

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF THE TOWERS LLC  
(A JOINT VENTURE BETWEEN VERTICAL BRIDGE  
REIT, LLC 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 TELECOMMUNICATIONS  
FACILITY AT 424 STORRS ROAD IN MANSFIELD,  
CONNECTICUT

DOCKET NO. 539

September 10, 2025

THE TOWERS, LLC PRE-HEARING SUBMISSION

The Towers, LLC (the “Applicant”) respectfully submits the following pre-hearing information available at this time regarding the above-referenced Application.

I. List of Witnesses

1. Brian Paul, Project Manager, Vertical Bridge REIT, LLC
2. Elizabeth Glidden, Senior Engineer, Regulatory and Real Estate, Verizon Wireless
3. Jason Margelot, Project Manager, Engineering Implementation, Airosmith Development, Inc.
4. Mark Brauer, Radio Frequency Engineer, Verizon Wireless
5. Matt Gustafson, Environmental Scientist, All Points Technology Corp, P.C.
6. Rick Landino, Graphics Specialist, All Points Technology Corp. P.C.

II. Exhibits to be Offered

The Applicant intends to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need filed on May 6, 2025.
2. Bulk File exhibits including:
  - a. Section 1: Mansfield Tomorrow: Plan of Conservation & Development, Town of Mansfield, Connecticut, dated October 8, 2015
  - b. Section 2: Zoning Regulations of the Town of Mansfield, Connecticut, Revised March 15, 2022
  - c. Section 3: Zoning Map of the Town of Mansfield, Connecticut, Effective June 20, 2021

- d. Section 4: Inland Wetlands & Watercourses Regulations, Town of Mansfield, Connecticut, Adopted by the Mansfield Inland Wetlands Agency, First Effective Date July 1, 1974 and Last Updated November 15, 2017
  - e. Section 5: Technical Report
- 3. Affidavit of Publication of the Legal Notice published in the Hartford Courant on May 2, 2025 and May 5, 2025.
  - 4. Applicant's Responses to Siting Council Interrogatories, Set I, dated September 10, 2025.
  - 5. Applicant's Certification of Service of a copy of the Application to the Connecticut Office of Consumer Counsel.

The Applicant reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as may be necessary during hearing process and on redirect.

### III. Remote Public Comment Session Presentation

Jason Margelot is the designated presenter for the 6:30 p.m. remote public comment session. The Proposed Facility drawings for the presentation are attached.

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, one original and fifteen (15) hard copies of the foregoing were sent via overnight Federal Express and electronically to the Connecticut Siting Council in accordance with the Connecticut Siting Council directives.

September 10, 2025



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Attorneys for the Applicant

cc: The Towers, LLC  
Project Consultant Team