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Also admitted in Massachusetts

December 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. 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**

**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 December 16, 2025 continued evidentiary hearing session 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	:	DECEMBER 2, 2025

**SUPPLEMENTAL 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. **Joe Johnston, P.E. Airosmith Development, Inc.**
5. Jason Margelot, Project Manager, Airosmith Development, Inc.
6. Dean Gustafson, Director of Environmental Services, Senior Wetland Scientist, Professional Soil Scientist, All-Points Technology Corp. P.C.
7. 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.
7. **Applicant's Supplemental Information filing dated December 2, 2025.**
8. **Applicant's Response to Council Interrogatory Set 2.**
9. **Applicant's Responses to Interrogatories from Intervenor, Cynthia Arons.**
10. **Applicant's Responses to Interrogatories from Intervenors, Gregory and Natalie Roy.**

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.

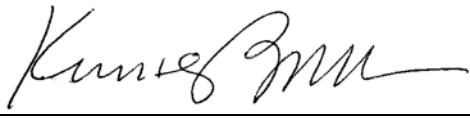
C. Remote Public Comment Session

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

CERTIFICATE OF SERVICE

I hereby certify that on the 2<sup>nd</sup> day of December 2025, a copy of the foregoing was sent,  
via electronic mail, to:

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Kenneth C. Baldwin