



United States Department of the Interior

NATIONAL PARK SERVICE
PO Box 168
Yellowstone National Park
Wyoming 82190

IN REPLY REFER TO

H3015(YELL)

CERTIFIED / RETURN RECEIPT

SEP 09 2019

Ms. Mary Hopkins
Wyoming State Historic Preservation Officer
Barrett Building, 3rd Floor
2301 Central Avenue
Cheyenne, Wyoming 82002

Subject: Section 106 Review for Proposed Wireless Broadband Right of Way and Equipment Installation, Yellowstone National Park, Wyoming

Dear Ms. Hopkins:

Access Parks (AP) has submitted an application for a Right of Way (ROW) permit to the National Park Service (NPS) proposing the installation of wireless radios, licensed microwave point-to-point, licensed point-to-multipoint, and license exempt indoor Wi-Fi installations throughout Yellowstone National Park (YNP) and developed areas in Wyoming. This project constitutes an undertaking as defined in 36 CFR §800.16(y), the implementing regulations for the National Historic Preservation Act (NHPA). We request your review and concurrence on our identification of the Area of Potential Effects (APE), identification of historic properties, and determination of effect on those properties.

Proposed Undertaking

In order to supply high-speed internet to park visitors and employees throughout much of YNP's employee housing and visitor areas, AP has proposed to install a large-scale wireless communication system covering Xanterra-controlled residential and boarding properties in Canyon Village, Grant Village, Lake, Mammoth Hot Springs, and Old Faithful. Additional equipment needs for this project include 5 microwave antenna locations, 12 wireless backhaul antennas ranging between 3 and 6 feet in diameter, and up to 484 premise radio transceivers 11 inch diameter or less, installed on single and multi-unit residential and lodging units. In addition to the currently proposed action, NPS anticipates an expanded proposal in the future to accommodate additional installations of equipment on NPS, Delaware North, Medcor, and Yellowstone Park Service Stations, Inc. residential housing units in Canyon Village, Grant Village, Lake, Mammoth Hot Springs, Tower, Roosevelt, and Old Faithful.

Area of Potential Effects

The area of Potential Effects for this project is broad in nature, and includes Canyon Village, Grant Village, Lake, Mammoth Hot Springs, Old Faithful, and the newly installed antenna

mounting structure surrounding the Mount Washburn Fire Lookout, as well as potential installations at Tower and Roosevelt. Enclosure 1 is a full list of proposed antenna locations in table form. Enclosure 1 also notes type and placement of all proposed radio transceivers in the application, and notes whether new penetrations into structures will be necessary. Enclosure 2, the *AccessParks Broadband Installation/ROW Plan for Yellowstone National Park Employee Housing and Xanterra Properties*, contains similar notations regarding antenna types and locations, as well as photo simulations showing antenna size and placement. Enclosure 3 is a full list of housing units that are not within the current proposal, but which are anticipated to be added to the proposal in the future.

Identification of Historic Properties

Buildings currently proposed for installations have all been evaluated for their National Register of Historic Places (NRHP) eligibility, or are age ineligible for inclusion on the National Register. Enclosure 1 contains a column detailing eligibility status for all buildings to be impacted.

Four hundred thirteen (413) of the impacted buildings have been identified as either eligible for inclusion on the NRHP, as contributors to historic districts, or as National Historic Landmarks. The Historic Properties identified include Canyon Lodge, Lake Hotel, The Lake Hamilton Store, 78 Lake Hotel Guest Cabins, 64 Lake Lodge Guest Cabins, Seagull Dormitory, Mammoth Hotel, 97 Mammoth Guest Cabins, the Mammoth Dining Hall, Lodgepole Dormitory, Juniper Dormitory, Spruce Dormitory, Old Faithful Inn, Old Faithful Lodge, 161 Old Faithful Guest Cabins, Laurel Dormitory, and Columbine Dormitory.

Seventy one (71) impacted buildings have been deemed ineligible for inclusion on the NRHP. Of these, 31 are ineligible based on age, 31 are located in historic districts but have been determined to be non-contributing structures, and 9 have been determined ineligible on their own.

Future anticipated proposals include 249 additional buildings throughout the park. Of these, 37 are either listed on the NRHP as individual buildings, or are contributors to an historic district. Six (6) are eligible for the NRHP, but not yet listed. Two hundred and six (206) are not eligible for listing on the NRHP. A full list of additional buildings anticipated for future proposals is located in Enclosure 3.

Determination of Potential Effects

In an effort to reduce or eliminate impacts to the historic fabric of Historic Properties, AccessParks has pledged to take into account the historic nature of properties when installing equipment on the proposed infrastructure. Installations will be similar to satellite TV installations which are ubiquitous throughout the park, but the AccessParks equipment will be smaller and less conspicuous. On Historic Properties, AccessParks states that they will use existing penetrations into buildings, and will disguise the new installations either by locating them inside the attic space, or placing them back from the edge of rooflines where they will be outside of casual view. A full outline of proposed locations and mitigation measures to reduce or eliminate adverse effects to historic properties is included in Enclosure 2.

Given the minimal visual impacts to historic properties outlined in the proposed project, and the

care taken to eliminate new penetrations in historic and unevaluated properties, the NPS finds there will be no adverse effect to historic properties as a result of this proposed undertaking. We seek your concurrence with that determination.

If you have any questions, please contact Tom James, Cultural Resource Specialist, at (307) 344-2715 or Thomas_James@nps.gov.

Sincerely,

Cameron H. Sholly
Superintendent

Enclosures: 3

bcc with enclosures:
Central Files
Superintendent Files
YCR/Cultural Resources Files

bcc w/o enclosures:
Pat Kenney
Bret De Young
John Darr
Tami Blackford
Jennifer Carpenter
Ray McPadden
Doug Madsen
Tobin Roop
Tom James
Zehra Osman
Zach Allely
Peter Galindo
Dale Reinhart
Willie Burhardt
Duane Bubac
YCR Files

FNP:TJames:agd:08/29/2019:2203

