

The National Park Service's (NPS) Incomplete Inventory of Cell Towers March 2021

Based upon the “NPS Commercial Cell Facility Inventory” (dated December 3, 2020), thirty-three (33) units of the National Park System have cellular facilities; 17 of those are “national parks.” Of the other 16 units, 8 are national recreation areas and two are national preserves. There is also one national seashore, one mountain park, one memorial parkway, one park, one national monument, and one performing arts center listed.

The document lists 109 rights-of-way (ROWs). Of these, 66 are “active,” with the remaining either “expired” (19), “no valid permit” (14), or “lapsing” (10). Thus, of the 109 listed, only 66 are “active” and 43 are problematic, meaning that only 61% are active and legal. Notably:

1. Santa Monica Mountains National Recreation Area leads all NPS units with 13 ROWs (12 are without any valid permit; one is active)
2. Yosemite National Park has 10 ROWs. Not one was issued following proper compliance with National Environmental Policy Act, National Historic Preservation Act, or NPS policy as embodied in Reference Manual-53 in that there was no public notice or input for any of them.
3. Yellowstone National Park is next with 9 ROWs. One is expired; two are lapsing.
4. Lake Mead National Recreation Area has 9 ROWs. Two are expired.

Based upon information available to PEER several cell towers are missing from this inventory, including:

- Big Bend National Park: cell tower installed in 2017 or 2018 in Chisos Basin. No known compliance with any law or policy.
- Bryce Canyon National Park: Finding of No Significant Impact (FONSI) for new cell tower at Science Hill signed by Superintendent Mazzu and Regional Director Reynolds in June-July 2020. Press release of July 14, 2020 states: “The next step will be to complete an appraisal to determine the annual use and occupancy fee Verizon would be required to pay to the NPS, which can take up to six months.”
- Grand Canyon National Park: FONSI for up to five new cell towers signed on November 19, 2020, before this 12/3/20 inventory was finished.
- Grand Teton National Park: FONSI approving 13 new cell towers in 9 locations signed in August 2019. The only ROWs mentioned in the NPS inventory are from many years ago on Signal Mountain. Even if the ROWs for these new towers have not been formally issued, they should be listed on this inventory as “pending.”*

- Sequoia National Park: FONSI for a new Verizon tower at Wuksachi Village signed in February 2019. The only ROW for Sequoia in the inventory is expired and relates to an AT&T facility at "Ash Mtn. Generals Highway (entrance station to Hdqs.)."

Other parks with cell tower proposals likely to be approved (because none has ever been rejected), include Crater Lake and Olympic, over which PEER is currently pursuing a Freedom of Information Act (FOIA) lawsuit to obtain details. In addition, Glacier National Park is drafting a park-wide Telecom Plan that is likely to result in at least a few new cell towers. PEER has a pending FOIA request with Glacier filed back in September 2020 for which we have yet to receive any responsive documents.

*In document PEER obtained under FOIA from Yellowstone National Park, notes from its Wireless Telecommunications Committee Agenda for September 17, 2020 under "Diamond GRTE SharePoint Site" read:

"5 cell towers up already (Kelly, Moose, Beaver Creek, Jenny Lake Lodge, and Signal Mountain Lodge, Flagg and Colter Bay will go up later this month."

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