

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

November 20, 2023

**RESPONSES OF MCM HOLDINGS, LLC TO INTERVENOR  
JOANN VILLAMIZAR PRE-HEARING INTERROGATORIES**

- Q1. Why was the property at 235 Simpaug Turnpike not listed as one of the alternate properties viewed as the property owner did take a representative of either MCM or Celco or Allpoints Technology Corporation on behalf of MCM or Celco or both on a tour?
- A1. *MCM has no records of a site visit at 235 Simpaug Turnpike. Nevertheless, as noted in Celco's Responses to Intervenors Interrogatories, a facility at 235 Simpaug Turnpike would not provide service to the area where service is needed.*
- Q2. What other properties were evaluated but not listed?
- A2. *None.*
- Q3. Please indicate the location of the leased Parcel and monopole thereon on Exhibit IV-A as it depicts the various camp sites and trails in an easier pictorial view than the Exhibit submitted by MCM. Please indicate on Exhibit IV-A the fall zone for the monopole in the event of a catastrophic failure.
- A3. *See Attachment 2 of the Responses of MCM Holdings, LLC to Connecticut Siting Council Pre-Hearing Interrogatories submitted on November 1, 2023. Since the proposed Facility is located more than 150' from the nearest property line, a hinge-point is not needed. In the event of a catastrophic failure the tower would remain within the property.*
- Q4. Please provide the distance from the (1) fenced area and (2) the monopole for each of the following areas listed on Exhibit IV-A:
- Blue Trail  
Lincoln Council Ring  
Garfield Camp Site
- A4. *The Blue Trail is located approximately 65' from the nearest point of the compound, and approximately 90' from the proposed monopole. The Lincoln Council Ring is located approximately 300' from the nearest point of the compound, and approximately 355'*

*from the proposed monopole. The Garfield Camp Site is located approximately 90' from the nearest point of the compound, and approximately 115' from the proposed monopole.*

- Q5. Did MCM take the concerns relative to the safety of the children into consideration relative to erecting the cell tower on Parcel 12-29? If yes, what was evaluated and what, if any, additional safety features are included over and above those previously utilized by MCM in other locations in light of the proposed cell tower being erected on a scout camp site?
- A5. *See Response A16 of the Responses of MCM Holdings, LLC to Connecticut Siting Council Pre-Hearing Interrogatories submitted on November 1, 2023.*
- Q6. When did MCM begin a search for properties and/or hire a third party to search for properties in West Redding and what was the center and radius of the search?
- A6. *Please refer to the Site Search Summary included as Attachment 2 to the August 14, 2023 Application for a Certificate of Environmental Compatibility and Public Need.*
- Q7. What Properties and/or cell towers were considered in Southwestern Bethel and Southern Danbury to address any deficiency in these areas and, if none, why was the search so limited?
- A7. *Please refer to the Site Search Summary included as Attachment 2 to the August 14, 2023 Application for a Certificate of Environmental Compatibility and Public Need which includes details of the existing tower facilities considered within the 4-mile radius of the Camp Hoyt site, including locations in Bethel, Danbury, and Ridgefield.*
- Q8. Please advise as to the significance of the 250' distance from a commercial child-care center or school?
- A8. *Pursuant to Connecticut General Statute § 16-50p, "In the case of a facility described in subdivision (6) of subsection (a) of section 16-50i that is ... (ii) proposed to be installed on land near a building containing a school, as defined in section 10-154a, or a commercial child care center, as described in subdivision (1) of subsection (a) of section 19a-77, that the facility will not be less than two hundred fifty feet from such school or commercial child care center unless the location is acceptable to the chief elected official of the municipality or the council finds that the facility will not have a substantial adverse effect on the aesthetics or scenic quality of the neighborhood in which such school or commercial child care center is located...."*
- Q9. Please provide a definition of a commercial child-care center as used in the application.
- A9. *Per Connecticut General Statute § 16-50p, the definition of commercial child care center can be found in subdivision (1) of subsection (a) of section 19a-77. Per Connecticut General Statute § 19a-77(a)(1), "A 'child care center' which offers or provides a program of supplementary care to more than twelve related or unrelated children outside their own homes on a regular basis."*
- Q10. MCM states in the application that additional information regarding Verizon's need will be provided when Cellco intervenes in the proceedings. Please advise as to what additional information has been provided in support of establishing a need for additional service in West Redding other than Cellco's unsubstantiated assertions of need.

- A10. *Please refer to the Responses of Cellco Partnership D/B/A Verizon Wireless to Connecticut Siting Council Pre-Hearing Interrogatories submitted on November 1, 2023. This is in addition to materials provided by Verizon which were included the August 14, 2023 Application for a Certificate of Environmental Compatibility and Public Need.*
- Q11. MCM states in the application that at this time there are no known existing tower sites or structures in the northwest 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. Are there such sites or structures in Southwest Bethel or southern Danbury that could accommodate a wireless facility?
- A11. *No. Please refer to the Site Search Summary included as Attachment 2 to the August 14, 2023 Application for a Certificate of Environmental Compatibility and Public Need for additional information on the alternative locations considered.*
- Q12. Please define a "vacant residential property" and is that reference being applied to the property at 235 Simpaug? What other properties in the surrounding area does MCM consider as vacant residential property? What is the significance of the adjective "vacant" to the building of the facility?
- A12. *The term "vacant" is used to describe property that has not been developed and the term "vacant" has no significance with respect to the building of the facility.*
- Q13. In the event that a child attending a function at the scout camp is injured climbing the fence and/or cell tower or injury sustained resulting from their trespassing into the site from other components of the facility, does MCM have any liability and, if yes, what is the extent of the liability?
- A13. *This information is not included in the legal criteria for the Siting Council to consider in a certificate proceeding as set forth in Connecticut General Statutes § 16-50p. Connecticut General Statutes § 16-50p requires the Siting Council to balance the public need for facilities with their probable environmental impacts and does not allow for Siting Council consideration of liability or insurance information.*
- Q14. Does or did MCM have any other agreements with the Parcel owner either oral or written, including but not limited to an option agreement in light of the Site Plan dated October 16, 2014 and the November 16, 2016 date of the lease Agreement? If yes, please provide a copy thereof or, if oral, the terms and conditions.
- A14. *This information is not included in the legal criteria for the Siting Council to consider in a certificate proceeding as set forth in Connecticut General Statutes § 16-50p. Connecticut General Statutes § 16-50p requires the Siting Council to balance the public need for facilities with their probable environmental impacts and does not allow for Siting Council consideration of prior verbal or written agreements. A redacted version of the lease agreement was submitted to the Siting Council in accordance with Connecticut General Statutes § 16-500(c). A copy of the current, unredacted lease agreement between MCM and the Boy Scouts of America was submitted to the Siting Council with a Motion for Protective Order on November 1, 2023. On November 9, 2023, the Siting Council approved the Applicant's Motion for Protective Order.*

Q15. Was the Simpaug Turnpike access road to the Parcel paved when the site was first seen by MCM or a third party on their behalf? If no, did MCM directly or indirectly support the paving of the driveway? If yes, please elaborate and provide any documents related thereto.

A15. *Yes, the access road was paved.*

**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.

Kenneth C. Baldwin, Esq.  
Robinson & Cole LLP  
280 Trumbull Street  
Hartford, CT 06103-3597  
Phone: (860) 275-8200  
[kbaldwin@rc.com](mailto:kbaldwin@rc.com)

Dorothy DeLuca  
4 Long Ridge Road  
Redding CT 06896  
Phone: (203) 664-1673  
[info@fleurdelisct.com](mailto:info@fleurdelisct.com)

Suzanne Fogle  
44 Granite Ridge Road  
Redding, CT 06896  
Phone: (203) 919-2703  
[sfged444@gmail.com](mailto:sfged444@gmail.com)

JoAnn Villamizar  
235 Simpaug Turnpike  
Redding, CT 06896  
[jlvilla56@aol.com](mailto:jlvilla56@aol.com)

Danielle Caldwell  
10 Fire Hill Lane  
Redding, CT 06896  
Phone: (201) 725-6494  
[dcaldwell29@gmail.com](mailto:dcaldwell29@gmail.com)

Meredith Miller  
256 Umpawaug Road  
Redding, CT 06896  
Phone: (203) 293-5228  
[meredithfordmiller@aol.com](mailto:meredithfordmiller@aol.com)

Ann Taylor  
Executive Director  
New Pond Farm Education Center  
101 Marchant Road  
West Redding, CT 06896  
Phone: (203) 938-2117  
[ann@newpondfarm.org](mailto:ann@newpondfarm.org)

Dino Trevisani  
Marchant Farm, LLC  
12 Marchant Road  
Redding, CT 06896  
Phone: (917) 376-2008  
[marchantfarm@gmail.com](mailto:marchantfarm@gmail.com)

November 20, 2023



---

Daniel Patrick, Esq.  
Lucia Chiochio, Esq.  
Cuddy & Feder LLP  
445 Hamilton Ave, 14<sup>th</sup> Floor  
White Plains, NY 10601  
(914)-761-1300  
Attorneys for the Applicant

cc: MCM Holdings, LLC