

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  
DOROTHY DELUCA PRE-HEARING INTERROGATORIES**

Q1. Please provide substantial proof that the need for service is greater than any environmental effects.

I have lived in West Redding for 12 years and have had zero issues with my service. Please provide proof of dropped 911 calls or any Towns emergency services which provide adequate safety to its residents versus the hazards associated with an invasive a 150' monopole with 9 panels for antennas and 9 remote radio heads emitting powerful electromagnetic frequencies that could affect the wildlife and children in this pristine 174 acre wildlife and educational preserve? If only "a preliminary study has been done on threatened or endangered species" when will a complete and conclusive study be done on all native species? And will it be provided to us well before the hearing? Also please provide data on how this will not be an "attractive nuisance" for boy scouts to climb creating an undue burden on our emergency resources and Town liability?

A1. *MCM refers generally to its August 14, 2023 Application for a Certificate of Environmental Compatibility and Public Need, with its attachments, as well as its subsequent filings in Docket No. 517, including the responses to Siting Council Interrogatories, which provide detailed explanations and analyses regarding the lack of potential adverse effects anticipated by the proposed construction of the facility along with information presented by Verizon detailing the coverage and capacity needs to be met by the proposed facility. A comprehensive survey of native species was performed as part of a survey for black cohosh as detailed in a State-listed Plant Species Survey report prepared by All-Points Technology Corp., P.C., dated August 3, 2023, and included in Response A19 of the Responses of MCM Holdings, LLC to Connecticut Siting Council Pre-Hearing Interrogatories submitted on November 1, 2023.*

Q2. There are 44 Towers and 79 Antennas within a 3 mile radius of 288 Simpaug Turnpike according to Antenna.search.com. Section 2 of the application site search summary states: "both MCM and Verizon seek to avoid the unnecessary proliferation of towers and to reduce the potential adverse environmental effects of a needed facility." Please provide data how you have "avoided" said proliferation of towers and reduced the environmental effects if MCM and Verizon is in fact adding yet another cell tower facility to an already crowded 3 mile radius?

If there is truly a "lack of coverage" as claimed then why would my Broadband RF Meter clearly show connecting service to 8 antennas? Four of which are Verizon Wireless?

A2. *MCM was not able to locate any "Antenna.search.com", as referenced in Q2. The Applicant further notes that "Antennasearch.com", which it is believed to be the website intended to be referenced in Q2, provides unsubstantiated and incomplete listings of existing wireless towers and antennas. Case-in-point, the nearest tower to 288 Simpaug appears to be a tower owned by MCM Holdings, LLC located at 3 Marchant Road, which is the subject of this application and of course does not yet exist. For a detailed list of existing towers in the vicinity which were considered and determined not feasible solutions to the current need, we refer to the Map and List of Existing Towers within a 4-mile radius of the proposed facility included as Attachment 2 to the August 14, 2023 Application for a Certificate of Environmental Compatibility and Public Need as well as the Telecommunications Database available on the Siting Council's website.*

*See Cellco's Responses to Intervenor Interrogatories regarding evidence of public need.*

Q3. Please list all "community preferences" that were taken into consideration for your site choice as referred to in your application. Please provide evidence on how your 4 mile search claims to not be able to find a "suitable location". Section 16-50. Define "Suitable"? If "community preferences" were actually taken as stated then it would be recommended to apply for a more "suitable" location such as the Francis J Industrial Park or the West Redding Firehouse. These locations are within the required coverage gap radius and would serve the supposed" need"

A3. *If Q3 is intended to refer to the Municipal Locations Preferences provisions of Connecticut General Statutes § 16-50gg, please note that MCM is unaware of any such location preferences being presented by the Town of Redding to the Siting Council or to MCM. The Applicant refers generally to its August 14, 2023 Application for a Certificate of Environmental Compatibility and Public Need, including the Site Search Summary included as Attachment 2 thereto, for a detailed discussion on the factors taken into consideration by MCM and Verizon during the site search processes. In general, a location is not suitable if a facility at that location would not provide the needed service, or if the property owner is not willing to lease space, or if insufficient space is available to site a facility, or if potential environmental impacts cannot be mitigated.*

Q4. Please explain in detailed layman's terms the specific reason why an alternative site was rejected?

A4. *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 and Response A3 above regarding reasons why a location is not feasible for the siting of a facility.*

Q5. Please provide a detailed explanation of what "RF rejected" means for locations at:

306 Umpawaug Rd  
4 Dittmar Rd  
36 Sugar Hollow Rd  
66 Sugar Hollow Rd

and all other rejected locations.

- A5. *See Cellco's Responses to Intervenors Interrogatories.*
- Q6. If the "supposed" coverage gap exists on Rte 53 and in Southwestern Bethel and Southern Danbury, why was the only spot deemed "suitable" not in those locations? Why was the specific half mile radius limited to Long Ridge Rd and Simpaug Turnpike and determined to be the only "suitable" location?
- A6. *See Cellco's Responses to Intervenors Interrogatories.*
- Q7. If the lease with the Scout Council of America was signed in 2014 was the Town of Redding notified and why was the coverage map done after the fact in 2016?
- A7. *The lease with the Connecticut Yankee Council, Inc. Boy Scouts of America was signed by MCM on November 15, 2016 and recorded on the Town of Redding Land Records December 8, 2016.*
- Q8. If a tree inventory was done in December 2022 why wasn't a balloon flow over the site then when there were no leaves? Why was it done in June when there was full foliage? Will there be a balloon run now? Can you please provide those photos taken to all intervenors prior to the hearing?
- A8. *Please refer to the Visual Assessment & Photo-Simulations included as Attachment 5 to the August 14, 2023 Application for a Certificate of Environmental Compatibility and Public Need which includes 29 photographs taken from the surrounding areas of the balloon float performed on February 1, 2023 during leaf-off conditions. A subsequent publicly noticed balloon float was conducted on July 24, 2023, at the request of the Town of Redding during the public information meeting held on June 8, 2023.*
- Q9. How will tree cover "limit overall visibility" as stated when the monopole is 150' and the native trees are not 150' tall? How will "year round visibility be limited to the immediate area" as stated when it is in an elevated location? Please define the "immediate" area?
- A9. *Please refer to the Visual Assessment & Photo-Simulations included as Attachment 5 to the August 14, 2023 Application for a Certificate of Environmental Compatibility and Public Need which includes 29 photographs taken from the surrounding areas of the balloon float performed on February 1, 2023. As depicted in the photographs and stated in the report, the vegetation in the area is comprised of dense woodland and mature growth trees, averaging approximately 85' in height immediately surrounding the Facility. This provides a significant visual buffer limiting the overall visibility of the proposed tower from ground level in the surrounding area, even during leaf-off conditions. The "immediate area" in this case is considered to be within approximately 0.5-mile of the Site.*
- Q10. Please list all agencies that have to be notified of this cell tower proposal. Please list if they have been reported to including NEPA who requires federal agencies to assess the environmental effects of their proposed actions prior to making decisions: "to use all practicable means to create and maintain conditions under which man and nature can exist in productive harmony."

- A10. Please see Attachment 11 to the August 14, 2023 Application for a Certificate of Environmental Compatibility and Public Need which includes a list of all federal, state, and local agencies that were provided notice along with a copy of MCM's filing prior to its submission to the Siting Council, as per Connecticut General Statutes § 16-50l(b). In addition to the agencies listed in Attachment 11, the following agencies were consulted, either directly or through the NEPA compliance review process, for the proposed Facility: CTDEEP NDDB, USFWS, FCC, SHPO, and THPOs.*
- Q11. Can you guarantee that a tower will improve service to the area once it is erected ? The tower that went up at 4 Dittmar Rd did not improve the service according to its residents. How do we know that this won't happen in West Redding?
- A11. See Cellco's Responses to Intervenors Interrogatories.*
- Q12. Please provide the exact pdf model and make specifications and speed for every antenna that is being proposed. Please provide the amount of power per transmitter and the direction of the transmitting beam.
- A12. See Cellco's Responses to Intervenors Interrogatories.*

**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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