Categorical Exclusion Form

Project: Authorize WiFi in All Buildings where Cellular Service is Approved
PEPC Project Number: 77463

Description of Action (Project Description):

This proposal involves changing one aspect of the Wireless Communications Services Plan / Environmental Assessment (2008). The FONSI specifically stated that some historic areas would be kept as WiFi free zones. If approved, this proposal will allow visitors to access WiFi connections, when available, in all buildings where cellular service is approved, including historic buildings.

The rationale for this change is technological advancement during the last decade. Currently, there is little distinction between WiFi and cellular access to the internet. Many visitors in the park's developed areas are already accessing the internet through their cellular phones. Thus, allowing WiFi connections in buildings has minimal potential to adversely affect the visitor experience.

WiFi access will primarily benefit visitors with cellular providers that do not offer service in the park. There will be no change to the park's cellular coverage areas. Routers are the only additional equipment required to offer WiFi connections. Routers will be inconspicuously placed, and have no impact on historic structures.

Specifically, this change will allow WiFi service in the following areas: the Old Faithful Inn, the Old Faithful Lodge, the Lake Hotel, the Lake Hotel Annex, the Lake Hotel Cabins, the Lake Lodge, the Mammoth Hotel, the Mammoth Dining Room, and the Roosevelt Lodge.

Project Locations:

<table>
<thead>
<tr>
<th>Location 1</th>
<th>Location 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>County:</td>
<td>County:</td>
</tr>
<tr>
<td>Park</td>
<td>Teton</td>
</tr>
<tr>
<td>State:</td>
<td>State:</td>
</tr>
<tr>
<td>WY</td>
<td>WY</td>
</tr>
</tbody>
</table>

Mitigation(s):

- No mitigations identified.

CE Citation: B.1 Changes or amendments to an approved plan, when such changes would cause no or only minimal environmental impact.

CE Justification:

Decision: I find that the action fits within the categorical exclusion above. Therefore, I am categorically excluding the described project from further NEPA analysis. No extraordinary circumstances apply.
### Extraordinary Circumstances:

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes/No</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>If implemented, would the proposal...</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Have significant impacts on public health or safety?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>B. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>C. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(F))?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>F. Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>G. Have significant impacts on properties listed or eligible for listing on the National Register of Historic Places, as determined by either the bureau or office?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>H. Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>I. Violate a federal, state, local or tribal law or requirement imposed for the protection of the environment?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>J. Have a disproportionately high and adverse effect on low income or minority populations (EO 12898)?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>K. Limit access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or adversely affect the physical integrity of such sacred sites (EO 130007)?</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>L. Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112)?</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

Categorical Exclusion Form - Authorize WiFi in All Buildings where Cellular Service is Approved - PEPC ID: 77463
ENVIRONMENTAL SCREENING FORM (ESF)

Updated Sept 2015 per NPS NEPA Handbook

A. PROJECT INFORMATION

Project Title: Authorize WiFi in All Buildings where Cellular Service is Approved
PEPC Project Number: 77463
PMIS Number:
Project Type: Other Plan (PLAN)
Project Location:
  County, State: Park, Wyoming
  County, State: Teton, Wyoming
Project Leader: Bret DeYoung

B. PROJECT DESCRIPTION

This proposal involves changing one aspect of the Wireless Communications Services Plan / Environmental Assessment (2008). The FONSI specifically stated that some historic areas would be kept as WiFi free zones. If approved, this proposal will allow visitors to access WiFi connections, when available, in all buildings where cellular service is approved, including historic buildings.

The rationale for this change is technological advancement during the last decade. Currently, there is little distinction between WiFi and cellular access to the internet. Many visitors in the park’s developed areas are already accessing the internet through their cellular phones. Thus, allowing WiFi connections in buildings has minimal potential to adversely affect the visitor experience.

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Specifically, this change will allow WiFi service in the following areas: the Old Faithful Inn, the Old Faithful Lodge, the Lake Hotel, the Lake Hotel Annex, the Lake Hotel Cabins, the Lake Lodge, the Mammoth Hotel, the Mammoth Dining Room, and the Roosevelt Lodge.

C. RESOURCE IMPACTS TO CONSIDER:

<table>
<thead>
<tr>
<th>Resource</th>
<th>Potential for Impact</th>
<th>Potential Issues &amp; Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Air Quality</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Environmental Screening Form (ESF) - Authorize WiFi in All Buildings where Cellular Service is Approved - PEPC ID: 77463
<table>
<thead>
<tr>
<th>Category</th>
<th>Type</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biological Nonnative or Exotic Species</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Biological Species of Special Concern or Their Habitat</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Biological Vegetation</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Biological Wildlife and/or Wildlife Habitat including terrestrial and aquatic species</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Cultural Archeological Resources</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Cultural Cultural Landscapes</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Cultural Ethnographic Resources</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Cultural Museum Collections</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Cultural Prehistoric/historic structures</td>
<td>Potential</td>
<td>Issue: Adding of equipment</td>
</tr>
<tr>
<td><em>Historic Buildings</em></td>
<td></td>
<td>Impact: Small screw holes to mount WiFi Routers, small drill holes to run phone wires to routers from existing phone system.</td>
</tr>
<tr>
<td>Geological Features</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Geological Geologic Processes</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Lightscape</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Other Human Health and Safety Public Safety</td>
<td>Potential</td>
<td>Issue: Potential for WiFi phone use to report emergencies.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Impact: Increased access to a small population of visitors that use WiFi-only phones, or cell phones from carriers not currently providing service within the park. Some visitors would have increased accessibility to phone service in order to report emergencies, or access local information provided for safety of visitors.</td>
</tr>
<tr>
<td>Socioeconomic Land Use</td>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>

Environmental Screening Form (ESF) - Authorize WiFi in All Buildings where Cellular Service is Approved - PEPC ID: 77463
| **Socioeconomic**  
Minority and low-income populations, size, migration patterns, etc. | None |
|---------------------------------------------------------------|------|
| **Socioeconomic**  
Socioeconomic | None |
| **Soundscapes**  
Soundscapes  
*Noise from devices if sound is turned up while videos on device are playing.* | Potential  
Issue: Noise from cell phone devices.  
Impact: Audio noise from videos playing on device. |
| **Visitor Use and Experience**  
Recreation Resources | None |
| **Visitor Use and Experience**  
Visitor Use and Experience  
Visitor Experience | Potential  
Issue: Potential for cell phone use to impact other visitors within historic spaces.  
Impact: Use of Internet services by visitors in historic hotel lobbies could impact other visitors close by if they are expecting an experience where they and all around them are "unplugged" from technology. Some visitors have an expectation that activities such as listening to a piano, playing board games, or reading are activities that should be expected in such a setting. |
| **Water**  
Floodplains | None |
| **Water**  
Marine or Estuarine Resources | None |
| **Water**  
Water Quality or Quantity | None |
| **Water**  
Wetlands | None |
| **Wilderness**  
Wilderness | None |

**D. ESF ADDENDUM QUESTIONS:**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
<th>Notes</th>
</tr>
</thead>
</table>

Environmental Screening Form (ESF) - Authorize WiFi in All Buildings where Cellular Service is Approved - PEPC ID: 77463
Reviewers:
Doug Madsen

Optional Signatures:

Compliance Specialist:
NEPA
Doug Madsen
Date: 5/2/2018

NHPA
Tobin Roop
Date: 5/2/18

Approved:

Superintendent: Daniel N. Wenk
For Daniel N. Wenk
Date: 5/2/18
ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

A. DESCRIPTION OF UNDERTAKING

1. Park: Yellowstone National Park

2. Project Description:

Project Name: Authorize WiFi in All Buildings where Cellular Service is Approved
Prepared by: Tobin Roop    Date Prepared:    Telephone: 307-344-2224
PEPC Project Number: 77463
Locations:
    County, State: Park, WY
    County, State: Teton, WY
Describe project:
This proposal involves changing one aspect of the Wireless Communications Services Plan / Environmental Assessment (2008). The FONSI specifically stated that some historic areas would be kept as WiFi free zones. If approved, this proposal will allow visitors to access WiFi connections, when available, in all buildings where cellular service is approved, including historic buildings.

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Area of potential effects (as defined in 36 CFR 800.16[d])
There is no undertaking

3. Has the area of potential effects been surveyed to identify historic properties?
   ___ No
   ___ Yes

4. Potentially Affected Resource(s):

Archeological Resources Affected:
Assessment of Effect Form - Authorize WiFi in All Buildings where Cellular Service is Approved - PEPC ID: 77463
Historical Structures/Resources Affected:

Cultural Landscapes Affected:

Ethnographic Resources Affected:

5. The proposed action will: (check as many as apply)
   __ Destroy, remove, or alter features/elements from a historic structure
   __ Replace historic features/elements in kind
   __ Add non-historic features/elements to a historic structure
   __ Alter or remove features/elements of a historic setting or environment (inc. terrain)
   __ Add non-historic features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape
   __ Disturb, destroy, or make archeological resources inaccessible
   __ Disturb, destroy, or make ethnographic resources inaccessible
   __ Potentially affect presently unidentified cultural resources
   __ Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources
   __ Involve a real property transaction (exchange, sale, or lease of land or structures)
   __ Other (please specify):

6. Supporting Study Data:
   (Attach if feasible; if action is in a plan, EA or EIS, give name and project or page number.)

B. REVIEWS BY CULTURAL RESOURCE SPECIALISTS
The park 106 coordinator requested review by the park’s cultural resource specialist/advisors as indicated by check-off boxes or as follows:

No Reviews From: Curator, Archeologist, Historical Architect, Historian, 106 Advisor, Other Advisor, Anthropologist, Historical Landscape Architect

C. PARK SECTION 106 COORDINATOR’S REVIEW AND RECOMMENDATIONS

1. Assessment of Effect:
   __ X No Potential to Cause Effects
   __ No Historic Properties Affected
   __ No Adverse Effect
   __ Adverse Effect

2. Documentation Method:

Assessment of Effect Form - Authorize WiFi in All Buildings where Cellular Service is Approved - PEPC ID: 77463
A. Standard 36 CFR Part 800 Consultation
Further consultation under 36 CFR Part 800 is needed.

B. Streamlined Review Under the 2008 Servicewide Programmatic Agreement (PA)
The above action meets all conditions for a streamlined review under section III of the 2008 Servicewide PA for Section 106 compliance.

Applicable Streamlined Review Criteria
(Specify 1-16 of the list of streamlined review criteria.)

C. Undertaking Related to Park Specific or Another Agreement
The proposed undertaking is covered for Section 106 purposes under another document such as a park, region or statewide agreement established in accord with 36 CFR 800.7 or 36 CFR 800.14.

D. Combined NEPA/NHPA Process
Process and documentation required for the preparation of an EA/FONSI or an EIS/ROD to comply with Section 106 is in accord with 36 CFR 800.8.c.

E. Memo to Project File

3. Consultation Information

SHPO Required: No
SHPO Sent:
SHPO Received:

THPO Required:
THPO Sent:
THPO Received:

SHPO/THPO Notes:

   Advisory Council Participating: No
   Advisory Council Notes:
   N/A

4. Stipulations and Conditions:

   N/A

5. Mitigations/Treatment Measures: Measures to prevent or minimize loss or impairment of historic/prehistoric properties: (Remember that setting, location, and use may be relevant.)

   No Assessment of Effect mitigations identified.

6. Assessment of Effect Notes:

This is not an undertaking per 36CFR800

D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:

Assessment of Effect Form - Authorize WiFi in All Buildings where Cellular Service is Approved - PEPC ID: 77463
E. SUPERINTENDENT'S APPROVAL

The proposed work conforms to the NPS Management Policies and Cultural Resource Management Guideline, and I have reviewed and approve the recommendations, stipulations, or conditions noted in Section C of this form.

Superintendent: [Signature] Date: 5/4/18
Other Compliance/Consultations Form

Park Name: Yellowstone National Park  
PEPC Project Number: 77463  
Project Title: Authorize WiFi in All Buildings where Cellular Service is Approved  
Project Type: Other Plan (PLAN)  
Project Location:  
  County, State: Park, Wyoming  
  County, State: Teton, Wyoming  
Project Leader: Bret DeYoung

ESA

Any Federal Species in the project Area? No  
If species in area: No Effect  
Was Biological Assessment prepared? No  
If Biological Assessment prepared, concurred? No  
Formal Consultation required? No  
Formal Consultation Notes:  

Formal Consultation Concluded:  
Any State listed Species in the Project Area? No  
Consultation Information:  
General Notes:

Data Entered By: Doug Madsen  
Date: Apr 6, 2018

ESA Mitigations

No ESA mitigations are associated with this project.

Floodplains/Wetlands/§404 Permits

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.1. Is project in 100- or 500-year floodplain or flash flood hazard area?</td>
<td></td>
<td>N</td>
<td>Exempt from compliance with executive order: Statement of findings approval date:</td>
</tr>
<tr>
<td>A.2. Is project in wetlands?</td>
<td></td>
<td>N</td>
<td>Exempt from compliance with executive order: Statement of findings approval date:</td>
</tr>
</tbody>
</table>

Other Compliance/Consultations Form - Authorize WiFi in All Buildings where Cellular Service is Approved - PEPC ID: 77463
B. COE Section 404 permit needed? N

C. State 401 certification? N

D. State Section 401 Permit? N

E. Tribal Water Quality Permit? N

F. CZM Consistency determination needed? N/A

G. Erosion & Sediment Control Plan Required? N

H. Any other permits required? N Permit Information:

Other Information:

Data Entered By: Doug Madsen Date: Apr 6, 2018

FloodPlains & Wetlands Mitigations

No FloodPlains & Wetlands mitigations are associated with this project.

Wilderness

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Does this project occur in or adjacent to Designated, Recommended, Proposed, Study, Eligible, or Potential Wilderness?</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>B. Is the only place to conduct this project in wilderness?</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>C. Is the project necessary for the administration of the area as wilderness?</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>D. Would the project or any of its alternatives adversely affect (directly or indirectly) Designated, Recommended, Proposed, Study, Eligible, or Potential Wilderness? (If Yes, Minimum Requirements Analysis required)</td>
<td>N</td>
<td></td>
</tr>
<tr>
<td>E. Does the project or any of its alternatives involve the use of any of the Wilderness Act Section 4(c) prohibited uses: commercial enterprise, permanent road, temporary road, motor vehicles, motorized equipment, motorboats, landing of aircraft, mechanical transport, structure, or installation? (If Yes, Minimum Requirements Analysis required)</td>
<td>N</td>
<td></td>
</tr>
</tbody>
</table>

If the answer to D or E above is “Yes” then a Minimum Initiation

Other Compliance/Consultations Form - Authorize WiFi in All Buildings where Cellular Service is Approved - PEPC ID: 77463
Requirements Analysis is required. Describe the status of this analysis in the column to the right.

Other Information:

<table>
<thead>
<tr>
<th>Date Entered By:</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Doug Madsen</td>
<td>Apr 6, 2018</td>
</tr>
</tbody>
</table>

Other Permits/Laws  *Questions A & B are no longer used.*

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>C. Wild and scenic river concerns exist?</td>
<td></td>
<td>N</td>
</tr>
<tr>
<td>D. National Trails concerns exist?</td>
<td></td>
<td>N</td>
</tr>
<tr>
<td>E. Air Quality consult with State needed?</td>
<td></td>
<td>N</td>
</tr>
<tr>
<td>F. Consistent with Architectural Barriers, Rehabilitation, and Americans with Disabilities Acts or not Applicable? (If N/A check Yes)</td>
<td>Y</td>
<td></td>
</tr>
<tr>
<td>G. Other:</td>
<td></td>
<td>N</td>
</tr>
</tbody>
</table>

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Other Compliance/Consultations Form - Authorize WiFi in All Buildings where Cellular Service is Approved - PEPC ID: 77463

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