

**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 BRITTA TONN

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

October 30, 2024

Summary:

Ms. Tonn's testimony will address the lack of impact that the Project will have under 10 V.S.A. § 6086(a)(8), historic sites.

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

2 A1. My name is Britta Tonn, and I am the Director of Cultural Resources - Vermont with
3 Vanasse Hanglin Brustlin ("VHB").

4 **Q2. Please state briefly your educational and professional background.**

5 A2. I received a B.A in History of Art and Architecture from Middlebury College in 2002 and
6 an M.S. in Historic Preservation from the University of Vermont in 2009. I meet the
7 Secretary of the Interior Professional Qualification Standards in the areas of Architectural
8 History and Historic Preservation, as specified by 36 CFR Part 61.

9 Before joining VHB, I prepared Vermont Historic Sites and Structure Surveys on a
10 number of buildings in Vermont, which served as nominations to the Vermont State
11 Historic Register, and evaluated each building's eligibility for listing on the National
12 Register. I also completed archival research on several downtown Burlington properties,
13 preparing detailed historical reports for each building.

14 As VHB's Director of Cultural Resources - Vermont, I prepare Federal Communications
15 Commission ("FCC") Section 106 analyses for VHB's wireless industry clients. My
16 duties include conducting cultural resources surveys, assessing National Register
17 eligibility of historic structures and sites and writing telecommunications reports as part
18 of the National Environmental Policy Act compliance process.

19 **Q3. Have you ever testified before the Public Service Board (now Public Utility
20 Commission)?**

21 A3. Yes, I provided Prefiled Testimony on behalf of Verizon Wireless in Docket No. 7826
22 (Castleton), Docket No. 7849 (Grand Isle), Docket No. 7878 (Fayston), Docket No. 7893
23 (Plainfield), Docket No. 7922 (Jericho) and Docket No. 8233 (Woodstock), among

24 others; all involving the issuance of a Certificate of Public Good (“CPG”) authorizing the
25 installation of telecommunications facilities.

26 **Q4. Please describe the historic resources analysis that you undertook for this project.**

27 A4. Because this project involves the construction of a new telecommunications tower, I
28 analyzed its conformance with Section 106 of the National Historic Preservation Act.
29 The standards in that Section are closely related to the historic sites criterion applied by
30 this Commission. In accordance with FCC requirements, I compiled the attached
31 Submission Packet, FCC Form 620, (Exhibit BT-1) which presented the details on the
32 proposed project as well as efforts that have been taken to identify, assess, and make
33 determinations of effect based on an assessment of the impacts of the proposed project on
34 Historic Properties. On October 28, 2024, a letter was sent to the Vermont Division for
35 Historic Preservation (Exhibit BT-2) notifying the agency of slight changes to the
36 proposed project design. I assessed the impacts of the new proposed project design on
37 Historic Properties and included this information in the letter (Exhibit BT-2).

38 **Q5. Based on the foregoing, have you reached a conclusion as to whether the Project will
39 have an undue, adverse impact on historic sites?**

40 A5. Yes. It is VHB’s opinion that the proposed project will have “No Adverse Effect” on
41 historic resources. As seen by its stamp on the first page of Exhibit BT-1, the Vermont
42 Division for Historic Preservation has concurred with our conclusions. As described in
43 Exhibit BT-2 letter, taking into account the new proposed project design, VHB maintains
44 its original opinion that the proposed project will have “No Adverse Effect” on historic
45 resources.

46 **Q6. Does this conclude your Prefiled Direct Testimony?**

47 A6. Yes.

Exhibits to Prefiled Testimony of Britta Tonn

Exhibit BT-1	Historic Resources Submission with Concurrence
Exhibit BT-2	October 28, 2024 Letter to the Vermont Division for Historic Preservation