

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 24-\_\_\_\_-PET

**Limited Size and Scope Application** )  
of Bell Atlantic Mobile Systems, LLC )  
d/b/a Verizon Wireless and Vertex Towers, LLC, )  
for a Certificate of Public Good, )  
pursuant to 30 V.S.A. § 248a, authorizing the construction )  
of a telecommunications facility in Manchester, Vermont )

**PREFILED DIRECT TESTIMONY OF DAVID ARCHAMBAULT**

**ON BEHALF OF BELL ATLANTIC MOBILE SYSTEMS, LLC,  
D/B/A VERIZON WIRELESS AND VERTEX TOWERS, LLC**

**October 31, 2024**

Summary:

Mr. Archambault’s testimony will address the effect that the Project will have on the scenic or natural beauty of the area and aesthetics generally.

1 **Q1. Please state your name, employer and current position.**

2 A1. My name is David Archambault. I am Co-Owner of Virtual Site Simulations (“VSS”).  
3 VSS has, for over 10 years, been directly involved in hundreds of wireless site  
4 installations across the country with a majority of those sites being completed in and  
5 around New England.

6 **Q2. Please describe your relevant education and experience.**

7 A3. I have been involved in the placement of communications facilities in New England, for  
8 over 27 years as site acquisition and project management with the last 10 years managing  
9 VSS. I have been directly involved in the development and implementation of new  
10 techniques and processes related to visual impact predictions. Through various data  
11 collection techniques, VSS can very accurately predict and show what a  
12 telecommunications site will look like and where it will be seen from prior to its  
13 construction. My résumé is attached as Exhibit DA-1.

14 **Q3. Have you conducted visual analyses under Criterion 8 of Act 250 (Scenic or Natural  
15 Beauty and Aesthetics) as incorporated into 30 V.S.A. § 248a?**

16 A3. Yes. VSS has helped conduct visual analyses for proposed AT&T sites in Granville,  
17 Strafford, and Chelsea among others.

18 **Q4. Did you conduct a visual analysis under Criterion 8 for the present Project?**

19 A4. Yes. VSS produced a Photo Simulations Package, which is attached as Exhibit DA-2.

20 **Q5. Please summarize the findings and conclusions of your analysis.**

21 A5. In completing the photo simulations, VSS determined that the proposed site will have few  
22 views from public roads or residential homes. The majority of the areas that had visibility  
23 were in open fields throughout the Area of Analysis (“AOA”) and the immediate area

1 around the project site, including the gravel pit to the North, Hunter Park just to the South  
2 and the open field just to the West.

3 **Q6. Did your office create photosimulations for this Project?**

4 A6. Yes, VSS created a Photo Simulation Package for this Project. Using several software  
5 programs, the photos and photo metadata, VSS is able to accurately represent a tower  
6 with photo simulations to show how much of the proposed tower would be seen. Photos  
7 from locations where the balloon is visible and not visible within the AOA are used in the  
8 package to show the overall visibility characteristics of the proposed tower location. The  
9 Photo Simulation Package is attached as Exhibit DA-2.

10 On June 4, 2024, VSS visited the proposed site and floated a three (3)-foot diameter  
11 helium balloon to 130' above ground level at the location of the proposed tower. From  
12 available mapping and with the balloon in the air, VSS drove public roads within a one-  
13 mile radius of the tower site, trying to determine from how many viewpoints the tower  
14 would be seen and, if visible, how much of the tower would be seen. VSS identified 28  
15 representative viewpoints. The balloon was visible (marking the highest point of the  
16 tower) from six (6) of those viewpoints. It was not visible from the other 22 viewpoints.  
17 Other than a location .12 miles away from the tower site (next to the existing solar farm),  
18 the six (6) simulations that VSS prepared using the results of the balloon float showed  
19 that only the topmost part of the tower would be visible. In many of those cases, it would  
20 be backdropped by higher terrain.

21 **Q7. Does this conclude your Prefiled Direct Testimony?**

22 A7. Yes.

**Exhibits to Prefiled Testimony of David Archambault**

Exhibit DA-1           Résumé for David Archambault

Exhibit DA-2           Photo Simulation Package