



**MAMMOTH LAKES FIRE PROTECTION DISTRICT**

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March 27<sup>th</sup>, 2024

Via Electronic Mail [[jjgray@townofmammothlakes.ca.gov](mailto:jjgray@townofmammothlakes.ca.gov)]

Jamie Gray, Town Clerk  
Town of Mammoth Lakes  
437 Old Mammoth Rd., Suite 230  
Mammoth Lakes, CA 93546

**RE: MLFPD Response to Appeal of Permit No. 211097 at Fire Station 2, 1574 Old Mammoth Road**

Dear Mayor Sauser and Town Council Members,

Mammoth Lakes Fire Protection District submits this letter to Town Council to support the Planning and Economic Development Commission's approval to place a stealth mono-pine wireless telecommunications facility at Fire Station 2, 1574 Old Mammoth Road. The two appeal opinions the District would like to address are the design considerations of the tower and the need for a tower from a public safety perspective.

The appeal applicant incorrectly argues the tower will only benefit those who have AT&T wireless service. The tower, as permitted, was deliberately calculated, with District input, to meet the needs of multiple providers as designed. There is no intent on the part of the District to increase the height post-approval because it is already properly designed. While the District has had a good relationship with AT&T contractors throughout the process, it has utilized external consulting to ensure that the interests of the community are prioritized in any areas where the District and the provider may have varying interests. The District has had parallel conversations with Verizon representatives and has worked through the bulk of an agreement process to place a second provider on the tower to ensure that the vast majority of Town constituents and visitors receive coverage in the area under consideration. The District Board has no intention of increasing the height of the tower because it was properly designed to meet the community's need. Because any significant changes to the tower would likely require new or altered District agreements for ground space utilization, the District has input on tower changes.

Statements in the appeal regarding the public safety uses of the system are incorrect and missing fundamental elements of modern communications systems. This system is being built out in response to the 2020 Mono County Grand Jury recommendations on emergency communications systems. At its core, communication is fundamental to any emergency response. The network coverage has implications for both communication between first responders as well as notification of the public. This was covered in extensive detail in the presentation to the Planning and Economic Development Commission and can be found in the recorded agenda. In summary, the tower will be utilizing FirstNet. The purpose of FirstNet is to establish, operate, and maintain an interoperable public safety broadband network. To fulfill these objectives, Congress allotted \$7 billion and 20 MHz of radio spectrum to build the network. This provides the Fire District and incoming mutual aid resources with much of the communication capacity during incidents. The spectrum is dedicated to first responders and under the new state CRIS radio system can also interface with the VHF system for additional capacity. Perhaps more importantly, the tower provides much needed reach and capacity for the Federal program, IPAWS (Integrated Public Alert and Warning System). As the appeal actually states IPAWS "is FEMA's national system for local alerting that provides authenticated emergency and life-saving information to the public through mobile phones" (appeal p. 9-10).

IPAWS is, by far, the most effective method for reaching the public in the event of an emergency. With the ubiquity of cell phone use, there is no better method for rapid and precise public outreach.

The area of Old Mammoth presents unique emergency considerations. There is limited access to the area due to road layout and topography. Due to the town being surrounded by federal forest, there is a limited mutual aid system in existence and local resources will be extremely taxed during any large-scale emergency or evacuation. The amount of tourism in our community leads to a significant portion of our population being unfamiliar with the area and needing more direction than local residents may need in times of emergency. These are factors that policy makers have limited control over, but we can work towards better communications for first responders, as well as the public. In a significant number of after-action reviews of tragic incidents, communications are listed as a major contributing factor to the outcome.

This submittal is a high-level response to the appeal statements. Because of the technical nature of the program, the District would encourage viewing the Planning and Economic Development presentations and deliberations if further information is desired. The presentation also had testimony from an Operations Chief on an external Incident Management Team to provide expertise on the need for modern communications and how they impact the emergency response.

Thank you and please reach out if I can provide any further information or clarify need, at [ales@mlfd.ca.gov](mailto:ales@mlfd.ca.gov) or on my cell phone at (760) 914-2326.

Respectfully,

A handwritten signature in black ink, appearing to read 'Ales Tomaier', with a stylized flourish at the end.

Ales Tomaier  
Fire Chief  
Mammoth Lakes Fire Protection District