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 Villamizar. submission of Exhibits IV-3, IV-4, IV-5 and IV-6 attached hereto.

Pre-Hearing Interrogatories to MCM Holdings, LLC
January 8, 2024

1. In the event that MCM's application is granted with the restriction to move the site and access road to a location 100 feet from Wetlands 1, please provide the distance from the (1) fenced area and (2) the monopole for each of the following areas listed on the Boy Scout Camp map submitted by MCM in Attachment 2:

   The latrine
   The Carter Cabin
   Johnson training area
   Arthur training area

2. MCM's response to Intervenor Villamizar interrogatory 6 relative to the date that MCM began its search in West Redding simply references the Verizon Site Search Summary in MCM's Attachment 2. As the attachments to the MCM lease agreement are dated 2014, please advise when MCM began a search for a site for a cell tower in West Redding and the basis for the search as it appears that it was not on the behest of Verizon based on Verizon's testimony that it did not begin its search until 2016.

3. Please provide the basis for MCM's search of properties in West Redding in 2014?

4. Please provide the evidence supporting MCM's testimony that it is not likely that any amphibians using the area of the Wetland 1 would traverse approximately 750 feet to vernal pool 1 as it is stated in Intervenor Villamizar Exhibit IV-3 that the spotted salamanders may move more than ½ mile from bodies of water where they breed.

5. As the spotted salamander is secretive and rarely seen spending most of their time hiding in burrows or under moist leaf litter (as stated in Intervenor Villamizar Exhibit IV-4), please explain how a spotter is going to spot the salamander in order to ensure that it is not killed?

6. As habitat degradation plays a significant role in wood frog decline and the fact that the frogs also may travel more than ½ mile to their breeding grounds (as stated in Intervenor Villamizar Exhibit IV-5), please explain how the clearing and erecting of monopole and related equipment within such close proximity to the vernal pool and Wetland 1 will not result in habitat degradation?

7. MCM states that moving the compound further from Wetland 1 would result in more tree clearing and grading but the photographs submitted showing the woodland surrounding the proposed site do not show a significant change in the tree density. Thus, please explain why more trees and grading would be needed for a 50-foot change in location to better protect Wetland 1 and its inhabitants?

8. Does the existing infrastructure, trails and usage by the camp prohibit movement of the proposed site 50 feet further from Wetland 1?

9. Would MCM be willing to do an additional balloon float at this time in order for the intervenors to take photographs from various locations for the benefit of the Siting Council to better understand the aesthetic impact of the erection of a monopole on the ridgeline?

10. Has MCM approached any other cellular providers relative to sharing of the monopole should the application be granted? If yes, was there any interest?

11. Did MCM inform Verizon of the lease agreement with the Boy Scout Camp on or before Q1 of 2016?

12. As the proposed monopole is on a ridgeline as shown in Exhibit IV-6, why were no views from the ridgeline to the southwest, west and northwest not provided?

13. MCM's testimony is that there would not be any year round visibility of the tower but as Exhibit IV-6 is from outside the residence at 235 Simpaug, does MCM believe that the 65 feet of monopole extending about the ridgeline would not be visible from 235 Simpaug?

14. Does MCM believe that the 65 feet of monopole extending above the ridgeline would not be visible from residences that are to the southwest, west and northwest which are located on the ridgeline in those directions?

Exhibit IV-3

Wild Things in Your Woodlands

Spotted Salamander

The spotted salamander (*Ambystoma maculatum*) is large and stout, with a broad, blunt head. It is recognized easily by the round yellow spots on its back, arranged in two irregular rows running down the length of its black or dark gray body. There can be as many as 50 spots, and these usually extend from the head to the tip of the tail. The belly tends to be a slate-gray color with gray flecks along the sides. Adults generally measure from 4 - 7 inches and can be as large as 10 inches. Males reach maturity usually when they are 2 to 3 years old, whereas females take usually 1 to 2 years longer to breed. A spotted salamander can live for more than 20 years.

The aquatic larvae of spotted salamanders are dull green with white or light bellies, and generally lack any particular markings.

The spotted salamander is relatively common and widespread in New York State. Spotted salamanders are most noticeable in the early spring when they congregate in large numbers to breed over a short period of time. During this period of explosive breeding, which usually occurs in March or early April, spotted salamanders can be seen at night making mass migrations toward nearby pools and ponds. The breeding migration generally is triggered by the first warm, steady spring rains, even if there is snow remaining on the ground. The males, who often arrive first, begin swimming about in a highly active state that becomes nearly a frenzy when females arrive in the pond to mate.

During courtship and mating, adult male spotted salamanders deposit gelatinous white sperm packets on sticks or on the bottom of the pond. These packets are very easy to spot and serve as the first clue that spotted salamanders are present in a pool or pond. A female will swim over the packet and take up the sperm into her cloaca. Within one to a few days, the female lays eggs in gelatinous masses of usually 100 to 200 eggs, attaching the egg clusters to aquatic vegetation or sticks. Eggs usually take from 30 to 50 days to hatch, depending on the temperature of the water. The new hatchling starts out as an elongate tadpole, with gills near its neck region, and short buds in place of front limbs.

As the tadpole develops, toes form on the front feet, rear legs sprout near the base of the tail, and it ultimately loses its gills and tail fin, all in preparation for life on land.

Temperature, water level, and food availability combine to influence the length of the tadpole stage. The minimum time it takes for a spotted salamander to metamorphose into its terrestrial form is two months; usually newly transformed animals begin leaving the water in late summer and early fall. In the water, the larvae eat small crustaceans, mollusks, and insect larvae. On land, spotted salamanders eat beetles, earthworms, snails, slugs, insects, and spiders. Once transformed, they will remain on land for the rest of their lives, except briefly during spring breeding periods.

While congregated together in their breeding pools, spotted salamanders can be seen readily, even by a casual observer. During the rest of the year, however, the spotted salamander is largely fossorial, retreating to underground burrows. In moist environments or damp weather, individuals occasionally can be encountered under logs, stones, or boards during the day, or out foraging at night. In winter, they hibernate underground in burrows sometimes more than three feet deep.

The spotted salamander is an important component in both aquatic and terrestrial communities. Eggs and larvae provide food for a wide variety of aquatic animals, and predatory fish, birds, snakes, and turtles eat adults. Because of their complex habitat requirements, spotted salamanders are sensitive to the loss of both wooded and aquatic habitats. Furthermore, their tendency to migrate between these habitats during the breeding season makes them highly vulnerable to mass mortality. Cars crush a substantial numbers of adults each spring, on roads that separate upland sites from breeding ponds.

Spotted salamanders may move more than 1/2 mile from bodies of water where they breed, but will return to the same pond to breed year after year, often using the same exact path each year to travel from upland to aquatic sites. To provide habitat for spotted salamanders, landowners can enhance and protect both their aquatic breeding sites and the surrounding woods. Shallow woodland pools that dry up during late summer or fall (and do not support predatory fish) provide particularly valuable breeding habitat. Protecting these and other breeding sites from pollution (chemicals, sediments from erosion) and disturbance is essential for these animals. By marking the boundaries of breeding pools during the wet season, landowners can help prevent disturbances within the boundaries of the pools during drier times.

In surrounding woodlands, maintaining a mostly closed forest canopy (> 75 percent within 100 feet, and > 50 percent within 400 feet of the pool or pond) will provide optimum habitat for the spotted salamander and many other amphibians. A closed canopy shades the forest floor, keeping soils moist and leaf litter abundant. Coarse woody debris (logs, tree tops, etc.) can also be left on, or added to, the forest floor to provide safe havens for the spotted salamander throughout much of the year.

Maintaining minimal disturbance between breeding pools and adjacent woodlands allows spotted salamanders to move freely between the two. Disturbances such as road

construction, skid trails, or large ruts can create barriers to travel if they occur close to breeding pools and ponds. Locating skid trails away from (400 feet) breeding pools, and harvesting timber when the ground is either frozen or completely dry, provides extra consideration for the spotted salamander.

Portions of this article were adapted from Stephen J. Morreale's Spotted Salamander Species Account *in* "Hands-On Herpetology: Exploring Ecology and Conservation" by R. L. Schneider, M. E. Krasny, and S. J. Morreale.

For more information on timber harvesting guidelines for vernal pool animals, ordering information for *Forestry Habitat Management Guidelines for Vernal Pool Wildlife* can be found at http://www.wcs.org/international/northamerica/mca/publications

Kristi Sullivan coordinates the Conservation Education Program at Cornell's Arnot Forest. More information on managing habitat for wildlife, as well as upcoming educational programs at the Arnot Forest can be found by visiting the Arnot Conservation Education Program web site at at arnotconservation.info

Spotted Salamander photo courtesy of
Department of Natural Resources, Cornell University Cooperative Extension

Exhibit IV-H

Spotted Salamander

Ambystoma maculatum

Background and Range: One of the surest signs of spring is the mass migration of spotted salamanders. These underground dwellers emerge from winter dormancy with the season's first warm rains, and then travel to their breeding pools. This salamander is in the family Abystomatidae which includes the large, stout-bodied mole salamanders. Distinguished by its large size and bright yellow spots, the spotted salamander is a vernal pool indicator species that has an important role in its respective niche.

The spotted salamander's range covers much of the eastern third of the United States and also the southeastern regions of the Canadian Maritime Provinces. It is Connecticut's most widespread mole salamander.

Description: Large, robust, and with a broad head, this salamander ranges in length from 4.75 to 6.75 inches (120-200mm). The back is dark in coloration while the lower sides and bottom regions are lighter, usually gray. Two irregular rows of bright yellow spots are along the back and tail. Females are considerably larger than males. Recently transformed young have greenish-yellow flecks, while larvae range from olive brown or black to various gray shades. The external gills of the larvae help distinguish them from frog tadpoles.

Habitat and Diet: Depending on the time of year, spotted salamanders can be found in aquatic, terrestrial, and subterranean habitats. Although they occur in a variety of habitats, they tend to prefer forested areas adjacent to swamps, ponds, and creeks. Secretive and rarely seen, these salamanders spend most of their time hiding in burrows or under moist leaf litter. Breeding adults and larval stages use aquatic habitats, such as seasonal short-lived pools, artificial ponds, wet meadows, and deciduous forests with moist substrates and lower soil temperatures. The salamanders hibernate in burrows or crevices underground during winter.

Spotted salamanders feed on worms, slugs, snails, spiders, millipedes, crickets, beetles, ants, and other invertebrates. In turn, they are food for some snakes, birds, fish, and mammals.

Life History: Because spotted salamanders are secretive and spend most of the time underground, they are seldom seen except in early spring (March-April) when they migrate in large numbers to breeding pools. Even then, they are active only on rainy nights. Males arrive to the breeding pools first where they deposit packets of sperm (spermatophores) on leaves and twigs lying on the bottom of the pools. The females follow on the next rainy night where they attach approximately 100 eggs to submerged sticks or plants. The eggs become a globular, fist-sized mass when the jelly-like substance that covers the eggs comes in contact with water.

After mating, the adults migrate back to summer feeding grounds and their underground homes. Larvae hatch in approximately 30 days and undergo metamorphosis during summer, transforming into miniature versions of the adults. The larval cycle is often timed with the ephemeral cycle of the breeding sites. Newly transformed spotted salamanders emerge from wetlands in late summer/early fall to migrate to terrestrial sites.

Interesting Facts: The skin of the spotted salamander secretes a noxious substance that deters many would-be predators. Predation is most common during egg and larval cycles before the salamander develops its toxicity. Spotted salamanders will even head-butt or bite in self defense.

Conservation Concerns: Connecticut's spotted salamander population appears to be undergoing a long-term decline, not only because of the loss of its vernal pool breeding habitats, but more so due to the reduction of upland habitat surrounding aquatic breeding sites. Most wetland regulations prescribe a 50- to 100-foot wide forested buffer around vernal pools. This buffer is to maintain water quality. Maintaining the amphibian diversity of a vernal pool requires 500 feet or more of primarily forested habitat surrounding breeding pools. There also are concerns that low pH and acid rain in the spotted salamander's aquatic habitats can cause eggs to die.

Spotted salamanders are declining in urbanized and fragmented habitats throughout the northeastern United States, mainly because they prefer undisturbed habitats and are less tolerant of areas with human encroachment and development.

Because spotted salamanders migrate together in large numbers during the early spring breeding season, many individuals are killed by vehicles as they cross roads. In response, some towns and agencies have installed "amphibian tunnels" to funnel these creatures safely underneath roads in hotspot migration areas.

What You Can Do

If you find a spotted salamander in the wild, leave it where you found it and only take photographs. Every individual salamander is vitally important to its local population.

Consider proper habitat management practices if your property contains successful vernal pools where spotted salamanders breed. The Vernal Pool Association (http://www.vernalpool.org) website is a good place to start your research.

Urge your town to install amphibian tunnels at migration hotspots that overlap roads. If you are fortunate enough to witness a mass spring migration, you can help move salamanders from one side of the road to the other, as long as it is completely safe to do so. This can be done with gloves and small buckets as to not stress the salamanders or be exposed to any secretions.

Spread the word about salamanders! Knowledge is often the best tool for conserving these important amphibians.

Additional information about salamanders is available on the Salamanders of Connecticut webpage (/DEEP/Wildlife/Learn-About-Wildlife/Salamanders-of-Connecticut).

Content last updated on October 11, 2016.

Exhibit IV-5

This event has passed.

Frog Frolic w/ Northwest Connecticut Land Conservancy

April 1, 2023 @ 11:00 am - 12:30 pm

Join Great Hollow and the Northwest Connecticut Land Conservancy for a guided hike to witness the spring migration and breeding of wood frogs. Every spring, wood frogs emerge from

hibernation underground and migrate as far as a half mile to their unique and ephemeral breeding habitats known as vernal pools. We'll hike up to the vernal pools at the top of the Towner Hill Preserve in Sherman to see wood frogs in action and listen to their chorus of mating calls. We will meet at the White Silo Winery in Sherman (32 Route 37) and then carpool just up the street to the Preserve. The hike is somewhat steep in some sections. Kid friendly and recommended! No dogs, please. Reserve a space and sign up to receive updates about the date and time by emailing John at jfoley@greathollow.org. Free for both members and non-members.

Please note – This date is just tentative and will be determined based on weather conditions.

DETAILS

Date:

April 1, 2023

Time:

11:00 am - 12:30 pm

VENUE

Great Hollow Nature Preserve

225 CT-37

New Fairfield, CT 06812

United States + Google Map

ORGANIZER

Great Hollow Nature Preserve & Ecological Research Center

Phone

(203) 546-7789

Email

info@greathollow.org

Exhibit IV-6

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 Villamizar submission of Exhibit IV-7 attached hereto.

Pre-Hearing Interrogatories to Cellco Partnership d/b/a Verizon Wireless
January 8, 2024

1. Was Cellco aware of the MCM lease with the Boy Scout Camp at the commencement of its site search?

2. How did Cellco choose the search center and radius?

3. Why was the search radius so narrow being only one mile?

4. What is date on which the data that supports the coverage maps which were filed with the MCM application was created?

5. Will the proposed cell tower at the Boy Scout Camp provide Cellco with the ability to offer 5G internet in West Redding?

6. Please explain the discrepancy between the Verizon coverage maps submitted as part of the Application and the Jason Jaffee's testimony and evidence (Exhibit IV-7) relative to the no coverage zones on the Cellco maps and the lack thereof found by Mr. Jaffee?

Exhibit IV-7

Good evening, everyone - my name is Jason Jaffee. I am a resident of West Redding, and I would like to take this opportunity to voice my opposition to the construction of the cell tower at the Hoyt Scout Reservation.

To begin, I do not believe that the dark zones lacking cell service in West Redding are as widespread and prevalent as the filings in Docket 517 would lead one to believe. I live less than 1 mile from the proposed cell site and utilize Verizon as my carrier. I have no issues with service at my residence. I also drive on the local roads every day, and rarely run into instances where I lose service.

To validate my claims and provide additional clarity regarding current cell coverage availability in the region, I conducted a simple assessment by driving around to each of the 29 locations presented within Attachment 5. All within a roughly two-mile radius of the proposed tower site, 26 of these locations are in the town of Redding, with Ridgefield, Danbury, and Bethel all represented with 1 location.

My cell service ranged from 2 to 3 bars depending on the location, and I had no problem sending and receiving text messages as well as phone calls from each of the 29 locations. I prepared a document with screenshots from my phone at each of these locations displaying the cell service as well as a map overlay. Please see the subsequent attached pages for this document.

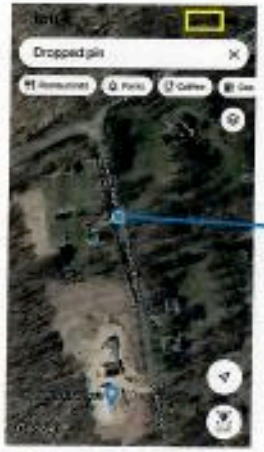
I also have concerns about the location that is being proposed. Adjacent to the tower site is the Saugatuck River, the primary source for the namesake reservoir that provides clean drinking water to thousands of people in Fairfield County. There is also a wetland less than 50 feet from the site, per Attachment 4. Additionally, many of Redding's most unique and beautiful natural resources and youth educational centers either directly border or lie near the Hoyt Scout property where the tower would sit, including the New Pond Farm Education center, the Marchant Farm, the Westbrook Nature School, as well as various Redding Land Trust conservation lands. I fear the visual impact associated with the construction of a 150-foot-tall structure so close to these cherished natural resources will permanently impair the experience that the users of these resources seek to enjoy.

Finally, there is the obvious safety concern that must be considered when placing a cell tower in a location that children frequent at all hours of the day and night, given that camping is a common activity at the Hoyt property, and campsites are located just a short walk away. I would not trust a simple fence to keep the tower protected from infringement and the potential for serious injury.

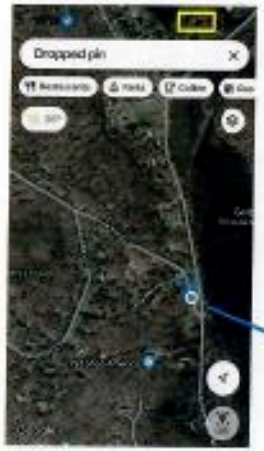
Redding is unique in its rural and bucolic attributes in a region of the state that is otherwise highly populated and urbanized. Residents have tremendous pride in the town's natural beauty, and many elect to live and raise their families here for this very reason. The potential gain for so few is not worth the permanent impairment and erosion of the very characteristics that make Redding a unique and desirable place to live for so many.

Thank you.

Location 1: Picketts Ridge Road; 2 Bars of Service, No Issue Sending or Receiving Text Messages or Phone Calls



Location 3: Fire Hill Road (Ridgefield); 3 Bars of Service, No Issue Sending or Receiving Text Messages or Phone Calls



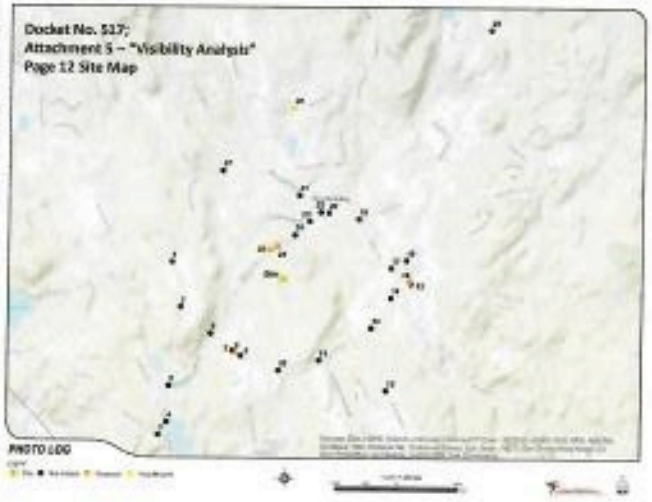
To Members of the Siting Council,

My name is Jason Jaffee. My address is 125 Picketts Ridge Road, Redding, CT 06896.

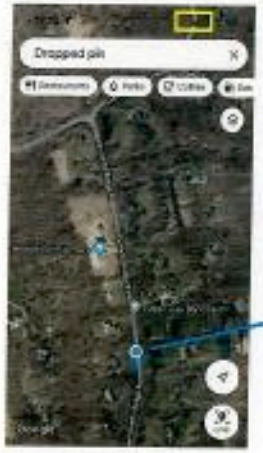
As a local resident residing less than 1 mile from the proposed cell tower site, as well as a current Verizon Wireless customer, I wanted to make the council aware of the current cell coverage availability in the region. To accomplish this goal, my wife and I drove around to each of the sites listed in Docket No. 517 Attachment 5, titled Visibility Analysis. The map to the right is page 12 from that attachment and represents 20 locations within an approximately 2-mile radius of the proposed cell tower site.

The following pages are screenshots from my phone at each of those locations taken on Saturday, November [illegible] samples were taken from inside the car between 12 and 1PM, with the blue dot representing my location at the time the photo was taken. Please note that cell service ranged from 2 to 3 bars in all locations (please refer to the top right side of the images on the following pages). Furthermore, I had no problem sending and receiving text messages as well as phone calls from the various locations on the map. This contradicts with the filings in the Docket provided by NEW Holdings LLC and Verizon Wireless, who state that the region consists of significant coverage deficiency in the existing Verizon communications network and lacks wireless services.

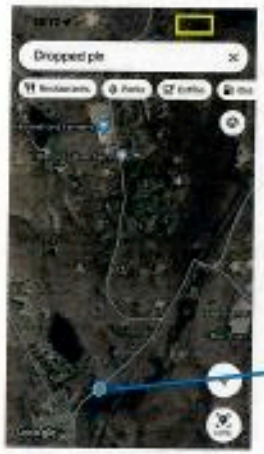
Redding is a rural town with many hills and valleys. As such, I don't believe the town will ever have perfect cell service. With that said, based on my experience living in West Redding, as well as the results of this assessment, I do not feel the tower is needed based on the wireless communications services already available.



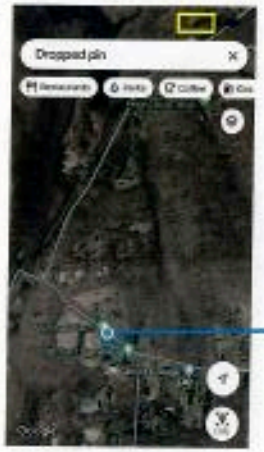
Location 2: Picketts Ridge Road; 2 Bars of Service, No Issue Sending or Receiving Text Messages or Phone Calls



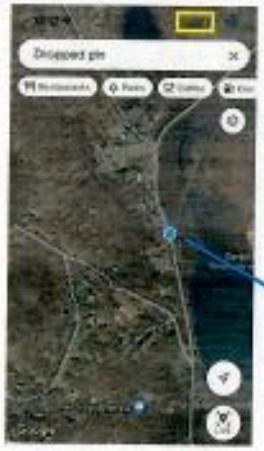
Location 5: Simpaug Turnpike; 3 Bars of Service, No Issue Sending or Receiving Text Messages or Phone Calls

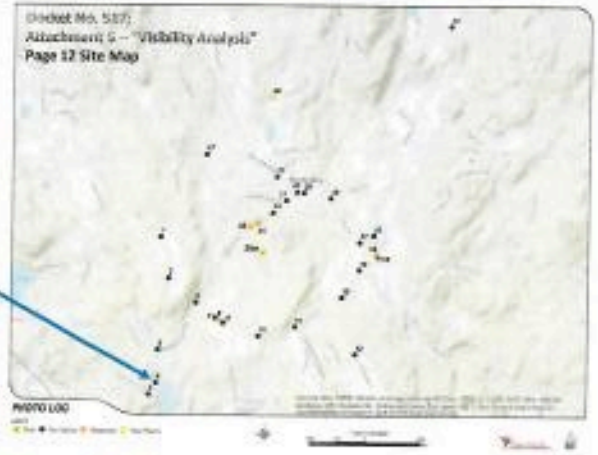


Locations 7, 8, and 9: Marchant Road; 2 Bars of Service, No Issue Sending or Receiving Text Messages or Phone Calls

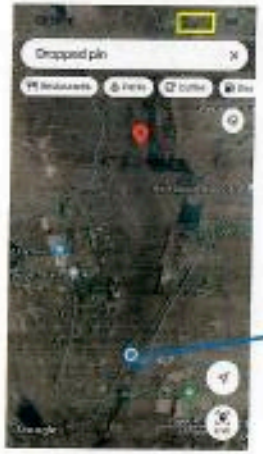


Location 4: Simpaug Turnpike; 3 Bars of Service, No Issue Sending or Receiving Text Messages or Phone Calls

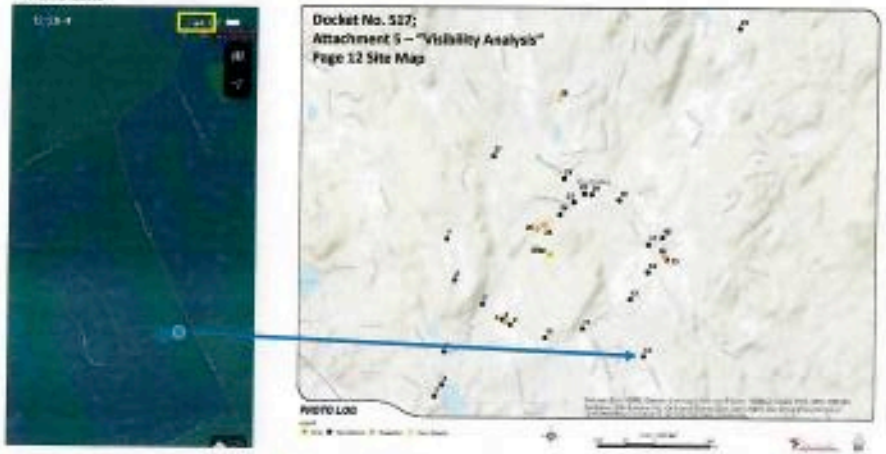




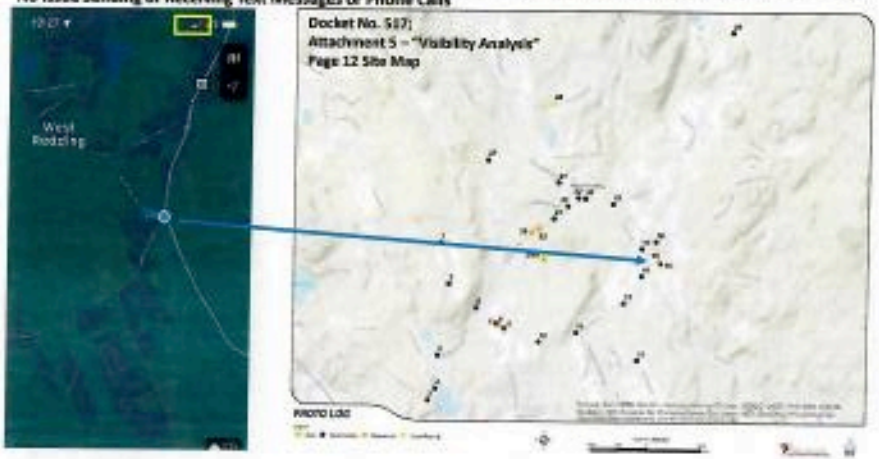
Location 6: Simpaug Turnpike; 2 Bars of Service, No Issue Sending or Receiving Text Messages or Phone Calls



Location 12: Umpawaug Road at Guardhouse Drive; 3 Bars of Service, No Issue Sending or Receiving Text Messages or Phone Calls



Locations 14, 15, 16, 17, and 18: Intersection of Redding Road, Station Road, and Umpawaug Road; 2 Bars of Service, No Issue Sending or Receiving Text Messages or Phone Calls



Locations 10 and 11: Marchant Road; 3 Bars of Service, No Issue Sending or Receiving Text Messages or Phone Calls

Location 13: Intersection of Umpawaug Road and Marchant Road; 3 Bars of Service, No Issue Sending or Receiving Text Messages or Phone Calls