



## United States Department of the Interior

NATIONAL PARK SERVICE  
INTERIOR REGION 7  
Southeast Utah Group: Arches and Canyonlands National Parks  
Hovenweep and Natural Bridges National Monuments  
2282 S. West Resource Boulevard  
Moab, Utah 84532-3298



IN REPLY REFER TO:

April 15, 2024

Utah Trust Lands Administration  
102 Tower  
102 South 200 East, #600  
Salt Lake City, Utah 84111

Dear Director McConkie,

The National Park Service (NPS) would like to comment on the application submitted by Vertical Bridge Development LLC to the San Juan County Commission for a variance to allow for the construction of a cell phone tower on state trust land adjacent to UT State Route 95. The NPS understands that the project seeks to construct a 460-foot cell phone tower just a few miles southeast of Natural Bridges National Monument. We also understand the importance of improved connectivity and communication in this remote area for health, safety, and quality of life reasons that this project seeks to address. Because Natural Bridges National Monument (the Monument) is an area of particular importance due to its cultural and natural significance, the NPS seeks to engage with the Utah Trust Lands Administration (TLA) to explore alternatives that would protect the Monument's unique resources while fulfilling the purpose of the application to expand cellular communication access in the area.

### **General NPS Comments**

Natural Bridges National Monument was designated in 1908 by Presidential Proclamation 804 to preserve and provide for public enjoyment of three of the world's largest stream-eroded natural bridges, and Ancestral cultural sites in their settings. The NPS stewards the Monument's cultural and natural resources, including the landscape that is of profound meaning and significance for the 27 traditionally associated Tribal Nations that consider the Monument sacred. The proximity and height of the proposed cell phone tower has serious implications for cross-boundary impacts to the Monument's natural and cultural landscape and the unique visitor experience the Monument provides. As such, the NPS respectfully requests that the TLA consider the following requests for information and recommended mitigations when assigning conditions to this application.

### **Detailed NPS Comments**

#### *Viewsheds and Cultural Landscapes*

Viewsheds from Natural Bridges are a protected and interpreted resource, and we prioritize maintaining a natural condition for viewscape areas from the Monument; particularly important is the viewshed from the Monument to the Bears Ears landscape feature. The indigenous cultural

landscapes are considered sacred to the Monument's 27 traditionally associated Tribal Nations and are an important value for the visitor experience. Additionally, the entirety of the Monument is listed on the National Register of Historic Places (NRHP) as the Natural Bridges Archeological District protected under the National Historic Preservation Act (NHPA). We believe a 460-foot cell tower located within the viewshed from the Archeological District will negatively impact the integrity of this historic property's setting and feeling. Because of the cultural significance of this area and the potential adverse effects posed by the project, we request the project proponent fully explore other suitable site locations for the project and provide stakeholders with a coverage map identifying these alternative sites.

NPS specifically requests a viewshed analysis and an assessment of the vertical Area of Potential Effect (APE) from key viewpoints in Natural Bridges including all the overlooks. The NPS would be happy to coordinate with the project proponents to provide photos to utilize in the simulations. Additionally, we request the project proponent fully explore a range of alternatives in determining the proposed design, and specifically the necessary height of the cell phone tower.

We trust that, through the National Historic Preservation Act (NHPA) Section 106 process, the project proponent will consult with the 27 traditionally associated Tribal Nations to understand their concerns for the sacred sites and landscapes affected by this project. Similarly, the NPS requests to be a consulting party in accordance with Section 106 of the NHPA to resolve any adverse effects the design alternative may pose to the NRHP listed property of the Natural Bridges Archeological District and other Monument resources.

#### *Night Skies*

Natural Bridges is one of the darkest national parks in the country and was the world's first International Dark Sky Park as certified by the International Dark Sky Association (IDSA). The NPS is concerned about the impacts lighting installations, blinking lights at the mid-point and on top of the proposed cell phone tower, will have on the pristine night sky qualities in and around the Monument.

#### *Migratory Birds and Bats*

The Monument preserves deep, moist canyons and associated diverse biotic assemblages that are regionally significant due to a long history of protection that has maintained these systems in their natural condition. The Monument contains potential habitat for three threatened and endangered bird species and five species of migratory birds of particular concern. Natural quiet and dark skies are critical to intact ecosystems. Communication towers kill more than 7 million migratory birds and bats each year because of lighting and collisions with guy wires. The NPS requests that other suitable site locations be explored for the project to reduce impacts to these imperiled species.

Thank you for the opportunity to comment on this proposal. We respectfully request continued communication with the TLA regarding this project so that we may collaborate to minimize activities from impacting NPS resources. We look forward to learning more about the potential range of project alternatives including other locations that may be more suitable for the application.

For more information, please contact Superintendent for the Southeast Utah Group Parks, Lena Pace ([Lena\\_pace@nps.gov](mailto:Lena_pace@nps.gov) 202-308-3595).

Sincerely,

Lena Pace  
Superintendent, Southeast Utah Group Parks