

**Attachment SF299 U.S. National Park Service – Big Bend National Park  
Commnet Telecommunication Facility – Panther Junction**

**1) Name and address of applicant**

Commnet Four Corners, LLC  
Attn: Kevin Hayes, Vice President, Site Engineering and Operations  
1562 Park St. #A  
Castle Rock, CO 80109

**2) Name and address of authorized agent if different from item 1**

Cheryl Eamick  
Right of Way Agent  
8750 E Speedway Blvd., STE 230  
Tucson, AZ 85710

**3) Telephone:** 520-829-6200

**Applicant:** Kevin Hayes, Vice President, Site Engineering and Operations  
**Authorized Agent:** Cheryl Eamick

**4) As applicant, are you?** (b) Corporation (LLC)

**5) Specify what application is for:**

(a) New authorization

**6) If an individual, or partnership, are you a citizen(s) of the United States?** Yes. (US-based LLC)

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**7) Project description (*describe in detail*): (a) type of system or facility (e.g., canal, pipeline, road); (b) related structures and facilities; (c) physical specifications (*length, width, grading, etc.*); (d) term of years needed; (e) time of year of use or operation; (f) volume or amount of product to be transported; (g) duration and timing of construction; and (h) temporary work areas needed for construction.**

**Project Background**

Commnet Four Corners, LLC (Commnet) is presenting this application to support the installation, operation, and maintenance of a telecommunication facility in the Panther Junction area of Big Bend National Park (the Park), in Brewster County, Texas (the Project). The telecommunication facility is proposed for placement within a new 2,206 square foot (0.050 acres) permit area.

Commnet is a wireless service carrier providing wireless wholesale roaming services in remote locations where there is little telecommunication infrastructure. The goal of the Project is to provide roaming services to additional carriers and supply a co-location opportunity for AT&T and Big Bend Telephone, as well as others who have a need to obtain service connections both within and outside the Park.

The proposed project will include facilities to serve the FirstNet Nationwide Safety Public Broadband Network ("FirstNet network") as well as the wireless carrier AT&T's commercial customers. The FirstNet network will provide first responders with priority access to wireless communications services on a single nationwide network, enabling increased coordination among first responder agencies and decreased response times. To expedite FirstNet deployment,

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Commnet Wireless, LLC (“Commnet”) is assisting AT&T in obtaining all requisite leases, approvals, permits and materials

In its partnership with the First Responder Network Authority, AT&T is responsible for building, maintaining, and upgrading the FirstNet network for the next 25 years. In order to support FirstNet, AT&T will be upgrading its existing wireless sites and building new wireless facilities throughout Texas. AT&T’s upgrades include deployment of the new frequency band (“Band 14”) supporting the FirstNet network. In 2012, the U.S. Congress set aside Band 14 for use by first responders. FirstNet Built with AT&T is designed to be reliable, functional, safe, and secure, and it will provide optimal levels of operational capacity at all times.

**Purpose and Need**

The purpose of the proposed Project is twofold: (1) ensure the installation of the proposed telecommunication system to solve the current problem of low capacity or non-existent wireless telecommunications service within the Park, serving park staff, residents, and visitors, as well as transport wireless signal to telecommunication sites outside the Park serving rural communities in the area (2) to install the telecommunications facility in a manner that prevents unnecessary degradation of the natural, cultural, historic, recreational and scenic resources of the Park.

The need for the Project is to provide wireless cellular service to cover current gaps and propagate wireless coverage to other telecommunication sites located within and outside of the Park boundary. These roaming services may be utilized by multiple carriers through acquiring wholesale roaming services from Commnet’s proposed facilities, as well as AT&T and the First Responder Network Authority.

**(a) type of system or facility (e.g., canal, pipeline, road).**

Wireless telecommunication facility.

**(b) related structures and facilities.**

50-foot monopole with 3 antennas, 2 radios, and 1 cabinet. Please see the attachment for the full equipment list.

**(c) physical specifications (length, width, grading, etc.).**

Physical specifications include the 2206 square foot permit area needed to house a 50-foot monopole with a 4-foot lightning rod.

**(d) term of years needed.**

The term requested is 10 years.

**(e) time of year of use or operation.**

The telecommunication facilities will be in use year-round. Regular maintenance activities will be scheduled and coordinated to avoid or minimize service interruptions to customers served by the facilities. Emergency repair and maintenance will occur immediately as needed. Commnet will provide required notice to Park staff in the event of planned maintenance and will notify Park staff within 24 hours of emergency repairs.

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**(f) volume or amount of product to be transported.**

The Project would transport 5G wireless cellular roaming service.

**(g) duration and timing of construction.**

Construction of the Project will take four to six weeks, with a target to start construction by the end of August 2022.

**(h) temporary work areas needed for construction.**

There are no temporary work areas proposed.

**8) Attach a map covering area and show location of project proposal?**

Please see the attached construction drawings and survey.

**9) State or local government approval:**

Applications for all required state and local approvals have already been or will be submitted during NPS review and approval process, as appropriate.

**12) Give statement of your technical and financial capability to construct, operate, maintain, and terminate system for which authorization is being requested.**

Commnet Wireless, LLC, the parent company of Commnet Four Corners, LLC, and a subsidiary of ATN International, is a wireless telecommunication company operating hundreds of similar telecommunication sites in 10 states. ATN International has typical annual profits of 20 million and owns 275 million in physical assets, thus is financially capable of constructing, operating, maintaining, and terminating the telecommunication facility.

**13a) Describe other reasonable alternative routes and modes considered.**

Commnet considered six alternatives before proposing the Preferred Alternative. The sites considered were either co-located with existing telecommunications sites or in already developed areas of the Park. The alternatives considered are listed below and shown in the attached map as Exhibit A- Alternatives Dismissed.

1. Water Tanks – Existing developed water tank site
2. Chisos Basin – Existing telecommunication site
3. Persimmon Gap- Existing developed area in the Park
4. Nine Point Mesa- Existing telecommunication site
5. Choate- Existing telecommunication site
6. Panther Junction POP site
7. Panther Junction Alternative
8. Alternative 8 Panther Junction behind NPS building

**13b) Why were these alternatives not selected?**

**1. Water Tanks Alternative**

The Water Tanks Alternative was reviewed, and Commnet's Transport Engineering Team determined that due to the terrain, they were not able to get the signal back to the existing Choate

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site. This would have resulted in the need for additional towers to transport the signal and provide needed coverage.

**2. Chisos Basin Alternative**

The Chisos Basin Alternative was not chosen due to potential effects on natural and cultural resources. Commnet was asked to review other alternatives. Please see attached letter from Bob Krumenaker, Park Superintendent.

**3. Persimmon Alternative**

Commnet's Transport Engineering team reviewed the Persimmon Alternative, and they determined it would require additional towers within the Park to transport the wireless signal. This Alternative would have also resulted in substantially less coverage for the Park.

**4. Nine Point Mesa Alternative**

The Nine Point Mesa Alternative is an existing telecommunication site outside of the Park boundary. Commnet has tried to reach an agreement with the landowner multiple times in the past and was unable to come to terms with the landowner.

Additionally, Commnet Transport Director indicated the Nine Point Mesa alternative would again require additional towers to transport the signal. This alternative would have resulted in less coverage for the Park.

**5. Choate Alternative**

The existing tower site located on Choate Mountain does not fulfill the coverage objective requirements for Commnet and AT&T.

**6. Panther Junction POP site**

The Panther Junction POP site was originally the Preferred Alternative because Commnet has an existing permit for a pole and communication dish at the location. After reviewing with Park staff, it was determined it had the potential to impact historic properties and visual resources for existing residences in the vicinity of the site.

**7. Panther Junction Alternative site**

This location would have required a new road to access the proposed permitted area. Per Section 8.6.4.1 of NPS Management policies 2006 "New roads may not be permitted with a right-of-way permit but require specific statutory authority."

**8. Alternative 8**

This alternative was rejected because it was located near an area of the Park's operations and may have caused an access concern.

**13c) Give explanation as to why it is necessary to cross federal lands.**

Crossing federally owned land is unavoidable as the signal needed to transport cellular service within the Park and outside the Park was determined to be located within the Park boundary.

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**14) List authorizations and pending applications filed for similar projects which may provide information to the authorizing agency (*Specify number, date, code, or name*).**

Chisos Basin Tower and Firehouse Sites – ROW Permit Number: RW 7130-19-001  
Panther Junction POP Microwave Site – ROW Permit Number: RW 7130-18-002

This application will also be accompanied by a proposal from AT&T Wireless and Big Bent Telephone Company to co-locate in the event the new tower at this location is approved.

**15) Provide statement of need for Project, including the economic feasibility and items such as: (a) cost of proposal (*construction, operation, and maintenance*). (b) estimated cost of next best alternative; and (c) expected public benefits.**

**(a) Cost of proposal (construction, operation, maintenance):**

The approximate cost to build, operate and maintain the tower site for Commnet will be \$200,000 with annual maintenance of \$2,500 thereafter.

**(b) Estimated cost of next best alternative**

The next best alternative is the Panther Junction POP Site Alternative, and it would have relatively the same construction and maintenance costs as the Preferred Alternative. This Alternative was dismissed due to potential effects on historic properties and visual resources for nearby residences.

**(c) Expected public benefits**

The Project will create new telecommunication connectivity for underserved rural communities, residents, and staff at the Park, providing opportunities to access sufficient bandwidth to enable data-intensive applications such as video transmission access which will benefit K-12 public education, higher education, and telemedicine.

**16) Describe probable effects on the population in the area, including the social and economic aspects, and the rural lifestyles.**

The Project will help mitigate the immediate health, safety, and economic effects of the COVID-19 pandemic, provide long-term economic growth opportunities as well as more reliable wireless service, allowing Park staff to provide even more timely emergency response services.

**17) Describe likely environmental effects that the proposed Project would have on:**

**(a) air quality; (b) visual impact; (c) surface and groundwater quality and quantity. (d) the control or structural change on any stream or other body of water. (e) existing noise levels; and (f) the surface of the land, including vegetation, permafrost, soil, and soil stability.**

**(a) Air quality**

Construction of the Project will have no effect on air quality. Applicant and its contractors will use industry best practices to mitigate fugitive dust during construction activities.

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**(b) Visual impacts**

The Project is proposed in an already developed area of the Park and will have some effect on visual resources in the immediate vicinity. Photo simulations are attached and include this proposal as well as co-location of both AT&T and Big Bend Telephone Equipment.

**(c) Surface and ground water quality and quantity**

No effects on water resources are anticipated.

**(d) Control or structural change on any stream or other body of water**

The Project would not require control or structural change of any perennial stream or other permanent body of water.

**(e) Existing noise levels**

After installation, the proposed system will not emit any noise beyond the current noise levels in the vicinity. Noise levels resulting from construction would be temporary. The Project would use batteries for backup power, which do not emit any noise when they are in use. The Project will comply with all local noise ordinances during construction, maintenance, and operation of telecommunication facilities.

**(f) The surface of land, including vegetation, permafrost, soil, and soil stability**

Commnet would need to grade the proposed permit areas for access, telecommunication site area, and temporarily disturb the ground surface to install utilities to support the Project. The access road and telecommunications site would require the removal of existing vegetation in areas that are proposed for permanent use.

In the event landscaping, hardscaping or grassy areas are disturbed during construction, these areas will be restored as close to original conditions as is practicable. Should any areas require replanting or seeding, Commnet will use the Park's recommendations for plant salvage, new plantings, and approved seed mix.

**18) Describe the probable effects that the proposed Project would have on (a) populations of fish, plant life, wildlife, and marine life, including threatened and endangered species; and (b) marine mammals, including hunting, capturing, collecting, or killing these animals.**

(a) The Project would not have negative effects on fish, plant life, wildlife, or marine life. There are no known threatened, or endangered species, or critical habitats present within the proposed Project area.

(b) The Project would not have any negative effects on marine mammals, nor include any hunting, capturing, collecting, or killing of these animals.

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**19) State whether any hazardous material, as defined in this paragraph, would be used, produced, transported, or stored on or within the right-of-way or any of the right-of-way facilities, or used in the construction, operation, maintenance, or termination of the right-of-way or any of its facilities.**

No hazardous material will be produced, transplanted, or stored on or within the proposed Permit Area.

**20) Name all the Department(s)/Agency(ies) where this application is being filed.**

National Park Service- Big Bend National Park

# EXHIBIT A – Alternatives Dismissed

Nine Point Mesa - Dismissed

Persimmon Gap Visitor Center - Dismissed

Choate Tower - Dismissed

Panther Junction Alternative 8  
Panther Junction Alternative - Dismissed

Water Tanks - Dismissed  
Chisos Tower - Dismissed

Big Bend National Park

Terlingua

Google Earth

Imagery Date: 2/1/2017 29°46'43.48" N 103°44'02.70" W elev 3654 ft eye alt 30.36 mi