TO: Holly R. Anderson, Clerk of the Public Utility Commission
CC: Peter Gregory, Patricia Harvey, Doon Hinderyckx, Dan McKinley
FROM: Bryan Kovalick, Planner
DATE: December 16, 2025
RE: Case # 25-2931-PET: Proposed Telecommunication Tower at 1030 Route 100 South in Rochester, Vermont

Dear Ms. Anderson:

The Two-Rivers Ottauquechee Regional Commission (TRORC) has reviewed the application for a proposed telecommunication facility at 1030 Route 100 South in Rochester, Vermont. TRORC finds that the proposed facility does not align with several of our Regional Plan's policies.

A. Forest-Based Resource Area Policy 12:

"No development in its built-out state shall create more than one acre of impervious surface."

The mast, compound, and most of the access road for the proposed telecommunication facility will be developed within the TRORC Regional Plan's mapped Forest-Based Resource Areas. Within the Forest-Based Resource Areas, no development may result in more than one acre of impervious surface. The site plans do not clearly show the amount of total impervious surfaces that will be developed within the TRORC Regional Plan's Forest-Based Resource Area. Given the site photos of the existing access road within the applicant's Natural Resources Review (SA-5) exhibit, it appears that considerable road improvements, grading, ditching, and stormwater structures will be required to construct a useable access road that will not fail during extreme rainfall events.

Recommendation:

1. The applicant must calculate the total amount of impervious surface created within the TRORC Regional Plan's mapped Forest Based Resource Areas.

2. The applicant must demonstrate to the PUC that the widening of, and improvements to, the surface of the existing access road are not considered impervious surface under the State's Stormwater Rule. TRORC recommend that the PUC request a determination from the State's Stormwater Program for both a construction and an operation stormwater permit.

B. Telecommunications Policy 5:

"New telecommunications facilities and related infrastructure (including access roads, site clearing, on-site power lines, lighting, and off-site power lines) must be sited to avoid the fragmentation of large priority and high priority forest blocks."

The compound and most of the access road to the proposed telecommunications facility will be sited within a highest priority interior forest block and connectivity block as mapped by the Vermont Agency of Natural Resources. TRORC finds that the proposed access road and compound will fragment a highest priority interior forest block.

To reduce the fragmentation of the highest priority interior forest block, the Certificate of Public Good for this proposed telecommunication facility should:

1. Require the burial of the utility lines to the proposed compound in order to minimize tree cutting and breaks in the tree canopy.

2. Require a gate across the access road where the use of the access road will become exclusive to the operator of the proposed telecommunication facility.

3. Restrict logging activities within fifty feet of the access road, ensuring that a tree canopy is able to grow over the access road.

4. Restrict logging activities where existing trees will screen the compound and the base of the telecommunication mast.

C. Telecommunications Policy 6

"Telecommunications facilities development shall minimize site clearing and highly visible roadways."

The application for this proposed telecommunication facility estimates that this project will entail 57,978 square feet of tree clearing. TRORC finds that this project as proposed will require an excessive amount of site clearing.

To reduce the excessive amount of site clearing, the Certificate of Public Good for this proposed telecommunication facility should incorporate the recommendations for Telecommunications Policy 5.

Sincerely,

Bryan Kovalick

Bryan Kovalick
Planner, TRORC