

MAY 14 2019

Planning & Building Services

Comments on Use Permit U_2018-007 by AT&T Mobility
for the

Cameron Telecom Tower

We commend AT&T's effort to bring improved broadband and cell service to Comptche under the American Recovery and Reinvestment Act initiated Connected America Fund (CAF) program.

Nonetheless, the application shouldn't be accepted in its current form because multiple pages aren't legible, e.g. pages 5, 43, 44, 45, 46, & 48. If these pages contain proprietary information, that should be explained in the text. Further, explanation of the analyses leading to the site and design choices is incomplete. Some specific limitations are:

- Some information is shown on the final page, 65, about likely cell service around Comptche. Page 65 seems to predict there will be no 4G service in downtown Comptche. True?
- Could equivalent details be provided on likely broadband service specs., speed, latency, etc., and projected subscriber cost for alternative services? Or does page 65 show wireless ISP coverage? There is no explanation.
- The case for this site isn't convincing. Two others nearby are rejected, but why this valley in the first place? Is it related to the fiber line availability, or other reasons?
- True there's no other tower within a 5 mi radius, as shown on page 33, but there is one on Mathison Peak, at about 8 mi. Why is it not shown on page 58?
- Power provision to the site requires some clarification:
 - o The application states fiber & power will be undergrounded to the site from C-Ukiah Rd. in two separate 4" conduits along Philbrick Mill/Mattilla/Mattila/Matilla (Gulch) Rd.* Does this mean there will be no additional overhead power lines, which has a big effect on the consequent fire hazard discussed below? Also, the run along the road seems way more than stated in the application, over 2 mi rather than 1.375.
 - o Since power really has to be brought from C-Ukiah Rd. for the run to the site, why not install it on the other (northeast) side of the valley, where there are off-grid residences, and string a line across to the tower? If the line, as well as the installation itself, brings added fire risk to residents, they should share in the benefit, thereby compensating property values for the impact on views, etc. This option doesn't seem to have been considered. If as noted above, all power is undergrounded, the issue is much less significant as the only added fire hazard derives from the site itself.
 - o Will provision be made for possible line extension to residences further down Mattila Rd? Alternatively, could power & fiber be added to the northeast side and then undergrounded on the other unmarked road that leads to the site, a shorter distance, about 1 mi? Actually, improving access from this direction and along Philbrick Mill/Mattila Rd. has been considered by residents as an

* Name varies on maps and documents.

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additional possible emergency escape route. Will MRC open up access as part of the project?

- The back-up power capability hasn't been properly explained. How many hours of operation will be guaranteed with the proposed 15 kW generator and its 54 gal diesel tank? What are plans for refilling it during an emergency? Will this facility have priority for diesel deliveries? Will this reliability level deteriorate as the tower's capacity is built out? Since this is an excellent solar site: 1) relying on diesel, a fossil fuel, doesn't comply with California's climate change and air quality goals; and 2) PV + batteries could provide back-up with a lower environmental footprint, and might be more economic under a net metering tariff. Further, as is typical of a remote forested area, overall power reliability is poor, with multi-day wintertime outages being painfully familiar. Planning for typical service reliability would be a serious error. Furthermore, adding a critical load to the local feeder lowers the likelihood PG&E will shut it down in times of high fire danger, thereby endangering neighbors.
- On the fiber side, the line along C-Ukiah Rd. isn't all undergrounded, so is vulnerable during storms, fires, etc. Can the tower maintain service via wireless connection to distant towers if the fiber connection is lost? How will reliability compare to eventually disappearing landline service?
- Could residents be additionally compensated for the view impairment, increased fire hazard, etc., with reduced rate broadband and/or cell service?
- It seems the Dept. of Planning and Building Services (PBS) will impose a height reduction of about 50' below AT&T's application. What effect will this have on tower available service quality? How many fewer customers will be served, and will it still serve enough customers? Where are the lost ones?
- Figure 1 on page 61 isn't adequately explained, e.g. what units are shown?

Finally, so our comments are not misinterpreted, Comptche is in dire need of better cell service, and many residents also have dismal internet access, and we are grateful to those trying to bring these services to our community.

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We Comptche residents endorse these comments on AT&T's application to the Planning Commission, and request due consideration of our concerns.

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