fire Lookout (48YE946).

Dear Ms. Hopkins:

Yellowstone National Park is proposing to upgrade telecommunications equipment at Mt. Washburn, including a proposed steel lattice structure surrounding three sides of the Mt. Washburn Fire Lookout. This structure is eligible for listing on the National Register of Historic Places. In accordance with Section 106 of the National Historic Preservation Act (NHPA), as amended, and implementing regulations 36 CFR §800, as well as the Secretary of the Interior Standards, we have determined that the proposed undertaking will have an adverse effect to this historic property. We request concurrence on our determination of effect. The park wishes to enter into formal consultation to develop a Memorandum of Agreement with your office and other interested parties, to mitigate the adverse effect of the installation of telecommunications equipment on Mt. Washburn. All documentation regarding this proposal can be found at the following link: <https://parkplanning.nps.gov/documentsList.cfm?projectID=70097>.

Project Description

As part of the 2008 Wireless Communications Plan, the park is considering the construction of a steel lattice structure that would allow for the migration of equipment from the historic structure to the proposed structure while maintaining the location of telecommunications equipment on Mt. Washburn. In the Finding of No Significant Impact (FONSI), the plan calls for the relocation of telecommunications antennae and other equipment to a platform tower adjacent to the existing location on the fire lookout. While the preferred alternative included construction of a stand-alone tower in the vicinity of the fire lookout, the park stated that all options to reduce visual intrusions on visitors and the historic structure would be considered, while also addressing the safety and security aspects of the site's proximity to a visitor destination. New towers would also be installed at Canyon and Fishing Bridge, and a new microwave receiver would be installed on the existing structure at Grant, improving data capacity throughout the developed areas within the park.

Yellowstone National Park has been in consultation with your office regarding the structure that would be constructed at the Mt. Washburn location. In a consultation letter dated February 3, 2017, the park notified your office of our proposed construction of the following infrastructure:

- A steel lattice structure at the Mt. Washburn fire lookout location that would support several NPS, USGS, Cellular Service Provider, and commercial radio antennas and associated hardware that would be relocated from the historic lookout to the new structure.
- Two new vaults on either side of the Mt. Washburn Lookout, designed to conceal and protect four new four- and six-foot diameter microwave dish antennas.
- Replace the existing generator shed and diesel generator on the northern flank of Mt. Washburn with a propane generator that would improve reliability, capacity, and provide a more environmentally friendly and safer backup power solution for the facility.
- Replace the existing buried electric line from the existing generator shed to the summit lookout with new line. The existing line is buried in a direct path up the mountain to the summit; the new line will be buried beneath the existing Chittenden access road, covering a distance of about 4,000 linear feet.
- Construct a camouflaged tower for microwave equipment and localized cellular coverage adjacent to an existing telecommunications site near the Canyon maintenance area.
- Construct a new steel lattice tower to support a new microwave antenna adjacent to an existing telecommunications site north of Fishing Bridge junction.
- Install a new microwave antenna on an existing communications tower at Grant.

The proposal would include a new steel lattice structure that will surround the east, north, and west aspects of the existing lookout. It is designed to accept relocation of multiple antennae currently attached to the historic fire lookout. Additionally, new microwave antennae would be installed and concealed in two separate vaults adjacent to existing concealed telecommunications microwave antennae. Most existing antennae would be removed from the historic building and some new antennae would be placed on the free standing lattice structure. The NPS requested a design with lattice structures to allow for a greater degree of visual transparency than solid monopoies.

Assessment of Effect

The park conducted additional public consultation in regards to adverse effects from May 19 to June 22, 2017, and received 24 comments from the public. The criteria of adverse effect have been applied to all historic properties within the APE, with consideration given to all qualifying characteristics of a historic property. The proposed undertaking will have an indirect adverse

effect to visual character of the fire lookout. The park has determined that the other proposed actions associated with this project will not be adverse.

Request for Concurrence

The NPS is seeking concurrence with your office regarding our determination that implementation of the proposed undertaking will constitute an adverse effect to the Mt. Washburn Fire Lookout.

Resolution of Adverse Effects and Continuing Consultation

Yellowstone National Park is requesting formal consultation with your office for the development of a Memorandum of Agreement (MOA) to resolve the adverse effect to the Mt. Washburn Fire Lookout. The park is also notifying the Advisory Council on Historic Preservation and other potential interested parties.

If you have any questions or concerns, please contact Tobin Roop, Chief, Branch of Cultural Resources, at (307) 344-2224.

Sincerely,

Daniel N. Wenk
Superintendent

bcc:

Central Files
Supt Files
Lindsay Robb
Tami Blackford
Nancy Ward
Mike Finken
George Helfrich
Bret DeYoung
John Darr
Jennifer Carpenter
Tobin Roop
Doug Madsen
Kyle Meakins
Zehra Osman
YCR/Cultural Resources file

FFNP:KMeakins:agd:09/07/2017:2203

