



Pacific PEER

Public Employees for Environmental Responsibility

Glacier Scoping Comments

These comments are submitted on behalf of Public Employees for Environmental Responsibility (PEER).

1. Glacier Should Acknowledge Organic Act Mandate

The mission of the National Park Service (NPS), as set forth in the Organic Act, is to protect and safeguard park scenery, wildlife, soundscape, natural or historic places, and other assets for current and future generations. This mandate takes precedence over any NPS role with respect to the Telecommunications Act of 1996.

Thus, Glacier should not approve any applications for wireless communications facilities if they impair or detract from park scenery, wildlife, soundscape, natural or historic places. That precondition should be made an explicitly clear precondition in park planning.

2. Glacier Lacks Coherent Rationale

The short scoping notice lays out a confusing and cryptic mix of objectives:

- One is to “Correct deficiencies in telecommunications systems that provide critical support for NPS operations” without explaining what this means;
- Another posits a need to “Provide for basic connectivity (e.g. cellular and/or data) for non-governmental use in developed areas” without explaining the need for that step. At the same time the notice states that connectivity will be provided “while preserving the ability to experience park resources and values” without explaining how that conflict manifests itself or what is required to preserve the park “experience”;
- Yet, another objective pledges to “Protect park resources by establishing parameters for telecommunications infrastructure, equipment, and coverage” without explaining what those parameters are;
- Even as it seeks to expand connectivity, another objective is to “Minimize the amount of telecommunications infrastructure in the park.” Arguably, not providing connectivity would best minimize infrastructure. However, this objective seems to imply that it will increase telecommunications infrastructure while saying the opposite; and
- Finally, an objective would be to “Enable a flexible response to changing communications needs and technological advances.” What this means and how it would be implemented is not explained.



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In short, the Glacier scoping notice reads like a used car salesman pitch, full of buzz words with little substance. This lack of coherence strongly suggests that the park will merely be following directions by telecommunications companies and provide glib but evasive explanations to the public. Glacier should go back to the drawing board and develop a sharp focus and a clear rationale for what it proposes to pursue.

3. Protect Wilderness and Backcountry

Several national parks that have approved cell towers in developed areas now have significant spillover into their backcountry. For example, two-thirds of Yellowstone's backcountry now has cell coverage through supposedly inadvertent signal spillover.

Glacier has nearly one million acres of wilderness eligible backcountry. Stopping the spillover of signals is essential to preserving the backcountry experience at Glacier.

The park needs to do more than just seek to avoid spillover or merely consider technologies to reduce spillover into the backcountry. Glacier should make confining any coverage to developed areas a precondition for any approvals. The park must not tolerate any signal spillover into the backcountry.

4. Preserve Historic Resources

Glacier should be explicit from the earlier stages of planning (i.e., now) about which, if any, of the park's historic districts, structures, and landmarks could be affected by its telecommunications plans and, if so, how.

Any potential impact should immediately trigger the consultation process required under Section 106 of the National Historic Preservation Act (NHPA).

5. Lack of Alternatives Is Inappropriate

The only alternative referenced in the scoping notice is a "No Action Alternative." That approach suggests that Glacier's approach is an all or nothing stance. Like many parks, Glacier appears to regard National Environmental Policy Act (NEPA) as a paper exercise that blocks rather than invites meaningful public input and mature consideration of a number of alternatives.

Given the range of possible actions Glacier is contemplating, the lack of a range of alternatives is both inappropriate and a violation of NEPA.

6. Violation of NPS Policies

In its July 2019 report ("The NPS Needs to Improve Management of Commercial Cellular Facilities' Right-of-Way Permits and Revenues"), the Department of Interior's Office of Inspector General criticized NPS for mismanaging its cellular approvals and violating its own policies, most notably a range of activities, from the NPS Reference Manual 53 (RM-53).



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Rather than heed the IG findings, Glacier appears to be joining the parade of non-compliant parks.

PEER urges that Glacier commit to compliance with RM53 which provides, among other things, that the park must:

- ✓ Notify the public and other telecom companies of the receipt of an SF-299 application;
- ✓ Post the complete SF-299 application (with accompanying documentation) online at PEPC;
- ✓ Open a NEPA and NHPA public comment period; and
- ✓ Mail notice to the park's list of potential interested parties advising receipt of application, if the park has developed such a list, or by posting a notice of receipt of application for a site in a newspaper of general circulation in the affected area and/or in the nearest metropolitan area newspaper.

PEER suspects that Glacier has been in discussions with months (if not years) with telecommunication companies without notifying the public. If so, the park is already out of compliance with NPS policy.

When Glacier initiates NEPA and NHPA public comments, please add PEER to the mailing list that you are preparing for this plan, and please notify us whenever a complete SF-299 application has been received.

7. Avoid Monopoles and Lattice Towers

NPS Management Policy 8.6.4.3 concerning monopole and lattice towers, states, in part, that:

“New traditional towers (i.e., monopole or lattice) should be approved only after all other options have been explored. If a traditional tower is necessary, it should not be visible from any significant public vantage point.”

Glacier should make explicit provisions for complying with this Management Policy.

8. Minimize Danger of Distracted Drivers

Glacier's scoping notice references “maintaining employee and visitor safety” without explaining how telecommunications facilities will accomplish that end.

On the other hand, it is unclear whether Glacier intends to provide cellular coverage to its roads. The concern is the danger that distracted drivers pose on winding, often poorly-lit park roads.

In national parks, more cellular service equates with more accidents. In recognition of this, Yellowstone's wireless planning pledges to minimize cellular coverage on its roads. PEER urges Glacier to do the same.



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9. Protect Natural Soundscapes

Penetrating human sounds both disturb wildlife and compromise the visitor experience. In addition to blocking spillover in the backcountry, Glacier should also be concerned about the soundscape in its developed areas. The incessant chirp of cell phones and related devices detracts from natural soundscapes. PEER urges Glacier to consider measures, such as “no cell areas”, in order to preserve, to the extent possible, a semblance of natural sounds throughout the park.

10. Comment Period

The short (15-day) public scoping period suggests that Glacier regards public input as a formality and not a substantive contributor to park planning. PEER urges Glacier to extend this comment period to be at least 30 days long, closing on March 23, 2020 at the earliest.

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