

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 25-\_\_\_\_-PET

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

**PREFILED DIRECT TESTIMONY OF SCOTT N. ADAMS, P.E.**

**ON BEHALF OF VERTEX TOWERS, LLC and BELL ATLANTIC MOBILE SYSTEMS,  
LLC d/b/a VERIZON WIRELESS**

**November 21, 2025**

Summary:

Mr. Adams' testimony will address the design of the proposed Project as well as the Project's impact on the applicable Criteria of 10 V.S.A. § 6086(a) and 1424a(d) that have not otherwise been addressed and will demonstrate the Project's conformance with the land conservation measures in the applicable local and regional plans.

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

2 A1. My Name is Scott N. Adams. I am a Professional Engineer employed by Advanced  
3 Engineer Group, P.C. (“AEG”), in Swansea, Massachusetts, which has provided  
4 engineering and consulting services to the wireless communications industry.

5 **Q2. Please state briefly your professional background.**

6 A2. I am a graduate of the University of Massachusetts, with a Bachelor's Degree in Civil  
7 Engineering as well as a licensed professional civil engineer in the State of Vermont with  
8 registration number 135423. I am a principal in the firm Advanced Engineer Group, P.C.  
9 (“AEG”) working as a consultant for the wireless telecommunications industry located at  
10 179 Swansea Mall Drive (Suite 1), Swansea, MA 02777. My professional services  
11 include providing professional engineering services for the design and construction of  
12 wireless telecommunications facilities throughout New England. I am familiar with the  
13 design and construction of antenna support structures including monopoles, self-  
14 supported towers, and guyed towers. I have been involved with the design and  
15 construction of wireless facilities throughout New England for over twenty (24) years.  
16 My experience, as it relates to wireless facilities, includes foundation analysis and design,  
17 geotechnical analysis and reporting, drainage analysis and design, surveying, viewshed  
18 aesthetic, land use impact analysis and site design

19 **Q3. Have you ever testified before the Public Utility Commission?**

20 A3. Yes, I provided pre-filed testimony Case No. 25-0066-PET (Williamstown), Case No.  
21 25-2297-PET (Newport) and Case No. 25-2351-PET (Concord).

22 **Q4. Please identify the location of the Project that is the subject to this § 248a filing.**

23 A4. Vertex Towers, LLC (“Vertex”) intends to construct a telecommunications facility for

1 use by Bell Atlantic Mobile Systems, LLC d/b/a Verizon Wireless (“Verizon”) and future  
2 co-locators, consisting of a 140’ above ground level (“AGL”) lattice tower (“Tower”)  
3 located at 1030 Route 100 South, Rochester, Vermont 05767. Verizon refers to the  
4 Project as “Rochester.” The property owner has given Vertex and Verizon permission to  
5 proceed with this Application. The Project consists of three (3) sectors of antennas  
6 mounted on the Tower at a centerline of 135’ AGL and an equipment shed (“Shed”)  
7 located to the north of the Tower. The coordinates for the Tower are: latitude  
8 43°51’35.39” North and longitude 72°47’53.37” West. See Permit Plans (Exhibit SA-1;  
9 “Permit Plans”) for a visual depiction of the Project’s location.

10 **Q5. Please describe, in detail, the design of the proposed Project.**

11 A5. Vertex will create a 50' x 50' compound (“Compound”) enclosed by an 6' high chain link  
12 fence, with a locked gate. Vertex will construct a 140’ above ground level (“AGL”) self-  
13 support lattice telecommunications tower (“Tower”) within the Compound.

14 Verizon will place three (3) sectors of three (3) panel antennas (“Antennas”) each on the  
15 Tower for a total of nine (9) Antennas. Each of the Antennas will be mounted at a  
16 centerline height of 135’ AGL. Six (6) of the Antennas will measure approximately 72”  
17 long and 11.9” wide each. The remaining three (3) Antennas will measure approximately  
18 28.9” long and 15.75” wide each. The topmost height of the Antennas will be  
19 approximately 138’ AGL.

20 At each sector, Verizon will install two (2) Remote Radio Heads (“RRHs”) per Sector for  
21 a total of six (6) RRHs. Due to their position behind the Antennas, the RHHs should not  
22 be visible to most viewers. Three (3) of the RRHs will measure approximately 14.96”

1 long and 14.96” wide; the other three (3) will measure approximately 15” by 15.” The  
2 topmost points of the RRHs will not exceed the topmost points of the Antennas.

3 Behind one of the sectors, Verizon will install one (1) OVP distribution box (“OVP”).  
4 The topmost point of the OVP will not exceed the topmost points of the Antennas. The  
5 OVP measures approximately 29.5” long by 16.5” wide. Full and accurate specifications  
6 of the proposed Antennas, RRHs and OVP are detailed in Exhibit ML-1.<sup>1</sup>

7 Verizon will place the 12’ by 20’ Shed on the ground to the north of the Tower. The  
8 exact location of the Shed is depicted on Sheet Z-3 of the Permit Plans. The Shed will  
9 have cabinets that will contain the electronics equipment necessary for the operation of  
10 the Project.

11 Verizon will place an emergency generator (“Generator”) on a concrete pad to the south  
12 of the Shed. The Generator will function if there is a power outage. Verizon will remotely  
13 test the Generator once a week at a time to be determined. To fuel the Generator, Verizon  
14 will use diesel contained in a fuel tank under the Generator.

15 Vertex will improve an existing logging path that connects to Route 100 South as  
16 depicted on the Permit Plans (the “Access”) to provide Verizon and future co-locators  
17 access to the Compound.

18 Vertex will run underground power and telcommunication lines along the Access from  
19 Route 100 South to the edge of the tree line as shown on Sheet Z-1.1 of the Permit Plans  
20 and thereafter the lines will continue above ground along the Access to a 4 Slot Multi  
21 Gang Meter Board. Verizon will run underground lines from the Meter Board to the Shed  
22 and will run cables over an ice bridge from the Shed to the Tower.

1 The construction of the Project will result in approximately 1,500 square feet of new  
2 impervious surface, 8,833 square feet of permanent earth disturbance and approximately  
3 57,978 square feet of clearing.

4 At the close of construction, Vertex will reseed and mulch all disturbed areas around  
5 the Access and around the Compound. Check dams, waterbars and silt fencing will be  
6 placed along the Access and at the Compound as indicated on the enclosed plans as  
7 necessary to control erosion both during and after construction. Construction shall  
8 meet the requirements of the State of Vermont Low Risk Site Handbook for  
9 Erosion Prevention and Sediment Control. Vertex will obtain a Stormwater  
10 Construction Discharge Permit prior to the commencement of construction.

#### 11 **Environmental and Related Criteria**

12 **Q6. Based on your evaluation, and in response to the requirements of 10 V.S.A.**  
13 **§ 6086(a)(1)(D)(floodways) and (a)(8)(aesthetics, scenic beauty, historic sites, rare**  
14 **and irreplaceable natural areas, endangered species, necessary wildlife habitat), will**  
15 **the proposed Project impact floodways, result in an adverse effect on scenic or**  
16 **natural beauty, aesthetics or historic sites, necessary wildlife habitat or endangered**  
17 **species; and will it be in conformance with local and regional plans?**

18 A6. The proposed Project will not have an adverse impact affecting the applicable criteria  
19 under 10 V.S.A. § 6086(a) and will conform to the land conservation measures in the  
20 applicable local and regional plans. Below are my detailed responses.

21 Criterion 1(B) – Waste Disposal -- Following construction, the proposed Project will not  
22 generate any waste. Construction waste generated during construction of the project will

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<sup>1</sup> From time to time, equipment manufacturers may alter their products or Verizon Wireless may purchase from different suppliers. Therefore, there is a possibility that the actual antennas, remote radio heads and/or distribution

1 be removed from the site and recycled or disposed of at approved waste processing  
2 facilities.

3 The only consumable on site will be fuel for the Generator. It and its fuel tank are  
4 designed with secondary containment and engine systems/fueling containment, including  
5 a double wall outdoor rated fuel tank with a rupture basin alarm and overflow basins to  
6 collect any spills. *See* Exhibit SA-2 for containment specifications for the proposed  
7 Generator. Verizon has standard operating procedures to limit any potential spill during  
8 refueling.

9 Criterion 1(D) – Floodways – The Project is not located within a floodway or mapped  
10 flood plain. *See* Exhibit SA-3 for FEMA Firmette. Therefore, the Project will not have an  
11 undue adverse impact under this Criterion.

12 Criterion 8 – Scenic Beauty, Historic Sites and Natural Areas – With regard to Scenic  
13 Beauty, on November 26, 2024, AEG visited the proposed site and floated a three (3) foot  
14 diameter balloon to 140 AGL’ at the location of the proposed tower. From available  
15 mapping and with the balloon in the air, AEG drove public roads within a radius of the  
16 tower site to determine from how many viewpoints the tower could be seen, and if  
17 visible, how much of the tower would be visible. AEG identified twenty-one (21)  
18 representative viewpoints. The balloon was visible (marking the highest point of the  
19 tower) from four (4) points and was visible, but obscured from four (4) points. It was not  
20 visible from the remaining thirteen (13). Using several software programs, the photos and  
21 photo metadata, AEG is able to accurately represent a tower with photo simulations to  
22 demonstrate the tower’s visibility. The photo simulation package is attached as Exhibit  
23 SA-4. Based on the photo simulations, the tower will have limited visibility from public

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boxes may be slightly different from but of similar dimensions as those described in this notice.

1 right of ways, including Route 100. As shown in the photo simulations, the visibility of  
2 the tower is limited due to the distance from the tower site to public roads, the height of  
3 the surrounding areas, as well as the topography of the area. In addition, the initial  
4 proposed height for the Tower was 176' AGL, following concerns raised regarding the  
5 aesthetic impacts, we re-designed the tower to 140' AGL to mitigate the visual impacts.

6 For these reasons, I conclude that the Project will have no adverse effect, let alone an  
7 undue adverse effect, on the scenic beauty of the area.

8 With respect to Natural Areas, EBI Consulting conducted a Natural Resources Review of  
9 the Project, the findings are outlined in a Natural Resources Report dated June 20, 2025  
10 (See Exhibit SA-5 Natural Resources Review). The report concluded the proposed  
11 telecommunications facility is not likely to adversely affect any critical or endangered  
12 species, or associated habitats (provided the conservation measures discussed below are  
13 implemented). Further, it is not within any rare or irreplaceable natural area. It is not  
14 within the boundaries of a FEMA-designated 100-year flood zone or jurisdictional  
15 wetland. See Exhibit SA-5 at 12. To the extent the Project could impact bat roosting, the  
16 Project will utilize downward-facing, full cut-off lens lights and direct any temporary  
17 lighting away from suitable northern long-eared bat and/or tricolored bat roosting habitat  
18 when bats may be present (April 15 - October 31). In addition, any tree  
19 trimming/clearing, as well as drilling/blasting will occur during hibernation season  
20 between November 1 and April 14." *Id.* at 8 and best management practices (BMPs) (i.e.  
21 silt fencing, wattles, erosion controls, etc.) will be employed during construction to  
22 ensure stormwater runoff does not carry construction related debris. *Id.* at 11.

23 With respect to Wetlands, the Review notes as follows: Arrowwood Environmental of

1           Huntington Vermont completed a 'Wetland at the proposed Rochester, Vermont Vertex  
2           Tower Site' memo. This memo identified two very small wetlands (Wetland A and  
3           Wetland B) located in low spots within the existing dirt access road. The wetlands are  
4           shallow emergent marsh wetlands and the vegetation is dominated by reed canary grass,  
5           sedges, tall buttercup, and sensitive fern. There is no permanent standing water in either  
6           wetland, although after heavy rain there may be temporary pooling of water in the  
7           wetlands. Based on a site visit on November 13, 2023, the Vermont state District  
8           Wetland Biologist classified these wetlands as Class III and therefore they are not  
9           regulated under the Vermont Wetland Rules. *See* Exhibit SA-5 at Pages 10, 94-95.

10          During the advance notice period, the Applicant received comments from the Agency of  
11          Natural Resources with raising concerns with respect to potentially adverse impacts on  
12          Rogers Brook. However, following further review it was determined that the initial  
13          permit plans filed with the advance notice mislabeled a seasonal brook as Roger Brook,  
14          which does not in fact cross onto the subject parcel as shown on the Permit Plans at Sheet  
15          C-1. Prior to filing the Petition, the Applicant received comments from the Agency of  
16          Natural Resources requesting that the in the event the existing culverts shown on the  
17          Permit Plans at Sheet Z.2.3 and Z.2.4 fail during or after construction, they be replaced  
18          with culverts that are appropriately sized to meet Q50 flow standards. The Applicant  
19          agrees to this condition and will comply in the event the existing culverts fail. The  
20          Agency of Natural Resources also proposed seasonal restrictions as the project site is  
21          within a deer wintering area (between December 15 and April 15) and the incorporation  
22          of non-native species prevention. The Applicant is willing to accommodate these  
23          proposed conditions and welcomes input from the Agency of Natural Resources during

1 the public comment period to ensure the restrictions with respect to bat hibernation and  
2 deer wintering achieve the Agency's conservation goals. Accordingly, I conclude that  
3 project will not have an undue adverse effect on natural resources.

4 With regard to Historic Sites, on December 11, 2024, EBI Consulting performed a review  
5 under Section 106 of the National Historic Preservation Act concluding the finding of the  
6 effect is "No Historic Properties in the Area of Potential Effects – Direct Effects" and  
7 "No Historic Properties in the Area of Potential Effects – Visual Effects" (See Exhibit  
8 SA-6 Historic Resources Review). The Historic Resource Review was initially provided  
9 to the Vermont Division for Historic Preservation ("SHPO") on April 10, 2024. SHPO  
10 responded on May 7, 2024 requesting additional information. Following the initial  
11 submission, the project design was revised, reducing the proposed tower height from 176'  
12 AGL (total height of 186' AGL) to 140' AGL. The revised plans and responses to  
13 SHPO's request for information were provided in the December 11, 2024 letter. SHPO  
14 concurred with the December 11, 2024 letter, indicating "no historic properties affected"  
15 on December 26, 2024. Accordingly, I conclude the project will have no adverse effect,  
16 let alone an undue adverse effect, on historic resources.

17 **Conformance with Local and Regional Plans** - According to 30 V.S.A. § 248a(c)(2),  
18 during the Commission's review, "substantial deference [will be] given to the land  
19 conservation measures" in the local and regional plans of the "affected municipality." We  
20 are, therefore, addressing the relevant provisions of the Town of Rochester Town Plan  
21 (adopted on April 27, 2020) ("Town Plan"; excerpts in Exhibit SA-7) and the Two Rivers-  
22 Ottauquechee Regional Plan (adopted February 26, 2025) ("Regional Plan"; excerpts in  
23 Exhibit SA-8) to illustrate that the proposed Project will comply.

1 The Town Plan includes the following section dedicated to Telecommunications (See  
2 Town Plan, Pages 15-16) and we accordingly respond in turn to each subsection:

3 Telecommunications facilities are subject to review and approval by the Vermont  
4 Public Utilities Commission (PUC) under 30 VSA §248a. Under these laws, prior  
5 to the construction of a generation or telecommunications facility (that is part of a  
6 network), the Board must issue a Certificate of Public Good. A Section 248a review  
7 addresses environmental, economic, and social impacts associated with a project,  
8 like Act 250. In making its determination, the Board must give due consideration or  
9 substantial deference to the recommendations of municipal and regional planning  
10 commissions and their respective plans similar to the Act 250 process. Accordingly,  
11 it is appropriate that this Plan address these land uses and provide guidance to town  
12 officials, regulators, and utilities.

13 For all telecommunications facilities, the following policies shall apply

14 1. **Preferred Locations:** New telecommunications facilities shall be sited and  
15 designed in locations that reinforce the town's traditional patterns of growth, of  
16 Rochester's compact village center surrounded by a rural countryside, including  
17 farm and forest land.

18 **Response:** *The proposed tower site has been sited in such a way to reinforce the town's*  
19 *traditional patterns of growth by providing improved coverage to the compact village*  
20 *center as well as Route 100. This improved coverage will encourage and support existing*  
21 *businesses and new business development in the compact village center. As shown on*  
22 *Exhibit ML-3, currently there is a significant gap in coverage along Route 100 south of*  
23 *Rochester. This impacts travelers and businesses using this coordinator. The Project*

1        *resolves this existing gap in coverage. See Pre-filed Testimony of Martin Lavin. The site*  
2        *has been selected to have a minimal impact on the rural countryside, avoiding productive*  
3        *agricultural land and utilizing existing logging roads for the Access where feasible. During*  
4        *the due diligence for this site, the Petitioner review existing facilities to determine if co-*  
5        *location would be feasible, no such facilities exist. See Pre-filed Testimony of Martin Lavin*  
6        *at Pages 3-4 and Exhibit ML-2 and ML-4. With respect to the existing facility located*  
7        *within the Church Steeple at 15 Main Street, Rochester. I have reviewed the associated*  
8        *permit plans Entitled: Rochester Federated Church, Prepared By: Hudson Design Group,*  
9        *Prepared For: AT&T, Dated: 01/28/10 (attached as Exhibit SA-9). It is my professional*  
10       *opinion that the existing structure could not support an additional carrier in its current*  
11       *condition, as it would require a spire replacement and extension of the spire as well as*  
12       *other substantial structural modifications.*

13            **2. Prohibited Locations:** Because of their distinctive natural, historic or scenic  
14            value, telecommunication facility development shall be excluded from the  
15            following areas:

- 16            • Floodways shown on FEMA Flood Insurance Rate Maps (except as required for  
17            hydro facilities)
- 18            • Fluvial erosion hazard areas shown on Fluvial Erosion Hazard Area maps (except  
19            as required for hydro facilities)
- 20            • Wetlands as indicated on Vermont State Wetlands Inventory maps or identified  
21            through site analysis.
- 22            • Rare, threatened or endangered species habitat or communities

23        **Response:** *The Tower site is not located in a floodway or floodplain (See Exhibit SA-3).*

1            *The Town Plan does not include “Fluvial Erosion Hazard Maps” however, as I understand*  
2            *the term to require sighting away from areas prone to erosion risk, this Project complies*  
3            *with that objective. The Project is sited along an existing logging road with relatively with*  
4            *erosion and sediment controls employed during construction to mitigate any risk. The*  
5            *Project is not located in a wetland or wetland buffer and will not impact jurisdictional*  
6            *wetlands. See Exhibit SA-5. No rare, threated or endangered species habitat, or*  
7            *communities were located on the project site. See Id.*

8            **3. Significant Areas:** All new telecommunications facilities shall be sited and  
9            designed to avoid or, if no other reasonable alternative exists, to otherwise  
10           minimize or mitigate adverse impacts to the following:

- 11           • Historic districts, landmarks, sites and structures listed, or eligible for listing, on  
12           state or national registers.
- 13           • Public parks and recreation areas, including state and municipal parks, forests and  
14           trail networks.
- 15           • State or federally designated scenic byways, and municipally designated scenic  
16           roads and viewsheds.
- 17           • Special flood hazard areas identified by National Flood Insurance Program maps  
18           (except as required for hydro facilities)
- 19           • Public and private drinking water supplies, including mapped source protection  
20           areas.

21           **Response:** *The project is sited to avoid any impacts to Historic districts, landmarks, sites*  
22           *and structures listed, or eligible for listing, on state or national registers. The closest*  
23           *location eligible for historic designation is the Village of Talcville, which is over half a*

1 mile from the proposed tower site. See Exhibit SA-1. The project will have limited visibility  
2 in that location due to the height of the trees surrounding the tower site, and therefore, will  
3 not have an adverse impact on public parks and recreation areas, including state and  
4 municipal parks, forests and trail networks. If anything, improved cell coverage will enable  
5 more residents and visitors to utilize the trail systems in a safe manner with better access to  
6 cellular coverage in the event of an emergency. The Project will not have an undue adverse  
7 impact on scenic byways, the project is designed to improve coverage along the Route 100  
8 corridor (See Pre-filed Testimony of Martin Lavin at Pages 3-4 and Exhibit ML-3). As  
9 shown on the photo simulations, visibility of the facility will be limited from Route 100. See  
10 Exhibit SA-4. The Project is similar to many other towers build along Route 100 designed  
11 to provide cellular coverage to one of Vermont's busiest state highways. Any visual impact  
12 is further mitigated by tree screening of the enclosure, topography, and a lowered height of  
13 140'. The project is unmanned and will not require water or wastewater disposal systems,  
14 and therefore, will not have an adverse impact on public and private water supplies.

15 4. **Zoning Compliance:** New telecommunications facilities shall be sited in  
16 accordance with municipal zoning regulations.

17 **Response:** The Town of Rochester Zoning Regulations contain one section dedicated to  
18 Telecommunications Facilities/Towers, which states "a non-networked  
19 telecommunications facility shall maintain front, side and rear setbacks that are 150% of  
20 the facility's height." (Zoning Regulations at Page 41). The proposed tower is 140' AGL,  
21 the nearest property boundary is 341' See Permit Plans at Sheet C-1. Therefore, the Tower  
22 complies with this requirement as the setback is greater than 210' or 150% of the facility's  
23 height.

1           **5. Natural Resource Protection:** New telecommunications facilities must be sited  
2           to avoid the fragmentation of, and undue adverse impacts to the town's working  
3           landscape, including large tracts of undeveloped forestland, open farm land, and  
4           primary agricultural soils mapped by the US Natural Resource Conservation  
5           Service.

6           **Response:** *The access to the tower utilizes an existing logging road/snowmobile trail*  
7           *where possible. It is sited such that it will not have an impact on open farm land or primary*  
8           *agricultural soils.*

9           **6. Protection of Wildlife:** Designers must gather information about natural and  
10          wildlife habitats that exist in the project area and take measures to avoid any undue  
11          adverse impact on these resources. Consideration shall be given to the effects of the  
12          project on: rare, threatened, and endangered species; the impacts of human  
13          activities at or near habitat areas; and any loss of vegetative cover or food sources  
14          for critical habitats for rare, threatened or endangered species.

15          **Response:** *The Petitioner completed a review of natural resources (See Exhibit SA-5).*  
16          *There are no rare, threatened, and endangered species within the project parcel, and*  
17          *therefore, the project will not have an undue adverse impact on these species, their*  
18          *food sources, or habitats. As noted above (see Pages 6-7), the Petitioner will take*  
19          *additional steps to mitigate adverse impacts on natural resources.*

20          **7. Site Selection:** Site review should not be limited to the telecommunications  
21          facilities; other elements required of the facility need to be considered as well.  
22          These include access roads, site clearing, onsite power lines, substations, lighting,  
23          and off-site power lines. Development of these elements shall be done in such a

1 way as to minimize any negative impacts. Unnecessary site clearing, and highly  
2 visible roadways can have greater visual impacts than the telecommunication  
3 facility itself. In planning for facilities, designers should take steps to mitigate their  
4 impact on natural, scenic and historic resources and improve the harmony with their  
5 surroundings.

6 **Response:** *The Petitioner has designed this site to minimize negative impacts. The initial*  
7 *proposal was for a 176' AGL tower (See June 12, 2024 Advance Notice, 24-1814-AN).*  
8 *Following feedback from the Town of Rochester, the Petitioner reduced the proposed*  
9 *Tower height to 140' AGL. To avoid unnecessary clearing, the Access will follow an*  
10 *existing logging road, which will be expanded to the minimum width required to support*  
11 *the facility, further limiting the access roads visibility.*

12 When surveyed in 2012, residents were very supportive of increasing cell coverage  
13 throughout the community depending on the location of the proposed  
14 telecommunications towers. Residents indicated that Deer Mountain, Alexander  
15 Hill and Mount Reeder would be the most acceptable locations for a  
16 telecommunications tower, while Mount Cushman, Rochester Mountain and Austin  
17 Hill would be the least. Developers should locate telecommunications towers  
18 accordingly.

19 Town Plan at Page 15-16.

20 **Response:** *The proposed project is not located on Mount Cushman, Rochester Mountain or*  
21 *Austin Hill.*

22 The Petitioner also received public comments from the Town of Rochester Planning  
23 Commission during the advance notice period (See 25-1056-AN). The majority of areas of

1 concern raised by the Planning Commission pertain to natural resources and the Planning  
2 Commission asked for assistance from the State agencies in reviewing the project. (forests,  
3 wetlands, habitat and species, flooding, roads and drainage), with respect to those items,  
4 Petitioner directs the Town to the responses above and Exhibit SA-3, SA-5, and SA-6.  
5 With respect to visibility and aesthetics, the petitioner highlights Exhibit SA-4. For the  
6 discussion of co-location, Petitioner refers to the Prefiled Testimony of Martin Lavin at  
7 Pages 3-4 and Exhibits ML-2 and ML-4. While the Planning Commission indicates they  
8 will ask the Petitioner to post a tower, structure, and equipment removal bond, we note that  
9 no such requirement is contained within the Town Plan nor the Town Zoning Bylaws. The  
10 only references to bonds in the Zoning Regulations are contained in the sections on forestry  
11 operations and earth resource extraction (*See Zoning Regulations Page 7-8 and Page 38,*  
12 *included in Exhibit SA-7*). Vertex has an obligation under the terms of their lease with the  
13 property owner to remove the facility once the tower is no longer used by carriers.

14 The Project will enhance the telecommunications services available to residents of and  
15 visitors to the Town of Rochester, which may attract new business development. Verizon  
16 has designed the project to minimize the adverse effect on the character and aesthetics of  
17 that municipality.

18 The Regional Plan contains a section dedicated to Telecommunications, which starts with  
19 the following observation:

20 “Information technology (such as broadband Internet and wired/wireless  
21 telecommunications) has become essential to residents and businesses in the  
22 Region. Our economy, educational systems, and functionality of our homes rely on  
23 ubiquitous availability of data and communications for our Region.” Regional Plan

1 at 123.

2 The Plan continues with a discussion of the increase in use of cellular technology:

3 “Use of cellular phones in day-to-day activities has skyrocketed over the past  
4 decade. The availability of broadband cellular data has increased the use of cellular  
5 phones to the point that they are essential to businesses and individuals alike. In  
6 fact, most U.S. households no longer have a “landline” phone. The lack of cell  
7 coverage is a major deterrent to both attracting businesses and younger families.

8 Cellular access is determined in great part by topography in relation to the  
9 placement of cellular transmission towers. While coverage in the TRO Region is  
10 reasonably good along main travel corridors, it is spotty in more rural areas. In  
11 some instances, there are entire communities (such as Barnard) that have virtually  
12 no cellular access. In most cases, residents support improved cell phone access, but  
13 are less supportive of having the necessary facilities located in their communities.

14 When residents object to proposed facilities, it is almost always due to the potential  
15 for aesthetic impacts.” Id. at 124.

16 The Regional Plan continues with the following goal with respect to cellular  
17 telecommunications “Universal availability of mobile cellular service is available  
18 throughout developed areas in the TRO Region.” Id. at 130. The Regional Plan then  
19 proceeds to note policies for achieving this goal, many of which mirror those of the Town  
20 Plan, emphasizing development outside of floodways, wetlands, or rare threatened and  
21 endangered species habitat, and designing sites to minimize and mitigate adverse impacts  
22 on historic sites, scenic viewsheds and wildlife habitat. Id. at 130. The Regional Plans  
23 policies also include designing facilities to the minimum height necessary to achieve

1 coverage, while incorporating reasonable options for sharing space on the proposed tower.  
2 Id. at 130-131.

3 As discussed in the responses to the Town Plan, the project has been designed to minimize  
4 or mitigate adverse impacts on natural resources, historic resources, and aesthetics. The  
5 tower is designed at the minimum height necessary to achieve coverage goals, but still  
6 provides the opportunity for other carriers to co-locate in the future, reducing the risk of a  
7 proliferation of towers in the Town of Rochester.

8 This Project fulfills the goals of the Town and Regional Plans by preserving and enhancing  
9 Verizon's ability to provide service in the affected parts of Rochester thus enabling the  
10 telecommunications infrastructure necessary for businesses and home offices to succeed in  
11 the global economy. This service also allows for telecommuting. The Project will  
12 continue to provide for enhanced communications for residents, travelers, educational  
13 institutions and emergency responders.

14 **Q7. Please identify any existing permits that relate to the facility and conditions that**  
15 **could impact the proposed improvements.**

16 A7. There are no known permits that would impact the proposed improvements.

17 **Q8. Can you certify that Verizon has not obtained or been denied a permit or permit**  
18 **amendment for the improvements covered by the current application or**  
19 **substantially similar improvements, under applicable provisions of Title 24 or**  
20 **chapter 151 of Title 10?**

21 A8. Yes, I can certify that Verizon has neither applied for, obtained, nor been denied a permit  
22 or permit amendments under applicable provisions of Title 24 or chapter 151 of Title 10  
23 for the improvements covered by the current application or substantially similar

1 improvements.

2 **Q9. Does this conclude your Prefiled Direct Testimony?**

3 A9. Yes.

Exhibits to Prefiled Testimony of Scott N. Adams

Exhibit SA-1	Permit Drawings
Exhibit SA-2	Generator Specifications
Exhibit SA-3	FEMA Firmette
Exhibit SA-4	Photo Simulations Package
Exhibit SA-5	Natural Resources Review
Exhibit SA-6	Historic Resource Review
Exhibit SA-7	Excerpts of the Rochester Town Plan
Exhibit SA-8	Excerpts of the Two Rivers-Ottawaquechee Regional Plan
Exhibit SA-9	Church Steeple Permit Plans