

Public Comments and NPS Responses  
 Regarding Commnet Application for  
 Installing a 54-foot Tall Telecommunications Monopole in the  
 Panther Junction Developed Area,  
 Big Bend National Park, Texas

<b>Comment Number</b>	<b>Topic of Comment</b>	<b>Response to Comment</b>
2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 15, 17, 18, 19, 20, 21, 22, 23, 24, 25, 27, 28, 31, 34, 35, 36, 37, 39, 40, 42, 45, 46, 47, 48, 50, 53	General support for the project	Thank you for your comment.
11, 16, 26, 29, 30, 38, 41, 43, 52	General opposition to the project	Thank you for your comment.
7, 11, 32	Concern for potential for light pollution. Opposes lights on monopole. Even small status lights at ground level should be shrouded to prevent interference with astrophotography.	<p>The National Park Service (NPS) agrees that natural dark is an important resource and strives to protect it. NPS stipulated to the applicant that the monopole must not have lights. There would also be no lights on the ground.</p> <p>The proposed monopole would not have lights. It would be 50-foot-tall with a 4-foot lightning rod (54 feet total), and the Federal Aviation Administration (FAA) has certified that the proposed facility would not be a hazard to air navigation and does not require aircraft warning lights.</p>
11, 13, 26, 44, 52	Concern for impacts to views. Consider designing monopole to look like a saguaro cactus or pine tree to blend into the landscape. Concerned that monopole would be visible from a key observation point.	<p>NPS agrees that views, viewsheds, and scenic values are important resources and strives to protect them. NPS carefully considered potential effects on views and used techniques such as balloon tests and photographic simulations to evaluate them.</p> <p>The 54-foot monopole and lightning rod replaces an existing 30-foot-tall Big Bend Telephone monopole in an already developed area of the park containing numerous power poles, buildings, shade structures, etc. It would not be silhouetted against the sky or viewable on a skyline, except from part of the Panther Junction administrative site, which is a non-public area. Viewed from public areas, its brown color would help it blend in with the mountains in the background.</p>

		The proposed location is not visible from any significant public vantage point, as shown in the photo simulations. The key observation points were selected based upon NPS staff knowledge in order to cover all of the significant vantage points in the area. NPS has determined that additional visual impacts are negligible.
11, 16, 30, 38	Thinks current cell service is adequate, and monopole is not needed. Some cell phones and other devices have emergency communication via satellites.	The purpose of this proposal is to establish, operate, and maintain an interoperable public safety broadband network available to all public safety agencies and first responders. Satellite communication does not support the scope of this proposal. FirstNet is intended to support first responders by connecting them to the Land Mobile Radio network and providing priority access to those using the service to ensure connection is not lost. iPhone 13 and iPhone 14 provide satellite services in an emergency, but they do not provide an interoperable network.
16	Asks if environmental studies have been done.	The park's interdisciplinary team completed a NEPA environmental screening form and conducted biological, archeological, and visual resource studies and surveys. Available information indicated that further study was not required for the project. See responses to comment #52 for more information on the environmental analysis (NEPA) pathway.
21, 29, 51	Concerned that AT&T is the only provider. Should give access to all major cell phone providers.	The purpose of FirstNet is to establish, operate, and maintain an interoperable public safety broadband network available to all public safety agencies and first responders. In addition, this project will provide extended wireless AT&T LTE coverage for visitors, employees, and residents within this area of Big Bend National Park. However, the monopole is not exclusive to AT&T. Big Bend Telephone and Commnet will also have equipment installed on this monopole. Each provider requires a separate Right of Way from the NPS.  NPS limited the height of the monopole to 50-feet-tall with a 4-foot lightning rod (54 feet total) in order to minimize visual impacts, which limits the ability for other providers to add their equipment. However, other providers such as Verizon, have the option to utilize Commnet equipment to provide service in the area.
33	Suggests expanding project to include a GMRS network.	A GMRS (General Mobile Radio Service) is outside the scope of this proposal and would not meet the purpose of the project.
38, 41, 43	Comes to the park to disconnect. Cherishes the sense of isolation and lack of services while there.	The purpose of this proposal is to establish, operate, and maintain an interoperable public safety broadband network available to all public safety agencies and first responders. The ability for visitors to utilize the service is an additional benefit that they can choose not to use if they want to remain disconnected.
40, 50	Favors expanding the project to include cellular	Additional facilities are outside the purpose and scope of this proposal .

	facilities at Castolon and Rio Grande Village	
49	Concerned about noise, especially low-frequency noise. States that noise assessment should not use A-weighted decibels but should use C-weighted decibels.	<p>NPS agrees that natural quiet and natural sounds are important resources and strives to protect them.</p> <p>The applicant (Commnet) responded to the technical questions raised by the commenter as follows:</p> <p>The Project is not anticipated to make any new low or high frequency noise in the area. According to Noise Engineers (a CENSEO company), general noise sources associated with cell towers include its air-conditioning units and generators. The Project has neither an air-conditioning unit nor a generator. It will use batteries in place of a generator. The power is converted at the pole by a residential-type transformer. Supply power is connected directly to the monopole through a power supply box in the equipment cabinet. Concern related to weighted A (dbA) vs. weighted C (dbC) in the evaluation of the monopole is not warranted as the monopole will not generate noise. C weighting is typically used to calculate low frequency noises generated by machines and aircraft such as in the study commentor provided, however C-weighting is less severe on low frequencies than the A-weighting (CED, n.d). C-level weighting is used for high level noise (as in the study provided) and therefore not used where no high-level noise is anticipated. That is why typically in studies done for telecommunication facilities they are measured in A-weighting because it still provides a substantial low-level attenuation (Long, 2014). Even if the Project were to emit some noise, it would not be strong enough to create sensitivity or generate sound that carries over long distance.  <a href="https://noiseengineers.com/environmental-noise-cell-tower/">https://noiseengineers.com/environmental-noise-cell-tower/</a>  <a href="https://www.pembroke-ma.gov/sites/g/files/vyhlif3666/f/uploads/cell_tower_site_plan_-_environmental_sound_assessment_report_-_rcvd_11-15-21.pdf">https://www.pembroke-ma.gov/sites/g/files/vyhlif3666/f/uploads/cell_tower_site_plan_-_environmental_sound_assessment_report_-_rcvd_11-15-21.pdf</a>  <a href="https://www.sciencedirect.com/topics/engineering/c-weighting">https://www.sciencedirect.com/topics/engineering/c-weighting</a></p>
52	Objects to National Environmental Policy Act (NEPA) pathway, thinks Environmental Assessment (EA) is necessary	<p>The NPS uses four pathways, or levels of analysis and documentation, to comply with NEPA. The appropriate pathway is determined following interdisciplinary review and consideration of potential impacts from the undertaking. For actions that have been found to have no potential for individual or cumulative significant environmental impacts under ordinary circumstances, but whose potential for environmental impacts warrants some level of analysis and formal documentation, the appropriate pathway may be a Categorical Exclusion (CE) with documentation.</p> <p>If an action fits within a CE it is not exempt from NEPA; however, it is exempted from the requirement to prepare an Environmental Assessment (EA) or Environmental Impact Statement (EIS).</p>

		<p>This project is different from some others that had an EA prepared because it is being constructed within an already developed area of the park, it is replacing an existing communication monopole, it would be relatively short, and it does not require additional infrastructure such as roads, powerlines, data transmission lines, generators, etc.</p> <p>A decision on the proper NEPA pathway will be made following the public comment review.</p>
52	Claims the project does not fall under any NEPA categorical exclusions	<p>A categorical exclusion (CE) describes a category or type of action that does not cumulatively or individually have the potential for significant environmental impacts. For the project under consideration, the proposed action could appropriately fit into more than one CE category.</p> <p>The park’s natural and cultural resources have been evaluated for this action, and no significant impacts have been identified. As part of the evaluation, NPS has conducted biological, archeological, and visual resource studies and surveys for the project.</p>
52	Objects to the park asking for public comment on the proposal	<p>Council on Environmental Quality (CEQ) regulations require agencies to “encourage and facilitate public involvement” and to make diligent efforts to involve the public in the NEPA process (1500.2(d); 1506.6(a)). NPS has and continues to follow the NEPA process as defined in 2015 NPS NEPA Handbook and is not relying on the public to provide information related to major resource impacts or concerns. The public comment process provides a way to involve the interested and affected public in the NEPA process.</p>
52	Claims the project conflicts with the park’s mission. Claims the proposal violates NPS Management Policies.	<p>NPS evaluated the project and found it would not cause an unavoidable conflict with the park's mission and that it meets all other criteria discussed in Section 8.6.4.3 of NPS Management Policies of 2006. This section of NPS Management Policies also directs superintendents to "consider the potential benefit of having telephone access to emergency law enforcement and public safety services."</p>
52	Thinks the project affects wilderness values	<p>NPS evaluated the project and found that it is not located in a wilderness area and that the availability of cellular service within the wilderness area would not have a significant impact upon use of the wilderness area.</p>
52	Disputes that other options have been explored.	<p>During evaluation of other potential options, it was determined that co-location on existing towers would not provide coverage in the areas needed and that micro-sites would require numerous additional locations, resulting in greater impacts. For example, the option of co-locating FirstNet on the Chisos Basin site was rejected because the topography of the mountains that surround the Basin would have prevented the signal from reaching areas where it could be effectively used.</p>

52	Claims that park has approved 3 cellular facilities in the past without proper compliance.	There is only one cellular facility within the park – in the Chisos Basin – and compliance for it was completed in 2017. The Choate Mountain facility is on privately-owned land where NPS has no authority.
52	Asks if tribal consultation has occurred	Tribal notification was conducted following the Nationwide Programmatic Agreement and applicable laws. Tribes or Nations either indicated no effect or no interest or did not respond within the allotted time frame + 15 days.
52	Asks about cumulative effects	NPS has evaluated the project and has determined that it would not have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects.
52	Requests a more detailed coverage map	A revised coverage map has been completed and is available on the PEPC public portal.