

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION BY MCM HOLDINGS, LLC  
FOR A CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED FOR THE  
CONSTRUCTION MAINTENANCE AND  
OPERATION OF A WIRELESS  
TELECOMMUNICATIONS FACILITY AT  
3 MARCHANT ROAD (CAMP HOYT), 288  
SIMPAUG TURNPIKE (PARCEL NO. 12-29),  
REDDING, CONNECTICUT

DOCKET NO. 517

January 16 , 2024

**RESPONSES OF MCM HOLDINGS, LLC TO INTERVENOR TIM K. KEYES,  
PRE-HEARING INTERROGATORIES**

- Q1. Did all interrogatory responders from MCM Holdings, LLC take a sworn oath of truthfulness administered by the CT Siting Council prior to answering the questions posed below?
- A1. *Yes.*
- Q2. In the event of an environmental/ecological incident during construction, operation and maintenance of the facility, will the applicant commit to fully fund full clean-up, remediation and restoration? Will the applicant monitor the wetlands for environmental degradation / wildlife die-off over time? Please describe the planned monitoring procedure.
- A2. *In the unlikely event of an environmental incident, MCM will comply with all applicable regulations and requirements for response and remediation.*
- Q3. Please confirm that under no scenario will the Town of Redding be responsible for any aspect arising from environmental issues caused by the construction, operation and maintenance of the proposed facility.
- A3. *The proposed facility will be privately owned and operated and as such, the Town of Redding is not involved.*
- Q4. There will be up to 2000 gallons of LPG stored on the site (see “Aerial Map, Topographical Map, Drawings, FAA Determination of No Hazard to Air Navigation”). An earlier question arose from the CT Siting Council about the dangers of filling tanks while the site is under construction. Intervenors have a similar question about filling tanks during use: how will this be handled to avoid hazardous spills on the site, especially near areas that may impact wetlands? What is the mitigation/remediation plan?
- A4. *Each carrier will engage the services of a propane supplier and these services will include proper propane refueling procedures.*

- Q5. Firearm target practice takes place on Hoyt premises (this was surfaced at the last hearing but not addressed). Are the LPG tanks at risk due to stray gunfire? What outcome would be expected if gunfire hits a tank?
- A5. *Due to the separating distance ( $\pm 825$  feet) of the firearm range to the nearest LPG tank, the ground elevation of the firearm range ( $\pm 10$  feet below the proposed Facility location), and intervening vegetation and structures it is unlikely that stray gunfire could strike an LPG tank in the proposed compound.*
- Q6. Have any trees been felled on the Hoyt property since the last Balloon Test for Visibility Analysis? If logging has occurred, wouldn't a new Balloon Test be warranted?
- A6. *MCM confirmed with the Boy Scout Camp that there were no tree removals and that no logging activities take place on the property.*
- Q7. Was the predictive computer model used in the Visibility Analysis independently validated? Was it calibrated to minimize errors? What predictive metrics were used to evaluate this model? How did it perform?
- A7. *The methodology used to develop the predictive viewshed analysis model is contained in the Visibility Analysis & Photosimulations included as Attachment 5 to the August 14, 2023 Application for a Certificate of Environmental Compatibility and Public Need. The predictive model incorporates various publicly available data and utilizes Geographic Information System (GIS) software to identify areas of potential visibility associated with the proposed Facility. A balloon float and field reconnaissance, including photo-documenting where the balloon was – and was not - visible, was conducted by All-Points Technology Corp., P.C. on February 1, 2023 in order to verify the results of the predictive analysis. Additionally, a publicly noticed balloon float was conducted on July 24, 2023 to provide members of the public with an opportunity to independently assess potential visibility.*
- Q8. What federal funding is being used by the applicant on this project?
- A8. *None.*
- Q9. Does the applicant have a financial relationship with any party in this process other than with the applicant?
- A9. *This question is unclear. As stated in the Application, MCM has a lease with the property owner and proposes to construct, maintain and own the facility and lease space to Verizon and any other carriers that are interested in collocating on the facility.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, one original and fifteen (15) hard copies of the foregoing was sent via overnight Federal Express and electronically to the Connecticut Siting Council and to the parties on the service list as noted below.

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