



Environmental Design & Research,
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memorandum

To: Vermont Public Utility Commission **EDR Project No:** 19121
From: Matthew Robinson
Date: April 26, 2021
Reference: Case No. 20-1261-NMP

Comments:

Environmental Design & Research (“EDR”) was retained to provide a supplemental aesthetic review of additional simulations and accompanying prefiled testimony of the proposed aesthetic mitigation filed by the Petitioner at the request of the Vermont Public Utility Commission. EDR concludes that the analysis provided by the Petitioner rests on a reliable methodology for production of the visual simulations and reaches a sound conclusion within the Petitioner’s aesthetic review.

EDR reviewed the Petitioner’s Supplemental Prefiled Testimony (20-1261-NMP – Third Supplemental Prefiled Testimony (TH) and Second Supplemental Prefiled Testimony (LT)) and concludes that the filings contain the appropriate information to verify the goals set forth in the Petitioner’s original Aesthetic Assessment (Exhibit MHG-LT-1). EDR’s supplemental analysis is consistent with the conclusions reached in EDR’s original aesthetics assessment report.

Updated visual simulations and accompanying answers to the PUC information request from 03/18/2021 were submitted by the Petitioner. EDR makes the following conclusions to supplement its original aesthetics analysis provided in this case:

- The updated conceptual visual simulations provided by the Petitioner (20-1261-NMP – Mitigation Plan Simulations) reflect the proposed mitigation plan and is representative of the conditions to be expected at the time of installation, 4-8 years post install and 10-15 years growth.
- As stated in the Third Supplemental Prefiled Testimony of Thomas Hand, the visual simulations provided adequately satisfy the Town of Manchester Land Use & Development Ordinance (2018) by incorporating varying growth projections for future years.
- The updated visual simulations accomplish the goals set forth in the mitigation plan by filtering the view of the proposed panels while preserving the Taconic ridgeline. The material shown in the rendering (20-1261-NMP – Mitigation Plan Simulations) in comparison to the simulations provided to the town (20-1261-NMP – Town Plan Simulations) demonstrates that the Petitioner has altered their understanding of the requested material and incorporated local outreach into the design.
- The visual simulation methodology and alignment features included in the Second Supplemental Prefiled Testimony of Lucy Thayer provide the necessary documentation and process to confirm the accuracy of the visual simulation provided.

Below is EDR's understanding of how the additional questions asked by the PUC in their Information request and the subsequent answers submitted by the Petitioner either agree with or are not in accordance with the original decisions presented in the Response to Procedural Order (20-1261-NMP – 2020.12.29 – Richville Road Aesthetics Report) provided by EDR

- Q1: No additional comments
- Q2: No additional comments
- Q3: EDR agrees with the Petitioners understanding of Open Space and how it is applied through the Quechee Test in this situation. The parcel is not part of an identified system of open space through a municipal plan.
- Q4: EDR is in concurrence with the Petitioners reasoning for not including the entirety of Richville Road as an identified scenic resource. As discussed in the supplemental prefile testimonies and included in the Line-Of-Sight analysis (Exhibit MHG-TH-12) and the various examples of visual simulations provided the proposed project will not interfere with the important scenic resource of the view to the Taconic Mountain Range
- Q5: No additional comments
- Q6: EDR was not tasked to review any type of maintenance plan as part of this project.
- Q7: No additional comments
- Q8: No additional comments
- Q9: EDR agrees with Petitioners understanding of their responsibility for proper functioning of the mitigation design for the life of the project.

This concludes EDR's review of the supplemental information.

Sincerely,



Matthew M. Robinson
Visualization Project Manager