

February 10, 2026

Via Electronic and Hand Delivery

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Docket No. 543 – 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 17 Warren Road, Washington (New Preston), Connecticut**

Supplemental Pre-Hearing Submission

Dear Attorney Bachman:

Enclosed please find the Applicant's Supplemental Prehearing Submission identifying its **supplemental** witness panel, list of exhibits and administrative notice items filed in advance of the February 24, 2026 evidentiary and public hearing sessions in Docket No. 543.

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: :
 :
THE TOWERS, LLC APPLICATION FOR A : DOCKET NO. 543
CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR :
THE CONSTRUCTION, MAINTENANCE AND :
OPERATION OF A TELECOMMUNICATIONS :
FACILITY AND ASSOCIATED EQUIPMENT :
LOCATED AT 17 WARREN ROAD, :
WASHINGTON, CONNECTICUT : FEBRUARY 10, 2026

SUPPLEMENTAL PRE-HEARING SUBMISSION

The Towers, LLC (“The Towers”) hereby provides the Connecticut Siting Council (“Council”) with the following supplemental 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. Keith Vellante, Sr. Radio Frequency Engineer/Manager/Director of RF Services,
C Squared Systems, LLC
3. Elizabeth Glidden, Real Estate Regulatory Specialist, Verizon Wireless
4. Joseph Johnston, 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
8. **Mike Libertine, LEP, Vice President, All-Points Technology Corporation**

9. **Phillip Kendall, P.E., New England Highway Practice Lead, Hardesty & Hanover**

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 30, 2025.
2. Bulk file exhibits including:
 - a. The Tower's "Technical Report," dated March 19, 2025, filed with the Town of Washington;
 - b. Town of Washington Zoning Regulations;
 - c. Town of Washington Inland Wetlands and Watercourses Regulations; and
 - d. Town of Washington Plan of Conservation and Development.
3. Applicant's Affidavit of Publication filed with the Council on August 4, 2025.
4. Applicant's Sign Posting Affidavit filed with the Council on November 24, 2025.
5. Applicant's Responses to Council Interrogatories filed with the Council on November 26, 2025.
6. Resubmission of Attachment 3 to Responses to Council interrogatories, dated November 26, 2025 and additional sign affidavit photograph, received December 1, 2025.
7. Resume of Keith Vellante, C Squared Systems, LLC.
8. Signed Protective Order – Lease Agreement Financial Terms, dated December 4, 2025.

9. Applicant's Responses to Council Interrogatories (Set Two) filed with the Council on December 30, 2025.
10. Applicant's Responses to Late File Exhibits filed with the Council on December 30, 2025.
11. Applicant Responses to Washington Montessori Association, Inc. Interrogatories, dated January 6, 2026.
12. Applicant's Responses to Area Residents Group Interrogatories, dated January 6, 2026.
13. **Resume of Michael Libertine, LEP, Vice President, All Points Technologies Corporation.**
14. **Applicant's Responses to Area Residents Group Interrogatories filed with the Council on February 10, 2026 and resume of Phillip Kendall, P.E. Hadesty & Hanover.**

C. **Request for Administrative Notice**

1. **Council Docket No. 445 – Findings of Fact No. 76**
https://portal.ct.gov/-/media/csc/1_dockets-medialibrary/media_do400-499/docket_445/do445fofinalpdf.pdf?rev=1ed3fa34f0fc4948b67217359663e8c9&hash=374E87EEF88EE63720EA4D9AE954D727
2. **Council Docket No. 448 – Findings of Fact No. 56**
https://portal.ct.gov/-/media/csc/1_dockets-medialibrary/media_do400-499/docket_448/decision/448decisionpackage011315pdf.pdf?rev=585a68c5282e466ab4c66e5f1aeb2a57&hash=949E392B6FE381B1F4CBCEAF44E7051A

3. **Council Docket No. 488 – Findings of Fact Nos. 82-93**
https://portal.ct.gov/-/media/csc/1_dockets-medialibrary/media_do400-499/do488/decision/d488-dfof_final.pdf?rev=9ee57ac5461b48ed920d90262f635edc&hash=1D17EBB90210B7134F833F4489522C1F
4. **Council Docket No. 502 – Findings of Fact No. 105-117**
https://portal.ct.gov/-/media/csc/1_dockets-medialibrary/1_media_do500_600/do502/decisiondocs/do502_fof_final.pdf?rev=32d62a0c2d1c4ef88e1404f6e3f72ea2&hash=782D6BDC4F08C1E0F2A57908D46CE546
5. **Council Docket No. 510 – Findings of Fact No. 114-121**
https://portal.ct.gov/-/media/csc/1_dockets-medialibrary/1_media_do500_600/do510/decisiondocs/do510_fof-23-01-05-final.pdf?rev=05061122c80c4017a6bcbf82bc7b4856&hash=8B131CC8A3AD62157B6D2607812745A8
6. **Southern New England Telephone Company Master Pole Attachment Agreement with Cellco Partnership**
[https://www.dpuc.state.ct.us/dockhistpost2000.nsf/8e6fc37a54110e3e852576190052b64d/589f6286923e3c808525829c0070f047/\\$FILE/Interrogatory%20EN-6,%20Attachment%20A.pdf](https://www.dpuc.state.ct.us/dockhistpost2000.nsf/8e6fc37a54110e3e852576190052b64d/589f6286923e3c808525829c0070f047/$FILE/Interrogatory%20EN-6,%20Attachment%20A.pdf)

7. **Eversource Energy Master Pole Attachment Agreement with Cellco Partnership**

[https://www.dpuc.state.ct.us/dockhistpost2000.nsf/8e6fc37a54110e3e852576190052b64d/09003f1a61bbe6728525829c0070f048/\\$FILE/Interrogatory%20EN-6,%20Attachment%20A.pdf](https://www.dpuc.state.ct.us/dockhistpost2000.nsf/8e6fc37a54110e3e852576190052b64d/09003f1a61bbe6728525829c0070f048/$FILE/Interrogatory%20EN-6,%20Attachment%20A.pdf)

8. **UI Master Pole Attachment Agreement with Cellco Partnership**

[https://www.dpuc.state.ct.us/dockhistpost2000.nsf/8e6fc37a54110e3e852576190052b64d/d289dd1696dd3c068525829c0070f04a/\\$FILE/Interrogatory%20EN-6,%20Attachment%20A.pdf](https://www.dpuc.state.ct.us/dockhistpost2000.nsf/8e6fc37a54110e3e852576190052b64d/d289dd1696dd3c068525829c0070f04a/$FILE/Interrogatory%20EN-6,%20Attachment%20A.pdf)

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.

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 10th day of February 2026, a copy of the foregoing was sent,
via electronic mail, to:

The Honorable James L. Brinton
First Selectperson
Town of Washington
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The Honorable Gregory M. LaCava
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A handwritten signature in black ink, appearing to read "Kenneth C. Baldwin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kenneth C. Baldwin

Michael Libertine, LEP
Vice President

All-Points Technology Corporation, P.C.
567 Vauxhall Street Extension
Suite 311
Waterford, CT 06320
860-552-2238
milibertine@allpointstech.com

Background

Mr. Libertine is the Vice President of All-Points Technology Corporation with over 35 years of professional experience in the environmental field. His consulting expertise includes regulatory siting and permitting; visibility and aesthetic evaluations; environmental due diligence, site assessments, and field investigations; and, NEPA compliance.

Mike assists clients in the siting and permitting of utility infrastructure, including telecommunication facilities, bulk power substations, transmission lines, and renewable energy facilities. He has provided expert testimony in front of state and local commissions, including the Connecticut Siting Council.

Mike has served as liaison to the Connecticut State Historic Preservation Office and Tribal Historic Preservations Offices in southern New England on behalf of numerous telecommunications projects, including supervising Section 106 of the National Historic Preservation Act consultations, preparing environmental assessments, and coordinating memoranda of agreement.

A Licensed Environmental Professional in Connecticut, Mike has completed/supervised over 2,200 environmental site assessments and field investigations throughout New England.

Representative Projects

Environmental Permitting Services for Wireless Telecommunications Clients, New England & NY

Mike has been providing environmental siting, land planning and permitting services on behalf of various telecommunications service providers and tower builders throughout New England and New York since 1997. He has testified on behalf of numerous clients regarding environmental and aesthetic considerations in front of local municipalities, the Connecticut Siting Council, and state and federal agencies. Representative services include: due diligence and land use evaluations; preliminary site screenings; preparation of environmental compliance documentation; Phase I ESAs and Phase II field investigations; remedial planning and oversight; visibility analyses; and securing regulatory permits.

Environmental Land Planning, Siting and Permitting – Electric Utilities

Since 2004, Mike has served as Program Manager for the siting and permitting of numerous electric utility projects in Connecticut and Massachusetts involving the assessment, siting and permitting of: new bulk power substations; modifications to existing substations; upgrades/relocation of transmission lines; installation of electrical system infrastructure; and, development of other support facilities. These projects require coordination with in-house discipline-specific team members, as well as client managers and engineers, outside consultants, legal counsel, staff, and subcontractors.

Project-related services include overseeing civil engineering feasibility studies, pre-acquisition due diligence evaluations, natural resources inventories and wetland delineations, habitat evaluations, noise analysis, hazardous waste investigations, site survey, landscape architecture, visual analyses, preparation of technical documents and regulatory applications, coordination with federal, state and local agencies, permitting, public outreach, and expert witness testimony.

Environmental Siting and Permitting Services, Commercial Solar Facilities, Connecticut

Mike has served as Project Manager on numerous approved commercial solar projects ranging in size from less than 1 MW to 20 MW. Mike oversees the preparation of environmental assessments and impact analyses to support filings to the Connecticut Siting Council and southern New England municipalities involving: environmental due diligence and feasibility investigations; site/civil engineering design; wetland delineations; vernal pool studies and impact evaluations; habitat and wildlife assessments; breeding bird surveys; noise analyses, visibility assessments; archaeological surveys; consults and coordination with state agencies; development of protective measures for natural resources; and, securing stormwater permits.

Environmental Siting and Permitting Services, Fuel Cell Installations

Similar to solar development, the siting and permitting process for fuel cell generation facilities requires an assessment of the project's potential impacts on water and other natural resources, vegetation and wildlife, rare species, historic and cultural resources, noise, air quality, scenic and recreational areas, and the community.

Environmental Evaluations and Regulatory Permitting, Wind Farm Colebrook, Connecticut

Mike served as the Project Manager for environmental evaluations associated with the development of Connecticut's first commercial wind farm. He supervised due diligence investigations, natural resource studies and environmental permitting activities, including the evaluation of: wetlands and watercourses; flora and fauna; potential noise impacts and flicker phenomena; and, visual/aesthetic considerations. Mike provided expert testimony at local and state public hearings and assisted in preparing the Development and Management Plan and pre-construction coordination efforts of the 3.2 MW project.

Visibility and Aesthetic Assessments

Mike has been responsible for evaluating the visual effects of small and large-scale development projects, using a combination of predictive computer modeling and in-field analysis. The predictive model provides a quantifiable measurement of visibility throughout a pre-defined study area. Conducting field reviews with visual markers (e.g., balloon floats) provides the ability to verify results of the computer model and photo-document existing conditions from publicly-accessible areas. Photographic simulations are prepared to depict scaled renderings of the proposed development, providing qualitative observations. Mike has managed more than 600 visual evaluations for telecommunication towers, electrical utilities, renewable energy facilities, and commercial development.

Education

University of Connecticut, B.S. Natural Resources Management,
December 1990
Stonehill College, B.A. Marketing, May 1981

Licenses

Licensed Environmental Professional, State of Connecticut,
LEP No. 345