



**MCM HOLDINGS, LLC (“MCM”)**

**Application to the  
State of Connecticut Siting Council**

**For a Certificate of  
Environmental Compatibility and Public Need**

**—3 MARCHANT ROAD/CAMP HOYT—**

**Docket No. \_\_\_\_\_**

**MCM HOLDINGS, LLC  
40 WOODLAND STREET  
HARTFORD, CT 06105**

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1. Verizon's Coverage Plots
2. Summary of Site Search and List and Map of Existing Tower/Cell Sites
3. General Facility Description, Site Evaluation Report, Site Impact Statement, Tree Inventory
4. Aerial Map, Topographical Map, Drawings, FAA Determination of No Hazard to Air Navigation
5. Visibility Analysis
6. SHPO No Effect Determination; Avian Resources Evaluation; and USFWS & NDDB Compliance Report
7. Power Density Analysis
8. Wetland Inspection
9. Materials related to municipal consultation
10. Text of legal notice published in the Danbury News Times; Notice to Abutting Landowners; List of Abutting Landowners; Certification of Service of Notice
11. Certification of Service of Application on Federal, State and Municipal Agencies
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## I. Introduction

### A. Purpose and Authority

Pursuant to Chapter 277a, § 16-50g et seq. of the Connecticut General Statutes (C.G.S.), as amended, and § 16-50j-1 et seq. of the Regulations of Connecticut State Agencies (R.C.S.A.), as amended, MCM Holdings LLC (“MCM”) (the “Applicant”), hereby submits an application and supporting documentation (collectively, the “Application”) for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a telecommunications tower facility (the “Facility”). The Facility is needed by Verizon to provide reliable wireless services to northwestern Redding, southwestern Bethel, and southern Danbury. Verizon will intervene in the Docket proceeding. The Facility is proposed on an approximately 174-acre parcel of land owned by the Connecticut Yankees Council Inc. (Boy Scouts of America) located at 3 Marchant Road in the Town of Redding (the “Parcel” or “Camp Hoyt”)<sup>1</sup>. The Parcel is used as a camp by the Boy Scouts of America and includes various camp sites, hiking trails, a training facility, a parking area and cabins. The Facility is proposed within an approximately 6,800 square-foot (s.f.) lease area in the center of the Parcel. Construction of the Facility will permit Verizon and other FCC licensed wireless carriers to provide reliable wireless services to residents, businesses, schools, municipal facilities, and visitors to northwestern Redding, southwestern Bethel, and southern Danbury.

#### 1. Executive Summary

The northwestern area of Redding and small areas in southwestern Bethel and southern Danbury suffer from a lack of reliable wireless services. The Facility will provide reliable wireless communications services to these areas and address the significant coverage deficiency in the existing Verizon communications network along the nearby roadways and the neighboring commercial/business and residential areas in Redding as well as portions of southwestern Bethel and southern Danbury. The Facility is needed by Verizon in conjunction with other existing facilities to provide reliable wireless services to the public that is not currently provided in this part of Redding. The area is characterized by hilly terrain and forested areas, which are challenges for signal propagation. The

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<sup>1</sup> The camp entrance is located at 288 Simpaug Turnpike.

challenging terrain and distance between existing wireless sites and the targeted coverage area result in limited options for Verizon to provide reliable wireless services.

Verizon and MCM independently investigated different parcels of land in and around Redding. These searches determined that there are no tall structures located at the higher elevations in this area of the Town of Redding, and other sites investigated were either unavailable or inappropriate for the siting of a tower facility or technically inadequate to satisfy coverage requirements in this part of the state.

The Facility consists of a new self-supporting monopole that is 150' in height. The monopole will be located within an approximately 4,880 s.f. fenced equipment compound located within the 6,800 s.f. lease area in the center of the Parcel. Verizon's antennas would be installed at an antenna centerline height of 146' on the monopole tower with an equipment cabinet, a back-up battery cabinet, and a propane fueled emergency back-up generator located within the equipment compound. The monopole tower and fenced equipment compound are designed to support the antennas and equipment of other FCC licensed wireless carriers. Access and utilities to the Facility will be extended from Simpaug Road. The facility will be unmanned with no sanitary or water services and will generate on average 1 vehicle trip per month by each wireless carrier consisting of a service technician in a light duty van or truck.

The Applicant respectfully submits that the public need for a tower to provide reliable wireless services to northwestern Redding far outweighs any potential adverse environmental effects from the Facility as proposed in this Application. Indeed, the proposed Facility will provide the important benefit of reliable wireless services to the nearby roadways and the neighboring residential and business/retail areas as well as reliable emergency communication services and will not have any substantial adverse effect on the aesthetics or scenic quality of the neighborhood.

## 2. The Applicant

Applicant MCM is a Connecticut Limited Liability Company with offices at 40 Woodland Street, Hartford, CT 06105. MCM owns and/or operates numerous facilities in the State of Connecticut. MCM will construct, maintain and own the Facility and will sublease space to tenants such as Verizon, AT&T, T-Mobile, OSPD and others.

MCM does not conduct any other business in the State of Connecticut other than the development and management of tower sites. Correspondence and/or communications regarding this Application shall be addressed to the attorneys for the Applicant:

Cuddy & Feder, LLP  
445 Hamilton Avenue, 14<sup>th</sup> Floor  
White Plains, New York 10601  
Attention: Lucia Chiochio, Esq.  
Daniel Patrick, Esq.

A copy of all correspondence shall also be sent to:

MCM Holdings, LLC  
40 Woodland Street  
Hartford, CT 06105  
Attention: Virginia King

### 3. Application Fee

Pursuant to R.C.S.A. § 16-50v-1a (b), a check made payable to the Siting Council in the amount of \$1,250 accompanies this Application. Included in this Application and its accompanying attachments are reports, plans and visual materials detailing the design and location for the proposed Facility and the environmental effects associated therewith. A copy of the Siting Council's Community Antennas Television and Telecommunication Facilities Application Guide with page references from this Application is also included in Attachment 12.

### 4. Compliance with C.G.S. §16-50/ (c)

MCM nor Verizon engage in generating electric power in the State of Connecticut. Therefore, the Facility is not subject to C.G.S. § 16-50r. Furthermore, the proposed Facility has not been identified in any annual forecast reports. Accordingly, the proposed Facility is not subject to § 16-50/ (c).

## II. Service and Notice Required by C.G.S. § 16-50/ (b)

Pursuant to C.G.S. § 16-50/ (b), copies of this Application have been sent by certified mail to municipal, regional, state, and federal officials. A certificate of service, along with a list of the parties served with a copy of the Application is included in Attachment 11. Pursuant to C.G.S. § 16-50/ (b), notice of the Applicant's intent to submit this application was published on two occasions in the Danbury News Times, the publication used for notices in the Town of Redding. The text of the published legal notice is included in Attachment 10. The original affidavits of publication will be provided to the Siting Council once received from the publisher. Furthermore, in compliance with C.G.S. § 16-50/ (b), notices were sent to each person or entity appearing of record as the owner of a property which abuts the premises on which the Facility is proposed. Certification of such notice, a sample notice letter, and the list of property owners to whom the notice was mailed are also included in Attachment 10.

## III. Statements of Need and Benefits

### A. Statement of Need

#### 1. United States Policy & Law - Wireless Facilities

United States policy and laws continue to support the growth of wireless networks. In 1996, the United States Congress recognized the important public need for high quality wireless communications service throughout the United States in part through adoption of the Telecommunications Act (the "Act"). A core purpose of the Act was to "provide for a competitive, deregulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies to all Americans." H.R. Rep. No. 104-458, at 206 (1996) (Conf. Rep.). With respect to wireless communications services, the Act expressly preserved state and/or local land use authority over wireless facilities, placed several requirements and legal limitations on the exercise of such authority, and preempted state or local regulatory oversight in the area of emissions as more fully set forth in 47 U.S.C. § 332(c)(7). In essence, Congress struck a balance between legitimate areas of state and/or local regulatory control over wireless infrastructure and the public's interest in its timely deployment to meet the public need for wireless services.

In December 2009, then President Obama issued Proclamation 8460 which included wireless facilities within his definition of the nation's critical infrastructure and declared in part:

Critical infrastructure protection is an essential element of a resilient and secure nation. Critical infrastructure are the assets, systems, and networks, whether physical or virtual, so vital to the United States that their incapacitation or destruction would have a debilitating effect on security, national economic security, public health or safety. From water systems to computer networks, power grids to cellular phone towers, risks to critical infrastructure can result from a complex combination of threats and hazards, including terrorist attacks, accidents, and natural disasters.<sup>2</sup>

Congress and the Federal Communications Commission further developed a national plan entitled "Connecting America: The National Broadband Plan" (the "Plan").<sup>3</sup> Although broad in scope, the Plan's goal is undeniably clear:

[A]dvance consumer welfare, civic participation, public safety and MCM security, community development, health care delivery, energy independence and efficiency, education, employee training, private sector investment, entrepreneurial activity, job creation and economic growth, and other national purposes.<sup>4</sup> [internal quotes omitted]

A specific goal of the Plan is that "[t]he United States should lead the world in mobile innovation, with the fastest and most extensive wireless networks of any nation."<sup>5</sup>

Shortly after adoption of the Plan, and in April 2011, the FCC issued a Notice of Inquiry concerning the best practices available to achieve wide-reaching broadband capabilities

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<sup>2</sup> Presidential Proclamation No. 8460, 74 C.F.R. 234 (2009).

<sup>3</sup> *Connecting America: The National Broadband Plan*, Federal Communications Commission (2010), available at <https://www.fcc.gov/general/national-broadband-plan>.

<sup>4</sup> Id. at XI.

<sup>5</sup> Id. at 25.



across the nation including better wireless access for the public.<sup>6</sup> The FCC also adopted various orders in furtherance of the public need for the deployment of wireless infrastructure including specific time limits for decisions on land use and zoning permit applications.<sup>7</sup> Congress also acted again when it passed the Middle Class Tax Relief and Job Creation Act of 2012, which includes Section 6409 in the Spectrum Act which preempts a discretionary review process for eligible modifications of existing wireless towers or base stations.

In 2018, the FCC adopted two separate orders incorporating several declaratory rulings and a set of new regulations to specifically address various areas of state and municipal oversight of wireless facility siting including towers and small cells.<sup>8</sup> The first order prohibits any actual or de facto moratoria on the siting of wireless facilities. The second, intended to streamline the siting of current 4G LTE and future 5G wireless infrastructure, addressed numerous provisions of the Telecommunications Act and focused on any state or local siting requirements that might materially inhibit the deployment of wireless facilities including small cells. The Trump Administration has further developed a national strategy for the United States to win the 5G global race and continue American leadership in wireless technology.<sup>9</sup>

Throughout the pandemic, the critical importance of reliable wireless services was underscored as various government entities issued stay-at-home orders and Americans utilized wireless services for work, school, telehealth, deliveries, etc. Indeed, telecommunications was deemed an essential service during the pandemic state of emergency. The federal government also identifies the continued operation and growth of telecommunications capabilities as vital during this unprecedented time. On March 16, 2020, the Director of the United States Department of MCM Security, Cybersecurity and

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<sup>6</sup> FCC 11-51: Notice of Inquiry, In the Matter of Acceleration of Broadband Deployment: Expanding the Reach and Reducing the Cost of Broadband Deployment by Improving Policies Regarding Public Rights of Way and Wireless Facilities Siting, available at <https://docs.fcc.gov/public/attachments/FCC-11-51A1.pdf>.

<sup>7</sup> WT Docket No. 08-165 - Declaratory Ruling on Petition for Declaratory Ruling to Clarify Provisions of Section 332(c)(7)(B) to Ensure Timely Siting Review and to Preempt Under Section 253 State and Local Ordinances that Classify All Wireless Siting Proposals as Requiring a Variance.

<sup>8</sup> WT Docket No. 17-79 - Declaratory Ruling and Third Report and Order, Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment.

<sup>9</sup> See <https://www.whitehouse.gov/presidential-actions/presidential-memorandum-developing-sustainable-spectrum-strategy-americas-future> and <https://www.whitehouse.gov/articles/america-will-win-global-race-5g>

Infrastructure Security Agency, National Communications Coordination Branch issued a directive ordering cooperation and access to allow telecommunications providers to maintain their infrastructure to ensure the continuation of critical communication capabilities during the COVID-19 pandemic.<sup>10</sup>

More recently, in an effort to close the digital divide and maintain America's leadership in wireless technology, the Biden Administration allocated \$65 billion for broadband expansion in the Infrastructure Bill to build high-speed internet networks, to assist low-income families pay for service and to establish digital equity programs.<sup>11</sup>

## 2. United States Wireless Usage Statistics

Over the past thirty plus years, wireless communications have revolutionized the way Americans live, work and play. The ability to connect with one another in a mobile environment has proven essential to the public's health, safety and welfare. As of June 2020, there were an estimated over 442 million wireless devices in the United States amounting to approximately 1.3 devices per person.<sup>12</sup>

In 2020, the United States also saw a record-setting amount of data-traffic with over 42.2 trillion MBs of data carried over U.S. wireless networks in 2020.<sup>13</sup> The ever-increasing number of households transitioning to mobile voice connection only (i.e. abandoning land lines) has now grown to approximately 62.5% of households nationwide.<sup>14</sup> As of 2019, Connecticut in contrast lags behind in this statistic with approximately 43.1% wireless only households.<sup>15</sup>

<sup>10</sup> <https://www.cisa.gov/news/2020/03/19/cisa-releases-guidance-essential-critical-infrastructure-workers-during-covid-19>

<sup>11</sup> H.R.3684 - Infrastructure Investment and Jobs Act 117th Congress (2021-2022)  
<https://www.congress.gov/bill/117th-congress/house-bill/3684/text>

<sup>12</sup> CTIA Annual "The State of Wireless 2020" available at <https://api.ctia.org/wp-content/uploads/2020/08/2020-Annual-Survey-final.pdf>.

<sup>13</sup> CTIA Annual "The State of Wireless 2021 Highlights" available at <https://api.ctia.org/wp-content/uploads/2021/07/2021-Annual-Survey-Highlights.pdf>.

<sup>14</sup> See *Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, January-June 2020*, National Center for Health Statistics, Stephen J. Blumberg Ph.D. and Julian V. Luke, found at <https://stacks.cdc.gov/view/cdc/100855>.

<sup>15</sup> See *Modeled Estimates of the percent distribution of household telephone status for adults aged 18 and over, by state: United States, 2018* available at [https://www.cdc.gov/nchs/data/nhis/earlyrelease/Wireless\\_state\\_202108-508.pdf](https://www.cdc.gov/nchs/data/nhis/earlyrelease/Wireless_state_202108-508.pdf)

Wireless access to the internet has also grown exponentially since the advent of the truly “smartphone” device. CTIA reports that data use in 2020 was 108 times more than 2010.<sup>16</sup> A total of 190.4 million data-only devices, such as medical sensor, smartwatches, and hotspots were connected in 2020.<sup>17</sup> Americans exchanged over 119 billion more messages in 2020 than in 2019.<sup>18</sup>

Wireless access has also provided individuals a newfound form of safety. Up to 80% of *all* 9-1-1 calls made each year come from a wireless device.<sup>19</sup> Beginning May 15, 2015, wireless carriers in the U.S. voluntarily supported Text-to-911, a program that allows users to send text messages to emergency services as an alternative to placing a phone call.<sup>20</sup>

During the pandemic, when so many relied on wireless service during an unprecedented time, mobile voice use increased by 24.3% and data traffic increased by 19.6%.<sup>21</sup>

### 3. Public Need For A Tower For Wireless Services

The Facility proposed in this Application will be an integral component of Verizon’s network in its FCC licensed areas throughout the state. There is a significant deficiency in Verizon’s wireless communications service in the northwestern part of Redding. The proposed Facility will provide reliable services in Verizon’s network to an area of the Town currently experiencing deficient coverage, including Route 53 as well as other

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<sup>16</sup> CTIA Annual “The State of Wireless 2021 Highlights” available at <https://api.ctia.org/wp-content/uploads/2021/07/2021-Annual-Survey-Highlights.pdf>.

<sup>17</sup> [Id.](#)

<sup>18</sup> [Id.](#)

<sup>19</sup> 911 Wireless Services Guide last reviewed November 2, 2015

<sup>20</sup> *See Text-to-911: What you need to know* available at <https://www.fcc.gov/consumers/guides/what-you-need-know-about-text-911>. It should be noted that while the carriers have committed to supporting 911 texting in their service areas, text-to-911 is not available everywhere. Emergency call centers, called PSAPs (Public Safety Answering Points), are the bodies in charge of implementing text messaging in their areas. These PSAPs are under the jurisdiction of their local state and counties, not the FCC, which governs the carriers. *See also Gov. Malloy Announced Launch of Statewide Text-to-911 Capability* available at <https://portal.ct.gov/Malloy-Archive/Press-Room/Press-Releases/2018/08-2018/Gov-Malloy-Announces-Launch-of-Statewide-Text-to-911-Capability>, indicating that the State of Connecticut has recently transitioned to the Text-to-911.

<sup>21</sup> CTIA Annual “The State of Wireless 2020” available at <https://api.ctia.org/wp-content/uploads/2020/08/2020-Annual-Survey-final.pdf>.

roads in the area and the surrounding neighborhood. The proposed Facility will also provide service to portions of southwestern Bethel, and southern Danbury. Attachment 1 includes coverage plots depicting the “Current Coverage” provided by Verizon’s existing facilities in this area of the state and “Proposed Coverage” as predicted from the proposed Facility together with existing coverage from adjacent sites. Additional information regarding Verizon’s need will be provided when Verizon intervenes in the proceeding.

B. Statement of Benefits

Northwestern Redding is an area that experiences significant gaps in reliable wireless services. The coverage area for reliable wireless services encompasses a large area of northwestern Redding and portions of southwestern Bethel and southern Danbury. Carriers have seen the public’s demand for traditional cellular telephone services in a mobile setting develop into a requirement for anytime-anywhere wireless connectivity with critical reliance placed on the ability to send and receive voice, text, image and video. Provided that network service is available, modern devices allow for interpersonal and internet connectivity, irrespective of whether a user is mobile or stationary, which has led to an increasing percentage of the population to rely on their wireless devices as their primary form of communication for personal, business and emergency needs. This reliance on wireless services became critical during the pandemic for working-from-home, virtual schooling, telehealth appointments and access to goods. Post pandemic, reliable wireless service continues as a critical tool for all aspects of daily life. The Facility would allow Verizon and other carriers to provide these benefits to the public that are not offered by any other form of communication system.

Moreover, Verizon will provide “Enhanced 911” services from the Facility, as required by the Wireless Communications and Public Safety Act of 1999, Pub. L. No. 106-81, 113 Stat. 1286 (codified in relevant part at 47 U.S.C. § 222) (“911 Act”). The purpose of this federal legislation is to promote public safety through the deployment of a seamless, nationwide emergency communications infrastructure that includes wireless communications services. In enacting the 911 Act, Congress recognized that networks that provide for the rapid, efficient deployment of emergency services would enable faster delivery of emergency care with reduced fatalities and severity of injuries. With each year since passage of the 911 Act, additional anecdotal evidence supports the public safety value of improved wireless communications in aiding lost, ill, or injured individuals,

such as motorists and hikers. Carriers are able to help 911 public safety dispatchers identify wireless callers' geographical locations within several hundred feet, a significant benefit to the community associated with any new wireless site.

In 2009, Connecticut became the first state in the nation to establish a statewide emergency notification system. The CT Alert ENS system utilizes the state Enhanced 911 services database to allow the Connecticut Department of MCM Security and Connecticut State Police to provide targeted alerts to the public and local emergency response personnel alike during life-threatening emergencies, including potential terrorist attacks, Amber Alerts and natural disasters. Pursuant to the Warning, Alert and Response Network Act, Pub. L. No. 109-437, 120 Stat. 1936 (2006) (codified at 47 U.S.C. § 332(d)(1) (WARN), the FCC has established the Personal Localized Alerting Network (PLAN). PLAN will require wireless service providers to issue text message alerts from the President of the United States, the U.S. Department of MCM Security, the Federal Emergency Management Agency, and the National Weather Service using their networks that include facilities such as the one proposed in this Application. Telecommunications facilities like the one proposed in this Application enable the public to receive e-mails and text messages from the CT Alert ENS system on their mobile devices. The ability of the public to receive targeted alerts based on their geographic location at any given time represents the next evolution in public safety, which will adapt to unanticipated conditions to save lives.

### C. Technological Alternatives

The FCC licenses granted to wireless carriers operating in Connecticut authorize them to provide wireless services in this area of the state through deployment of a network of wireless transmitting sites. Redding is a community with significant changes in ground elevation, which provides for a challenging topography for transmitting wireless services in all directions. At this time, there are no known existing tower sites or structures in the northwestern Redding area that would meet the technical requirements and/or are available for lease or acquisition for construction of a tower site that could support a wireless facility.

Repeaters, microcell transmitters, distributed antenna systems and other types of transmitting technologies are not a practicable or feasible means of addressing the existing coverage deficiency in Redding. Technologies like small cells are best suited for

specifically defined areas where capacity is necessary, such as commercial buildings, shopping malls, and tunnels. Closing the coverage gaps and providing reliable wireless services in northwestern Redding requires a tower site that can provide reliable service over a footprint that spans several square-miles. The Applicant submits that there are no equally effective, feasible technological alternatives to a new tower for providing reliable personal wireless services in the northwestern Redding area.

#### **IV. Site Selection and Tower Sharing**

##### **A. Site Selection**

Verizon currently does not provide reliable services in areas of northwestern Redding. To address this need, Verizon and MCM have been engaged in site searches in northwestern Redding and the surrounding area over a period of several years. This particular site search area in Redding is predominated by hilly terrain and forested areas. No suitable tall structures are located at the higher elevations in this area of the Town of Redding. The area consists principally of low story residential structures on large parcels with some farms and wooded areas.

MCM collaborated with Verizon to investigate a number of different parcels of land within Redding. As provided in Attachment 2, including the Parcel, four (4) sites were investigated as well as two (2) existing towers and deemed either unavailable or inappropriate for the siting of a tower facility or technically inadequate to satisfy Verizon's coverage requirements for this area of need.

##### **B. Tower Sharing**

The proposed Facility is designed to accommodate the antennas and equipment of Verizon and up to three (3) additional wireless carriers for wireless services networks in the Town of Redding.

#### **V. Facility Design**

The proposed Facility includes an approximately 6,800 s.f. rectangular shaped lease area located in the center of the approximately 174-acre Parcel with a post office address of 3 Marchant Road and access from 288 Simpaug Turnpike. The Facility consists of a new self-supporting monopole that is 150' in height. The monopole tower will be located

within a 4,800 s.f. fenced equipment compound. Verizon would install nine (9) antennas with nine (9) remote radio head units (RRHs) at a centerline height of 154' and an equipment cabinet, a back-up battery cabinet, and a propane-fueled emergency back-up generator on a 10' x 20' concrete pad in the northeastern corner of the fenced equipment compound. A 1,000-gallon propane fuel tank will be located on a separate 5' x 26' concrete pad on the northwestern portion of the equipment compound. The tower would be designed for future shared use of the structure by other FCC licensed wireless carriers.

The 4,880 s.f. fenced equipment compound would accommodate Verizon's equipment and provide for future shared use of the Facility by other carriers. The tower compound would be enclosed by an 8' high chain link fence with privacy slats.

Vehicle access to the Facility would be provided from Simpaug Turnpike over the existing paved driveway and gravel parking area. A new 12'-wide, approximately 125' gravel access drive will connect the Facility to the existing gravel parking area. Utility connections would be routed underground from an existing utility pole #4884 on site. Attachments 3 and 4 contain the specifications for the proposed Facility, including an abutters map, existing conditions survey, site plan, compound plan and tower elevation, and other relevant details of the proposed Facility.

Included as Attachments 5, 6, 7, and 8 are various documents obtained or created as part of the Applicant's environmental review including a Visibility Analysis (Attachment 5). Some of the relevant information included in Attachments 5, 6, 7, and 8 reveals that:

- Total area of disturbance is approximately 13,300 s.f. and 19 trees with a greater than 6" dbh are proposed for removal. Site improvements entail approximately 345 cubic yards of excavation. Approximately 270 cubic yards of crushed stone are needed for the compound and driveway construction.
- Management of stormwater and erosion controls will be implemented during and after construction and as such, the proposed Facility will have little to no impact on water flow or water quality. No direct impacts to any wetlands or watercourses are anticipated.

- Anticipated visibility of the Proposed Facility will be limited to the immediate area of the proposed Facility. The combined seasonal and year-round visibility of the proposed Facility is estimated to be less than 1% of the 8,042-acre study area.

## **VI. Environmental Compatibility**

Pursuant to C.G.S. §16-50p (a)(3)(B), the Siting Council is required to find and determine as part of the Application process any probable impact of the Facility on the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forest and parks, air and water purity, and fish and wildlife. As demonstrated in this Application, the Facility will be constructed in compliance with applicable regulations and guidelines, and best practices will be followed to ensure that the construction of the proposed Facility will not have a significant adverse environmental impact. In addition, the regular operation and monthly maintenance of the Facility will not have a significant environmental impact.

### **A. Visual Assessment**

Included in Attachment 5 is a Visibility Analysis which contains a viewshed map and photo simulations of off-site views. As detailed in the enclosed Visibility Analysis, areas from where the Facility would be visible when leaves are off the trees comprise 44+/- acres of the 8,042-acre study area and are generally limited to locations within 0.5 miles of the Parcel. Year-round visibility is anticipated to occur over open fields and water, comprising an additional 2 ± acres. Together, this represents less than one percent of the 8,042-acre study area (± 0.06%) with more than half of the predicted visibility occurring over the Parcel.

No schools or commercial child-care centers are located within 250' of the Parcel. John Read Middle School is located approximately 2.07 miles southeast of the Parcel and the Children's Academy childcare center is located approximately 1.83 miles southwest of the Parcel. No visibility from these locations is anticipated.



Weather permitting, the Applicant will raise a balloon with a diameter of at least three (3) feet at the Parcel on the day of the Siting Council's first hearing session on this Application, or at a time otherwise specified by the Siting Council.<sup>22</sup>

B. CT DEEP, SHPO and Other State and Federal Agency Comments

Various consultations and analyses for potential environmental impacts are summarized and included in Attachments 6 and 8. Representatives of the Applicant submitted requests for review from federal and state entities including the Connecticut Department of Economic and Community Development State Historic Preservation Office (SHPO). MCM conducted an evaluation of the proposed Facility's potential effects on historic resources and concluded that the proposed Facility will have no effect on historic properties listed or eligible for listing on the National Register of Historic Places. SHPO's concurrence with MCM's evaluation that the Proposed Facility will have no impact on historic resources is included in Attachment 6.

Based on an Avian Resources Evaluation report, no adverse impacts to migratory bird species are anticipated. The proposed Facility is not proximate to an Important Bird Area and would comply with the United States Fish and Wildlife Services ("USFWS") recommended best practices. The Avian Resources Evaluation report is included in Attachment 6.

According to the most recent Connecticut Department of Energy & Environmental Protection DEEP Natural Diversity Data Base ("NDDB") maps, the proposed Facility is located within a shaded NDDB buffer area. A NDDB Determination letter indicates that only one state-listed Endangered species, Appalachian blue butterfly may be influenced by the proposed Facility. A survey for black cohosh was conducted on July 13, 2023 and no plants were found. A copy of MCM's USFW & NDDB Compliance Report is included in Attachment 6.

Two federally listed species under the Endangered Species Act are known to occur in the vicinity of the Parcel: the northern long-eared bat ("NLEB"; Endangered; *Myotis septentrionalis*) and bog turtle (Threatened; *Clemmys muhlenbergii*). A review of the DEEP NDDB NLEB habitat map revealed that the proposed Facility is not within 150' of

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<sup>22</sup> The Applicant will comply with Siting Council directives regarding the state-wide efforts to prevent the spread of the COVID-19 coronavirus with respect to conducting the balloon float.

a known occupied NLEB maternity roost tree and is not within 0.25 mile of a known NLEB hibernaculum. The nearest NLEB habitat resource to the proposed Facility is located  $\pm 16.8$  miles to the northeast in Bridgewater. On November 30, 2022, the USFWS reclassified the NLEB as Endangered under the Endangered Species Act. Using the new NLEB Determination Key developed by the USFWS for NLEB, a determination that the proposed Facility would likely not affect the NLEB was submitted. Since no response was received within 15 days of this determination submission, no further action is required. Please see MCM's USFW & NDDDB Compliance Report included in Attachment 6 for a copy of the USFWS March 21, 2023 letter confirming compliance.

The Project Site and adjacent areas also do not support bog turtle habitat. The Facility would be located within a forested upland area adjacent to a gravel parking area and boy scout camp facility and would not impact nearby wetlands. The nearest potential bog turtle habitat is possibly associated with wetland habitat contained within the Saugatuck River valley located over 1,500' northwest of the Project Site. Therefore, no likely adverse effect to bog turtle, a wetland dependent species, would be anticipated from the proposed project. A Preliminary Site Assessment was filed through the CTDEEP eNDDDB system to determine which listed species may be present on or within the vicinity of the Project Site. A species list was generated through the eNDDDB system on February 18, 2023 revealing that no records of bog turtle exist on or in the vicinity of the Project Site. Even though the proposed Facility is not expected to impact bog turtle or its habitat, a Bog Turtle Protection Plan was developed and will be implemented. Please see MCM's USFWS & NDDDB Compliance Report included in Attachment 6.

As required by statute, this Application is being served on state and local agencies, which may choose to comment on the Application prior to the close of the Siting Council's public hearing.

### C. Power Density

In August of 1996, the FCC adopted a standard for Maximum Permissible Exposure (MPE) for RF emissions from telecommunications facilities like the one proposed in this Application. The tower site will fully comply with federal and state MPE standards. The cumulative worst-case calculation of power density from Verizon's operations would be 9.0% of the MPE standard. A Far Field RF exposure analysis is included in Attachment 7.

D. Wetlands, Drainage & Other Environmental Factors

A wetland delineation was conducted at the Parcel and identified two nearby freshwater wetlands, one approximately 48' west of the proposed facility and another approximately 443' east of the proposed facility. No permanent, direct impacts to wetlands, or species habitat, are anticipated to result from the proposed Facility. Proposed sedimentation and erosion controls will be designed, installed, and maintained during construction activities in accordance with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control which will minimize any temporary impacts. Overall, the construction and operation of the proposed Facility will not impact any wetlands or inland waterways. The Wetlands Inspection is included in Attachment 8.

The proposed Facility would be unmanned, requiring monthly maintenance visits approximately one hour long. Carriers that maintain antennas and equipment at an approved Facility monitor their facility 24 hours a day, seven days a week from a remote location. The proposed Facility does not require a water supply or wastewater utilities. No outdoor storage or solid waste receptacles will be needed. Furthermore, the proposed Facility will neither create nor emit any smoke, gas, dust, other air contaminants, noise, odors, nor vibrations other than those created by any heating and ventilation equipment or generators installed by the carriers. During power outages and weekly equipment cycling an emergency generator would be utilized with air emissions in compliance with State of Connecticut requirements.

E. National Environmental Policy Act Review

The Applicant evaluated the project in accordance with the FCC's regulations implementing the National Environmental Policy Act of 1969, Pub. L. No. 91-190, 83 Stat. 852 (codified in relevant part at 42 U.S.C. § 4321 et seq.) ("NEPA"). The Parcel was not identified as a wilderness area, wildlife preserve, National Park, National Forest, National Parkway, Scenic River, State Forest, State Designated Scenic River or State Gameland. Furthermore, according to the site survey and field investigations, no federally regulated wetlands or watercourses will be impacted by the proposed Facility.

## F. Air Navigation

The proposed Facility was analyzed for potential impacts to air navigation. The Federal Aviation Administration (“FAA”) determined that the proposed Facility does not exceed obstruction standards and would not be a hazard to air navigation. See the FAA Determination included in Attachment 4.

## VII. **Consistency with the Town of Redding’s Land Use Regulations**

Pursuant to the Siting Council’s Application Guide, a narrative summary of the consistency of the project with the Town’s zoning and wetland regulations and plan of conservation and development is included in this section. A description of the zoning classification of the site and the planned and existing uses of the proposed site location are also detailed in this section.

### A. Redding’s Plan of Conservation and Development

The Redding 2018 Plan of Conservation & Development (“POCD”), adopted May 26, 2020 and effective June 12, 2020 is included in the Bulk Filing. Wireless communication is noted on POCD Page 8-2 where the tower facility at the Redding Ridge Fire Department is noted as addressing the “burgeoning need for more widespread and reliable wireless communications” for residents and public entities. Telecommunication services are also noted on POCD Page 6-2 where telecommunication services are noted as supporting the trend toward working from home as the desire for more attractive surroundings while working increases. One of the goals of the POCD is to provide more life-saving equipment for medical response technicians. It is respectfully submitted that the Proposed Facility will further the POCD goal of providing more life-saving equipment for medical response technicians and emergency responders by providing reliable emergency communication services.

### B. Redding’s Zoning Regulations and Zoning Classification

The most recent Town of Redding Zoning Regulations, effective August 18, 2020, do not address telecommunications towers and antennas. The Parcel is classified in the Town’s R-2 Residential Zoning District.

### C. Planned and Existing Land Uses

The Facility is proposed on an approximately 174-acre parcel of land owned by the Connecticut Yankees Council, Inc. and is currently used as a camp by the Boy Scouts of America known as Camp Hoyt with various camp sites, hiking trails, a parking area and cabins. Vacant residential and open space wooded properties are located north, south and east of the subject site. Vacant wooded and residential properties are located west of the subject site. Consultation with municipal officials did not indicate any other planned changes to the existing surrounding land uses. Copies of the Town of Redding Zoning Code, Inland Wetlands Regulations, Zoning Map and Plan of Conservation and Development are included in the Bulk Filing.

### D. Redding's Inland Wetlands and Watercourses Regulations

The Redding Inland Wetlands Regulations ("Local Wetlands Regulations") regulate certain activities conducted in "Wetlands" and "Watercourses" as defined therein, including areas within 100' of a wetland or watercourse. As set forth in the Wetland Investigation Report in Attachment 8, wetland, identified as Wetland 1, is located approximately 48' west of the Proposed Facility and distant wetland, identified as Wetland 2, was delineated approximately 443' east of the Proposed Facility. The project would constitute a regulated activity under Local Wetlands Regulations in connection with Wetland 1. The proposed Facility is not anticipated to result in an adverse impact to wetlands. All appropriate sediment and erosion control measures will be designed and employed in accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Connecticut Council of Soil and Water Conservation and DEP (2002). Soil erosion control measures and other best management practices will be established and maintained throughout the construction of the proposed Facility. The Applicant does not anticipate an adverse impact on any wetland or water resources as part of construction or longer term operation of the Facility and respectfully submit that any indirect impacts would not significantly add to the existing development and usage of the Parcel.

### VIII. Consultation with Town Officials

C.G.S. § 16-50/ generally requires an applicant to consult with the municipality in which a new tower facility may be located for a period of ninety days prior to filing any application with the Siting Council. With respect to the Facility as proposed in this Application, a Technical Report was filed with the Town of Redding on April 18, 2023. On June 8, 2023, a duly noticed (in-person) public information meeting was held at the Town of Redding Town Hall including a presentation by the MCM and Verizon and comments and questions from the public in attendance. After the public information meeting at the request of the Town, MCM conducted a duly noticed balloon float on July 24, 2023. The Applicant did not receive any additional comments after the public information meeting.

A copy of the April 18, 2023 Technical Report is included in the Bulk Filing.

### IX. Estimated Cost and Schedule

#### A. Overall Estimated Cost

The total estimated cost of construction for the proposed Facility is represented in the table below.

<b>Requisite Component:</b>	<b>Cost (USD)</b>
Tower & Foundation	240,000
Utility Installation	40,000
Facility Installation	55,000
<b>Subtotal MCM Cost</b>	<b>335,000</b>
Verizon Radio Equipment	300,000
Verizon Antennas and Coax	90,000
Generator	25,000
<b>Subtotal VERIZON Cost</b>	<b>415,000</b>
<b>Total Estimated Costs</b>	<b>750,000</b>

## B. Overall Scheduling

Site preparation work would commence following Siting Council approval of a Development and Management (“D&M”) Plan and the issuance of a Building Permit by the Town of Redding. The site preparation phase is expected to be completed in 3-4 weeks. Installation of the monopole, antennas and associated equipment is expected to take an additional 2 weeks. The completion of construction (level/grading; fence installation) will take approximately 2 weeks. The duration of the total construction schedule is approximately 8 weeks. Facility integration and system testing for carrier equipment is expected to require an additional 2 weeks after construction is completed.

## X. **Conclusion**

This Application and the accompanying materials and documentation clearly demonstrate that a public need for a new tower in northwestern Redding and portions of southwestern Bethel, and southern Danbury exists to provide reliable wireless services to the public. Verizon has gaps in reliable communications in and around this area of the state. The Applicant respectfully submits that the public need for the proposed Facility outweighs any potential environmental effects from development of the tower, none of which have been identified as substantial or significant. Accordingly, the Applicant respectfully requests that the Siting Council grant a Certificate of Environmental Compatibility and Public Need to MCM for a new wireless telecommunications Facility in northwestern Redding.

Respectfully Submitted,

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