

**Attachment D - 5**  
**Technical Siting Analysis**



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## TECHNICAL SITING ANALYSIS

Proposed Wireless Telecommunications Facility

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**Project Description**  
**Site Selection**  
**Site Justification**  
**Alternative Site Analysis**

**Date:** 2-8-2024

**Jurisdiction:** Township of Mammoth Lakes

**Site Name:** AT&T "CSL04615"

**Address:** 1574 Old Mammoth Road  
Township of Mammoth Lakes, CA 92780

**Applicant:** AT&T  
1452 Edinger Ave  
Tustin, CA 92606

**Representative:** Sonal Thakur  
EukonGroup  
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## **Introduction**

AT&T requests approval of Wireless Telecommunications Facility (“WTF”) permit for a new wireless telecommunication facility. The proposed facility is located at 1574 Old Mammoth Road. Currently the area is developed with a Township of Mammoth Lakes Fire Department fire station.

AT&T is a telecommunications service provider operating wireless telecommunications sites throughout California and nationwide. AT&T and its affiliates have acquired licenses from the Federal Communications Commission (“FCC”) to provide wireless telecommunication services.

## **Description of Use**

Pursuant to Township of Mammoth Lakes Municipal Code Sec 17.52.280, AT&T has submitted an application for a Wireless Telecommunications Facility Use Permit approval to establish and operate a Wireless Telecommunications Facility (WTF).

AT&T WIRELESS PROPOSES TO CONSTRUCT A WIRELESS INSTALLATION. THE SCOPE WILL CONSIST OF THE FOLLOWING:

- INSTALL (1) 80'-0" HIGH MONOPINE
- INSTALL (15) AT&T PANEL ANTENNAS
- INSTALL (15) AT&T REMOTE RADIO UNITS (RRUS)
- INSTALL (3) DC9 SURGE SUPPRESSORS
- INSTALL (4) DC12 SURGE SUPPRESSORS
- INSTALL (1) AT&T 4'-0"Ø MICROWAVE ANTENNA
- INSTALL 10' x 20' LEASE AREA COMPOUND
- INSTALL (1) POWER PLANT
- INSTALL (1) PURCELL CABINET
- INSTALL (1) 20KW DC POLAR GENERATOR w 125 GAL. FUEL TANK
- INSTALL (1) CIENA
- INSTALL (1) TELCO BOX
- INSTALL (1) METER
- INSTALL (1) UTILITY H-FRAME
- REMOVE (1) EXISTING TOWER CONCRETE PAD

## **Site Selection**

Pursuant to the municipal code, AT&T searched the area within the search ring for sites that presented three primary factors. First, the area is analyzed to determine zoning compatibility in a district to allow for the placement of a WTF.

The selection of the proposed site rested on the determination of compatibility with adjacent development and preservation of existing view corridors. Further consideration supporting the proposed location included the availability of adequate space to place the WTF equipment.

The proposed location is in an area that limits the visual impact on adjacent properties and the public traveling along Old Mammoth Road, Club Drive, and Ski Road, yet provides the required performance to close the significant gap in coverage.

The subject site allows for the proposed project to operate in a manner that precludes adverse impacts to access, path of travel and maintains the current aesthetic condition for the area.

### **Site Justification**

Wireless telecommunication networks operate on a grid system of facilities that establish the functionality and performance of the system. The network is established on a line-of-sight premise that demands each site be situated in a manner that allows adjacent and abutting sites to generate signals that slightly overlap. By establishing this model of network deployment, the objective to provide seamless service is increased.

At this time, AT&T RF engineers have identified a significant gap in the acceptable level of service in the area the proposed project will serve. The network is evaluated continuously in an effort to maintain the standard of service demanded by the public and mandated by governmental regulations. Currently, a significant gap in service exists primarily to the east, south and north of the proposed location. There is also insufficient capacity to provide dependable connectivity for stationary and in-building coverage. This area is comprised of a major highway and medium density residential developments, a church, school and open space. There is existing poor service levels and poor to nonexistent service levels that preclude the required signal strength necessary to establish and maintain in-building service. The proposed facility will upgrade the deficiency within the target area and will fill the significant gap in coverage.

In the absence of the proposed facility, AT&T will be precluded from completing the network deployment and their customers will continue to experience unacceptable levels of service. The detrimental impact may be most pronounced in daily usage and heightened during emergencies and catastrophic events. The system will provide access to “E911” and to first responders during periods that landlines may not be operable.

The project is consistent with the City’s General Plan concerning policies that seek to guarantee the adequate distribution of utility services to the entire community in a manner that is compatible with the character of the City and community. Further, the provision of service of this type supports the City’s goal of integrating in a region wide communications network that assists residents and the traveling public in the ability to coordinate with first responders during emergency events or periods of catastrophe.

### **Project Objectives**

To provide coverage in this area of the city, any combination or one of the following reasons may apply. AT&T’s RF Engineering has also submitted coverage maps as part of this application.

- Coverage: No Service in the area (Indoor, Outdoor or Vehicular) and can apply specifically to the type of service provided (Voice or Data – GSM, 3G, 4G). Specifically, this proposed location addresses the following needs:

- Urban – Subscriber anticipated to have accessibility to Township of Mammoth Lakes service while even indoors at lower performance levels.
- Suburban – Subscriber anticipated to have accessibility to Township of Mammoth Lakes service while in-vehicle.
- Outdoor – Subscriber anticipated to have accessibility to Township of Mammoth Lakes service while outdoors.
- Capacity: Proposed service in surrounding areas is insufficient to meet anticipated demand by customers in and traversing through the area. Furthermore, proposed facilities servicing the surrounding area would be overloaded preventing service, dropped calls or complete denial of service during peak usage hours.
- Quality: Township of Mammoth Lakes seeks to improve its wireless services by ensuring sites are located in areas that are expected to produce strong signals for high traffic locations.

### **Co-Location Statement**

AT&T agrees to allow the collocation of other Wireless Carriers on the site, as long as a proposed Carrier's antennas and equipment do not cause interference with AT&T antenna signal.

### **Site Maintenance**

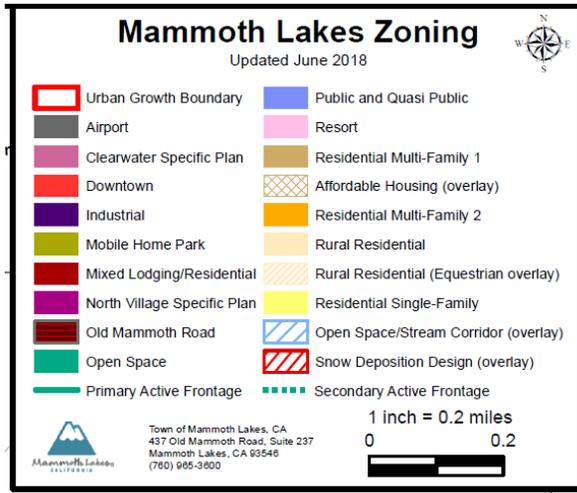
The site will be periodically visited (typically once a month) for maintenance by AT&T staff. An emergency number is also provided on site for the reporting of graffiti and vandalism.

### **FCC Compliance:**

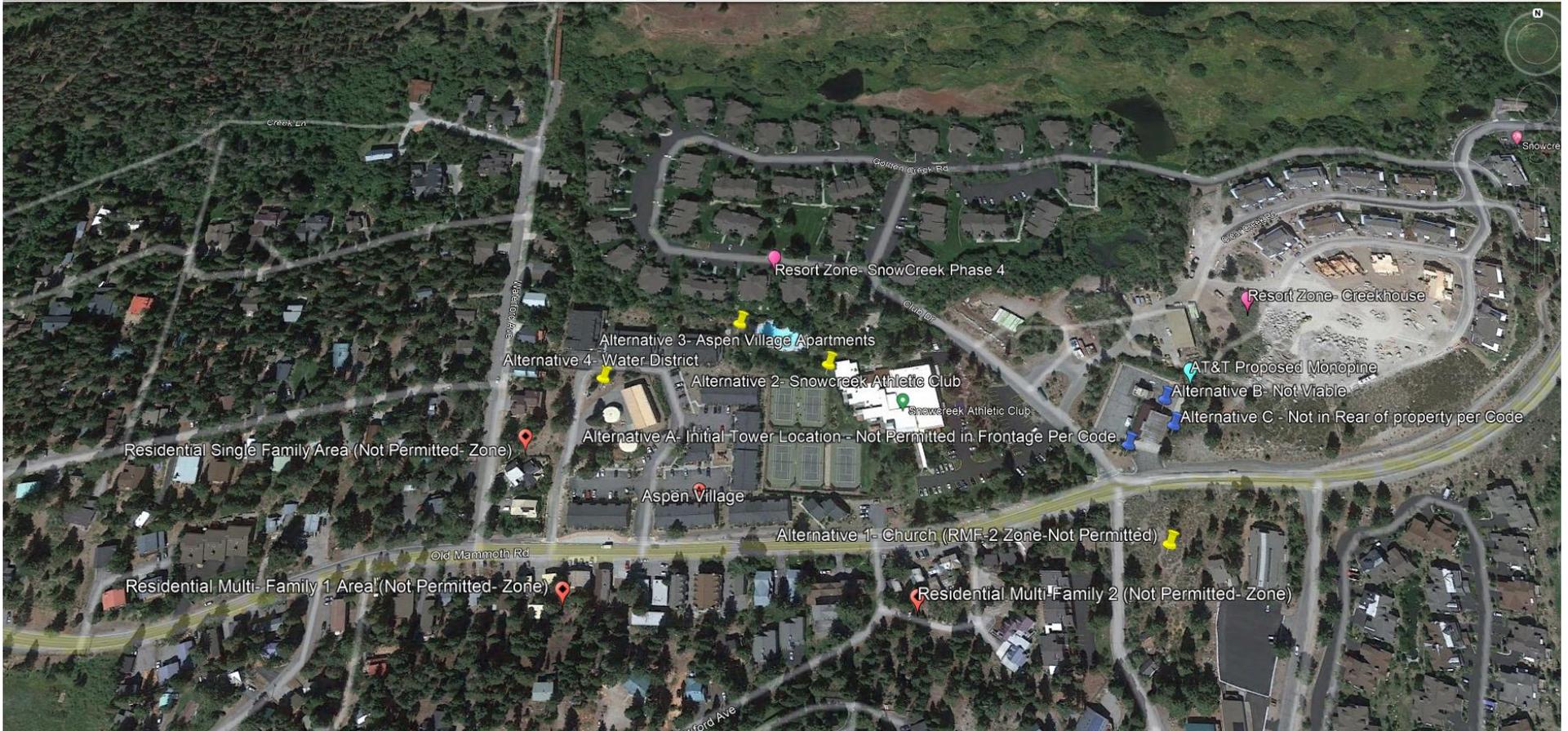
Fox Hill Telecom, has analyzed the project and prepared a report that concludes the proposed AT&T site is in compliance with FCC requirements. Additionally, at the direction of the City, Fox Hill also prepared a report to analyze and confirm that AT&T's wireless facility operation would not interfere with any of the existing communications systems that the First Responders use. Fox Hill determined that AT&T's project does not cause any interference.

AT&T will operate this facility in full compliance with the regulations and licensing requirements of the FCC, Federal Aviation Administration (FAA) and the CPUC, as governed by the Telecommunications Act of 1996, and other applicable laws.

AT&T Site ID: CSL04615 - Mammoth Lakes Monopine - Alternative Sites Analysis



## AT&T Site ID: CSL04615 - Mammoth Lakes Monopine - Alternative Sites Analysis



The aerial image above shows the location of the current proposed AT&T candidate location, depicted by the teal balloon icon. The blue thumb tacks show the three alternative candidate locations, on the same parcel (Mammoth Lakes Fire Protection District/Fire Station 2) as AT&T's proposed monopine, that were also considered and reviewed. The yellow thumb tacks show alternative candidates, on other parcels, that were also reviewed and considered. The pink balloons show some of the Snowcreek and Creekhouse townhome resort developments, on the parcels adjacent to the alternative candidate parcels. The balloons in red show residential single and multi-family zoned parcels/neighborhoods, where the Town's code prohibits the installation of cellular facilities. These residential zoned parcels and neighborhoods are also where more of the structures are inhabited by occupants who reside in the structures year-round, and use them as their primary homes, as opposed to the townhomes and structures in the Resort zone, which are primarily secondary homes or used for vacation rentals, in comparison.

AT&T Site ID: CSL04615 - Mammoth Lakes Monopine - Alternative Sites Analysis

- **PRIMARY CANDIDATE (1): Fire Station 2 (Teal Marker – AT&T Proposed Monopine)**



- This property is zoned Resort, which is permitted to support cellular wireless towers, with the approval of a CUP. An 80-foot tall, stealth monopine cell tower is proposed at the northeast/rear corner of the Fire Station 2 property, as required by the town’s development standards. The wireless tower is located near existing live pine trees, for context, compatibility, camouflaging, and blending with the surrounding environment, as required by the Code’s development design standards. The proposed tower is 80 feet in height, to accommodate AT&T’s wireless antennas and equipment, to provide the critically needed coverage to this area of Mammoth Lakes, and to also accommodate space for a future wireless carrier to collocate, (below AT&T’s equipment) on the same pole, as required by the Code. The wireless tower must “see” and have an unobscured line of sight, over the local topography to provide the effective and much needed coverage to the area. The proposed 80-foot height is the lowest functional height to fill AT&T’s service gap in this area of Mammoth Lakes. It is AT&T’s understanding that Verizon has already expressed strong interest to the Fire Protection District in collocating on this tower, to also provide much needed coverage to this area of Mammoth Lakes. With the deployment of the AT&T wireless facility at this location, the RF engineers will be able to meet the coverage objectives for this area of the town and strengthen and expand the network. This missing coverage has been severely needed for close to a decade, if not more, especially for the first responders of this remote and mountainous terrain. As communicated by Mammoth Lakes Fire Chief Ales Tomaier, the need for this coverage has been a high priority and continued concern for first responders in Mammoth Lakes and the larger Mono County area, such that the Mono County Grand Jury recommended that Mono County and the Town of Mammoth Lakes continue to support

## **AT&T Site ID: CSL04615 - Mammoth Lakes Monopine - Alternative Sites Analysis**

improvements to needed coverage for cell sites, as part of a unified plan for the entire county. For this reason, first responders in the county as well as Mammoth Lakes Fire have worked hard to develop and deploy the infrastructure needed to protect the public's health, safety, and general welfare. Chief Tomaier has also stated that Mammoth Lakes Fire could also utilize the new AT&T tower to locate some of their equipment in the future.

The top of the telecommunications pole and AT&T's pole mounted antennas and equipment would be at 75 feet. The additional five feet at the top of the pole is to accommodate faux pine branches, which are needed to make the overall monopine as concealed and realistic in form, as possible, to blend with the surrounding environment and live pine trees. The AT&T antennas, radios, and equipment on the monopine will be painted green and screened with faux pine needle socks for additional camouflaging. Without the additional five feet at the top of the pole for the faux branches, the tower would have a flat top, and not have a more realistic pine tree form. The Creekhouse Developer/current HOA President, Chuck Lande, and the HOA's designated Representative, David L. Jordan, asked AT&T to also provide photosims of a 75-foot-tall monopole, with the AT&T equipment, but void of the faux pine branches and pine socks that assist in camouflaging, screening, and blending the tower with the surrounding live pine trees and environment. The photosims of the 80-foot tall monopine and 75-foot-tall monopole were provided.

The proposed 80-foot tall monopine design and location complies with the town's development standards for cellular facilities. The location of the facility on the northeast, rear corner of the Fire Station 2 property allows AT&T to provide First Net coverage to the First Responders, and the critical coverage and signal for the residents, businesses, and tourists in this area of Mammoth Lakes. The associated equipment enclosure for the site is located on the west side of the Fire Station 2 building. Both the location of the equipment enclosure area, and the monopine on the fire station property are very easily accessible, with a clear path of travel, if needed for any AT&T network operations technicians during a routine maintenance visit or an emergency. The path for power and fiber is also very direct and clear. The equipment and tower are situated such that they are out of the way of any vehicular or pedestrian circulation, as required by the town's code, and in optimal locations for providing coverage to the area, while still blending with the surrounding area, land uses and live pine trees. Locating AT&T's cellular facility on the Fire Station property makes the most sense as the property is at a high elevation, has the clear and direct access to the tower and equipment as required by AT&T, and is a use that is consistent and appropriate with the current operations on this Fire Station Facility- responding to emergency calls and ensuring the safety of the residents and visitors of the Mammoth Lakes area. The Mammoth Lakes Fire Department will also have the ability to locate their equipment onto the AT&T monopine in the future. AT&T will be able to provide the town and first responders with the coverage that has been missing in this terrain for many years, for life safety efforts and connectivity in general.

The much-required coverage that AT&T (and a future wireless carrier) will be able to provide once the proposed tower is deployed, will provide first responders like the Mammoth Lakes' Fire and Police Departments with the ability to communicate effectively with one another (First Net- nationwide wireless network for first responders and the extended public safety community), as well as the residents, tourists and businesses in the area, especially during times of extreme weather conditions and emergencies. The reliable and critically needed coverage more this area, provided by a telecommunications tower, is necessary facility for the public, and most compatible and appropriate to the functions and operations of a Fire Station. The tower is more appropriate to be located at the current proposed Fire District location.

The Mammoth Lakes Fire District and the AT&T have already negotiated a lease. With CUP approval and the required city permits, this site could be constructed and go on air in 2024, so that Mammoth Lakes Fire and other first responders in the town can have the critically needed coverage to do their

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jobs, and to address public safety issues in a timely manner. It is in the best interests of the Town of Mammoth Lakes' general welfare and public safety to have this proposed wireless design and location approved in a timely manner, to avoid further delay of critical coverage being made available.

### Zoomed in Aerial View of Alternatives on the Fire Station 2 Property



#### ➤ **Alternative A: Fire Protection District Landscape Frontage**

This is the location AT&T originally proposed to locate their monopine tower. However, the Town of Mammoth Lakes development standards for cellular wireless require that wireless facility towers are located in the rear portion of the property. As this location was in the front of the Fire Protection District property, the proposed location needed to be moved elsewhere on the Fire Protection District property. This is not a feasible location.

#### **Alternatives B & C**

Chuck Lande, President/CEO of Chadmar, the developer of Creekhous, and David L. Jordan, homeowner in Creekhous, appointed HOA representative, and President/CEO of SSV Properties, requested to meet, on-site, with Mammoth Lakes' Community Development Director, Nolan Bobroff and Fire Chief, Ales Tomaier. On December 21, 2023, the individuals walked the Fire Protection District property, to discuss alternative locations on the fire district property that the Creekhous HOA would like explored. The request was to also provide simulations of an 80-foot tall monopine, as well as a 75-foot tall (top of pole steel and antenna equipment)

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non-stealth monopole, for the locations. Artistic Engineering, a third-party vendor that specializes in Photosimulations prepared the Photosimulations of the Primary candidate location and design, as well as the HOA requested, alternative design and locations on the fire station. These Photosimulations were submitted to the planning department, along with a statement of accuracy, from Artistic Engineering.

➤ **Alternative B: At rear of Fire Station building, by the fire engine garage doors and adjacent to the fire training tower.**

This was not a feasible alternative for AT&T to locate a non-stealth monopole tower, as there are several manhole covers in this area, which are likely associated with existing underground utilities. Additionally, this alternative location is located right next to the dual garage doors for the fire truck engines. Enough clearance from the fire station building's foundation and AT&T's tower caisson would need to be provided. The wireless tower would not only be in the way of the fire engine trucks, but more importantly, would be right next to the fire training tower that would routinely be set on fire for training exercises. The proximity of an AT&T tower to this fire training facility puts AT&T's equipment at risk, and is not a viable location for AT&T.

➤ **Alternative C: East side Fire building**

This was another alternative location the HOA representatives requested AT&T look into. Photosimulations were provided for an 80-foot tall monopine, and 75-foot-tall non-stealth monopole, as requested. The HOA provided no input or comments to the Towne or AT&T, regarding this alternative location, after the photosims were requested. However, like AT&T's original Alternative Location A, Alternative Location C is not located near the rear of the property, as required in the town's development standards. The current proposed candidate location, therefore, remains the optimal candidate.

**Alternative 1: St. Peter's Catholic Church (58 Ranch Road, Mammoth Lakes, CA 93546)**



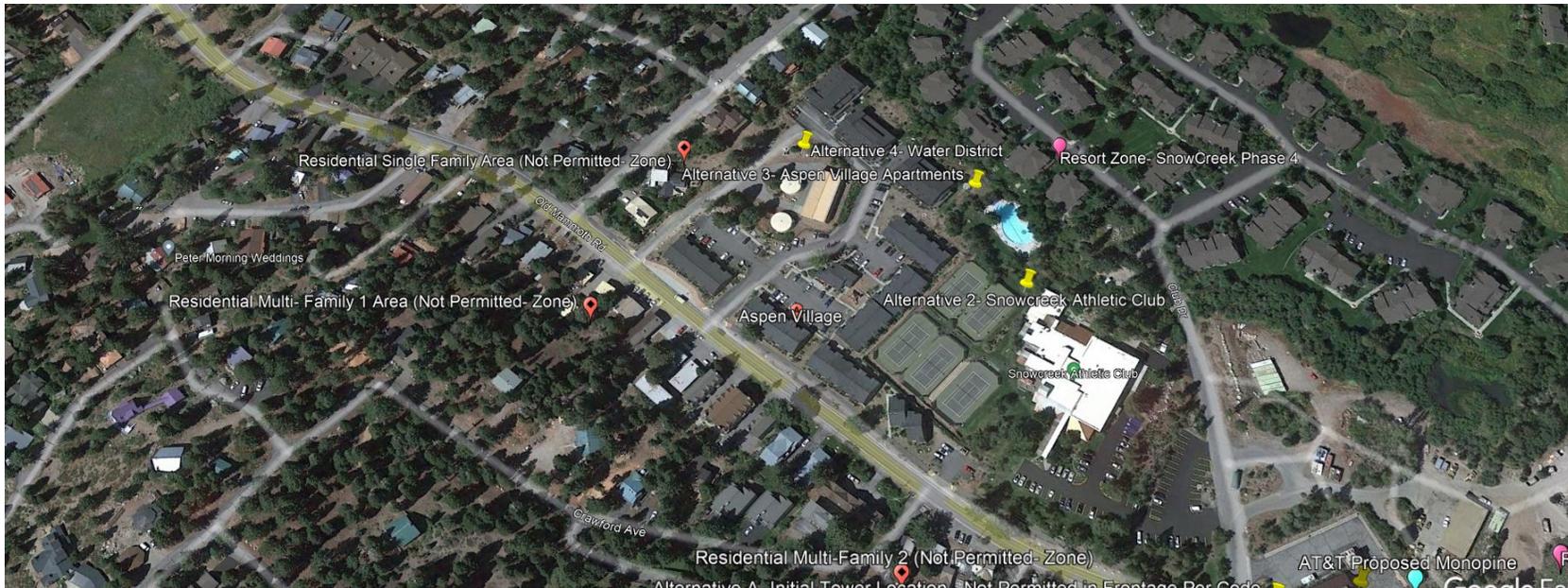
This property is zoned RMF-2 (Residential Multiple Family 2). The Towne of Mammoth Lakes zoning code prohibits cellular wireless facilities to be located in the residential zones. Therefore, a monopine cell tower is not permitted to be proposed on this property. This is not a viable candidate.

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- **Alternative 2: Snowcreek Athletic Club (51 Club Drive, Mammoth Lakes CA)**



Centered Aerial View of Snowcreek Athletic Club



The Snowcreek Athletic Club is located on a parcel zoned "Resort", west of Club Drive, and north of Old Mammoth Road. It is directly west of the Fire Protection District but sits at lower elevation. If a wireless tower was proposed on the athletic club parcel, per the town's development standards, it would

## **AT&T Site ID: CSL04615 - Mammoth Lakes Monopine - Alternative Sites Analysis**

need to be located away from the parcel frontage, and near the rear portion of the property. The code prohibits cellular facilities from locating in required parking, maneuvering, or vehicular/pedestrian circulation areas. Given the use of this property for athletic activities like tennis, swimming, and other activities, locating the tower at this property would be very limited. The cellular tower could not go anywhere in the parking lot. Additionally, to the west of the athletic club building, there are pedestrian walkway paths, leading to the pool and tennis courts. Placing the tower and associated ground equipment in this highly used public pedestrian area is not optimal or desirable.

Locating an 80-foot tall monopine (likely taller due to lower elevation) and associated 200 square foot ground lease area for the required equipment enclosure with an 8-foot-tall chain link fence or CMU wall, would perhaps need to be somewhere near the tennis courts or swimming pool. This location could impact the landlord's pedestrian paths and landscaped areas for his patrons. As there is also more open, public foot traffic for this athletic club use, there are increased concerns of safety with AT&T's equipment. This location also does not provide the most direct, shortest, and clear path of travel to access AT&T's tower and equipment enclosure, like the current Fire Station 2 property does. AT&T's network operations or technicians can more easily access the tower and equipment on the proposed Fire Station 2 property. Additionally, the current proposed location on the Fire Station 2 property has 24/7 fire personnel and security on-site, which also adds another layer of safety that is optimal and best suited for AT&T's.

This Athletic Club location is not optimal or superior to the current proposed candidate at the Fire Protection District property. Locating a monopine tower at this club location locates it where there is a larger volume of public foot traffic, lesser level of equipment security and access for AT&T technicians (in comparison to the Fire Station 2), and less direct access for AT&T's technicians. But locating the AT&T tower on the Snowcreek Athletic Club property also locates the tower closer to the Snowcreek (Phase 4) townhomes to the north, as well as the Aspen Village Apartments immediately west and south of the tennis courts. Proposing the tower on this property simply moves the facility away from the Creekhouses townhomes by the Fire Protection District, and instead moves a tower closer to the Aspen Village Apartments, and the Phase 4 Snowcreek townhomes. This location is not optimal; the Fire Protection District property is still a superior, appropriate, and more preferable candidate. The 80-foot monopine will accommodate AT&T's wireless equipment, as well as allow for the colocation of a future wireless carrier. The Fire District will also have the ability to use the AT&T tower in the future to locate its needed equipment. The much-required coverage that AT&T (and a future wireless carrier) will be able to provide once the proposed tower is deployed, will provide first responders like the Mammoth Lakes' Fire and Police Departments with the ability to communicate effectively with one another, as well as the residents, tourists and businesses in the area, especially during times of extreme weather conditions and emergencies. The reliable and critically needed coverage more this area, provided by a telecommunications tower, is necessary facility for the public, and most compatible and appropriate to the functions and operations of a Fire Station. The tower is more appropriate to be located at the current proposed Fire District location.

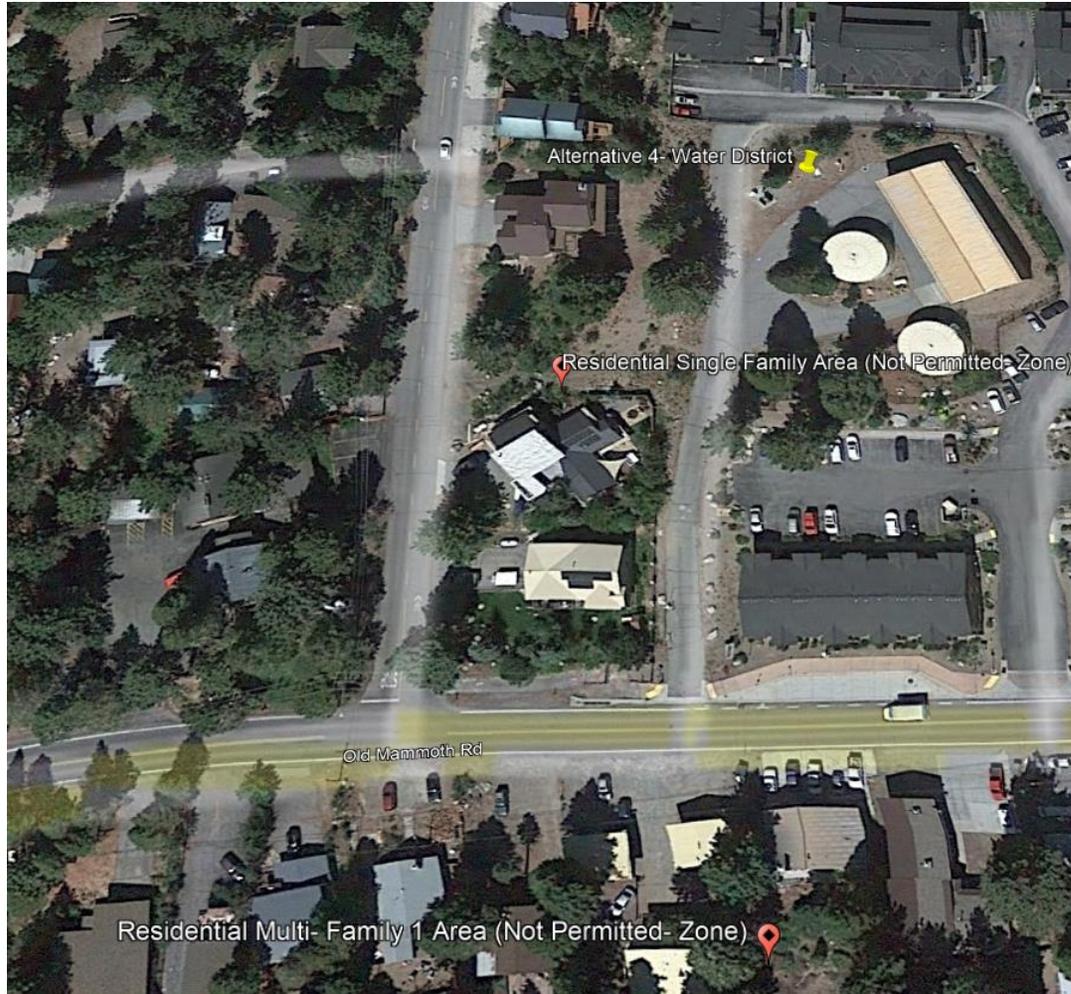
- **Alternative 3: Aspen Village Apartments (1700 Old Mammoth Road Trail, Mammoth Lakes)**



The Aspen Village Apartments is in the Resort zone, and the westerly adjacent parcel to the Snowcreek Athletic Club. The buildings on this parcel are more densely situated, given the apartment uses. The majority of these apartments are more likely to function as the primary residence of renters living in the town year-round, as opposed to rental units for tourists and short-term vacation stays. Additionally, there appears to be no suitable location to situate a monopine tower and associated equipment enclosure area, would be difficult on this parcel, without encroaching into the required parking, or vehicular and pedestrian circulation areas.

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- Alternative 4: Water District



- The Water District property is also in the Resort zone, and adjacent to the Aspen Village Apartment buildings, situated to the north, east and the south of the water district parcel. Residential single family area zoned homes are on located on the parcels directly west and northwest of the water district property. Residential Multi- Family 1 zoned parcels are also situated along the south side of Old Mammoth Road. The town's code prohibits cellular facilities to be placed on properties with a residential zone designation. Locating a monopine tower here would move the use closer to the residential zone, where a majority of the homes are for primary use, as opposed to units in the resort zones, which are used more as secondary homes and vacation/tourist rentals. This property is not superior to the current Fire Station 2 location and proposed candidate.

**Conclusion:**

Based on the preceding facts and statements and consistent with the municipal code's standards for development and operation of WTF's, AT&T respectfully requests approval of Wireless Use Permit application to construct, operate and maintain a WTF as proposed.