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March 14, 2024

Via Electronic Mail and Hand Delivery

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

Re: **Docket No. 520 – Application of Homeland Towers, LLC and Celco Partnership
d/b/a Verizon Wireless for a Certificate of Environmental Compatibility and Public
Need for the Construction, Maintenance and Operation of a Wireless
Telecommunications Facility at 124 Ague Spring Road in Haddam, Connecticut**

Dear Attorney Bachman:

In accordance to the Siting Council's directive, enclosed please find the Applicant's Pre-hearing Submission identifying its witnesses and exhibits filed in advance of the March 21, 2024 evidentiary and public hearing sessions in Docket No. 520.

If you have any questions or need any additional information regarding these matters, please contact me.

Sincerely,



Kenneth C. Baldwin

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
: :
APPLICATION OF HOMELAND TOWERS : DOCKET NO. 520
LLC AND CELLCO PARTNERSHIP D/B/A :
VERIZON WIRELESS FOR A CERTIFICATE :
OF ENVIRONMENTAL COMPATIBILITY :
AND PUBLIC NEED FOR THE :
CONSTRUCTION, MAINTENANCE AND :
OPERATION OF A WIRELESS :
TELECOMMUNICATIONS FACILITY AT :
124 SPRING AGUE ROAD, HADDAM, :
CONNECTICUT : MARCH 14, 2024

PRE-HEARING SUBMISSION

Homeland Towers LLC (“Homeland”) and Cellco Partnership d/b/a Verizon Wireless (“Cellco”) (collectively the “Applicant”) hereby provides the Connecticut Siting Council (“Council”) with the following pre-hearing information available at this time regarding the above-referenced Application.

A. List of Witnesses

1. Raymond Vergati, Regional Manager, Homeland Towers LLC
2. Manny Vicente, President, Homeland Towers LLC
3. Wesley Steven, Radio Frequency Engineer, Verizon Wireless
4. Robert Burns P.E., All-Points Technology Corp. P.C.
5. Martin Brogie, Principal Environmental Scientist, Martin Brogie, Inc.
6. Brian Gaudet, Project Manager, All-Points Technology Corp. P.C.

B. Exhibits to be offered

Homeland and Cellco intends to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need filed by Homeland and Cellco dated November 29, 2023.

2. Bulk file exhibits including:
 - a. Homeland’s “Technical Report” dated July 31, 2023, filed with the Town of Haddam;
 - b. Town of Haddam Zoning Regulations;
 - c. Town of Haddam Inland Wetlands and Watercourses Regulations; and
 - d. Town of Haddam Plan of Conservation & Development.
3. Hartford Affidavit of Publication dated December 7, 2023.
4. Applicant’s Sign Posting Affidavit filed on March 14, 2024.
5. Applicant’s Responses to Council Interrogatories dated March 8, 2024.

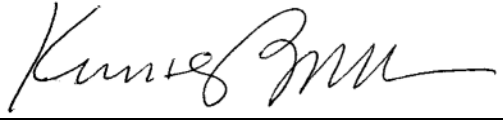
The Applicant reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

C. Remote Public Comment Session

Prior to the start of the Remote Public Comment Session, the Applicant’s Attorney, Kenneth C. Baldwin will make a brief presentation describing the site features and proposed site improvements. Mr. Baldwin will refer to Site Plan Sheets SP-1, SP-2 and CP-1, included in Attachment 1 of the Docket No. 520 Application. Electronic copies of Plan Sheets SP-1, SP-2 and CP-1 are attached to this filing.

Respectfully submitted,

HOMELAND TOWERS LLC AND
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By: 

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
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Its Attorneys