

KENNETH C. BALDWIN

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Also admitted in Massachusetts  
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August 19, 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. 537 – 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 327 North Anguilla Road, Stonington, Connecticut**

Dear Attorney Bachman:

Enclosed please find the Applicant's Prehearing Submission identifying its witness panel and exhibits filed in advance of the August 28, 2025 evidentiary and public hearing sessions in Docket No. 537.

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. 537
CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED FOR	:	
THE CONSTRUCTION, MAINTENANCE AND	:	
OPERATION OF A WIRELESS	:	
TELECOMMUNICATIONS FACILITY AT 327	:	
NORTH ANGUILLA ROAD, STONINGTON,	:	
CONNECTICUT	:	AUGUST 19, 2025

PRE-HEARING SUBMISSION

The Towers, LLC (“The Towers”) 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. 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. Robert Burns, P.E., All-Points Technology Corporation
5. Matt 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 25, 2025.

2. Bulk file exhibits including:
  - a. The Tower's "Technical Report," dated October 8, 2024, filed with the Town of Stonington;
  - b. Town of Stonington Zoning Regulations;
  - c. Town of Stonington Inland Wetlands and Watercourses Regulations; and
  - d. Town of Stonington Plan of Conservation and Development.
3. Applicant's Affidavit of Publication filed with the Council on April 30, 2025.
4. Applicant's Sign Posting Affidavit filed with the Council on August 18, 2025.
5. Replacement of Attachment 17 – Redacted Land Lease Agreement dated May 5, 2025.
6. Applicant's Responses to Council Interrogatories filed with the Council on August 7, 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, Robert Burns, the Project Engineer, will make a brief presentation describing the site features and proposed site improvements. Mr. Burns will refer to the Site Schematic and Plan Sheets SP-1, SP-2 and CP-1 included in Attachment 1 of the Docket No. 537 Application. Electronic copies of the Site Schematic and Plan Sheets SP-1, SP-2 and CP-1 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