

February 22, 2024

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

Re: **Docket No. 517 – MCM Holdings, LLC Application for a Certificate of Environmental Compatibility and Public Need for the Construction, Maintenance and Operation of a Wireless Telecommunications Facility Located at The Boy Scouts of America Camp Hoyt, 288 Simpaug Turnpike (Parcel No. 12-29) Redding, Connecticut**

Letter in Lieu of Post Hearing Brief

Dear Attorney Bachman:

On behalf of Cellco Partnership d/b/a Verizon Wireless (“Cellco”), an intervenor in the above-referenced proceeding, please accept this letter in lieu of Post-Hearing Brief, in support of the MCM Holdings, LLC (“MCM”) application for the construction, operation, and maintenance of a wireless telecommunications facility in Redding, Connecticut.

On August 14, 2023, MCM filed an application with the Siting Council (“Council”) for a Certificate of Environmental Compatibility and Public Need (the “Application”) to construct a wireless telecommunications facility on a 174-acre parcel at 3 Marchant Road in Redding, Connecticut (the “Property”). Cellco identifies this facility as its Redding North Facility. The Property is owned by the Connecticut Yankees Council Inc./Boy Scouts of America (“BSA”) Camp Hoyt and is actively used as a camp by the BSA.

The proposed Redding North Facility would provide Cellco customers with improved wireless telecommunications services in northwest Redding particularly along portions of Route 53, as well as local roads in the area. The Redding North Facility will also provide improved wireless service to customers in southwest portions of Bethel, and southern portions of Danbury.¹

¹ See Application, at Attachment 1 (Cellco Existing and Existing and Proposed Coverage Plots).

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Facility Description

MCM proposes to construct, own and maintain a 150-foot-tall monopole tower within a 4,800 square foot facility compound (6,800 square foot leased area) in the northerly portion of the Property.²

Cellco proposes to install antennas and remote radio heads on an antenna platform at the top of the tower. The antennas would maintain a centerline height of 146 feet AGL.³ Cellco's radio equipment, a backup battery cabinet and a 50-kW propane fueled back-up generator would be installed on a concrete pad beneath a canopy structure.⁴ A 1,000 gallon propane tank will be installed on a 5-foot by 16-foot concrete pad within the fenced facility compound.⁵ Access to the proposed tower site would extend from Simpaug Turnpike over the paved driveway and gravel parking area.⁶ A new 12 foot wide, 125-foot gravel access drive will connect the proposed tower site to the existing gravel parking area.⁷

Public Need

The unrefuted evidence in the Docket No. 517 record reveals that significant gaps in wireless service exist in each of Cellco's operating frequencies in northwest portions of Redding, southwest Bethel, and southern Danbury.⁸ These gaps cannot be filled by service from Cellco's surrounding cell sites.⁹ The proposed Redding North Facility will fill many of these existing wireless service gaps, particularly along Route 53, as well as local roadways in the area around the Property.¹⁰ The proposed Redding North Facility will also provide capacity relief to Cellco's existing Redding CT (Gamma Sector), Topstone CT (Alpha Sector) and Danbury S CT (Beta

² See Application, at Attachment 3, p. 8 (Site Plan).

³ *Id.*

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

⁷ *Id.*, at Attachment 3, p. 7.

⁸ See Application, at Attachment 1 (Cellco Existing and Existing and Proposed Coverage Plots). See also Responses to Connecticut Siting Council Pre-Hearing Interrogatories (Set One) Questions 5-12 and 16; Responses to Interrogatories from Intervenor Dottie DeLuca (Set One) Questions 1, 2 and 5 (Nov. 20, 2023) and (Set Two) Questions 1-3 (Jan. 16, 2023); Responses to Interrogatories from Suzanne Fogle (Set One) Question 1 (Nov. 20, 2023) and (Set Two) Question 1 (Jan. 16, 2024); Responses to Interrogatories from Intervenor Joann Villamizar (Set One) Question 5 (Nov. 20, 2023) and (Set Two) Questions 5 and 6 (Jan. 16, 2024); Responses to Interrogatories from Intervenor Tim Keyes (Set One) Questions 2, 4, 5, and 6, and Attachment A (Jan. 16, 2024).

⁹ See Application, at Attachment 1 (Cellco Existing and Existing and Proposed Coverage Plots). See also Responses to Interrogatories from Intervenor Tim Keyes (Set One), Questions 2, 4, 5 and 6, and Attachment A (Jan. 16, 2024).

¹⁰ *Id.*

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Sector) facilities which are currently operating beyond their existing capacity limits.¹¹ Although existing coverage plots show that there is some 700 MHz service in northwest Redding, existing coverage plots also demonstrate that significant gaps in service remain throughout northwest Redding, particularly along Route 53 to the east of the proposed Redding North Facility.¹²

Site Selection

Cellco's original site search for a Redding North Facility commenced in Q1 of 2016.¹³ The approximate center of Cellco's search ring was the intersection of Simpaug Turnpike and Long Ridge Road approximately one-half mile east of the proposed tower site proposed by MCM.¹⁴ The search ring had a radius of approximately one mile, which is typical for Cellco's search rings in Connecticut.¹⁵ After establishing the Redding North Facility search ring, Cellco considered several alternative locations for a tower site and subsequently learned of MCM's lease for the BSA tower site at 3 Marchant Road.¹⁶ As indicated throughout the course of this proceeding, the MCM tower site satisfies Cellco's wireless service objectives in the northwest Redding.

In addition to the BSA site, Cellco considered several other parcels in the area as alternatives to the MCM site at Camp Hoyt.¹⁷ The West Redding Fire Station at 306 Umpawaug Road is located approximately one mile southeast of the proposed MCM tower site at a ground elevation is approximately 150 feet lower than the 3 Marchant Road location.¹⁸ The West Redding Fire Department site would not provide adequate service to existing coverage gaps to the north and west of the MCM tower site.¹⁹ In addition, a significantly taller tower would be required at the West Redding Fire Station to compensate for the lower elevation.²⁰ The parcel at 101 Marchant Road is a large (100 acre) property that contains changes in elevation that would necessitate a taller tower and contains forested areas that would require a large amount of tree

¹¹ Responses to Connecticut Siting Council Pre-Hearing Interrogatories, Question. 9 (Nov. 1, 2013).

¹² See Application, at Attachment 1 (Cellco Existing and Existing and Proposed Coverage Plots). See also Responses to Interrogatories from Intervenor Tim Keyes (Set One), Questions 5 and 6, and Attachment A (Jan. 16, 2024).

¹³ See Responses to Connecticut Siting Council Pre-Hearing Interrogatories, Question 1 (Nov. 1, 2013). See also Application, at Attachment 2 (Site Search Summary).

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ Public Evidentiary Hearing Transcript at 31 (Jan. 23, 2024). See also Application, at Attachment 2 (Site Search Summary).

¹⁷ See Application, at Attachment 2 (Site Search Summary).

¹⁸ See Application, at Attachment 2 (Site Search Summary). See also Responses to Connecticut Siting Council Pre-Hearing Interrogatories, Question 2 (Nov. 1, 2013); Public Evidentiary Hearing Transcript at 18-19 (Jan. 23, 2024).

¹⁹ See Responses to Connecticut Siting Council Pre-Hearing Interrogatories, Question 2 (Nov. 1, 2013).

²⁰ See Public Evidentiary Hearing Transcript at 18-19 (Jan. 23, 2024).

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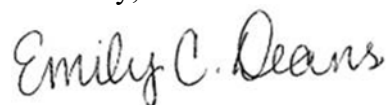
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clearing to develop a tower site.²¹ The parcel at 4 Dittmar Road is located 2.7 miles to the northeast of the proposed MCM tower site and would not provide the coverage required to meet Cellco's wireless service objectives.²² The parcel at 66 Sugar Hollow Road is located two miles northwest of the proposed MCM tower site is terrain-blocked between Sugar Hollow and the 3 Marchant Road property and would not provide the coverage required to meet Cellco's needs, particularly along Route 53 located to the east of Camp Hoyt.²³

Conclusion

The unrefuted evidence in the record clearly demonstrates that there is a need for the proposed Redding North Facility and that Cellco's customers and emergency service providers will benefit from improved wireless service in northwest Redding. Also, as demonstrated by MCM the environmental impacts from the proposed facility location would be limited and outweighed by the benefits of improved wireless services in the area.

Sincerely,



Emily C. Deans
Kenneth C. Baldwin

²¹ See Public Evidentiary Hearing Transcript at 13-14 (Jan. 23, 2024).

²² See Responses to Connecticut Siting Council Pre-Hearing Interrogatories, Question 3 (Nov. 1, 2013)

²³ See Responses to Connecticut Siting Council Pre-Hearing Interrogatories, Question 2 (Nov. 1, 2013). See also Public Evidentiary Hearing Transcript at 20-22 (Jan. 23, 2024).

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of February 2024, a copy of the foregoing was sent,
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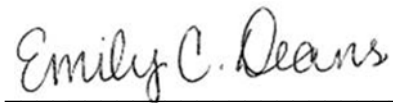
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