

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF THE TOWERS LLC
(A JOINT VENTURE BETWEEN VERTICAL BRIDGE
REIT, 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 TELECOMMUNICATIONS
FACILITY AT 90 ROUTE 171 (WOODSTOCK AVENUE
WEST), WOODSTOCK, CONNECTICUT

DOCKET NO. 534

July 9, 2025

THE TOWERS, LLC PRE-HEARING SUBMISSION

The Towers, LLC (the “Applicant”) respectfully submits the following pre-hearing information available at this time regarding the above-referenced Application.

I. List of Witnesses

1. Brian Paul, Project Manager, Vertical Bridge REIT, LLC
2. Elizabeth Glidden, Senior Engineer, Regulatory and Real Estate, Verizon Wireless
3. Robert Burns, P.E., Telecommunications Department Manager, All Points Technology Corp. P.C. (resume attached)
4. Kip DiVito, Radio Frequency Engineer, Verizon Wireless (resume attached)
5. Matt Gustafson, Environmental Scientist, All Points Technology Corp, P.C. (resume attached)
6. Rick Landino, Graphics Specialist, All Points Technology Corp. P.C. (resume attached)

II. Exhibits to be Offered

The Applicant intends to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need filed on March 31, 2025.
2. Bulk File exhibits including:
 - a. Section 1: Woodstock Plan of Conservation and Development, Effective June 1, 2015
 - b. Section 2: Woodstock Zoning Regulations, Effective January 1, 1992, Amended October 27, 2023
 - c. Section 3: Woodstock Zoning Map, Effective June 1, 2015

- d. Section 4: Woodstock Inland Wetlands and Watercourses Regulations, The Inland Wetlands Commission of the Town of Woodstock, Effective June 4, 2007, Amendments through February 2, 2009
 - e. Section 5: Technical Report
- 3. Affidavit of Publication of the Legal Notice published in the Woodstock Villager on March 21, 2025 and March 28, 2025
 - 4. Applicant's Responses to Siting Council Interrogatories, Set I, dated July 9, 2025.

The Applicant reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as may be necessary during hearing process and on redirect.

III. Remote Public Comment Session Presentation

Robert Burns is the designated presenter for the 6:30 p.m. remote public comment session. The Proposed Facility drawings for the presentation are attached.

CERTIFICATE OF SERVICE

I hereby certify that on this day, one original and fifteen (15) hard copies of the foregoing were sent via overnight Federal Express and electronically to the Connecticut Siting Council in accordance with the Connecticut Siting Council directives.

July 9, 2025



Lucia Chiocchio, Esq.
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(914)-761-1300
Attorneys for the Applicant

cc: The Towers, LLC
 Project Consultant Team

Robert C. Burns, P.E.
Telecommunications Department
Manager

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Waterford, CT 06385
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rburns@allpointstech.com

General Background

Robert Burns joined All-Points Technology Corporation in 2013 as a Project Manager. Robert Burns has more than 39 years of experience working on a variety of projects that include all aspects of civil engineering and site development, including highway/roadway design, sanitary sewer and septic system design, water mains, grading, drainage, site layout, and permitting. He has designed roadway improvement projects, corporate office parks, industrial complexes, retail centers, and developed numerous telecommunication facilities.

Robert manages projects involving the siting, design and permitting of utility installations, modifications to existing substations, transmission line upgrades, solar photovoltaic electric generating facilities, fuel cells, and telecommunication sites. He has been involved in the preparation of numerous filings to the Connecticut Siting Council and has appeared as an expert witness on multiple Dockets.

Representative Projects

- Telecommunication Facilities.
 - Clients: - Homeland Towers - Connecticut
 - T-Mobile Northeast, LLC - Connecticut
 - American Tower Corp. - Connecticut
 - Bay Communications II, LLC - Connecticut
 - Verizon Wireless, Inc. – Connecticut, New York, and western Massachusetts
 - Message Center Management – Connecticut
 - UNIsite – Northeast Region
 - Crown Castle – Northeast Region
 - Sprint PCS – Connecticut and New York
 - Omnipoint Communications – Massachusetts
 - SNET Mobility, Inc. – Connecticut, Massachusetts, and Rhode Island
- Eversource 348 OPGW Line
- Eversource Windsor ERP
- Eversource East of Hurd State Park
- Eversource Mansfield SS
- Eversource Shunock SS
- North Branford Solar Facility
- Killingly HS Solar Facility
- Haddam Quarter Road Solar Facility
- Enfield Solar Facility
- East Windsor 2 Solar Facility

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Education

Northeastern University, BS Civil Engineering 1986

Licenses

Licensed Profession Engineer, State of Connecticut #20071



Kip DiVito
Sr. RF. Engineer
Verizon Wireless

Wallingford, CT
203.671.2776
Kip.DiVito@verizonwireless.com

General Background

Kip DiVito possesses a distinguished career spanning 12 years in the field of Radio Frequency (RF) engineering, marked by a robust foundation in both military service and corporate telecommunications. His journey began with 12 years as a dedicated Radio Frequency Engineer in the United States Air Force, where he honed critical skills in designing, implementing, and maintaining complex communications infrastructure. This extensive military experience provided a comprehensive understanding of RF principles, network architecture, and mission-critical systems, often under demanding operational conditions.

Alongside his impactful career in the Air Force, he has transitioned to the private sector, bringing his invaluable expertise to Verizon Wireless, where he has contributed for the past six years. In this capacity, he has been instrumental in cellular network design, a testament to his adaptability and keen understanding of evolving telecommunications landscapes. His responsibilities at Verizon Wireless are geographically extensive, encompassing a significant portion of New England. He is currently entrusted with the cellular network operations and optimization across four counties in Massachusetts: Berkshire, Franklin, Hampshire, and Hampden. Furthermore, his purview extends into Connecticut, where he is responsible for three counties: Middlesex, New London, and Windham. This broad geographical responsibility underscores his capability to manage and enhance RF performance across diverse topographies and subscriber bases, ensuring optimal network reliability and capacity for Verizon Wireless customers.

Professional Experience

2019- Present. Senior Radio Frequency Engineer. Verizon Wireless.

2013- Present. Cyber Defense Operations Craftsman. 103 Air Lift Wing, Bradley ANGB, CT.

Education

Present. Associates, Electronics Systems Technology, CC of the Air Force

2024. NCOA, Air University

2016. ALS, Hanscom AFB, MA

2008. BA, Arts, Lesley University

General Background

Matt Gustafson is a Registered Soil Scientist, Wetland and Forestry Biologist, and Certified Professional in Erosion and Sedimentation Controls since 2011. His skills include Connecticut and federal wetland delineations, Army Corp of Engineers data plots, wetlands functions and values assessments, vernal pool analyses, threatened and endangered species and critical habitats inventories, biological surveys, vegetative habitat classification and cover-type mapping, environmental and construction monitoring, erosion control inspections and wetland mitigation planning and monitoring. Mr. Gustafson has consulted on numerous projects which involved erosion and sediment control planning, vegetative soil stabilization and storm water management Best Management Practices evaluation and selection. He is experienced in vernal pool monitoring and assessment, including identification of a wide variety of native amphibians and reptiles that utilize vernal pool habitats.

Matt has assisted with local, state and federal wetland permitting for a variety of projects including wireless telecommunications, electric and alternative energy utilities, roadway improvements, and commercial and public developments. He also has experience in GIS data creation and management, data analysis, mobile data collection applications, integrating GIS services and solutions, and mapping.

Representative Projects

Solar Energy Facility Developments, Connecticut

Matt assisted in developing environmental documentation for several solar energy facilities in Connecticut, from the due diligence phase through construction. Matt performed feasibility analyses, wetland delineations and function/value assessments, ACOE permitting coordination, rare species field investigations and state/federal compliance services. He also assisted in the development and implementation of wetland, vernal pool, and rare species protection programs and mitigation plans, and creation of environmental assessment documentation. Matt also provided compliance monitoring services including development and implementation of a contractor awareness program, inspection of erosion and sedimentation controls, rare species protection, and documentation to satisfy regulatory approval requirements.

Northeast Utilities, Central Connecticut Reliability Project

Matt assisted with field efforts associated with natural resource and constructability evaluations along a 35-mile electrical transmission corridor in central Connecticut. The natural resource evaluation included Connecticut and Federal wetland delineations, Army Corps of Engineers data plots, wetland functions and values assessment, inventory of several State and Federal Threatened and Endangered species, and habitat/land use cover-type mapping. The constructability evaluation included documenting and mapping key project features including existing and potential access routes, current and new transmission tower locations, and construction laydown areas and their proximities to wetlands and other sensitive natural resources. The data was used to assess potential impacts to resources and identify constructability constraints.

Utility Right of Way Rare Species/Wetland/Vernal Pool Investigations, Waterford, CT & CT-17 Vegetation Management

Matt assisted with field investigations for the presence of several state listed rare species (flora and fauna) and habitat within a four-mile long electrical transmission corridor and immediately surrounding areas. Potential habitat was field-located using GPS survey equipment, catalogued and qualitatively described. He also conducted an extensive vernal pool investigation which identified, mapped and evaluated over fifteen vernal pool systems.

Utility Right-of-Way Wetland Investigation/Permitting/Compliance Monitoring, 310/368/383 Lines, Huntsbrook Junction to Manchester Substation, CT; Card St./Tunnel Substation, Lebanon, CT; Frostbridge to Campville Substation, Torrington, CT

Matt assisted with field investigations and mapping for wetland resources within various utility corridors including vernal pool assessments, constructability analyses and field location of important resources. Following these preliminary assessments, Matt assisted in securing various state and federal permits including the CT General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities, Certificates of Environmental Compatibility and Public Need and Orders of Conditions issued by the Connecticut Siting Council, CT State Land Notifications, and Army Corps. Of Engineers Connecticut General Permit for activities within waters of the United States. During construction, Matt provided compliance monitoring for the various environmental permit requirements including compliance with the CT General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities, CT DEEP Natural Diversity Database conditions, and Army Corps of Engineers CT General Permit.

Utility Right of Way Rare Species/Wetland/Vernal Pool Investigations, CT-17 Vegetation Management

Matt led field investigations and delineation, location, and survey for wetland and vernal pool resource areas within an 18-mile-long electrical transmission corridor and immediately surrounding areas. Wetland resource areas were flagged and field-located using GPS survey equipment, catalogued and qualitatively described. Matt assisted in producing GPS data and mapping to be used by field personnel. He also conducted an extensive vernal pool investigation which identified, mapped and evaluated vernal pool systems.

Education

University of Vermont, The Rubenstein School of Environment and Natural Resources
B.S., Double Major: Environmental Science and Forestry, May 2011

Continuing Education

New England Soil Certification Program, completed 2012

Registrations

Registered Soil Scientist, Society of Soil Scientists of Southern New England

Connecticut Association of Wetland Scientists

Certifications

OSHA Hazardous Water Operations and Emergency Response
(HAZWOPER) Training (29 CFR 1910.120)

Certified Professional in Erosion and Sedimentation Controls (CPESC) #6523

Certified Erosion, Sediment and Stormwater Inspector (CESSWI) #12450

Richard Landino
Senior Designer/Analyst

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General Background

Mr. Landino has over 17 years of professional experience in the graphics field. His expertise includes 3-dimensional modeling, preparing photographic simulations, field reconnaissance for visual and aesthetic evaluations, precision photography, graphic design, and production of presentation and marketing materials. He has extensive experience conducting and preparing photographic simulations, sight-lines and related graphics for large-scale utility installations, telecommunication sites, new and modified substations, transmission structures, electrical corridor upgrades, wind and solar facilities, and fuel cells throughout New England and New York.

Representative Projects

- Visibility Analysis – Proposed monopole, Haddam, CT 2025
- Visibility Analysis – Proposed telecommunications rooftop equipment, West Haven, CT 2024
- United Illuminating, Fairfield-Congress Railroad Transmission Line 115-kV Rebuild Project, CT 2023
- United Illuminating, Derby Junction-Ansonia Substation Transmission Line 115-kv Rebuild Project, CT 2022
- United Illuminating, Milvon-West River Railroad Transmission Line 115-kv Rebuild Project, CT 2021
- United Illuminating, Proposed and Existing Substations, Multiple Locations, CT 2012-2021
- Facility Renderings & Visibility Analyses - Greenwich Substation and Line Project, Greenwich, CT 2015-2018
- Visibility Assessment & Photographic Simulations – Manchester Substation Proposed Tower, Manchester, CT 2018
- Photographic Simulations – Birchwood Condominiums, Danbury, CT 2017
- Visibility Analysis – Danielson Work Center, Killingly, CT 2017
- Visibility Analysis – Proposed Microwave Tower, East Hampton, CT 2016
- Visibility Analysis - Norwalk Area Work Center Tower Replacement - 2015
- Photographic Simulations - Proposed Renewable Electric Generating Facilities, Multiple Sites 2014 – Ongoing
- Telecommunications, Existing Conditions Photo-Documentation / Photo-simulations

Education

B.A. Southern Connecticut State University, Arts, 2003
Paier College of Art, 2004-2006