



Public Employees for Environmental Responsibility

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Proposed Telecommunications Infrastructure Expansions at Mount Washburn and Other Yellowstone National Park Areas

Comments submitted by

Public Employees for Environmental Responsibility (PEER)

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Introduction

Yellowstone National Park has announced its intent to authorize a massive commercial cellular expansion that would result in a more than a fifty-fold increase in bandwidth, bathing the park and much of its remote backcountry with 4G signals to enable video streaming, music downloads, and online gaming. Planned work is so extensive that one of its most visited venues, Mt. Washburn, will be closed to the public during construction.

The sixteen slated telecommunications augmentations include –

- A new 95-foot cell tower at Canyon (the park’s first “monopine”) and a new Verizon microwave tower at Lake, next to a tower that hosts a Qwest microwave dish;
- A new industrial “antenna support structure” at Mt. Washburn, wrapped around three sides of the historic fire lookout tower (which is eligible for the National Register of Historic Places); and
- Facilities to support “increased bandwidth for voice and data” at Old Faithful.

As detailed in our comments filed on March 2, 2017, PEER urges that this planned project be withdrawn because, among other flaws, drawbacks and adverse effects, it –

- Improperly impairs park resources and values;
- Illegally avoids statutorily required environmental and historical preservation reviews;
- Violates several National Park Service (NPS) rules to protect scenery and soundscapes and to ensure required public notice and involvement;
- Makes improper use of park resources for purely commercial uses; and

- Diverts substantial resources away from priority YNP infrastructure needs.

To our knowledge, the concerns raised in these earlier comments have yet to be addressed.

COMMENTS

With respect to the adverse effects on historic or cultural resources this project would have and the Park's obligations to comply with the requirements of the National Historic Preservation Act, we offer the following comments:

I. Project Aggravates Adverse Impacts on Mt. Washburn Historic Values

One of Yellowstone's most iconic features is Mt. Washburn. Its historic fire lookout tower is eligible for the National Register of Historic Places.

Mt. Washburn is currently festooned with at least 35 antennas and microwave dishes, many of them relating to cellular service in the Park. These have all been added since 1980 (the cellular antennas were added starting in 1996).

This plan would encircle the fire lookout with new microwaves dishes covered by vaults, surrounded by new lattices and antennae. The net result would further transform scenic Mt. Washburn, the park's highest point, into a hulking telecommunications bunker.

II. Cumulative Effects at Mt. Washburn Ignored

Yellowstone National Park has yet to conduct an examination of the "cumulative effects" of such a conglomeration on the scenery at Mt. Washburn or on the viewshed from this historic structure.

III. Reneged Promise on Old Faithful Historic District

Under this expansion, the Old Faithful cell tower would be supplied with increased bandwidth for voice and data. The tower remains clearly visible from much of the Old Faithful Historic District, despite the Park's 2009 promise to relocate the structure to a less intrusive spot. The plan contains no mitigation of this adverse effect. Nor has Yellowstone National Park taken any apparent steps to fulfill its 2009 promise to relocate this tower.

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