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Also admitted in Massachusetts

November 13, 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. 542 – 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 off Pequotsepos Road, Stonington (Mystic), Connecticut**

Dear Attorney Bachman:

Enclosed please find the Applicant's Prehearing Submission identifying its witness panel and exhibits filed in advance of the November 20, 2025 evidentiary and public hearing sessions in Docket No. 542.

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

Sincerely,



Kenneth C. Baldwin

Copy to:
Parties and Intervenors of Record

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF THE TOWERS, LLC FOR A	:	DOCKET NO. 542
CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED FOR	:	
THE CONSTRUCTION, MAINTENANCE AND	:	
OPERATION OF A WIRELESS	:	
TELECOMMUNICATIONS FACILITY OFF	:	
PEQUOTSEPOS ROAD, STONINGTON	:	
(MYSTIC), CONNECTICUT	:	NOVEMBER 13, 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. Joseph Johnson, P.E., Vice President, Engineering, Airosmith Development Inc.
5. Jason Margelot, Project Manager, Airosmith Development Inc.
6. Dean Gustafson, Senior Soil Scientist and Director of Environmental Services,
All-Points Technology Corporation
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 July 16, 2025.

2. Bulk file exhibits including:
 - a. The Tower's "Technical Report," dated March 20, 2025, 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 July 21, 2025.
4. Applicant's Sign Posting Affidavit filed with the Council on October 28, 2025.
5. Applicant's Responses to Council Interrogatories filed with the Council on November 13, 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, Joseph Johnson, P.E., the Project Engineer, will make a brief presentation describing the site features and proposed site improvements. Mr. Johnson will refer to the Site Location Map, Site Schematic and Plan Sheet Z-4 included in Attachment 1 of the Docket No. 542 Application. Electronic copies of the Site Location Map, the Site Schematic and Plan Sheet Z-4 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