

September 4, 2025

Dear Public Utility Commissioners,

As a life-long Vermonter, and a resident of the Town of Marshfield since 2008, I want to submit my firm opposition to the Verizon/Bell Atlantic Mobile Systems LLC petition for a certificate of public good to allow the installation of their cell tower at 2264 U.S. Route 2 in Marshfield, Vermont.

According to [Vermont Statute Title 30, Section 248a](#) the PUC deems the phrase “public good” as having “the greatest benefit of the people of the State.” The proposed cell tower site is antithetical to the criteria deemed necessary in statute that must be satisfied before a certificate of public good can be issued. VSA § 248a (c) 1 states: *The proposed facility will not have an undue adverse effect on aesthetics, historic sites, air and water purity, the natural environment, and the public health and safety, with due consideration having been given to the relevant criteria specified in [10 V.S.A. §§ 1424a\(d\) and 6086\(a\)\(1\) through \(8\) and \(9\)\(K\)](#).*

- **Aesthetics, Scenic Beauty and Historic Sites:** Bell Atlantic’s proposed tower site will have a significant impact on the rural, pastoral nature of our town. Established in 1790, Marshfield is a small village of 1400 residents, with a historical general store, a post office, and a gas station as the only brick and mortar places of commerce. The massive tower would be visible from the Old School House Common, which is located where the original town schoolhouse was - now it houses the library, town offices, and a vibrant playground with a baseball diamond and basketball court. Up the steep, neighboring Depot Hill Road is an incredible waterfall that is listed on the New England Waterfalls of interest and brings tourists who come on their way to the Groton State Forest, which was established in 1919 by the Civilian Conservation Corps. Marshfield residents currently gather at the Old School House Common for summer concerts, farmer’s markets, to vote and to pay taxes. The Bell Atlantic tower would dwarf and dominate the views and the historical heritage of the town - we would now only see this massive, industrial tower drawing the eye away from the natural beauty of the town and landscape.
- **Water Purity and the Natural Environment:** The Winooski River was an important factor in the establishment and development of Marshfield, with several small streams joining the river as it flows southwest through the township in a fertile and picturesque valley. Today the course of the river, the floodplain and ecology is a natural resource protected by [the Marshfield Town Plan](#). The proposed tower site places it within a wetland, violating the Town Plan and compromising water quality, local habitat and flood resilience. Furthermore, the tower falls within a wildlife corridor, in which black bear, coyote, bobcat and deer are regularly spotted. The Marshfield town plan includes the stated goal *“to protect and preserve the integrity and function of Marshfield’s important natural resources and environmentally sensitive areas.”*

This goal includes these objectives:

“8. To Protect environmentally sensitive or unique areas such as rare and irreplaceable natural areas; rare, threatened and endangered species; and ecologically significant areas.

9. To maintain and enhance the quality and quantity of soil and the benefits it provides.

10. To maintain and protect existing soil and water resources of high quality and quantity and the benefits they provide, and restore the condition of soil and water resources of existing lesser quality and quantity.

11. To protect critical wildlife habitat, significant natural communities and habitat for rare and threatened species.

12. To preserve Marshfield's historic and archeological heritage.

13. To preserve Marshfield's scenic beauty.”

- **10 V.S.A. § 6086 (8) and (9) - State Land Use and Development Plans:** This statute includes Act 250 criteria which is specific to subdivision development but is worth noting that section 8 requires that land development will *“not have an undue adverse effect on the scenic or natural beauty of the area, aesthetics, historic sites, or rare and irreplaceable natural areas.”* Nor that the perceived benefit to the public of the development will *“not outweigh the economic, environmental, or recreational loss to the public from the destruction or imperilment of the habitat or species.”* Clearly, the proposed tower will certainly have an undue, adverse effect on the scenic aesthetics in Marshfield, overshadowing the historical and natural features of the town with this industrial monolith. Marshfield's future economic, environmental and recreational opportunities could be jeopardized by the risk the siting and the building of this tower poses for this fragile ecologically-sensitive area.

In looking into the motivations of Bell Atlantic Mobile Systems to propose a cellphone tower site so close to our watershed, in a wildlife corridor, within view of most of the townsfolk of Marshfield, it would seem that Bell Atlantic is looking to save considerable amounts of money on siting and development by locating a site right off a major roadway. Rt. 2 is also not a “scenic byway,” a label that comes with considerably more regulation. Perhaps, Bell Atlantic identified Marshfield as a downtrodden, post-flooded community with little resources or vision. In other words, this tower does not provide a “public good” - rather the “good” will go into the private pockets of the developers.

It is also questionable why Marshfield or Plainfield needs this cell tower when the cable fiber internet lines have been run all over this area and will soon be connected. This cell tower is not necessary, and it will have significant aesthetic, historical and environmental impact and damage the entire character of the town. This petition violates the tenets of Marshfield's Town Plan and is not supported by the criteria laid out in Vermont statutes for the approval of a certificate of public good. I implore you not to approve this petition for a certificate of public good for the Bell Atlantic Mobile System to make money off of the destruction of our town.

Thank you for your consideration,
Jill Sudhoff-Guerin

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