

KENNETH C. BALDWIN

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Also admitted in Massachusetts
and New York

September 4, 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. 538 – 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 1022 Trumbull Highway, Lebanon, Connecticut**

Dear Attorney Bachman:

Enclosed please find the Applicant's Prehearing Submission identifying its witness panel and exhibits filed in advance of the September 11, 2025 evidentiary and public hearing sessions in Docket No. 538.

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. 538
CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED FOR	:	
THE CONSTRUCTION, MAINTENANCE AND	:	
OPERATION OF A WIRELESS	:	
TELECOMMUNICATIONS FACILITY AT 1022	:	
TRUMBULL HIGHWAY, LEBANON,	:	
CONNECTICUT	:	SEPTEMBER 4, 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. Jason Margelot, Project Manager, Airosmith Development, Inc.
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 May 2, 2025.

2. Bulk file exhibits including:
 - a. The Tower's "Technical Report," dated January 24, 2025, filed with the Town of Lebanon;
 - b. Town of Lebanon Zoning Regulations;
 - c. Town of Lebanon Inland Wetlands and Watercourses Regulations; and
 - d. Town of Lebanon Plan of Conservation and Development.
3. Applicant's Affidavit of Publication filed with the Council on May 9, 2025.
4. Wetland and Vernal Pool Assessment Report dated June 9, 2025.
5. Applicant's Responses to Council Interrogatories filed with the Council on August 13, 2025.
6. Sign Posting Affidavit dated September 3, 2025.

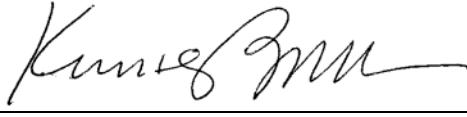
The Applicant reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties, or intervenors.

C. Remote Public Comment Session

Prior to the start of the Remote Public Comment Session, Kenneth C. Baldwin, Esq., will make a brief presentation describing the site features and proposed site improvements. Mr. Baldwin will refer to the Plan Sheets Z-2, Z-4 and Z-5 included in Attachment 1 of the Docket No. 538 Application. Electronic copies of Plan Sheets Z-2, Z-4 and Z-5 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