



## United States Department of the Interior

NATIONAL PARK SERVICE  
Bryce Canyon National Park  
PO Box 640201  
Bryce, UT 84764



IN REPLY REFER TO: L3208

October 13, 2015

Mr. Jared White  
1894 West 1690 South  
Woods Cross, UT 84087

Dear Mr. White,

On September 8, 2015, we acknowledged the receipt of the right-of-way permit application from Verizon Wireless LLC (Verizon) on July 21, 2015, and asked for more information. We appreciate your response on September 25, 2015. Having reviewed the information you provided we still find the application not to be complete. The National Park Service (NPS) is unable to process Verizon's application until the application is satisfactorily completed. In order to be considered complete, Verizon must: (1) look at other sites outside of the park that could host the facility and serve Verizon customers in the park, (2) revise the SF 299, and (3) include additional information as attachments to the SF 299.

In the attachment to your email of September 25, you stated; "In order to provide coverage inside the park the site itself must be located inside the park due to the topography of the area. There is an existing communications facility near the highway outside of the park. Verizon explored this as an option but determined they would not be able to provide adequate coverage from that location." In order to process Verizon's application the NPS will need to know that Verizon has evaluated all possible locations outside of the park. The tower near Ruby's Inn is the location you noted that is near the highway outside of the park. Additional locations that Verizon should evaluate for feasibility are listed below. Please provide the results of your feasibility analysis that includes site access, power alternatives, and coverage for all possible locations, including:

- Canaan Peak. Access by FR 1997. Federal Land Manager: US Forest Service, Dixie National Forest. No commercial power. Distance to rim of the amphitheater is about 20 miles. Possible location: 37°36'35.44"N 111°47'51.18"W
- Barney Top. Access by 1458 (from Barney Top Road). There is an existing tower on Barney Top. It is licensed to the Utah Communications Authority. Distance to rim of the amphitheater is about 18 miles. The tower is 60 ft high. Reference:  
<https://www.radioreference.com/apps/db/?fccCallsign=WNML637>
- Tropic. On Google Earth there appear to be at least two possible locations for a tower in Tropic.
  - BV Hill located at 37°37'24.68"N 112° 3'41.38"W
  - T Hill located at 37°37'12.13"N 112° 5'19.51"W

In the attachment to your email of September 25, you stated, "No feasible options exist outside the park." If you have completed a feasibility study on the Ruby's Inn tower, Canaan Peak, Barney Top, and Tropic then please provide a copy for NPS to review. We did receive your Received Signal Reference Power

(RSRP) coverage maps for the Ruby's Inn tower. As we stated in our September 8 letter we need Verizon's justification for not using a site outside of the park in order to process Verizon's application.

In the attachment you stated that "Verizon does not have their own fiber backhaul in the area so we are dependent on the service providers to bring fiber to a meet point. The meet point that has been established is off of Highway 63." In order to understand the full footprint we need to know how Verizon would connect to the existing fiber optic connection point (near the park residential area, on the west side of Hwy 63). If Verizon proposes to communicate with Wilson Peak on a microwave link then we need confirmation that there is line of sight from the proposed microwave antenna at Science Hill (for both a 60 foot and 80 foot tower height) and the microwave antenna at the tower on Wilson Peak.

The NPS decision-making process for rights of way for wireless communications facilities (WTF) considers the full footprint of the proposed site, which includes the tower-antenna-base structure facilities, any additional structures (such as an emergency generator), the access road required for construction and service, and the supplying power lines and communication lines. For all ROW permit applications, NPS requires the following information as attachments to the Standard Form (SF) 299:

- Full description of the requested land or facility use in the park, including proposed number of sites, types of sites, equipment and antennas (including structures) to be located at each site, required new (or modification of existing) electrical and telephone service for each site, location of the sites in the park, and existing or proposed roads to be used for access to the proposed site.
- Maps showing the "before" and "after" service levels and signal strength for the proposed WTF site(s).
- Maps showing all other WTF sites and their coverage operated by the applicant up to a 15 mile radius (or other distance determined appropriate by the superintendent).
- Propagation maps from the applicant showing its proposed buildout of sites within a 15-mile radius of the proposed site within the next five years (or other distance or timeframe determined appropriate by the superintendent). Note that this information may be exempt from disclosure under FOIA.
- For each proposed site, a schematic site plan and elevations showing the equipment and antennas to be installed, including supporting structures, connections to telephone and electrical service, and how the applicant will access the site for construction (with a list of construction equipment to be used) and ongoing maintenance.
- Copy of the FCC license authorizing the applicant to provide wireless telecommunications services for that area, along with a map showing the boundaries of the authorized service area and the relationship of that area to the park's boundaries.
- Payment of the one-time application fee required pursuant to 36 CFR Part 14.

The following changes and inputs to Verizon's SF 299 are required:

- The application requests a 25 year right-of-way (ROW) permit. NPS policy limits ROW permits to ten (10) years. You will need to submit a SF 299 Form that requests approval for no more than 10 years for the ROW.
- Include corporate information on page 4 of the SF 299.
- Include other applications submitted in the immediate area, especially with NPS (e.g., Zion National Park) on page 2, question 14.

The following attachments to Verizon's SF 299 are required:

- A revised map. The map you provided does not show how Verizon will connect to the existing fiber optic connection point. In the attachment to your September 25 email you stated that “Verizon does not have their own fiber backhaul in the area so we are dependent on the service providers to bring fiber to a meet point. The meet point that has been established is off of Highway 63.” There is no fiber optic connection at that point. Verizon would need to connect to the existing fiber optic connection point (near the park residential area, on the west side of Hwy 63).
- A site plan is required. Note that preliminary construction drawings that show the proposed equipment are acceptable. The diesel generator exhaust could contaminate the air quality samples taken on Science Hill. Consider an emergency generator that would minimize impacts on the air quality monitoring program.
- Documentation that microwave communications with Wilson Peak is possible with both the 60-foot and 80-foot tower option. If Verizon proposes to use microwave communications to communicate with Wilson Peak then we need confirmation that there is line of sight between the proposed antenna at Science Hill and the microwave antenna at Wilson Peak.

Upon NPS’ receipt and approval of the above materials, we will be in a better position to move forward and process Verizon’s application.

We noted on September 8th that acknowledgement of Verizon’s application does not guarantee issuance of a right-of-way permit, and no work is to commence by Verizon Wireless until and unless a signed right-of-way permit has been issued. Verizon’s application is currently incomplete, and cannot be processed until the missing components are submitted.

Once a complete application is received, the next steps in the ROW permitting process may include the environmental compliance, appraisal, and agreement on permit terms. As part of the permitting process, Bryce Canyon National Park may implement cost recovery for processing the application. Cost recovery includes administrative and environmental compliance costs, including the cost of an appraisal.

If you have any questions or comments about the right-of-way application process, please contact Cynthia Morris at 435-834-4760 or Jim McNitt at 435-834-4758.

Sincerely,



Lisa E. Eckert  
Superintendent

Copy to:  
Chief, Environmental Quality, Intermountain Region  
Realty Specialist and Right of Way Coordinator, Intermountain Region

**From:** [Mazzu, Linda C](#)  
**To:** [Bellrichard, Kathy](#); [Gorman, Kim](#); [Rice, Heather E](#)  
**Cc:** [Poe, Kevin N](#); [Kiser, Brandon Steve](#); [Miller, Candi R](#)  
**Subject:** Re: [EXTERNAL] RE: BRCA Cell Tower Proposal EA - public comments received  
**Date:** Tuesday, May 12, 2020 11:52:07 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
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[image015.png](#)

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I'm sorry, I have no date. It's all COVID right now. If you want me to say we need to formally postpone this decision, then I am doing that now with this email.

Linda C. Mazzu  
Superintendent  
Bryce Canyon National Park  
3000 Hwy 63, Bldg #1  
Bryce, UT 84764  
435-834-4700 (office)  
435-690-1177 (cell)

*Vision: To create and maintain a sustainable organization focused on ensuring Bryce Canyon's natural wonders and cultural stories can be experienced now and in the future.*

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**From:** Bellrichard, Kathy  
**Sent:** Tuesday, May 12, 2020 10:58 AM  
**To:** Gorman, Kim ; Mazzu, Linda C ; Rice, Heather E  
**Cc:** Poe, Kevin N ; Kiser, Brandon Steve ; Miller, Candi R  
**Subject:** RE: [EXTERNAL] RE: BRCA Cell Tower Proposal EA - public comments received  
Hi Linda, checking in again on the FONSI. Please let us know if you have any idea when you'll be able to finish it up.  
Thanks,  
**Kathy Bellrichard** | Environmental Scientist | Tetra Tech  
Direct (612) 643-2233 | [kathy.bellrichard@tetratech.com](mailto:kathy.bellrichard@tetratech.com)

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**From:** Bellrichard, Kathy