

JONATHAN H. SCHAEFER

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Also admitted in Massachusetts and Vermont

August 6, 2025

Via Federal Express and Electronic Mail

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

Re: Docket No. 536 – Tarpon Towers III, LLC and Cellco Partnership d/b/a Verizon Wireless 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 78 Goshen East Street, Norfolk, Connecticut

Dear Attorney Bachman:

In accordance with the Siting Council's directive, enclosed please find the Applicant's Prehearing Submission identifying its witnesses and exhibits filed in advance of the August 14, 2025 evidentiary and public hearing sessions in Docket No. 536.

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

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Jonathan H. Schaefer

STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

.

APPLICATION OF TARPON TOWERS III, LLC : DOCKET NO. 536

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 78 GOSHEN EAST STREET,

NORFOLK, CONNECTICUT : AUGUST 6, 2025

PRE-HEARING SUBMISSION

Tarpon Towers III, LLC ("Tarpon") 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. Brett Buggeln, President and Chief Operating Officer, Tarpon Towers III, LLC
- 2. Kenneth Curley, EVP Corporate Development, Tarpon Towers III, LLC
- 3. Elizabeth Glidden, Real Estate Regulatory Specialist, Verizon Wireless
- 4. Shiva Gadasu, Radio Frequency Engineer, Verizon Wireless
- 5. Amy White, Project Manager II, Smartlink
- 6. Jesse Moreno, Professional Engineer, Proterra Design Group, LLC.
- Dean Gustafson, Director of Environmental Services, Senior Wetland Scientist,
 Professional Soil Scientist, All-Points Technology Corp. P.C.
- 8. Rick Landino, Senior Designer/Analyst, All-Points Technology Corp. P.C.

B. Exhibits to be offered

The Applicant intends to offer the following Exhibits:

- Application for a Certificate of Environmental Compatibility and Public Need filed by Tarpon and Cellco dated April 17, 2025.
- 2. Bulk file exhibits including:
 - Tarpon's "Technical Report" dated January 2, 2025 filed with the Town of Norfolk;
 - b. Town of Norfolk Zoning Regulations;
 - c. Town of Norfolk Inland Wetlands and Watercourses Regulations; and
 - d. Town of Norfolk Plan of Conservation & Development.
- 3. Affidavit of Publication dated April 22, 2025.
- 4. Applicant's Sign Posting Affidavit filed with the Council on July 31, 2025.
- 5. Applicant's Responses to Council Interrogatories dated July 23, 2025.

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 Kenneth Curley, EVP Corporate Development, Tarpon Towers III, LLC will make a brief presentation describing the site features and proposed site improvements. Mr. Curley will refer to the Site Schematic and Site Plan Sheet A-2 included in <u>Attachment 1</u> of the Docket No. 536 Application. Electronic copies of the Site Schematic and Plan Sheet A-2 are attached to this filing.

Respectfully submitted,

TARPON TOWERS III, LLC AND CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

By:

Jonathan H. Schaefer, Esq. Robinson & Cole LLP One State Street Hartford, CT 06103 Its Attorneys