



IN REPLY REFER TO:

United States Department of the Interior

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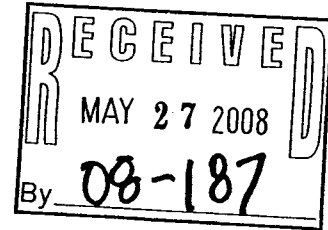
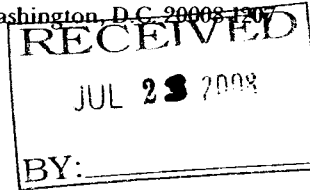
NATIONAL PARK SERVICE

National Capital Region

Rock Creek Park

3545 Williamsburg Lane, N.W.

Washington, D.C. 20008-1207



H14 (NCA-ROCR)

MAY 20 2008

David Maloney
State Historic Preservation Officer
Historic Preservation Division
Office of Planning
801 North Capitol Street, NE, #400
Washington, D.C. 20002

Re: Wireless Telecommunication Facility Plan/Environmental Assessment Rock Creek Park

Dear Mr. Maloney:

In order to meet the conditions of the 2003 *Rock Creek park Telecommunication Facilities EA Finding of No Significant Impact* (FONSI) and to provide a consistent and coordinated process for considering right-of-way permit applications for wireless telecommunication facilities (WTF), the National Park Service (NPS) initiated an Environmental Assessment (EA), which was finalized in 2008.

The Environmental Quality Division of the NPS and consultants The Louis Berger Group, Inc., Rummel, Klepper & Kahl, LLP, and Cityscapes Consulting, Inc. completed the *Rock Creek Park Wireless Telecommunications Plan and Environmental Assessment*. In their report, the Environmental Quality Division and the consultants evaluated the potential environmental impacts associated with proposed actions related to the potential construction of WTF within Rock Creek Park and its administrative units. The EA process led to the identification of Alternative C, Management to Focus on Coverage Gaps, as the preferred alternative. Under this alternative, the park would identify areas where coverage gaps for wireless telecommunication service exist. Applicants would be encouraged to site in these areas provided there exists no conflict with the park mission and the natural/cultural resources the NPS protects. Under this alternative, no permits would be issued for the Forest Zone, the Park Road Zone, the Fort Circle Parks, Dumbarton Oaks Park, and Montrose Park because of desired conditions stated in Rock Creek Park's General Management Plan (GMP) and other applicable documents.

The Rock Creek Park Historic District was listed in the National Register of Historic Places in 1991. The NPS is submitting this EA for review under the provisions of the National Historic Preservation Act of 1966, as amended, and the regulations of the Advisory Council on Historic Preservation.

We look forward to your review of this EA and request your concurrence at your earliest convenience.

If you have any questions regarding this project, please contact Cultural Resource Specialist Simone Monteleone Moffett at (202) 895-6011. Please forward all Section 106 compliance concerns to my office. We look forward to hearing from you soon.

Sincerely,

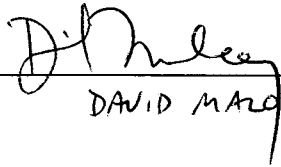


Adrienne A. Coleman
Superintendent, Rock Creek Park

Enclosures

I concur that the proposed project/EA will have no adverse effect upon the cultural resources of Rock Creek Park.

State Historic Preservation Officer

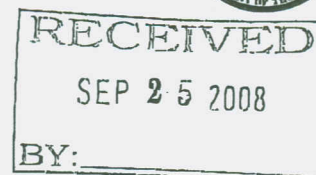

DAVID MARONEY

Date 7-18-08



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240



Adrienne A. Coleman
Superintendent, Rock Creek Park
National Park Service, National Capital Region
3545 Williamsburg Lane, N.W.
Washington, D.C. 20008-1207

Re: Response to H3019 (NCA-ROCR, August 1, 2008 letter)

Dear Superintendent Coleman:

On behalf of the Division of Migratory Bird Management (DMBM) of the U.S. Fish and Wildlife Service (FWS), thank you for the opportunity to review the National Park Service's (NPS) February 2008 *Wireless Telecommunication Plan and Environmental Assessment* (EA). The information provided in this EA is helpful because there continues to be a dearth of scientific study about the impacts to birds and bats from collisions with such towers. Results from the second year of a 3-year study by Dickey and Gates (2008)¹ on two Rock Creek Park cellular telephone towers provided some important preliminary scientific information regarding bird presence and the impacts of these towers on migratory birds. Not unexpectedly – though tall, human-constructed structures can kill birds as a result of collisions – the level of mortality at both towers has been very low.

Based on the Dickey and Gates (2008) report and the recommendations in your preferred alternative, we concur with your Finding of No Significant Impact (FONSI), stating that the proposed project will have minimal impacts on migratory birds. This alternative comports strongly with the FWS's September 2000 voluntary communication tower guidance. Keeping any new antennas to less than 30 feet AGL, using unguyed monopole towers, concealing outbuildings, maintaining wires underground, and minimizing forest fragmentation are all sound and bird-friendly practices.

We note that when the Audubon Naturalist Society of the Central Atlantic States brought suit against the NPS in 2000, the District Court ruled against the NPS in 2002. The FONSI was revised by NPS in 2003 when issues involving the effects of radiation were only beginning to become public. Since then, new findings about the potential impacts of radiation from communication towers on migratory birds – including embryo death, site abandonment, clutch size reduction, reduced chick survivorship, feather deformities, locomotion abnormalities, and death – have been published, primarily based

¹ Dickey, S.D., and J.E. Gates. 2008. The effects of cell towers on birds and bats at Rock Creek Park, Washington, D.C. University Maryland Center for Environmental Science, Appalachian Laboratory, Frostburg, Draft Annual Report 2007, submitted to NPS February 19, 2008. 21 pages.

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Clinton Riley, Deputy Chief
Division of Migratory Bird Management

on research conducted in the laboratory in the United States and in the field in Europe. However, European field studies need to be replicated in the U.S. to assess how radiation may affect migratory birds and bats. In light of these factors, we ask you to consider a review of radiation impacts from cellular telephone towers evaluated under your EA.

If you are willing to entertain such research at the two Rock Creek towers, or others where nesting activities have historically been documented, we are willing to work with you to develop and refine a radiation research protocol. A radiation study under the auspices of this EA would help to answer the question about cumulative impacts from tower collisions and radiation.

Should you have further questions about these recommendations and the need for a radiation study, please contact Dr. Albert Manville at albert_manville@fws.gov or 703/358-1963.

Sincerely,

A handwritten signature in black ink, appearing to read "Clinton Riley", with a stylized flourish extending from the end.

Clinton Riley, Deputy Chief
Division of Migratory Bird Management



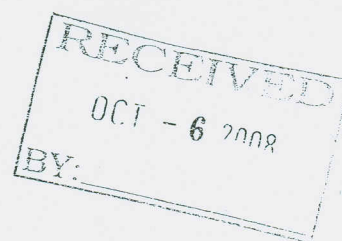
United States Department of the Interior

FISH AND WILDLIFE SERVICE

Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis, MD 21401
(410) 573-4575



OCT 03 2008



Ms. Adrienne A. Coleman
Superintendent, Rock Creek Park
National Park Service
3545 Williamsburg Lane, N.W.
Washington, D.C. 20008-1207

Re: Rock Creek Park Wireless Telecommunication Plan and Environmental Assessment

Dear Ms. Coleman:

As requested in your letter of June 17, 2008, we have reviewed the referenced document. This response is provided in accordance with Section 7 of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*). The Federally listed endangered species of concern in Rock Creek Park is the Hay's Spring amphipod (*Stygobromus hayi*).

All of the action alternatives in the referenced plan would exclude wireless telecommunication facilities from locations within the Park Forest and Park Road Zones, the areas where the Hay's Spring amphipod occurs. Based on this information and the analysis provided in your Wireless Telecommunication Plan and Environmental Assessment, we concur with your conclusion that the preferred alternative would have no effect on the Hay's Spring amphipod.

Thank you for the opportunity to comment. Should you have any questions regarding this response, please contact Andy Moser of my Threatened and Endangered Species Program at (410) 573-4537.

Sincerely,


Leopoldo Miranda Castro
Field Supervisor