

From: [Gayle Totton](#)
To: [CA Broadband Council](#)
Subject: Comments and Recommendation letter - Yocha Dehe Wintun Nation
Date: Tuesday, December 15, 2020 3:56:33 PM
Attachments: Ltr - CA Broadband Council Letter Signed 12-8-2020.pdf

Subject: Comments and Recommendation letter - Yocha Dehe Wintun Nation

Please see attached.

Gayle Totton, B.S., M.A., Ph.D.
Tribal Resources Manager

Yocha Dehe Wintun Nation

[Redacted]
[Redacted]
[Redacted]

www.yochadehe.org



December 8, 2020

Tribal Council

Anthony Roberts
Chairman

James Kinter
Secretary

Matthew Lowell, Jr.
Treasurer

Mia Durham
Member

Diamond Lomeli
Member

Submitted electronically to cabroadbandcouncil@state.ca.gov

The California Department of Technology (CDT)
Attn: Amy Tong, Chair of California Broadband Council
1325 J Street, Suite 1600
Sacramento, CA 95814-2928

Dear Chair Tong and Members of the California Broadband Council:

On behalf of Yocha Dehe Wintun Nation ("Yocha Dehe"), a federally recognized tribe located in rural Yolo County approximately 50 miles northwest of Sacramento, we submit the following comments and recommendations on increasing broadband access in rural and Tribal communities.

Unquestionably, there exists a stark infrastructure gap between rural and urban broadband accessibility. While urban centers enjoy widespread availability of high-speed internet service, rural and Tribal communities are either not connected, or are challenged with inadequate connectivity speeds. The impact of this gap has become more severe during the Covid19 pandemic where the need for high speed internet is critical to meet the growing demands of online school and work platforms, as these have become a "new normal" for many Californians. Connectivity provides higher quantity information which can be exchanged rapidly, and improves opportunities for rural residents. While Yocha Dehe's citizens and employees have access to internet services, our internet connection is inconsistent at times, with periodic outages due to a lack of critical backup systems and redundancies present in rural Yolo County. Also, as residents of the broader rural community, we know local County residents face the daily challenges of inadequate internet speeds which the pandemic has only exacerbated. To accelerate broadband deployment for underserved rural and Tribal communities, the State's assistance is vital in the following areas.

Funding and Resource Allocation

Local Needs Assessment

In 2016-2017, Tribal communities participated in an initial survey of broadband needs on Tribal lands conducted by Cynthia Gomez, Tribal Advisor to Governor Jerry Brown. This assessment was limited. The initial analysis showed that Tribes throughout California had little to no access to broadband services, but did not detail



local needs for specific Tribes. Tribal and rural communities continue to have limited resources addressing many immediate needs, including critical infrastructure like high-speed broadband. Specific and detailed research and needs assessments can help determine where and how resources may best be targeted and prioritized, and provides a much needed tool to coordinate between jurisdictions. These assessments should include local and Tribal stakeholders and should be tailored for a rural context. With proper research and a needs assessments in hand, Tribes and rural communities will have the tools to advocate for themselves and be better positioned to focus their efforts where they will have the best results. A targeted needs assessment for the rural community of the Capay Valley, for example, would allow Yocha Dehe to work with Yolo County, as well as state and federal policymakers, and funding agencies, to better understand the needs of the community.

Infrastructure Investment and Creating Incentives

There has been severe disinvestment in rural, community broadband infrastructure. A recent Deloitte Consulting analysis estimated that the United States requires between \$130 and \$150 billion over the next five to seven years to adequately support rural coverage and 5G wireless densification. These amounts are extensive, and if there is to be a chance to keep up with technological advances, the State needs to make financial commitments to rural communities now to avoid falling further behind.

As part of a funding strategy, the State could explore developing funding streams in the state budget, or through public bonds. The state can also explore the development of cost-sharing programs lead by public agencies, such as the California Public Utility Commission (CPUC), Energy Council, or similar departments, with a focus on bringing service providers to the table to help fund infrastructure, particularly middle- and last-mile capital costs and the installation of both terrestrial and non-terrestrial technologies. Perhaps the State can explore tax credits for private and public stakeholders that are commensurate with the public benefits generated from the investments made. These type of partnerships could go a long way in quickly advancing broadband services to underserved areas.

Coordination with Network Operators and Service Providers

Tribes and rural governments would benefit from working directly with network providers to explore options. To that end, network providers need to create a clear path to engaging with rural communities, including designating a person or team committed to this work and developing partnerships. We believe the CPUC and other state agencies can play a role in bridging the divide between Tribal and rural communities and network operators. Requesting network operators to share and consult locally on deployment roadmaps and long-range plans to increase bandwidth in or near underserved rural areas with the highest need is a way to bridge that divide.

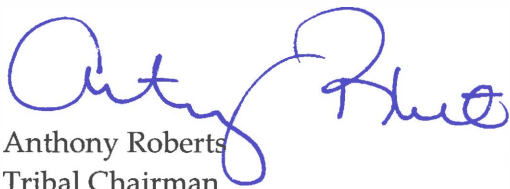
Adequate and Timely Outreach

Proper and adequate consultation and outreach to Tribal governments and rural communities continues to be a top priority for Tribes. State agencies could facilitate consultation between Tribes and network operators and service providers to make sure our communities are included in the entire project from scoping and advanced planning to infrastructure construction. Unfortunately, even though the Governor's Executive Order was signed on August 14, 2020, we did not receive a request for input until November 3, 2020, giving us no notice for the Tribal Listening Session *on the same date*, and only 2 weeks to provide these comments. It appears the State then expects to distill all of the comments received and have a report complete by year end, notwithstanding the intervening holidays. Against this backdrop, it is hard not to conclude Tribes were more than an afterthought.

To put it mildly, meaningful consultation requires notice to the commenting party, and an opportunity by the recipient to actually consider and digest comments. In the future, we would ask for a more robust outreach and marketing campaign, which has to occur if the needs of Tribes and rural communities are to be adequately addressed. Going forward, more time to prepare thoughtful and thorough comments is essential.

We appreciate your consideration of our comments and recommendations on this matter of great importance to California Tribes and rural communities. If you have questions regarding our comments please contact Omar Carrillo, Director of Government Affairs at ocarrillo@yochadehe-nsn.gov.

Wile bo,



Anthony Roberts
Tribal Chairman

cc: Tribal Council, Yocha Dehe Wintun Nation
Christina Snider, Governor Tribal Advisor