

8 January, 2024

To: Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: MCM Holdings, LLC
Proposed Wireless Telecommunications Tower Facility
288 Simpaug Turnpike (Parcel 12-29), Redding, Connecticut
Docket 517

Intervenor Keys - Pre-Hearing Interrogatories to **MCM Holdings, LLC**

1. 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?
2. 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.
3. 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.
4. 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. Intervenor has 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?
5. 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?
6. 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?

7. 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?
8. What federal funding is being used by the applicant on this project?
9. Does the applicant have a financial relationship with any party in this process other than with the applicant?

Intervenor Keyes - Pre-Hearing Interrogatories to **Verizon Wireless**

1. Did all interrogatory responders from Verizon Wireless take a sworn oath of truthfulness administered by the CT Siting Council prior to answering the questions posed below?
2. Please explain in detail all information on the coverage maps – specifically the legends and significance of sequential maps (see “Verizon’s Coverage Plots”). What frequency level is the minimum required to solve any lack of coverage problem?
3. What is the significance of "RF rejected" in site determination (see “Summary of Site Search and List and Map of Existing Tower/Cell Sites”)?
4. Please explain why it is not possible for Verizon to use any of the numerous existing towers within a four-mile range of the proposed tower (existing adjacent towers; see “Summary of Site Search and List and Map of Existing Tower/Cell Sites”). Are all of these locations at capacity utilization? How many of these were considered prior to the application for a tower on the Hoyt property?
5. What is your response to the analysis submitted by Jason Jaffee after the public forum in November, 2023?
6. What specific problem is being addressed by the construction of a new cell tower within such close proximity to other towers, in a region where there has been demonstrated evidence (by Jason Jaffee) that there is sufficient coverage. Based upon what analysis, model or drive-by was the site selection determined? Does the gap in coverage comport with the coverage advertised publicly (or on the internet) by Verizon for the area in question?
7. What is Verizon’s rate of application decline by the CT Siting Council over the last 5 years?
8. What federal funding is being used by Verizon Wireless on this project.
9. Does Verizon wireless have a financial relationship with any party in this process other than with the applicant and potentially individual consumers?