

Mount Rainier

National Park Service
U.S. Department of the Interior

Mount Rainier National Park



PARADISE CELLULAR FINDING OF NO SIGNIFICANT IMPACT

April 2018

This Finding of No Significant Impact (FONSI) documents the decision of the National Park Service (NPS) to select Alternative B, the action alternative, as analyzed in the Paradise Cellular Environmental Assessment (EA). This FONSI documents the NPS determination that no significant impacts on the quality of the human environment will occur from implementation of this course of action.

The selected alternative will issue right-of-way permits to two wireless carriers, Verizon Wireless and T-Mobile, allowing co-location of limited range wireless communications facilities (WCF) in the attic of the Jackson Memorial Visitor Center (JVC), located in Paradise, Mount Rainier National Park. The WCF will provide year-round wireless telecommunications service to the Paradise developed area, 24 hours per day, as long as power is available to the park and connection to the CenturyLink fiber optic network connection (backhaul) is available. Cellular service will consist of LTE transmitted over the 700 MHz, 850 MHz, 1900 MHz, and 2100 MHz bands, enabling voice and data capabilities at the site.

A third carrier, AT&T submitted an application to provide cellular service in January 2016, prior to completion of the EA. As part of this decision, AT&T may be added pending final review and approval of AT&T's proposal. NPS will consider additional applicants separately to provide WCF in the JVC.

Paradise is a historic developed area located on the south slope of Mount Rainier. It is the most popular and heavily used area of the Park, with approximately one million visitors in 2017, and up to 9,000 visitors visiting Paradise on the busiest days. Completed in 2008, the current JVC was designed to be architecturally compatible with the Paradise Historic District. The interior of the visitor center can accommodate up to 3,000 visitors over the course of a busy summer day. The visitor center is open seven days per week Memorial Day through mid-October, and is open on weekends and holidays the remainder of the year.

This FONSI, its appendices, and the EA constitute the record of the environmental impact analysis and decision-making process, as required by NEPA. The FONSI is available on the NPS Planning, Environment, and Public Comment (PEPC) website at <https://parkplanning.nps.gov/mora>.

PURPOSE AND NEED

The purpose of the right-of-way permits, as presented by the applicants, is to provide year-round 24-hour-per-day public wireless telecommunications service to the Paradise developed area. The NPS evaluated the right-of-way proposals and considered whether the issuance of right-of-way permits would conflict with the purpose, significance, and fundamental resources and values of Mount Rainier National Park as described in the 2002 General Management Plan. The NPS is required by the Telecommunications Act of 1996 to consider all applications for the installation of wireless communication facilities on NPS lands. In light of this legal requirement and need, the NPS identified the following objectives:

- Consider wireless telecommunication applications in accordance with the Telecommunications Act of 1996 (47 USC 332 note), which authorizes, but does not mandate, a presumption that such requests be granted;
- Understand, characterize, and analyze the environmental impacts of the proposed action to fully inform a decision as to whether to grant right-of-way permits;
- Give consideration consistent with NPS Management Policies as to whether or not the proposal would cause unavoidable conflict with the park's mission, in which case the permit would be denied;
- Give consideration consistent with NPS Management Policies to the potential benefit of having telephone access for emergency law enforcement and public safety service;
- Give consideration to the proposed project's potential impacts to park resources and values; and
- Give consideration to existing telecommunication facilities, cumulative impacts, the potential for co-location, and future needs and capacity for Mount Rainier National Park.

SELECTED ALTERNATIVE

The NPS selects Alternative B as described in the EA for implementation. Antenna arrays will be mounted on a metal frame on the interior of the building on the east and west gable ends of the JVC. The antennas will be mounted as close to the exterior wall of the two gable ends as is possible, and will be invisible from the exterior. The existing rough-sawn board and batten exterior treatment within the central, approximately 8 ft. by 8 ft. section of the exterior wall located on each gable end will be removed and replaced with a fiberglass panel fabricated to match the existing appearance of the two gable ends. The fiberglass reinforced plastic (FRP) panels will provide for a Radio-Frequency friendly medium that allows the RF signal to be transmitted through the panel from the antenna while presenting a uniform and seamless visual appearance, as viewed from the ground and from the Paradise parking lot. The wireless facility will connect to fiber optic cable via an existing vault located in the basement of the JVC.

Other key elements of the project include the following:

- Interior space requirements: Each carrier will require ancillary equipment cabinets and racks located in the west attic.

- Climate control: Each carriers' equipment racks and batteries will produce heat that will be cooled via fans contained within the cabinets.
- Electrical requirements: Each carrier will require a dedicated 100-amp service (120/240 volts/single phase). Each carrier will have generator backup via the National Park Service's existing generator located in the basement of the JVC. Electrical service will be extended from the existing power source located in the building basement to the west gable attic area. Conduit will be routed similar to the existing electrical service, and will extend from the basement through the 1st floor cafeteria, through the 2nd floor office space and then into the attic space to connect to the equipment racks.
- Connections to power and fiber: Each carrier will install a tenant check meter in the building basement. The power service for each carrier will then be extended to the west end attic gable from the building basement, up into the cafeteria on the 1st floor of the building. The cable will continue into the office/storage area on the 2nd floor, and finally extend into the attic area. The alignment for the fiber will be similar to the electrical service.
- GPS antennas: Two small (5.0" L x 3.2" D) cone-shaped GPS units, one per carrier, will be installed on the exterior of the building, on the west gable end next to other equipment mounted and owned by the NPS.

In addition, the project will implement a number of resource protection measures (Attachment A) to protect the structural integrity, life-span, energy efficiency, functionality and appearance of the Jackson Visitor Center, and to minimize the degree or severity of adverse effects on soils, vegetation, air and water quality, wildlife, soundscapes, and visitor experience and safety.

In addition to resource protection measures and construction best management practices described in the EA, implementation of the selected alternative is subject to the following stipulations:

- Antennas on the west/southwest-facing gable end will be focused downward and/or power reduced (to the extent possible given limitations of the design) to limit signal reach on park roads, and more remote areas including the west end of the Tatoosh Range, Rampart Ridge, and beyond. This measure addresses public concerns regarding the potential spillover of cellular signals in wilderness.
- Verizon Wireless, T-Mobile, and potentially AT&T, will fund government contracted architectural and engineering services to analyze and review the installation and design proposal, and oversee submittals and construction. National Park Service approval of the final design and material submittals will be required prior to construction. The analysis is intended to ensure technical feasibility and that modifications to the building are acceptable.
- Antennas will only be permitted within or near the central, 8 ft. by 8 ft. panels located at the gable ends of the building. The AT&T proposal to replace the triangular panels located adjacent to and right and left of the central panels would result in the replacement of the entire exterior wall of the attics on the gable ends, excluding the peaks. This option is rejected due to concerns about the scale of the impact to the building. This measure was added following an internal and independent NPS review of the design after publication of the EA. Approval of design is a condition of all permits.

- A design revision is required that minimizes and mitigates exterior wall intrusions and impacts, including the loss of insulation on the 8 ft. by 8 ft. panel where antennas will be mounted. An alternative design might include an overall reduction in the size of the opening, smaller individual exterior FRP panels for each antenna, and/or construction of an enclosure that will protect the interior of the attic from the uninsulated FRP panel. These revisions are in response to an internal and independent NPS review of the design after publication of the EA.
- A robust public education program will be designed that addresses the expressed public concerns related to the use of cell phones in the Paradise area, and will be initiated when cellular service is established. Elements of this action will include signs, website messages, newsletters, and interpretive messaging. Messages will be incorporated into backcountry and wilderness programs as well as front country programs.

OTHER ALTERNATIVES CONSIDERED IN THE EA

Under Alternative A, identified as the No Action Alternative in the EA, ROW permits would not be issued, and a wireless communication facility providing cellular service would not be installed in the Paradise area. Existing limited coverage would likely remain the same or increase, as opportunities for coverage extending to the Paradise area from outside the park are limited due to topography.

The following alternatives were considered, but dismissed in the EA:

Construct a cell tower in the lower parking lot. A cell tower was considered for placement in the lower Paradise parking lot, which is outside the National Historic Landmark District (NHL), but visible from the NHL. Tower heights ranging from 70 to 130 feet were considered. Equipment could have been installed in the ski dorm, either within the existing building or in the bay area. The tower would have been installed in the west end of the lower parking lot or behind the ski dorm. The tower proposal would have extended cellular service to a broader geographic area than Alternative B. This alternative was dismissed because all configurations would have resulted in a monopole visible from many locations within the Paradise area and from surrounding trails within the NHL and wilderness. Dismissing this alternative maintained visual quality objectives and scenic values described in the Mount Rainier National Park General Management Plan (NPS 2002), and effectively constrains the signal to the areas closest to the Paradise developed area.

Construct a cupola on the JVC roof that would house an antenna array. A cupola was included in the original application, and would have been located on the roof of the new Jackson Visitor Center. This configuration would have provided for a taller antenna array than the selected alternative, and would have extended cellular service to a broader geographic area, including the Muir snowfield. The proposed cupola would have disrupted the roof line of the 2008 JVC and changed its character. It would have created a new opening in the roof that would have required a redesign that would need to address snow loads, structural engineering, and a longer-term and much more invasive construction period than the selected alternative.

Install equipment within the Historic Guide House. This alternative was initially proposed because it is the building with the highest elevation in the Paradise area. The proposal included exterior as well as interior elements that had the potential to cause an adverse effect to the historic property, which is a contributing element to the Paradise Historic District. This alternative was abandoned because the JVC provided a feasible alternative that would not impact historic buildings or the Paradise Historic District.

Add antennas on the north and south walls of the JVC attic. An intermediate design included the installation of panels on the north and south walls of each of the attics. This option would have extended cellular service to broader geographic areas to the north and south of the JVC as compared with Alternative B. This proposal was rejected because the building HVAC equipment limits the space. A second iteration including small antennas covered with RF panel shrouds would not have interfered with the HVAC equipment; however, this option was rejected because the eaves would have been diminished due to the thickness of the antennas and shroud configuration, potentially impacting their function.

DECISION REACHED AND RATIONALE

The NPS selected Alternative B, Issue Right-of-Way Permits to two wireless carriers. The selected alternative will result in issuance of separate right-of-way permits to Verizon Wireless and T-Mobile to provide cellular service to Mount Rainier National Park in the Paradise developed area. A third right-of-way permit would also be issued to AT&T as part of this decision, provided the installation of additional antennas can be accommodated within the exterior center panel area of the JVC gable ends, and only if there is no change in the degree of impacts foreseen in the EA analysis.

The NPS has determined that the long-term health, safety, and information-dissemination benefits associated with enhanced communications, including the benefits to visitor and employee safety through facilitation of emergency and nonemergency reporting and response, outweighs the brief disruption some visitors may experience in response to other visitors' use of cell phones in public spaces.

The project design effectively mitigates effects to the scenic and historic resources at Paradise by requiring installation of the facilities within an existing non-historic structure, and incorporating measures to ensure the equipment is hidden within the JVC attics, and not easily seen by visitors from the ground or adjacent trails. Small GPS antennas would be mounted on the west end of the JVC, one for each carrier. GPS antennas would be masked, and installed near other park fixtures. The design and placement also meets the U.S. Fish and Wildlife Service recommended guidelines to reduce impacts on wildlife and migratory birds. Construction and maintenance impacts from the project are expected to be minimal and short-lived.

The NPS determined that the action will not cause conflict with the park's mission, and that the provision of cellular service at Paradise will benefit the public by improving communication between visitors, and between the NPS and the public. Public and employee safety would be best served by cellular signals in those areas that are most intensely used, and where most accidents and visitor fatalities occur, including Paradise area proper, the trails from Paradise to Panorama Point, the Muir Snowfield, and Mazama Ridge. The NPS does not favor increased cellular

coverage in areas where solitude and primitive and unconfined recreation are most available and expected. In these areas the NPS will work with cellular providers to constrain the signal to the degree possible, and given limitations of the design.

Improved cellular service may enhance or detract from visitors' experience at Paradise and adjacent wilderness, depending on their personal subjective expectations of a satisfactory outdoor experience. While some visitors use technology to learn and improve their experience, others prefer locations and experiences where technology is scarce. Public comments received during the review period identified this as a benefit and a concern, reflecting support or opposition to the installation depending on individual perspective.

Mount Rainier National Park's position is that improved cellular service will provide opportunities to more easily and quickly communicate park conditions to visitors, including real-time information on parking, traffic, weather and hazardous conditions. Many visitors will view the service as a welcome benefit for purposes of accessibility, coordination, communication and safety. While other visitors may view cell phone service at Paradise as an unwelcome intrusion, the NPS is committed to a public education program to promote considerate use of cell phones in shared public facilities and spaces.

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 Code of Federal Regulations (CFR) § 1508.27, significance is determined by examining the following criteria:

1. Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

Implementation of the selected action will result in both beneficial and adverse impacts, none of which the NPS has found to be significant. Construction-related activities may have localized adverse effects on resources; however, the effects will be short-term and will be minimized or avoided through design and resource protection measures. The impacts of enhanced cellular service on visitor experience in the Paradise area and affected surrounding wilderness is expected to be both beneficial and adverse, depending on visitor behavior and perception. The physical impacts on wilderness and non-wilderness resources are negligible because cellular equipment would be hidden within the attic of the JVC, a non-historic building. No significant effects were identified in the environmental analysis.

2. The degree to which the selected action affects public health or safety.

The project is expected to have both beneficial and adverse effects on public health or safety. People near facilities that produce a power level of 2000 watts would experience EMF (electromagnetic frequency) exposures of 7.4% of the maximum permissible exposure at six feet above ground level. Because the total power in any given sector of the proposed facility would

be less than 2000 watts, visitor and employee exposure to EMF would be even lower. Because of this low exposure level, the project would be exempt from routine environmental reviews. Cellular service in the Paradise area may improve service and communications, and visitors may be more readily informed of hazards in the park in real-time. Safety measures will minimize or prevent risk to the public from construction related activities. While the installation of a wireless communication facility would improve existing, spotty coverage in the area, and may affect visitor and employee safety (beneficial and adverse), there are no projects planned that would further increase wireless service within the park in the foreseeable future.

3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

No prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas will be affected by the selected action. The project will occur within the Paradise Historic District. The Washington SHPO concurred with the NPS determination that the selected action will have no adverse effect on Mount Rainier NHL or the Paradise Historic District. Because there will be no ground disturbance, the project will have no effect on archaeological resources.

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.

Public comments received during public scoping and review of the EA revealed that those opposed to the proposal were primarily concerned about visitors' experience of solitude, self-reliance, natural soundscapes, and the ability to disconnect from technology, particularly in wilderness. Many were also concerned about the installation of a tower, which is not part of the proposal. Comments in support cited benefits to visitor health, safety, and convenience resulting from enhanced communication. Potential effects on visitor experience and other resources were identified and evaluated in the EA. Although reviewers expressed strong opinions regarding the proposal, physical impacts on wilderness and the non-wilderness Paradise area are expected to be negligible. Accordingly, there is no substantial dispute as to the size and nature of the environmental consequences of the proposed action.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

Limited and spotty cellular coverage currently exists within the park as a result of cellular facilities located outside the park. Isolated "hot spots" may be found along roads, in developed areas, and in the backcountry. The anticipated effects on the human environment of increased cell coverage, as analyzed in the EA, are not highly uncertain or unique, and do not involve unknown risks. Resource conditions in the project area are well known, and the anticipated physical impacts from implementing the selected action on the National Historic Landmark District, are understood.

6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The decision to grant right-of-way permits to Verizon Wireless, T-Mobile, and potentially AT&T, for cellular service at Paradise does not establish a precedent for future actions with significant effects. Future applications for cellular service right-of-way permits within Mount Rainier National Park would require separate consideration by the NPS.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

The EA concluded that past, present, and future activities, when coupled with the impacts of the selected action, will have both beneficial and adverse cumulative effects. Potential impacts to scenic and cultural resources are considered minor in nature primarily because new facilities would be hidden within the attic of the JVC. Visitor experience would be temporarily degraded during construction; however, within the context of construction that has occurred in the Nisqually to Paradise corridor during the past five years, and the timing of construction, cumulative impacts would be negligible. An increase in cellular signals in the southwest area of the park would add to signals that spillover from outside of the park (Crystal Mountain Ski Area, White Pass and Ashford), and to satellite signals that blanket the park. Potential effects are considered positive or negative depending on individual opinions of the presence of cellular service. visitors who are affected by disruptions may see an increase in negative experiences in the Paradise area. While these impacts may add to impacts of existing cellular signals and satellite signals that have sources outside the park boundaries, potential impacts to wilderness character and visitor experience were not considered cumulatively significant in the EA.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

The communications facilities will be installed within an existing non-historic structure within the Paradise Historic District. The Washington SHPO concurred with the NPS determination that the selected action will have no adverse effect on Mount Rainier NHL or the Paradise Historic District. Because there will be no ground disturbance, the project will have no effect on archaeological resources. There will be no effects on highways, structures, or objects, or loss or destruction of significant scientific, cultural, or historical resources.

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat.

There will be no effects to listed species. The design and placement of the cellular facilities meets the US Fish and Wildlife Service recommended guidelines to reduce impacts on wildlife and migratory birds.

10. Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

The selected action does not violate any Federal, State, or local environmental protection laws.

PUBLIC INVOLVEMENT

Public scoping was conducted November 28, 2016 through December 12, 2016, on the NPS Planning, Environment, and Public Comment (PEPC) website, prior to publication of the Environmental Assessment. 492 comments were received; 249 commenters were supportive of the proposal to install cellular service at Paradise, and 241 commenters were against. Two people were neutral. The EA provides a summary of public scoping comments.

The EA was made available for a 45-day public review and comment period from June 5, 2017, through July 19, 2017, on the NPS PEPC website. Announcement of the review opportunity was made through news releases issued to news media outlets, and the NPS notified individuals, businesses, organizations, state, county, and local governments, federal agencies, and culturally affiliated American Indian tribes via letter. The EA was also made available at the following libraries, in addition to visitor center locations in the park: Buckley Library, Eatonville Library, Enumclaw City Library, Tacoma Public Library (Tacoma Branch), and Yakima Valley Regional Library.

The NPS received 893 pieces of correspondence in response to the notification of the EA during the review period; the responses reiterated the range of comments submitted during scoping. No new substantive concerns or pertinent environmental information were received. Three organizations provided comments: National Parks Conservation Association, Mount Rainier National Park Associates, and Public Employees for Environmental Responsibility. Of the total pieces of correspondence, 338 were supportive, which included 100 form letters sent by Verizon employees. Of the 100 form letters, three letters were modified by individuals and counted as unique. Discounting the duplicate form letters by Verizon employees, there were a total of 244 unique responses in support of the proposed action. Finally, a number of comments received were out of scope, with most having to do with apparent confusion about the difference in general between guidance and requirements; variance between direction in RM-53 and DO-12, and perceived priorities of mandates established in the Telecommunications Act of 1996 and the Wilderness Act of 1964. Some but not all such comments are included in the Errata (Attachment B).

Several themes emerged from the public comments in response to the Paradise Cellular EA. In general, public responses to the EA were similar thematically to those who commented during the public scoping period in 2016. Most commenters cited safety as the primary reason for allowing cell service at Paradise. Some suggested that data service was not necessary, and that texting and voice, or just texting would be enough to address safety issues and useful for coordination and staying connected to loved ones. Most of those recommending conditional issuance of the permit suggested that service be restricted to 911 emergency calls, or direct calls to Rangers only, while a few suggested that WiFi only at the JVC would be the best option.

Supportive comments welcomed the opportunity for coordination, and to stay connected and to touch base with loved ones if they were leaving the park later than planned. Some considered the lack of service as an accessibility issue – having service would make it easier to visit the park.

Of the total 893 pieces of correspondence, 516 were opposed to the proposal to issue right-of-way-permits to wireless carriers. Of the total opposed, 9 were form letters from an unknown

source. Comments opposed to the issuance of the right of way permits emphasized the protection of National Parks and wildernesses from electronic signals. Comments either focused on impacts to visitor experience in the backcountry, or at Paradise.

Themes and representative comments, and responses to questions and substantive comments are provided as Attachment B.

AGENCY AND TRIBAL CONSULTATION

Washington State Historic Preservation Officer

Documents related to the National Historic Preservation Act, in accordance with the Advisory Council on Historic Preservation regulations implementing Section 106 (36 CFR Part 800) were completed and submitted to the Washington SHPO. The NPS has determined that the selected action will have no adverse effect on either the Paradise Historic District or the National Historic Landmark District (NHL), and requested concurrence from the SHPO on August 30, 2017. The SHPO concurred with this determination in a letter dated September 8, 2017.

Native American Consultation

Six federally recognized Native American tribes associated with the park were contacted and invited to participate in the planning process. These tribes included the Cowlitz Indian Tribe, Muckleshoot Indian Tribe, Nisqually Indian Tribe, Puyallup Tribe of Indians, Squaxin Island Tribe, and Yakama Nation. The park received a response from the Nisqually Indian Tribal Chair reminding the park to notify the Tribes if cultural resources are found as a result of project construction.

U.S. Fish and Wildlife Service

The U.S. Fish and Wildlife Service (USFWS) determined that the project is fully compatible with the USFWS Recommended Best Practices for Communication Tower Design, Siting Construction, Operation, Maintenance, and Decommissioning published by the agency's Division of Migratory Bird Management in 2016. This determination is provided in an email dated March 3, 2017.


CONCLUSION

Based on the planning and environmental impact analysis documented in the EA, with due consideration of the nature of the public comments and consultations with other agencies, and given the capability of the resource protection measures, construction best management practices, and design constraints to avoid, reduce, or eliminate impacts, the NPS has determined that the selected alternative does not constitute a federal action that normally requires preparation of an EIS. Adverse environmental impacts that could occur are localized and limited in context. The selected alternative will not have significant effect on the quality of the human environment or the park's cultural or natural resources.

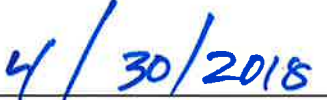
There are no unmitigated adverse impacts on public safety, sites or districts listed in or eligible to be listed in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, cumulative effects, or elements of precedence were identified. Implementation of the selected alternative will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS will not be prepared and the selected alternative may be implemented as soon as practicable.

Recommended:

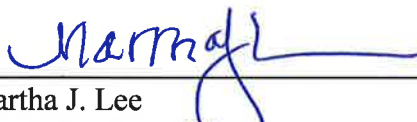


Palmer Jenkins
Superintendent
Mount Rainier National Park




Date

Approved:



Martha J. Lee
Acting Regional Director
Pacific West Region



Date

ATTACHMENT A – Best Management Practices and Resource Protection Measures

To prevent and minimize potential adverse impacts associated with the installation, best management practices (BMPs) and mitigation measures will be implemented during the design approval, construction and post-construction phases of the project.

Category	Responsibility
Design Considerations	
Potential installation and construction related impacts to the functionality, life-span, current use and appearance of the JVC must be satisfactorily addressed or the wireless cellular installation and service will not be approved by NPS and no right-of-way permits will be issued.	NPS Project Manager, Applicant
The National Park Service will contract, at applicant expense, with architecture and engineering services to visit the site, confirm existing conditions and utilities, review draft construction documents for adherence to existing building energy efficiencies and structural integrity in compliance with the International Building Code; review proposed façade materials and appearance; and otherwise provide related expertise and recommendations to the National Park Service.	NPS Project Manager, Applicant
The installation of antennas must be constrained within the center panel area on the gable ends of the JVC. Carrier wireless telecommunication installations at Paradise will be limited to this designated space and location, as otherwise approved. The National Park Service will reject new wireless service applications if additional space for antennas and related equipment is not available in the JVC.	NPS Project Manager, Applicant
Permit Terms and Conditions/Contract Specifications	
Construction limits, including the staging area, will be clearly marked prior to the beginning of work. Temporary construction fencing will only be installed where determined necessary by the NPS. As currently designed, the project will stage immediately adjacent to the JVC during construction.	Permittee, NPS Project Manager
Staging areas on existing asphalt surfaces (used for construction equipment storage, vehicle storage, fueling, servicing, and hazardous material storage) will be approved in advance by the NPS.	Permittee, NPS Project Manager
Parking of equipment and private vehicles will be restricted to hardened surfaces, such as existing parking areas.	Permittee, NPS Project Manager
The permittee will be required to preserve the existing asphalt surface. If asphalt of other NPS property is damaged, the permittee will be required to restore the property to its original condition.	Permittee, NPS Project Manager
Vegetation will not be disturbed, and specifically, vegetation next to the JVC. Temporary stockpiling of materials and equipment will be on hardened surfaces.	Permittee, NPS Project Manager, Plant Ecologist
All tools, equipment, barricades, signs, surplus materials, and rubbish will be removed from the project work limits upon project completion. Any asphalt surfaces damaged due to work on the project will be repaired to their original condition. All demolition debris will be removed from the project site, including all visible concrete, wood and metal pieces.	Permittee, NPS Project Manager
Vehicles and equipment will not be allowed to idle.	Permittee, NPS Project Manager
Construction debris will be hauled from the park to a licensed disposal location. Debris will not be disposed of in the park.	Permittee, NPS Project Manager

Construction will begin no earlier than the week following Columbus Day in October, and end no later than the week before Memorial Day weekend, and only during weekdays when the JVC is closed to minimize impacts to visitors.	Permittee, NPS Project Manager
A Hazardous Spill Plan or Spill Prevention, Control and Countermeasures Plan, whichever is determined appropriate, will be in place, stating what actions will be taken in the event of a spill, notification measures, and preventive measures to be implemented, such as the placement of refueling facilities, storage, and handling of hazardous materials. The plan will be submitted prior to the beginning of construction work as specified in the permit terms and conditions.	Permittee, NPS Project Manager
All motor vehicles and equipment will have mufflers conforming to original manufacturer specifications that are in good working order and are in constant operation to prevent excessive or unusual noise.	Permittee, NPS Project Manager
Sound attenuation devices (such as rubber strips or sheeting) will be installed and maintained on all equipment.	Permittee, NPS Project Manager
Use of unmuffled compression brakes will be prohibited within park boundaries.	Permittee, NPS Project Manager
Use of air horns within the park will not be allowed except for safety.	Permittee, NPS Project Manager
All motor vehicles and equipment will have mufflers conforming to original manufacturer specifications that are in good working order and are in constant operation to prevent excessive or unusual noise.	Permittee, NPS Project Manager
Any roadkill or wildlife collisions will be reported to the park immediately.	Permittee, NPS Project Manager, Wildlife Ecologist
Feeding or approaching wildlife will be prohibited.	Permittee, NPS Project Manager, Wildlife Ecologist
The park wildlife ecologist will be notified if bears or foxes loiter in the project area.	Permittee, NPS Project Manager, Wildlife Ecologist
A litter control program will be implemented during construction to eliminate the accumulation of trash. All food items will be stored inside vehicles, trailers, or wildlife-resistant receptacles except during actual use to prevent attracting wildlife.	Permittee, NPS Project Manager, Wildlife Ecologist
The construction schedule and status of construction will be provided to the park, which will be communicated to the public via a number of outlets: the park website, regional newspapers, radio, entrance stations, visitor centers, news releases, local newspapers, media outlets, postings in local businesses, and via social media.	Permittee, NPS Project Manager
The majority of material deliveries will be made and disruptive work will be done during the week, rather than on weekends or holidays, and will occur before or after peak visitation periods. Deliveries will be coordinated with the NPS.	Permittee, NPS Project Manager
Paved areas used by vehicular and pedestrian traffic will be kept clean of construction debris and soils, as necessary.	Permittee, NPS Project Manager
Staging areas and contractor access to the JVC will be managed to minimize impacts to visitors and concession operations. All access during construction and maintenance of facilities will be coordinated with the park and Rainier Guest Services.	Permittee, NPS Project Manager, Concessions Manager

Construction workers and park staff will wear appropriate protective gear such as hard hats, gloves, and goggles to protect themselves when working in the construction zone. This project will be compliant with all federal, state, and local requirements and in accordance with Occupational Safety and Health standards pertaining to employee or worker safety.	Permittee, NPS Project Manager
Visitors will not be allowed in the construction zone.	Permittee, NPS Project Manager, Chief Ranger

ATTACHMENT B

Errata and Comment Response Summary

This errata and comment summary and response to public comment documents feedback received on the Paradise Cellular EA, and no text corrections. During the review period, public comments reiterated the range of comments submitted during the public scoping period. No new substantive concerns or pertinent environmental information was received.

The NPS received 893 correspondences in response to the notification of the EA during the review period. Three organizations provided comments: National Parks Conservation Association, Mount Rainier National Park Associates, and Public Employees for Environmental Responsibility. Of the total correspondences, 338 were supportive, which included 100 form letters sent by Verizon employees. Of the 100 form letters, three letters were modified by individuals and counted as unique. Discounting the duplicate form letters by Verizon employees, there were a total of 244 unique responses in support of the proposed action. Of the total 893 correspondences, 516 were opposed to the proposal to issue right-of-way-permits to wireless carriers. Of the total opposed, 9 were form letters from an unknown source.

This comment response summary contains two parts: a list of themes and representative comments, and a list of responses to questions and substantive comments received during the 45-day public comment period for the Paradise Cellular EA.

Themes and representative comments supportive of cellular service at Paradise:

1. Provide cell service for safety.

- ◆ Having cell phone service could mean the difference between life and death. Cell service is an aspect of safety that is not currently available, may potentially save a life.
- ◆ Cell service speeds up rescues, and would help immensely if I need to meet up with others or we are separated.
- ◆ Adding cell service would increase hiker and climber safety if it extends to the upper mountain and summit.
- ◆ I have personal experience with a rescue; cell service would have benefited my situation.
- ◆ Those who want to remain disconnected have no basis to block increased coverage for others (don't try and prevent others from benefiting from increased safety and comfort)
- ◆ Adding cell service will lead to increased safety in winter and improve chances of rescue for hikers and climbers during bad weather.
- ◆ Adding cell service will reduce ranger time assisting visitors who need a tow, or have been disconnected from fellow travelers.
- ◆ Cellular service would potentially allow for expedited mobilization of emergency services, potentially saving lives with more timely response.

2. Provide cell service for safety, limit calls to emergency/911 only.

- ◆ I strongly support the proposal, but want it limited to emergency calls (911) or Ranger contact only. No data streaming or WiFi.
- ◆ I support service in the backcountry (Mazama Ridge trail, between Paradise and the summit), but only for emergencies. No data.

3. Improve coverage in high population Paradise.

- ◆ Expanding communication options to include cell phones in most heavily developed area of Park is appropriate.
- ◆ Paradise is most heavily visited and highly developed area within the Park, impacted by

infrastructure, development and extensive parking areas. It is not a primitive area (people go elsewhere for solitude).

- ◆ Cell service is needed because of high visitor use and safety on the south side of Mount Rainier, for responding to hazardous events/natural disasters.

4. Cell service will help fellow travelers, friends, and families connect/stay in touch.

- ◆ Adding cell service will lead to increased safety and ease of meeting up with friends who might start at a different time.
- ◆ Cell service would also allow guests to communicate with one another while separated, and assist with lost or late travelers.
- ◆ Cell phone service will increase safety and improve parking and traffic congestion by making it easier to coordinate drop-offs and pickups.
- ◆ It is frustrating to have no choice. I've often opted to not do hikes or hiking at certain times because of lack of service.
- ◆ I prefer to be disconnected, but support having the option to connect.

5. As long as the facility is hidden and doesn't affect the environment, I am supportive.

- ◆ I am in support because it's not an eyesore, not a tower that would have a negative impact on the landscape, but improves visitor experience.
- ◆ I oppose, but if must be cell service hidden towers are best for aesthetics.

6. On balance benefits outweigh potential disadvantages.

- ◆ I understand and share the concerns of those who want there to be places where people are disconnected, and who are afraid that some visitors will abuse the connection privilege and degrade other visitors' experience, but on balance I am in favor of installing the cellular capability.
- ◆ Although I agree that getting off the grid is healthy and a good choice for many in the wilderness, there are dangers on climbing and hiking in the mountains, and the ability to check weather forecasts, communicate with climbing and hiking partners, and contacting emergency services far outweighs any concerns.
- ◆ Cellular access is invaluable for public safety, emergency notification, search, rescue, emergency medical and law enforcement access. Cellular access will also improve MORA internal operations and efficiency.
- ◆ The alternative option raises potential positives, but ultimately people make the choice and often find it impossible to give up technology. Scenery and location are not the only "sense of place"; this element of infrastructure will inevitably change the park and visitor's experience because it will not be the same place, whether one uses a cell phone or not.

7. To me this is an issue of accessibility.

- ◆ I have a disability; I would visit more if it was safer.
- ◆ I have sick people in my life, and I need to be in touch with them.

8. Not an issue

- ◆ The EA is a well-founded and considered plan with little impact. I read the Paradise Cellular Environmental Assessment, looking for a substantial objection. I didn't see any, especially because the towers would be mounted on the side of the Jackson Visitor Center.
- ◆ There are other electronic distractions and modern technology at Paradise that park visitors use with or without service.
- ◆ Having cell service that will negatively affect parks because visitors will spend all time on screen is ridiculous argument; if offended it is a prejudicial attitude problem vs problem with cell user
- ◆ Those who want to escape technology when they visit the NP are free to do so; they should not be

allowed to dictate their morals upon others.

- ◆ There are a lot of radio waves in a park already, no difference if we add or remove a cellular radio.
- ◆ Cell tower here or there is not any more of an eyesore than roads or buildings built in the park.
- ◆ Sunrise has cell service, have not read of ill effects.
- ◆ Please provide coverage in other areas within the park.
- ◆ This is the 21st century. Mount Rainier needs phones in the Paradise Inn and outside for emergencies.

9. Cell phones provide additional benefits beyond safety and coordination.

- ◆ Access to social media from Paradise will enable visitors to share photos and experiences and increase awareness of the park and value of natural places.
- ◆ Cell service would help mapping abilities on smart devices in addition to ability to call for help.
- ◆ Cell phone use will increase safety and improve parking and traffic congestion by making it easier to coordinate drop-offs and pickups.
- ◆ Phones offer navigation (would be improved with cellular signal) and other functions that make it safer and easier for people to have a great experience.
- ◆ Cell service could increase public awareness and interest in the park.
- ◆ There would be increased learning opportunities such as learning about glaciers.
- ◆ Real-time updates on parking could be provided.

10. I am conflicted about the proposal, but feel that the potential to improve safety outweighs the drawbacks. I am supportive of coverage for safety only.

- ◆ It would be a benefit to people lodging at Paradise; the negative that I see is people losing experience of outdoors due to addiction to connectivity. It is unclear if cellular connectivity would have any effect.
- ◆ Prefer no service, but if demand is compelling then emergency only.
- ◆ If safety is NPS sole reason, I support it; do not upgrade if positive implications are minimal.
- ◆ For safety [there are] many devices that don't rely on cell coverage; allow a private network only or wifi for rangers
- ◆ I understand the argument, but the park has been without service my entire life and I have always felt safe there. If a need, only emergency service for staff.
- ◆ Emergencies only. If you need 911 service, then make that the only thing available. We would have to listen to people talking loudly on the phone. Accident level would go up on the road to Paradise and in the parking lots.
- ◆ I support cell service for emergencies only, and at Paradise.

11. I am conflicted about the proposal; provide WiFi/provide service in buildings or "cell phone zone" only.

- ◆ Set up high bandwidth wifi inside buildings as a much better option, which would provide convenience of staying in touch
- ◆ Limit to buildings, Paradise Inn, VC, etc
- ◆ A Cell signal at the parking lot seems useful, but might give people false sense of security. A better option would be to provide WiFi at the visitor center.
- ◆ Only allow cell service in very restricted sites near the main building like designated smoking areas.
- ◆ Addition of wifi to JVC would be reasonable alternative so people can get their "fix" before or after their visit to the mountain.
- ◆ If cell service is provided entirely within the visitor center, then it should suffice for those needing to contact their friends and family. There is no reason to extend it to the trails or the Paradise Inn.

- ◆ A shrouded antenna is not necessary, the issue is the cell phone coverage (signal) blanketing the area. The only acceptable coverage would be within the visitor center and a small bubble of leakage outside the VC. There is weight in the argument that more people will rely on electronics for navigation and end up getting into more trouble, not less, because of it.
- ◆ Set up cellular service inside lodge and VC, but put signal blocking in place outside the buildings. NPS should not allow cell service, encourage a true and aware wilderness experience.
- ◆ Dedicate a cell phone room in the VC or Inn.
- ◆ Prefer no action, but if allowed confine service to a small zone out of main corridors of use (eg the Paradise picnic area). Allow intentional use away from places like Paradise where they would endanger fragile vegetation and block trails.

Themes and representative comments opposed to cellular service at Paradise:

1. Protect wilderness.
 - ◆ Protect wilderness experience. Cell service is contrary to the spirit of this wild refuge. I am a mountaineer, backpacker and backcountry skier. Selfies can be taken then posted later.
 - ◆ Cell coverage greatly diminishes wilderness experience. Seeing people constantly check phones diminishes experience.
 - ◆ Enhancing cell service in any NP or wilderness is contrary to concept that these areas exist to allow everyone to enjoy wilderness experience without modern technology intrusion.
 - ◆ As the Seattle Metropolitan area becomes more densely populated the need for access to solitude increases for all. Research is showing the human need for solitude is real and is a critical component of a healthy lifestyle; once it is gone, it is gone forever.
 - ◆ Allowing cell service to supplement profit of a few telecommunications companies is at odds with providing “opportunities for solitude or a primitive and unconfined type of recreation.”
 - ◆ Ruling on drone use applies to cellphone use: Launching landing or operating a UA from or on lands... is prohibited (36 CFR 1.5 (a)(1) Superintendent’s Compendium).
2. The proposal violates the purposes of the park and the Organic Act.
 - ◆ Organic Act keywords are “conserve scenery... leave unimpaired” – new generations won’t appreciate quietness and originality of what true wilderness is like.
 - ◆ Proposal violates the very purpose and intent that parks and wildlife refuges were created to accomplish. Allowing this cell tower at Mt. Rainier NP will set a precedent for all NPs and Wildlife Refuges, which were created to preserve pristine unspoiled environments...
3. Protect the experience at Paradise Inn.
 - ◆ The charm of all inns within our National Parks includes watching families connect with each other, reading, playing board/card games, putting together puzzles, or just enjoying the natural surroundings. Please keep last few areas where tech has not taken over.
 - ◆ It will be a shame if people have to hike to Camp Muir just to find a place void of technological distractions. Most who visit the lodge could never make it to Camp Muir to experience peace in nature undisturbed by technology.
 - ◆ I have visited the park for every year for forty years and will be there again this August; Paradise lodge is a hub of community activity without the distraction of the cell phones.
 - ◆ We camp at MORA or stay at Paradise Inn, we do not want coverage. It is extremely important for children and adults to unplug from technology and be fully present in the beauty and peace of nature.
4. Can use current technology and skills to address safety.
 - ◆ I don’t buy the safety arguments as mountain rescue can use radio and the general public should focus on mountain education and preparation, not rely on cell coverage.

- ◆ The park Service already uses 2 way radios with repeaters mounted at various high points for communication with Park Staff, and mountaineers and skiers already use GPS locators, Personal Locator Beacons and sat phones that are all served by wireless satellite providers.
 - ◆ My father was a park ranger and superintendent, I grew up in parks and monuments. Using phrase “in case of an emergency” as a justification for cell service is mis-guided. NPS has always had emergencies and attended to them with care and efficiency using radios.
 - ◆ Paradise is already circus-like on popular weekends. Some say cellphones would be helpful for emergencies, yet radios and PLBs are readily available and rapid response has been provided in the few emergency situations my friends and I have encountered.
 - ◆ Emergency response in critical areas of the mountain where serious accidents happen will not be helped by cell service.
 - ◆ Maybe go retro and install a few more pay phone at the visitor centers?
5. Cell service is not necessary, does not provide a measurable benefit.
- ◆ Hiking areas around the lodge (Paradise Inn) are among the most heavily used by the public, so help is readily accessible. It would be less of a paradise with cellphones (as much as I like using my cellphone as a convenient tool).
 - ◆ Paradise is already circus-like on popular weekends. Emergency response in critical areas of the mountain where serious accidents happen will not be helped by cell service.
 - ◆ NPS should not act on this proposal based on the theory that cellular service would improve health or safety by making rescue more swift or sure. I agree people take greater risks based on a belief they can call for a rescue.
6. Potential accidents may occur from distraction, access to cell phones will make it less safe.
- ◆ Mount Rainier is a dangerous and wild wilderness. Cell service will create a false sense of security – especially with strong signal at Paradise.
 - ◆ Extending mobile cell service would make it less rather than more safe; when tech available, we tend to pay less attention to where we are and where we are going.
 - ◆ I understand upsides, but I feel improved coverage will encourage more risk-taking by inexperienced visitors.
 - ◆ Many more unprepared individuals will take chances in the park, thinking they can always call for help; this will increase pressure on first responders.
 - ◆ Cell phones don’t work in all conditions; could a lawsuit result against the park if they don’t work in all conditions?
 - ◆ Many unprepared people go into the deep woods count on their cell phone and other hikers to bail them out. I have had special outdoor moments spoiled by listening to another hiker walking along and talking on their cell. I carry an “Inreach” in case of a true emergency.
7. Don't want to experience disrupted behavior, it will diminish wilderness experience.
- ◆ I have witnessed disruptive behavior due to technology; have respect for those who value wild spaces and would prefer to experience them without digital distractions.
 - ◆ Cell coverage greatly diminishes wilderness experience. Seeing people constantly check phones diminishes experience.
 - ◆ I was disgusted by the use of cell phones at Yellowstone. No ugly cell towers, even if it’s a tree.
 - ◆ The experience of millions of nature lovers will be compromised for the possibility that phone service will help rescue people, the cost is too large. Provide special rental phone/radio systems to those nervous about safety. Give everyone who enters a card explaining they are now in a wild place without phone service. If people are not comfortable without service it might not be the best place for them to go.
8. Cell towers would be unsightly.

- ◆ I am against any infrastructure in any wilderness or wild spaces, national parks, etc.
 - ◆ No towers or exposed wire, which will move park further into a cable TV Disneyland and not the natural place it was set aside to be.
 - ◆ Please, no unsightly tower here. There must be some other place you can put it.
 - ◆ Towers would impact wildlife; the plants and trees will be disrupted when there is "tower maintenance".
 - ◆ Cell towers in mountainous terrain must be placed at or near peaks or ridges to allow for coverage of lower areas. The pristine landscapes our NPS protects would be ruined by even one cell tower jarring out from the natural skyline. At night, cell towers must by law be illuminated with warning signals for aircraft. The natural lands of Mount Rainier have remained almost entirely clear of light pollution, but even one flashing red light will be viewable from miles in every direction and will easily ruin that.
9. I am opposed to corporate/commercial "giveaway".
- ◆ Allowing right of way to cellphone service providers is giving away our national parks.
 - ◆ Please do not let there be a cell tower. Do not let corporations take over wilderness. How many fatalities does park have that warrants a cell tower? I would love to know how many people that would be saved versus environmental impact.
 - ◆ Allowing cell service to supplement profit of a few telecommunications companies is at odds with providing "opportunities for solitude or a primitive and unconfined type of recreation" (WA).
 - ◆ Don't let short term considerations take precedence over the bounty that the wisdom of the planet has provided us with. We would be poorer if we sold out to cell phone service providers and their overreach.
 - ◆ I do not agree with a corporate entity to place property on public land for for-profit reasons; that is in conflict with the purpose of national parks.
10. Visitor's opportunity for direct communication would be reduced.
- ◆ To introduce devices that foster ever increasing distraction, we encourage depression, anxiety and countless other mental problems as a result of modern society's inability to concentrate on what is present, alive and magnificent.
 - ◆ As a former seasonal interpreter in Yellowstone and the North Cascades, I wonder if this will encourage the NPS to replace interpreters with electronic walks.
11. Cell phones interfere with the natural environment.
- ◆ Like with dogs (not allowed in national parks), cell phones would interfere with the natural environment; some people are pretty annoyed by them, and a select few cell phone users would ruin everyone else's experience.
12. Cell service would result in the loss of something special.
- ◆ Even though VC is in a developed area, it is within a NP – wilderness by definition. I think in years to come, these areas (without coverage) will be regarded as the Dark Sky Preserves are today: rare and something that is to be treasured.
 - ◆ Something special will be lost no matter how sensitively it's done.
 - ◆ I understand some visitors would like to use phones to coordinate plans, or for emergency communications, but I also know that I along with many others have not just survived but delighted in countless trips in the wilderness and in National Parks in an era that predated ubiquitous cell phones. I don't believe the benefits of cell coverage would outweigh subtle destruction of engagement, attentiveness and peace that would occur.
 - ◆ Mount Rainier is not a movie with popcorn and comfy seats and the movie ends and you go home... we need to honor the mountain by letting it remain wild.

13. People are distracted, constantly fact checking and consuming, not enjoying the moment.
- ◆ I am a seasonal ranger and happier when I work at parks without cell service; visitors... are not fact-checking their phones, they are paying attention to flowers and plants and birds.
 - ◆ Some people feel a compulsion to constantly check up on what is happening at work, even while on vacation; they don't know how to unplug; it is wonderful that when they go to Mount Rainier, the decision is made for them.
 - ◆ People at Paradise Inn are not interrupting their dinners to look at texts, social media, watching streaming videos, they are actually HERE, in the moment.
 - ◆ Cell service is like allowing the serpent into Paradise. Immersion in nature and family bonding replaced by distractions and electronic addiction.
 - ◆ Cell reception will likely increase nature deprivation syndrome. Misbehaving children will be pacified by electronic devices instead of finding the natural cures/pleasures found in wild natural places.
 - ◆ Cell phone use dilutes the experience for visitors and people around them; people at Paradise are alive and smile as they pass; I dread the walk to Alta Vista when many walkers will be focused on little screens.
 - ◆ There is hardly a place left in the world without the annoying, weakening, intrusive and attention-zapping cell phone. As you must know from your line of business, people come to visit Mt. Rainier to view its splendor, challenge themselves physically, and to restore their souls and spirits. You receive millions of visitors each year - imagine the cacophony of one way conversations in and around the mountain.
14. Mount Rainier is a place to unwind, a place to experience the real world.
- ◆ Mount Rainier is a place to go to unplug - to unwind - to be ourselves. I encourage you to keep the park as phone-free as possible, which will help maintain historic character of the park, but, more importantly, will help visitors to connect, both with the park, and with each other.
 - ◆ Proposal is an outrage, Muir would have been horrified; the whole point of why we created the national parks was for people to escape their city lives and appreciate the wonders of nature... the mountain is already crawling with fools on smartphones.
 - ◆ Cell phone conversations are heard and experienced very differently than in-person conversations (Journal of Experimental Psychology, 2008, Vol. 14, No. 5). Cell phone use will lead to hostile reaction among guests and possible altercations between visitors. Cell phones in the wilderness have direct links with risk taking behavior by individuals who don't have the appropriate outdoor experience.
 - ◆ The integrity of the sweetness of the sounds of nature will undoubtedly be ignored by many folks. It is a place to step back and be unhooked from technology. Many people need real help to unhook.
 - ◆ We can already take photos and upload them after leaving Paradise. Adding coverage will not improve experience (uploading not immediate), but would distract from the relaxing, immersive break from our fast-paced lives.
15. Noise issue.
- ◆ NPS study of noise levels in US – blue areas in West; noise extends into landscape along roads; development now penetrating places that were recently wild (From Hi Country News, 3-15). Being able to hear and survey what's going on around you is a critical part of survival (assumption: cell phone activity would increase noise levels).
16. Electromagnetic radiation is an issue.
- ◆ This continuous microwave exposure is only going to rapidly age, sicken, and shorten the lifespan of the Park employees. The resulting unrelenting microwave radiation produced by this proposal

will also provide yet another reason for the wildlife that people come to the park to see to stay far far away from the visitor center.

- ◆ I am a physician treating patients with EMF sensitivity (EMF Radiation Toxicity Syndrome); on their behalf, I request that the parks be kept free of microwave transmitters.
- ◆ Microwave radiation interferes with the navigation of birds etc, has negative health impacts, increases global warming, causes allergic responses in 2-5% of people, has a negative effect on all humans and all life forms. Many do not feel the effects, yet are still affected.
- ◆ This year I lost my tolerance to emfs/wireless etc (and even feel it dramatically/severely). I see our National Parks as sanctuary. Please say "no", to preserve human health and safety and wireless free sanctuary wildlife health safety planet safety.
- ◆ You have a fiduciary responsibility to make sure there is no cell tower danger; I demand you not allow their existence in Paradise or any place in WA.
- ◆ The Vatican moved their cell tower due to the number of cancer cases in the vicinity.
- ◆ Cellular communication microwaves are real things and do have effects on biological systems.
- ◆ It is not in keeping of the wild spirit of National Parks to have cellular transmitters within the boundary of any Park.
- ◆ Microwaves interfere with our body's own EMFs and cause many potential health problems; headaches, memory loss, cardiovascular stress, low sperm count, birth defects, cancer.
- ◆ I am EMF sensitive and do not want pulsing signals that are not natural to the environment.
- ◆ Those of us who have electromagnetic hypersensitivity enjoy getting away from electromagnetic-polluted fields. The current proposal to erect towers at Paradise would blanket the Paradise Lodge with continuous microwave radiation from three hidden transmitters.

17. I am concerned about the process. The NPS did not follow correct process.

- ◆ I visit the park frequently, and have seen that fiberoptic were already being installed in the roadway, before at least a year or more before the comment period was announced this year. If my observation is correct and this infrastructure is already installed, the NPS' solicitation of comments would be disingenuous. If I am mistaken, please let me know so that I do not take further action.

NPS response to questions and substantive comments

1. The EA does not present the last few years of incident reports in the Paradise Area to determine how often the availability of cell service would have made a significant difference as to serious injury or death.

The park has not collected data to determine whether there is a statistically significant difference in the prevention of injury or death. See the "Decision Reached and Rationale" on pages 5-6 of the Finding of No Significant Impact (FONSI).

2. I am not supportive of coverage at backcountry camps. People are oblivious of how behavior affects others, stand around taking pictures, posting things online, making calls, streaming. Will backcountry be affected? I am usually doing backcountry camping, I need a better understanding of what park areas will be affected.

Coverage is not expected to change at backcountry camps. The closest camp to the JVC is Paradise River backcountry camp, located to the southwest. Because of its location in the valley, coverage is not expected to change.

3. Please do not let there be a cell tower. Do not let corporations take over wilderness. How many fatalities does park have that warrants a cell tower? I would love to know how many people that would be saved versus environmental impact. The pristine landscapes our NPS protects would be ruined by even one cell tower jarring out from the natural skyline. The natural lands of Mount Rainier have remained almost entirely clear of light pollution, but even one flashing red light will be viewable from miles in every direction and will easily ruin that.

Cell towers will not be built at Paradise as a result of this decision. The antennas will be restricted to the attics of the JVC, and will not require flashing red lights. See the Decision Rationale on pages 5-6 of the FONSI.

4. I visit the park frequently, and have seen that fiberoptic were already being installed in the roadway, before at least a year or more before the comment period was announced this year. If my observation is correct and this infrastructure is already installed, the NPS' solicitation of comments would be disingenuous. If I am mistaken, please let me know so that I do not take further action.

The NPS approved installation of utilities in the 2012 Nisqually to Paradise Road Rehabilitation Project FONSI. The purpose was to upgrade electrical, data, and communications for park operations. The road and utility work was completed during summer 2017.

5. This continuous microwave exposure is only going to rapidly age, sicken, and shorten the lifespan of the Park employees. The resulting unrelenting microwave radiation produced by this proposal will also provide yet another reason for the wildlife that people come to the park to see to stay far far away from the visitor center.

The electromagnetic radiation exposure is addressed on pages 37-38 of the EA.

6. Mount Rainier National Park should negotiate with the wireless carriers to obtain priority service to be used in the case of Park emergencies- -either the GETS program or Wireless Priority Service would allow them priority. Search and rescue should not have to compete for cell service with visitors uploading selfies in the meadows.

AT&T, if approved, would have this priority.

7. Mount Rainier National Park should consider adding guidelines to its newsletter and to visitors' handouts describing appropriate and expected telecommunication behavior in this scenic national park, so that other visitors may enjoy the peace and beauty of the Paradise area.

We are committed to implementing a robust communication and education program that would address this issue. See page 4 of the FONSI.

8. The EA was silent on any financial benefit to Mount Rainier for leasing out this space to these commercial companies. We would expect that the park should be receiving substantial annual rents as any landlord would when allowing cellular communication facilities to be installed on its property. MRNPA wants to see NPS commit to using these ongoing rental payments for operational purposes specific to MORA to make up for a decreasing budget that harms the parks by failing to cover basic maintenance and operations costs. If MORA's visitors are to be disturbed by the intrusion of cellular communication uses, at least they could be somewhat comforted by the fact that the park was receiving ongoing rent to support its operations and benefit its visitors.

The NPS will charge a rent, which would be deposited to the U.S. Treasury. The park sees no financial benefit to right-of-way rent. The carriers will pay Mount Rainier National Park for utilities consumed by the project, which will be measured via meters attached to the park's electrical service.

9. The National Park Service (NPS) mission, as delineated in the Organic Act, takes precedence over the Telecommunications Act of 1996. Through the Telecommunications Act of 1996, Congress has given the NPS clear direction regarding permitting of wireless communications facilities within the National Park System. The act precludes permitting when facilities are in direct conflict with the agency's mission stating: "...requests for the use of property, rights-of-way, and easements by duly authorized providers should be granted absent unavoidable direct conflict with the department or agency's mission." Thus the NPS mission takes precedence over the Telecommunications Act. NPS should not permit applications for wireless communication facilities within the National Park System if the facilities would impair or detract from the scenery, wildlife, wilderness experience, or natural and historic places or objects.

We agree. See pages 5-6, Decision Reached and Rationale, pages 5-6 of this FONSI.

10. Clarify the responsibilities of the Providers to Mount Rainier National Park and its visitors. If the Providers are awarded permits to install the WCF, they will receive certain benefits from NPS. For example, beyond using space in the Paradise Visitor Center attic, the Providers all propose to use an NPS generator for backup in the event of a power outage (EA 18). Further, locating a WCF at Paradise benefits the Providers by improving the services they provide to their customers. In turn for receiving these benefits, the Providers should be responsible for serving and improving Mount Rainier National Park. (See Section 3, "Create and distribute guidelines....," for examples of services the Providers could contribute to NPS and Mount Rainier National Park.)

The NPS plans to implement a robust communication and education program. See page 4 of this FONSI. Costs directly related to the installation would be recovered from the carriers. Rent for use of the JVC would go to the U.S. Treasury.

11. Ensure NPS is fully indemnified. The Providers should retain full responsibility and NPS should be wholly indemnified in case of emergencies that occur as a result of the location of the WCF at the

Paradise Visitor Center.

The government is self-insured, and would seek damages from the permittee for damages via the right-of-way permit.

12. Create and distribute guidelines for cell phone etiquette. As is evident in the comments received during scoping for the EA, many visitors are concerned about the potential negative impacts of others' cell phone usage on their experiences while visiting Mount Rainier National Park. To minimize these potential impacts, NPS should develop and distribute (or clearly post) guidelines for visitors' cell phone usage. These guidelines could include suggestions that visitors silence and avoid using phones while hiking unless necessary. NPS could distribute these guidelines in brochures, on the Mount Rainier National Park website, as notifications in NPS mobile phone applications, or on signs posted throughout the park. The Providers should be responsible for funding, in whole or in part, the development and distribution of these guidelines.

The NPS plans to implement a robust communication and education program. See page 4 of this FONSI. Costs directly related to the installation would be recovered from the carriers.

13. Minimize seepage of cell service into designated Wilderness. NPCA acknowledges the benefits of cell service in developed areas like the Paradise Visitor Center and its immediate surroundings. However, NPCA is committed to preventing human influence on Wilderness. To avoid degradation of the wilderness character of Mount Rainier National Park's Wilderness, the permits should require that the Providers install the WCF in such a way that minimizes seepage of service into the backcountry.

As designed, the antennas would be mounted onto the FRP panels as described in the EA. Signals would be strongest toward the east and reach Mazama Ridge. Moderate signals to the west would intersect the western peaks of the Tatoosh Range. The NPS will work with the cellular providers to direct or reduce signal strength toward the west. See pages 5-6 for the Decision Rationale.

14. Include in permits provisions for revocation and facility removal. As wireless communications technologies continue to evolve, it is likely that in-park wireless facilities may become obsolete and unnecessary. The ROW permits should contain provisions for revocation and facility removal based upon the availability of new technologies that can provide substantially the same service but be located outside park boundaries. The ROW permits should require bonding in an amount sufficient to ensure facility removal and should be limited to a five-year period subject to review for technological obsolescence. This is consistent with other federal permits such as those issued under the National Pollution Discharge Elimination System rules. This also is a sufficient period for the wireless carrier to recover its capital costs in the facility.

The right-of-way permit would contain standard provisions that address revocation and facility removal.

15. Expand and adjust Best Management Practices (BMPs). The BMPs described in the EA require two improvements. First, the BMPs do not include pest management, and should be expanded to include methods to prevent access to the cable openings by pests such as bats and rodents. Second, the BMPs for WCF installers and repairpersons only require that "vehicles would not be allowed to idle longer than 15 minutes when not in use" (EA 24), and should be amended to require that vehicles be turned off immediately when not in use.

A provision was added that addresses pest management. Currently the entire project is interior to the

Jackson Visitor Center, which is currently free of rodents. The only feature that extends to the exterior of the building is the GPS unit (one per carrier).

The 15-minute idling provision was edited as suggested.

16. This was written 11 years ago: The "growing prevalence of wireless telecommunications" is truer now than ever. So why has Mount Rainier National Park (MORA) ignored this provision for 11 years? You are proceeding in a distinctly ad hoc manner here. The Park asked for cell coverage at Paradise in 2012, and is now moving forward with that proposal, given the recent availability of fiber optic cable in the area. Nobody will be surprised if Longmire is considered next for cell coverage. Then will come a proposal for Sunrise, once fiber optic cable reaches that area. There's no planning, and no consideration of the long-term or cumulative implications of the Park's decision-making, or whether any of this is consistent with the laws and policies that Congress has enacted to protect national parks and wilderness areas. I would ask that, regardless of how you proceed on this proposal for Paradise, you take a step back for a few months, follow the guidance of the NPS Management Policies, and conduct some overall telecom planning before considering any other cellular proposal for the park.

The park is required to respond to applications in accordance with the Telecommunications Act of 1996. The point is well taken that "the manner in which the park will manage the technology and related facilities should be addressed in an appropriate planning document." The issue of wireless signals in wilderness will be addressed in the Wilderness Stewardship Plan. The park may consider development of a park wide plan in the future, but not as part of this environmental analysis.

To clarify, the park did not request coverage at Paradise in 2012, or initiate a conversation with any carrier at any time. Verizon approached the NPS and discussed options to install cellular facilities at Sunrise in 2012. The NPS did not hear from Verizon until applications were submitted late 2014. The application for an installation at Sunrise was denied.

17. On page 5, you state that the EA's purpose is to "give consideration... as to whether or not the proposal would cause unavoidable conflict with the park's mission, in which case the permit would be denied." This, of course, is the critical language from Section 704(c) of the Telecommunications Act of 1996. It is the threshold test for all cell tower proposals. You state that you are going to "give consideration" to this issue, but I cannot find anywhere in the EA that you have done so. Please let the public know where in this EA the discussion took place.

We do not agree that the proposal causes and unavoidable conflict with the park's mission. See pages 5-6 of this FONSI for the Decision Reached and Rationale.

18. You state on page 2 that this "EA was prepared in accordance with... Reference Manual 53..." This is simply false. You need to correct the record by removing that statement. You did not comply with RM-53 in at least two ways. First, you did not publish a notice in the Federal Register, which is part of the RM-53 process: "Upon receipt of the required compliance documentation, the park will then take the following simultaneous actions: Initiate a 30 day public comment period by posting a notice in the newspapers as above and in the Federal Register of availability of the EA for comment." (See RM-53, Appendix 5, Exhibit 6, Pages A5-52 and A5-53.) Second, you did not notify members of the public within 10 days that you had received the first SF-299 from Verizon in early 2015. "Following a 'yes' or 'maybe' decision, and no later than 10 days after receipt of the application, the park will perform the following simultaneous actions... [M]ail notice to the park's list of potential interested parties advising of receipt of application, if the park has developed such a list, or by posting

a notice of receipt of application for a WTF site in a newspaper of general circulation in the affected area and/or in the nearest metropolitan area newspaper. The purpose of this notice is to... promote public and local governmental participation..." (See RM-53, Appendix 5, Exhibit 6, Page A5-51.)

You are correct that the NPS did not precisely follow the policy guidance provide in RM-53. The RM-53 is a process designed to rapidly respond to telecommunications proposals including the issuance of an environmental document and decision within 120 days. The current NEPA guidance supersedes the guidance presented in the RM-53, which truncates the NEPA process. Additionally, the statement "The EA was prepared in accordance with Reference Manual 53" also refers to efforts to revise and redesign the initial proposal so that it minimized impacts to resources at Paradise. The NPS responded to the proposal at Paradise with an answer of "maybe", and to the proposal at Sunrise with an answer of "no".

19. Next week in Washington, the state's new "Driving Under the Influence of Electronics" Act takes effect. So while MORA officials may still be wondering whether there's any link between cell phone use and distracted driving, the WA Legislature has taken action to address this growing threat.

Noted. Mount Rainier National Park observes and enforces Washington State traffic laws.

20. On page 11 of the EA, you write that, "While the proposed installation would be constructed in the Paradise developed area and is not intended to target wilderness, improved cellular service would likely extend into adjacent wilderness." "Would likely" is not accurate. The sentence should be corrected to state the truth: "... improved cellular service would extend into adjacent wilderness."

"Would likely" is used because the estimated coverage is just that - estimated and based on a model. However, we agree that the coverage is likely, and will be tempered (see Decision Reached and Rationale, page 5 of this FONSI).

21. On page 31, the EA states that if the cellular facility is installed at Paradise, "... visitors may increase their use of cellular devices..." It is certain that visitors will increase their use of cellular devices. Right now, according to the EA, very few people use their cell phones at Paradise. Soon thousands will be doing so. It's not speculative.

Noted. This statement is speaking to the fact that visitors use their devices whether they have coverage or not. The added option of a cellular signal is likely to increase cellular use.

22. On page 36, the EA states that under the No-Action alternative, "Visitors would continue to rely on direct contact with park staff to communicate emergencies or request assistance." This is false. Currently, the park receives notifications of emergencies from cell phones, satellite phones, and other assorted communications devices. Look at the Park's press releases for details. There's much more current communication than you let on in this EA. Please correct this erroneous sentence.

At Paradise, visitor communication with Rangers and EMS personnel is direct and often time consuming. Family or friends commonly call the park dispatchers from outside the park, looking for late family members or friends, to which the Park responds. Reporting of accidents (typically via text) has occurred from within the park using cellular devices. Visitors in need of help have texted friends and family located outside the park, who in response have called the park to relay information from the visitor in need of help.

23. This question should have been answered in detail in the EA. You do state that there are "... 40 to 50

[Search and Rescue] operations... annually within the park," but provide no further details. How many of the current rescues involved a 911 call made from a cell phone? How many involved a call from a satellite phone? How many involved contact from another device? How can you make the argument that cellular is needed at the park if you do not provide the details of these SAR cases? You should provide at least a few years' worth of data on recent SAR operations at the park.

The argument that cellular is need is not based on the number of SARs. This information is shared simply to inform the reader that we are a busy park with an active SAR program. Anecdotally, our dispatchers receive calls or text from people who need rescue on the mountain, or from people where were contacted by someone on the mountain via text, for example. We do not keep these statistics.

24. The EA does admit that cellular service is not necessary for Park operations: "... park staff would continue to rely on two-way radio communication, which is not expected to change in the near term" (see p. 12 of the EA).

Park operations and communications between employees (all park divisions) would continue to use two-way radios because cellular service would not be consistent park-wide. However, cellular service would supplement two-way radios in the Paradise developed area.

25. Why this EA is Legally Insufficient: 1. You have not presented or assessed any serious alternative to your own (and Verizon/T-Mobile's) proposal: You made clear at the scoping stage that you were intent on looking at just "two" alternatives: yours and "no action." I objected to that in my scoping comments. I discussed the possibility of wi-fi at the Jackson Visitor Center as an alternative to cellular, which, as it turns out, you're going to approve in addition to this cellular proposal. But it is unreasonable to expect the public to come up with specific "alternatives" at the scoping stage. Now that I've read the EA, I see that other alternatives would indeed be possible to consider. For example: You could expand existing wired and wireless phone service throughout the park. You note on page 8 of the EA that "Landline telephones (CenturyLink-provided pay phones or Park-provided toll-free courtesy/emergency phones) are available to the public at several, but not all, developed locations around the park." Why don't you tell us more about these landline telephones in the park? Why can't more be installed? Why isn't this a reasonable alternative to the current proposal?

New emergency phones have been added to each of the entrance stations in recent years. NEPA requires a minimum of two alternatives: a "no action" and an "action" alternative. The NPS considered additional alternatives including a tower, etc., but dismissed all actions that would have the potential to adversely impact resources at Paradise and with the mission of the NPS. The action alternative was the only alternative considered feasible or potentially acceptable to the NPS.

26. Similarly, on page 9, you note that "Satellite wireless signals are present in most locations..." You make clear (on page 35) that "typical satellite coverage that is most available to wilderness visitors is limited to texting, short calls, emergency notification and GPS tracking depending on the satellite device used." Why isn't satellite communication a reasonable alternative to cellular? It would have all of the safety elements you want to enhance, without all of the negative aspects of cellular communications. Why did you not look at this as an alternative, and provide the public with all of the details?

Noted. See "Decision Reached and Rationale" in the FONSI, page 5-6.

27. Less cellular coverage in the backcountry (designated wilderness) is a possibility, and a reasonable

compromise to the conflicting desires of the park and public. Mitigation possibilities should have been explored under the "Resource Protection Measures and Best Management Practices (BMPs)" section. Ask Verizon, T-Mobile, and AT&T the best way to reduce spillover into the Park's designated wilderness. Panel antennas are much more "directional" than the previous "whip" antennas, and can be focused on certain areas. The cellular antennas at Paradise could be tilted downward to reduce spillover. Are you aware that Yellowstone National Park officials are currently proposing to place just one panel antenna (instead of three) on a tower at Canyon Village, so that spillover is minimized and backcountry experiences are protected? Likewise, Theodore Roosevelt National Park recently approved a cell tower for its North Unit, but they are specifically forbidding cell companies from placing any panel antennas facing the west, where the park's designated wilderness is located. MORA should join these other parks in taking steps to protect their precious backcountry areas.

See Decision Reached and Rationale, pages 5 and 6 of the FONSI.

28. Why not a Cellular on Wheels (COW) for the peak visitation months? The EA states (p. 30) that "about 80 percent of the visitor use occurs between May and October... Park visitation... decreases substantially beginning in October." Why not an alternative that considers bringing in an inconspicuous COW for four months of the year? That would have many advantages. There would be no permanent installation at Paradise, and no 24/7/365 coverage. But the overwhelming majority of visitors would be provided with cell service.

While most visitors go to Paradise May through October, we believe it would be equally important as an option for communication during the often hazardous fall and winter months. A Cellular on Wheels implemented most of the year is essentially a development that is seasonally permanent, and would not be compatible with the National Historic Landmark District. However, a "Cellular on Wheels" is a potential solution to communication challenges in other remote park locations on an emergency basis, however.

29. The Cumulative Impacts of this Cellular Proposal and Others, Plus the NPS Wi-Fi initiative, Have Not Been Considered: The EA reveals (p. 6) that "T-Mobile is... in the process of securing coverage via a separate site in the vicinity of Ashford..." Later, the EA adds: "New cellular towers planned for construction in Ashford may result in spillover of cellular signals to adjacent wilderness managed by the U.S. Forest Service (Glacier View Wilderness), and Mount Rainier Wilderness." This is alarming and not analyzed in any way in the "Cumulative Impacts" section on page 35. Nothing is mentioned about whether the Park will "actively participate" in the "planning and regulatory processes and seek to prevent or mitigate the adverse impacts," as required by NPS Management Policy 8.6.4.2. ("...superintendents will actively participate...")

We were not aware of an invitation to comment on plans to install the T-Mobile tower in the Ashford area. Staff became aware of the proposal to install a Verizon tower in Ashford because flyers were posted in the Ashford area. The policy to participate in review of proposals that may impact park resources is an option that Mount Rainier National Park will consider for the future.

30. With wi-fi soon to arrive at the Jackson Visitor Center, MORA needs to analyze the combination of new wi-fi and cellular service in the area. It will bring about significant changes to Visitor Use and Experience (to mention one impact topic), and these changes must be considered before the Park approves this proposal and wi-fi.

The recent decision to install wi-fi was proposed under a nationwide NPS campaign. The primary purpose of the project is to provide network access so that people may obtain climbing permits or

campsite reservations within the park, a critical component of the newly implemented fee system that requires payment through pay.gov.

31. The Public was Left Out of this Four-Year process Until Late 2016, Contrary to Law and Policy:

The current proposal was initiated in late 2014, and was not a four-year process. Law does not dictate a timeline, however policy does. The RM-53 guidance was designed for typical WTF that are towers. The NPS is encouraged to work with providers to design projects that minimize impacts.

The NPS sent notices to “interested parties”, known at the time to be telecommunications companies that may be interested in applying for a right of way permit – the purpose is to encourage other applicants to apply at the same time for the purposes of efficiency. RM-53, Appendix 5, Exhibit 6, page A5-48 states:

“The superintendent may discuss proposed sites with the licensee to determine which zones, areas, locations, and types of installations are likely to not result in a derogation of park resources, values and purposes.

“Superintendents should review the location of existing utility systems and roads. If utility service and access to the proposed site is already in existence, the park must consider what additional impacts the proposed use might cause and the possibility of additional utility rights of way needed. The potential applicant should be made aware that the NPS decision process considers the full footprint of a WTF site: The tower-antenna-base structure facilities; the access road required for construction and service; and the supplying power and telephone lines. Should any of these disparate parts be found to cause unmitigatable impacts, the entire application would be denied.”

RM-53 page A5-45 states:

“Superintendents may wish to quickly identify critical resource areas, operational needs, and existing infrastructure. This is a completely optional process. Such an effort is intended only to provide basic, preliminary information so as to expeditiously inform the park manager about potentially suitable WTF sites, or areas where WTF facilities may not be approved. This process is NOT conducted in lieu of coordinated NEPA-NHPA compliance. If conducted at all, it may be done prior to or after receipt of a complete application. It may be most appropriate when the park has or expects to receive multiple applications for multiple sites, or in parks that encompass large or geographically dispersed acreage, variable topography, or complex resources. It should be accomplished by park staff as appropriate. This exercise may also be used by the park manager to open a dialog with the potential applicant(s), or for any other reason the manager deems appropriate.”

32. I spoke with MORA's staff in early 2013 after reading news reports that the park was considering cellular service in the park. No specifics were available at that time, but the Park has continued to work with the telecom companies since then (more than four years ago). Why was the public not brought into this discussion sooner, as required by the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA)?

The current proposal was initiated late 2014, and applications received early 2015. The NPS did not invite telecom companies to look at the potential for installation of facilities in the park. The NPS did respond to inquiries about installations at Sunrise (informally in 2012), and via application (2015). The Sunrise location was deemed infeasible because of topography, lack of suitable infrastructure, and lack of

power.

During the 2012 inquiry, it was suggested that Paradise may be a possible location. Because there was also no line-of-site connection to other towers in the area at Paradise in 2012, Paradise was also dropped as a possibility.

During 2012, the NPS approved a plan to rehabilitate the Nisqually to Paradise road, which included the installation of modern utilities within the corridor. The purpose of the action was to modernize utilities, including electrical, data and communications between the Nisqually entrance and Paradise for the NPS, and not for telecommunications companies. The fiber optic cable upgrade by CenturyLink made it possible for cellular providers to connect to the cellular network (backhaul).

33. NHPA (through the Section 106 regulations) emphasizes early public input: "The agency official shall ensure that the section 106 process is initiated early in the undertaking's planning, so that a broad range of alternatives may be considered during the planning process."

The NPS thoroughly considered impacts to the historic district to the degree that options considering installations within historic buildings were dismissed, and towers that would affect the scenic quality and National Historic Landmark District rejected. See pages 27-29 of the EA. The EA documents communications with the SHPO prior to publication of the EA (page 40), and the FONSI describes the formal consultation that took place (page 9).

34. Why haven't you posted at PEPC the e-mail correspondence between the Park and WA SHPO re this proposal? Why haven't you posted information about the Paradise Historic District? How is the public supposed to know about the details of this district and how this proposal might affect it?

The correspondence with the consulting agencies is not typically included in an EA. Formal consultation and request for concurrence is typically initiated with the EA, and the response recorded in the FONSI. Informal consultation with the SHPO was conducted prior to completion of the EA to ensure there would be no conflicts. Cultural properties and scenic resources were defining issues that resulted in the rejection of cell towers in the Paradise area (see pages 27-29 of the EA).

35. The coming 5G antennas/Cumulative Impacts Ignored Cellular technology is not static. What is approved today may - and most likely will - be upgraded tomorrow. The EA does not address the cumulative effects of these upgrades. When MORA is approached in a couple of years to upgrade the Paradise installation to 5G antennas, the Park appears poised to say yes without a whit of further review.

There is no proposal to add 5G antennas, which are also not approved via this NEPA process. The ROW permit would be for a 4G LTE service and would not include 5G. We will make this clear in the stipulations.

36. MORAs Wilderness Stewardship Plan EIS is currently on hold because of inadequate park staffing. It is unclear why accommodating commercial wireless corporations and their subscribers should command far more Park resources and attention than addressing the vast wilderness which covers 97% of MORA and is the Parks raison d'etre.

Noted. The Wilderness Stewardship Plan is not on hold. The WSP EIS will address issues related to wireless communications.

37. Roadkill and distracted driving.

Roadkill is addressed under the Resource protection measures. In our experience, construction activities have the potential to increase roadkill in areas of construction. The NPS monitors roadkill routinely.

38. The Cellular Proposal Conflicts with the Very Purpose of This Park The EA does not make any reference to MORAs Foundation Document dated April 2015.

The Foundation Document, which was consulted, is not a plan, or a decision document and does not provide any guidance related to telecommunications.

39. Cell Coverage Incompatible with Wilderness Management

- a. Preempts MORAs Wilderness Stewardship Plan Remarkably, the EA does not make any reference to the Parks existing Wilderness Stewardship Plan or the updated version the Park began to work on in 2015.

The original Wilderness Stewardship Plan provides no guidance for telecommunications, so was not cited. The current WMP planning effort will consider the impacts of telecommunications on wilderness character.

- b. Diverges from Best Wilderness Management Practices. The EA does not examine any other U.S. national parks and whether they consider cellular use incompatible with wilderness values. PEER cited Yellowstones stance on protecting the backcountry from cellular signals, as well as Baxter State Parks commitment to keeping cellular use limited in its primitive park.

The NPS has reviewed approaches in other parks, and has accepted a design that mitigates impacts to the physical environment by confining antennas to the attic of the JVC, and limits cellular signals through this limitation. Also see the FONSI, pages 5-6: Decision Reached and Rationale.

- c. Violates NPS Directors Order on Wilderness The EA does not mention new Directors Order #41 on Wilderness Management, even though it states that commercial services may be limited to preserve opportunities for primitive recreation or other aspects of wilderness character.

The NPS does not agree that signals produced by telecommunications facilities are commercial, and that they are prohibited by policy or law; however, the NPS does recognize that there may be adverse impacts to visitor experience and the quality of solitude, and primitive and unconfined recreation.

- d. Violates Wilderness Act Prohibition against Commercial Services The EA mentions the Wilderness Act and some of its language, but does not address the Acts prohibition on commercial enterprises in the wilderness.

See response to c.

40. The sole comment the EA makes about wilderness is the following: Wilderness Character: Cell phone coverage, even though it does not have a physical presence in wilderness, may be used as a proxy indicating potential subjective effects on wilderness experience& The wilderness quality of solitude or primitive and unconfined recreation could be impacted by spillover of cellular signal from the

Paradise developed area. p. 34. Yet these impacts are never analyzed, nor, as noted below, is there any attempt by MORA to lessen those impacts.

The EA pages 33-36 discuss potential impacts to wilderness. See also the FONSI Decision Reached and Rationale, pages 5-6.

41. No Consideration of Soundscape Impacts. The EA dismisses Soundscapes as a separate topic (but considers it, only marginally, in the section on Visitor Experience).

Soundscapes are considered but dismissed; see page 12.

42. Adverse Public Safety Effects Not Analyzed The EA omitted any mention of the 2012 Board of Reviews report, including their language that the NPS mission places a high priority on providing a visitor experience that is not controlled by park management, and that a number of variables make it impossible to expect that all future mishaps on the mountain could be prevented.

The decision is not driven by the tragedies that occurred during 2012. The EA addresses Safety and Health on pages 36-38, also see the FONSI, pages 5-6.

43. Telecommunications Act Does Not Require Approval. The Telecommunications Act is mentioned very briefly at the beginning of the EA that it authorizes, but does not mandate, a presumption that such [telecom] requests be granted. But the key language is what comes next: & absent unavoidable conflict with the Parks mission, or the current use of the property. The EA (p. 5) says that it will give consideration to this issue of whether the proposal would cause unavoidable conflict with the parks mission, but in no place does the EA actually do that.

We agree that the Telecommunications Act does not require approval. We prepared an environmental assessment to evaluate the potential impacts of the proposal because of this. However, Congress, in the Telecommunications Act, did direct the establishment of a process to allow right-of-way access to Federal land.

Mount Rainier National Park dismissed the option of a cell tower, and suggested alternatives to the Telecommunications companies to design an alternative that would confine antennas and associated equipment to the attics of the JVC to address conflicts with the Park's mission, including scenic quality and impacts of a tower to the Historic District and views from adjacent Wilderness. This approach is supported in RM-53.

44. EA Ignored Concerns Raised by NPS Staff Through Freedom of Information Act (FOIA) requests, PEER has obtained a number of records in which NPS staff, both inside and outside MORA, have raised concerns that the EA failed to address. Visitor Experience: the Parks Historical Landscape Architect, raised the following concern: "Recognize that visitor use and activities inside the Paradise Inn will change when cell service is introduced. Cell phone and computer use will be introduced into an area where people have engaged in puzzles, board games, reading, writing, and other non-digital recreation. Visitor use and activities will also change in similar ways in outdoor areas where cell service/internet becomes available."

This statement was brought up in public comments, and is a concern that the NPS continues to have. See the topic "Visitor Experience" in the EA.

45. He brought up another concern at an Interdisciplinary team meeting on February 17, 2016. He wanted to know about a possible cone of silence at the Jackson Visitor Center. The response, as written in the minutes of that meeting, was there would be none, signal would be available inside building. Perhaps not surprisingly, his concerns were ignored. There's nothing in the EA about the impact of cellular use at the historic Paradise Inn or in other areas (indoor and outdoor) near the Jackson Visitor Center.

This statement is also well represented in public comment; it was discussed under the topic "Visitor Experience" in the EA.

46. Similarly, MORAs Maintenance staff member was invited to a meeting with Verizon to discuss cellular alternatives. In his ~~June 26, 2015~~ e-mail stating that he could not make the meeting because he wants to go backpacking overnight with his daughter, he added: "Tell them to keep their damn cellular crap in town." So, not only did the park ignore many of our scoping comments, they ignored the specific concerns raised by their own employees.

Mount Rainier National Park employees are entitled to their personal views. As with other employee comments, it was not unlike many visitor comments, which are addressed under "Visitor Experience" and "Wilderness Character."

47. The EA does touch on visitor experience but in a confusing manner: Cumulative Impacts: The NPS has a servicewide initiative for WiFi in NPS unit visitor centers. The park is proposing to add public WiFi service to NPS facilities in visitor centers where backcountry permits are obtained. The addition of Wi-Fi service to the JVC would allow people with mobile devices to purchase permits regardless of their carrier. [p. 32] This suggests that Paradise will soon have both cellular and Wi-Fi. That combination will certainly alter, if not preclude, the ability of visitors to get away from it all at Paradise.

Visitor experience is addressed on pages 30-33.

48. No Alternatives Considered In its Executive Summary, the EA declares: "This EA analyzes a reasonable range of alternative to meet objectives of the proposal." That statement is untrue. Rather than exploring a reasonable range of alternatives, the EA looks only at the park's preferred alternative versus doing nothing. For example, the EA states: Satellite wireless signals are present in most locations [p. 9]. Yet, the EA does not consider an alternative that looks at furnishing satellite phones to parties going into risky areas. Similarly, the EA mentions the availability of landline telephones: Landline telephones (CenturyLink-provided pay phones or Park-provided toll-free courtesy phones) are available to the public at several, but not all, developed locations around the park. [p.8] But the EA provides no specifics about these toll-free phones (e.g., where they are located, and how many there are). Nor is use of these phones, or an expansion of their use, considered as an alternative to wireless facilities.

The EA analyzes two actions, but dismissed other alternatives, such as a cell tower, which would have provided much more expansive coverage than the proposed action. The EA discloses telecommunication devices/facilities within the park.

49. No Mitigation of Impacts As noted both above and below, the EA does not address several adverse impacts. If the EA does not acknowledge impacts, it is hard to mitigate them. Nonetheless the EA proclaims "This EA identifies mitigation measures to lessen the degree or extent of these impacts." The only mitigation measures in the EA deal with construction and other on-site impacts.

Nothing is mentioned (despite both internal and external concerns) about mitigating the spread of signals into areas beyond the developed zone at Paradise.”

The EA lists mitigation measures on pages 23-25 of the EA, also attached to the FONSI (Attachment A). The design of the facility addresses other issues including signal strength and direction, which are limited by design. See also the Decision Reached and Rationale, pages 5-6 of this FONSI.

50. In various places MORA references the improved public safety that would be accorded by a wireless installation at Paradise. Yet, it never analyzes the degree or nature of any such improvement. Similarly, the EA touches upon public danger from cellular access but never analyzes those impacts. In still other places, the EA suggests that the proposal has no safety effects. 1) Danger of Distracted Drivers. On one hand, the EA acknowledges an increased public peril “Improved cellular service along roadways may also increase distraction, and is believed to contribute to accidents.” [p. 37] But on the other hand, it declines to ponder the scope or consequences of this enhanced risk; The following issues/impact topics were retained for further analysis: Improved cellular service along roadways may also increase distraction, and is believed to contribute to accidents,& [p. 11] An Environmental Assessment is supposed to assess, not digress. 2) Hiker Safety. With respect to safety in the wilderness, the EA provides no coherent assessment of impacts on visitor or staff safety. Since the emergency use of cell phones is envisioned in the wilderness - as opposed to a visitors center - enhancing safety would suggest that MORA should seek to wire its entire wilderness - something it claims to have no intention to do. Instead, this proposal should be recognized as a commercial service for paid subscribers rather than any form of public service.

These issues are addressed under the topic “Safety and Health,” pages 35-38. See also “Decision Reached and Rationale.”

51. Ambiguity About Signal Reach: The EA fails to make clear how far signals from Paradise installations will reach into MORA wilderness. In one place, the EA suggests that there is broad coverage throughout the Park: Limited and spotty coverage is available throughout the park including Paradise, Camp Muir and Sunrise& Isolated 'hot spots may be found along roads and in the backcountry. [p.9] Elsewhere, the EA suggests that it will not reach remote areas. For example, the Park maintains that this proposal would not extend coverage to Camp Muir (see p. 39). The basis of this assertion is not stated. How far this proposal will extend cellular signals, and at what strength, is a key question that MORA should have answered before starting the EA process.

The statement that the signal does not reach Camp Muir is based on information provided in Figure 5.

52. Approval is Pre-Determined As noted above, the EA predicts that a FONSI will issue, regardless of the impacts raised in comments. Further, thus far MORA has billed Verizon and T-Mobile for a total of \$33,367. Given this five-year investment of staff time and the amount of money already spent, the Park is signaling that it has already decided to approve this project.

Telecommunications companies are required to pay expenses for review, including NEPA analysis of applications. This does not guarantee their approval.

53. Public Excluded The NPS rule governing these right-of-way approvals is found at Reference Manual (RM)-53: Special Park Uses, Rights-of-Way, Wireless Telecommunication Facilities. The RM-53 process is in addition to the normal NEPA and National Historic Preservation Act (NHPA)

compliance. RM-53 makes clear that the public must be alerted to the Parks receipt of a cell tower application within 10 days:

RM-53 is not a rule as suggested. It is policy guidance for implementation. The NPS sent notices to "interested parties" known at the time to be telecommunications companies that may be interested in applying for a right of way permit – the purpose is to encourage other applicants to apply at the same time for the purposes of efficiency. RM-53, Appendix 5, Exhibit 6, page A5-48:

"...the superintendent may discuss proposed sites with the licensee to determine which zones, areas, locations, and types of installations are likely to not result in a derogation of park resources, values and purposes.

"Superintendents should review the location of existing utility systems and roads. If utility service and access to the proposed site is already in existence, the park must consider what additional impacts the proposed use might cause and the possibility of additional utility rights of way needed. The potential applicant should be made aware that the NPS decision process considers the full footprint of a WTF site: The tower-antenna-base structure facilities; the access road required for construction and service; and the supplying power and telephone lines. Should any of these disparate parts be found to cause unmitigatable impacts, the entire application would be denied."

54. Receipt of a written application [SF-299] and application fee starts a 120 day clock& Within the first ten days after receipt of an application, the park will use the submitted material to come to an initial decision whether the parks answer will be yes, no or maybe& [See Appendix 5, Exhibit 6, Page A5-50]. Following a 'yes or 'maybe decision by the Park, and no later than 10 days after receipt of the application, the park will& mail notice to the parks list of potential interested parties advising of receipt of application, if the park has developed such a list, or by posting a notice of receipt of application for a WTF site in a newspaper of general circulation in the affected area and/or in the nearest metropolitan area newspaper. The purpose of the notice is [in part] to& promote public and local governmental participation. The Park first received Verizons SF-299 proposal for Paradise in January 2015. The public was not notified until November 28, 2016. RM-53 requires public notification within the first ten days after an application is received.

RM-53 (Appendix 5, Exhibit 6, Page A5-51) states: Following a "yes" or "maybe" decision, and no later than 10 days after receipt of the application, the park will perform the following simultaneous actions.

*"mail notice to the park's list of potential interested parties advising of receipt of application, if the park has developed such a list, or by posting notice of receipt of application for a WTF site in a newspaper of general circulation in the affected area and/or in the nearest metropolitan area newspaper. The purpose of this notice is to notify other FCC licensees authorized to provide wireless communication services within or adjacent to park boundaries, and to promote public and local governmental participation. By these methods, the park will notify other Telecommunication companies and other interested parties in the same area of receipt of the application. **This action is strictly a courtesy notification mostly aimed at other telecommunication companies who might have similar interests, not a request for comments.** Responses, if any, must reach the park within 10 days of the notice being published."*

This notification is about notifying other telecommunication companies to streamline an approval process. The 60-day timeline to complete a NEPA document is not intended to enhance public participation, but to benefit the applicants and streamline the review process. (See response below).

55. In fact, this approval process at MORA had been going on for nearly five years without any real public involvement....MORA not only improperly bypassed NPS rules but deliberately acted to exclude the public until the process had reached a stage where the outcome was already pre-determined.

The NPS did not bypass NPS rules, and did not act to exclude the public. The NPS did, however take longer than the time recommended in RM-53, and appropriately kept the applicants informed of progress as allowed in policy. RM-53 states (page A5-52):

“On or before day 60 after receipt of application, all compliance documents are completed and received in park. If complications arise that delay completion of the document(s), the park and the applicant shall meet and discuss a possible extension of the time limit”

On page A5-46, RM-53 states the following:

“If for some reason, delays occur or are expected to occur in either the EA or EIS process, the park should inform the applicant of the probable delay, the reason(s) for it, and discuss an expected time frame for completion.”

Regarding compliance with NEPA: the RM-53 process does not prescribe public scoping, nor does NEPA or DO-12 or the new 2015 NEPA Handbook. The 2011 DO-12 and 2015 NEPA Handbook supersedes RM-53. In this case, the NPS did provide a 14-day scoping period in in 2016, recognizing the potential controversy surrounding the proposal. Additionally, the NPS provided a 45-day public comment period for the review of the Environmental Assessment, vs the 30 days prescribed in RM-53.

