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September 2, 2025

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. 535 – The Towers, LLC Application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a telecommunications facility and associated equipment located at 835 Norwich Worcester Turnpike (Route 169), Woodstock, Connecticut**

Supplemental Pre-Hearing Submission

Dear Attorney Bachman:

Enclosed please find the Applicant's Supplemental Prehearing Submission identifying its witnesses and exhibits filed in advance of the September 9, 2025 continued evidentiary hearing session in Docket No. 535.

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 THE TOWERS, LLC FOR A	:	DOCKET NO. 535
CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED FOR	:	
THE CONSTRUCTION, MAINTENANCE AND	:	
OPERATION OF A WIRELESS	:	
TELECOMMUNICATIONS FACILITY AT 835	:	
NORWICH WORCESTER TURNPIKE (ROUTE	:	
169), WOODSTOCK, CONNECTICUT	:	SEPTEMBER 2, 2025

SUPPLEMENTAL PRE-HEARING SUBMISSION

The Towers, LLC (“The Towers”) hereby provides the Connecticut Siting Council (“Council”) with the following supplemental pre-hearing information available at this time regarding the above-referenced Application.

A. List of Witnesses

1. Brian Paul, Project Manager, Vertical Bridge REIT, LLC
2. Kip Divito, Radio Frequency Engineer, Verizon Wireless
3. Elizabeth Glidden, Real Estate Regulatory Specialist, Verizon Wireless
4. Jason Margelot, Project Manager, Engineering Implementation, Airosmith Development, Inc.
5. Matthew Gustafson, Registered Soil Scientist & Forester, All-Points Technology Corporation
6. Rick Landino, Senior Designer/Analyst, All-Points Technology Corporation

B. Exhibits to be offered

The Towers intends to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need

filed by The Towers, dated April 7, 2025.

2. Bulk file exhibits including:
 - a. Homeland's "Technical Report," dated December 4, 2024, filed with the Town of Woodstock;
 - b. Town of Woodstock Zoning Regulations;
 - c. Town of Woodstock Inland Wetlands and Watercourses Regulations; and
 - d. Town of Woodstock Plan of Conservation and Development.
3. Applicant's Affidavit of Publication filed with the Council on April 15, 2025.
4. Applicant's Sign Posting Affidavit filed with the Council on July 14, 2025.
5. Applicant's Responses to Council Interrogatories filed with the Council on July 14, 2025.
6. **Applicant's Supplemental Response to Council Interrogatory No. 54.**
7. **Applicant's Responses to Interrogatories to Intervenor, Paska Nayden.**

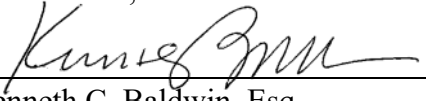
The Applicant reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties, or intervenors.

C. Remote Public Comment Session

Prior to the start of the Remote Public Comment Session, undersigned counsel will make a brief presentation describing the site features and proposed site improvements. I will refer to the Site Schematic and Site Plan Sheets Z-1 and Z-2, included in Attachment 1 of the Docket No. 535 Application. Electronic copies of the Site Schematic and Site Plan Sheets Z-1 and Z-2 are attached to this filing.

Respectfully submitted,

THE TOWERS, LLC

By: 
Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
One State Street
Hartford, CT 06103
Its Attorneys

CERTIFICATION OF SERVICE

I hereby certify that a copy of the forgoing was sent electronically to the following:

Paska Nayden
c/o 44 Jesse Lee Drive
Easton, CT 06612
ct4rt@protonmail.com

September 2, 2025

Date



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