

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**Message Center Management application for a  
Certificate of Environmental Compatibility and  
Public Need for the construction, maintenance,  
and operation of a replacement telecommunications  
facility located at 4 Dittmar Road, Redding, Connecticut**

**Docket No. 425**

**December 10, 2012**

**TOWN OF REDDING COMMENTS ON MESSAGE CENTER MANAGEMENT'S  
DEVELOPMENT AND MANAGEMENT PLAN**

**I. DECISION AND ORDER**

Pursuant to the Connecticut Siting Council's (CSC) Decision and Order dated June 21, 2012 (D&O), Message Center Management (MCM or Applicant) must prepare a Development and Management Plan (D&M Plan or Plan) for the Dittmar Road site. The D&M Plan must include final site plans of site development to include specifications for the tower; tower foundation; antennas; equipment compound; radio equipment; access road; utility line; and landscaping. See D&O, p. 1. The Plan must also include construction plans for site clearing; grading; landscaping; water drainage; erosion control; and sedimentation control. Id. Finally, the Plan must include evidence that the Town of Redding (Town) has reviewed and is in agreement with the landscaping plan. Id.

MCM's Plan covers most of these areas but, as is discussed below, the Plan is deficient in other areas, and the Town asks that the CSC require MCM to correct these deficiencies.

**II. THE D&M PLAN**

MCM submitted its D&M Plan to the CSC on November 21, 2012. The Plan consists of a cover letter; a Geotechnical Engineering Report prepared by Terracon Consultants, Inc.; tower

and foundation designs prepared by Larson Camouflage, LLC (Larson Camo); and various project drawings.

The Town has two comments on the tower design. First, the design is for a 140-foot tall tower with an overall height of 145 feet. See Larson Camo report, Tab B, D&M Plan. In its D&O, the CSC approved a 120-foot tower with an overall not-to-exceed height of 127 feet. See D&O, p. 1. The Town asks that the CSC have the Applicant explain why it submitted a drawing for a 140-foot tower, including an explanation of whether the design of a 120-foot tower would differ significantly from the design for a 140-foot tower. Second, the design refers to pine branches and limbs but does not make reference to faux bark cladding on the tower. The Applicant and its witnesses made several references in the record to utilizing such bark in the tower's design. See Transcript, March 27, 2012, 3:00 p.m., p. 82; Transcript, March 27, 2012, 7:00 p.m., pp. 43, 50-51; MCM's Post-Hearing Brief, April 26, 2012, pp. 5, 9. The Town asks that CSC have the Applicant confirm that it intends to construct a tower that includes faux bark, and that the CSC require the Applicant to make such reference in its Plan. The CSC has the authority to order changes to a D&M plan pursuant to the Regulations of Connecticut State Agencies § 16-50j-75(f).

### **III. DRAWINGS**

As noted previously, the CSC's D&O requires the Applicant to include certain specific site and construction plans in its D&M Plan. The Applicant included most of the required drawings, but some are missing. Specifically, there is no site plan for the access road or the utility line, and there are no construction plans for site clearing or water drainage. The Town also notes that the D&O requires erosion and sediment controls to be construction plans, but the

D&M Plan lists the erosion and sediment control plan as a site plan. See D&M Plan, sheet SP-3. Additionally, only one landscaping plan is included with the D&M Plan. See D&M Plan, sheet LS-1. The D&O requires two such plans, one as a site plan and one as a construction plan. See D&O, p. 1. Finally, on sheet N-1, under General Notes, item number 1 states that construction will comply with the standards and specifications of the town of Old Lyme. The Town of Redding asks the CSC to order the Applicant to correct these deficiencies. The CSC has the authority to order changes to a D&M plan pursuant to the Regulations of Connecticut State Agencies § 16-50j-75(f).

#### **IV. LANDSCAPING PLAN**

On August 9, 2012, MCM sent via email to Natalie Ketcham, First Selectman of Redding, a copy of a letter from MCM's landscape architect regarding vegetative screening of the equipment compound (Landscaping Letter). On August 23, 2012, MCM sent via email to Ms. Ketcham a copy of MCM's landscaping plan (Landscaping Plan). The Landscaping Plan calls for the planting of four different types of evergreen, supposedly deer-resistant vegetation in conjunction with the use of deer fencing. The Town has reviewed the plan, and as is described more fully below is not in agreement with its details.

MCM proposes to plant Green Columnar Juniper, Eastern Red Cedar, White Fir, and American Holly. See Landscaping Letter; Landscaping Plan, Drawing LS-1. MCM claims that these species of evergreens are deer resistant. See Landscaping Letter. The Town's Tree Warden, Sean McNamara, is aware of this plan and in his opinion, only the American Holly is deer resistant; the other three species suggested by MCM are not deer resistant and should be avoided. Mr. McNamara recommends the use of Colorado Blue Spruce, Norway Spruce, American Holly,

and Dragon Lady Holly. The use of deer-resistant species as suggested by Mr. McNamara would likely obviate the need for the deer fencing. This benefits the neighbors by improving the appearance of the screening and benefits MCM by eliminating the need for inspection and repair of the fence.

In the spirit of cooperation, the Town would like to offer MCM a choice. The Town's preference is for MCM to use the evergreen species suggested by Mr. McNamara and to eliminate the deer fence. This seems to be the best long-term plan for both the Town and MCM. If MCM declines this option and decides to continue with its suggested evergreen species, then the Town would require that MCM indicate the frequency with which it will inspect the deer fence for damage and include an annual spraying of deer repellent on the evergreens. The Town asks that once MCM decides on one of these options, the CSC require MCM to make the corresponding changes to its D&M Plan. The CSC has the authority to order changes to a D&M plan pursuant to the Regulations of Connecticut State Agencies § 16-50j-75(f).