

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 26-____-PET

Application of	)
Industrial Tower and Wireless, LLC	)
for a Certificate of Public Good,	)
pursuant to 30 V.S.A. § 248a, authorizing	)
the construction of a wireless telecommunications	)
facility in Enosburgh, Vermont.	)

PREFILED DIRECT TESTIMONY OF LOUIS HODGETTS, P.E.

ON BEHALF OF INDUSTRIAL TOWER AND WIRELESS, LLC

March 27, 2026

Summary:

Mr. Hodgetts' testimony will address 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.

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

A1. My Name is Louis Hodgetts. I am a Professional Engineer and Project Manager employed by DuBois & King, Inc., in South Burlington, Vermont, which has provided engineering and consulting services to telecommunications providers in Vermont since the late 1990's.

Q2. Please state briefly your professional background.

A2. I graduated from University of Vermont, College of Engineering with a Bachelor's Degree in Civil Engineering. I have worked at Dubois & King, Inc. since May 2005. I obtained my Professional Engineering License in June, 2009. I have worked in the area of design and permitting of wireless telecommunications facilities since 2008. During that time, I have provided expert testimony and reports before numerous bodies administering local zoning bylaws and Act 250 regarding tower siting and site design. I have experience in many facets of permitting and design of wireless telecommunications facilities, including evaluation of aesthetic and land use impacts.

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

A3. Yes. I participated in the design of and/or provided prefiled testimony in Docket No. 8103 (Town of Norwich), Docket No. 8221 (Berlin North), Docket No. 8169 (Duxbury), Docket No. 8219 (West Rutland), Docket No. 8220 (Bradford), among others, all involving the issuance of a CPG authorizing the installation or upgrade of a telecommunications facility.

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

A4. ITW intends to construct a telecommunications facility on a portion of the approximately 506-acre parcel of land owned by Matthew Hull on Bordoville Road, Enosburgh Falls,

Vermont. ITW refers to the project as “Enosburgh.” The property owners have given ITW permission to proceed with this Application. The coordinates for the Project are latitude 44° 50’ 27.60” North and longitude 72° 48’ 39.42” West. *See* Permit Plans, Exhibit LH-1, for a visual depiction of the Project’s location.

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

A5. ITW will create an 80' x 80' “Compound” enclosed by an 8' high chain link fence, with a locked gate. Within the Compound, ITW will construct a 120’ above ground level (“AGL”) telecommunications self-supporting lattice tower (“Tower”). Six (6) thin “whip” antennas (“Antennas”) will be mounted at 120’ AGL of the Tower. Five (5) transmit Antennas will extend upward to a maximum height of 133.0’ AGL. One (1) receive Antenna will reach downward from the 120’ AGL mounting level. Each Antenna will measure approximately 13’ long and 2.75” in diameter.¹ *See* Exhibit KD-2 for full and accurate specifications for the Antennas.

ITW will place an equipment cabinet (“Cabinet”) on a 10’ by 10’ concrete pad inside the Compound, to the southwest of the Tower. The Cabinet will contain the electronics equipment necessary for the operation of the Project. *See* Cabinet Specifications (Exhibit LH-2). Co-axial cables from the mounted antennas will descend on the inside of the Tower. The cables will exit near the base of the Tower and will connect with the Cabinets via a proposed cable bridge.

To provide access to the Compound, ITW will be create a 12’ wide access (“Access”) which will follow the existing entrance to a seasonal camp within a 25’ wide easement

¹ From time to time, equipment manufacturers may alter their products or ITW may purchase from different suppliers. Therefore, there is a possibility that the actual antennas and other equipment may be slightly different from but similar in dimensions as those described in this testimony.

1 area. Underground electric and telephone utilities will follow the Access from a proposed
2 overhead utility line extension on Bordoville Road by Enosburg Light and Electric.

3 Approximate clearing limits are shown on the Permit Plans. The contractor will limit
4 clearing to the minimum required to construct the Access and Compound, which is
5 estimated to be approximately 25,256 square feet. The project will result in 26,240 square
6 feet of permanent earth disturbance. At the close of construction, ITW will reseed and
7 mulch all disturbed areas along the Access and around the Compound.

8 **Environmental and Related Criteria**

9 **Q6. Based on your evaluation, and in response to the requirements of the applicable**
10 **criteria of 10 V.S.A. § 6086(a) and 10 V.S.A. § 1424a(d), will the proposed Project**
11 **result in: undue water or air pollution; reduction of quality of ground or surface**
12 **waters; unreasonably burden to existing water supplies; unreasonable soil erosion;**
13 **highway congestion or unsafe conditions; a burden on educational and municipal**
14 **services; adverse effect on scenic or natural beauty, aesthetics or historic sites,**
15 **necessary wildlife habitat or endangered species; public investments; and is in**
16 **conformance with the land conservation measures in the applicable local and**
17 **regional plans?**

18 A6. The proposed Project will not have an adverse impact affecting any of the applicable
19 criteria under 10 V.S.A. § 6086(a) and 10 V.S.A. § 1424a (d) and will conform to the land
20 conservation measures in the applicable local and regional plans. Below are my detailed
21 responses.

22 **Criterion 1 - Water or Air Pollution:**

1 **HVAC System:** The proposed equipment installation will utilize equipment
2 cabinets installed outdoors within a fenced compound (“Compound”) on a 10’ by 10’
3 concrete pad. The outdoor equipment cabinets are equipped with an air-to-air heat
4 exchange system. The outer loop of the system includes air intake and exhaust
5 perforations on the door and a fan to maintain the allowable operating temperatures
6 within the cabinet.

7 **Dust Control:** If conditions arise during construction that would require
8 treatment to minimize dust, water and/or calcium chloride will be applied to the surface.
9 There will be no noxious gases, smoke or odors emitted from the facility.

10 **Noise:** No significant noise will be generated by this Project once in
11 operation. Typical hours of construction will be 7:00 AM to 5:00 PM, Monday through
12 Friday, although occasional evening or weekend work may be required.

13 ***Outstanding Water Resources (10 V.S.A. § 1424a (d)); Headwaters, Waste Disposal,***
14 ***Water Conservation, Floodways, Streams, Shorelines and Wetlands (10 V.S.A §***
15 ***6086(a)(1) (A)-(G), (2) and (3)):***
16

17 **Criterion 1A - Headwaters:** The project area may be classified as a headwaters area
18 due to steep slopes, shallow soils, and limited drainage area; however, the proposed
19 improvements are located on a relatively flat portion of the property. Runoff from the
20 installation of the proposed Access and Compound will be dispersed into crushed stone
21 working surface and then drain into the surrounding terrain resulting in a negligible
22 change to the drainage patterns.

23 Further there is no water supply or wastewater discharge from the site, and
24 stormwater discharges will be effectively unchanged. Therefore, there would be no
25 impact to the ability of a Headwaters area (if it exists at this location) to contribute to the

1 downgradient potential for water supply and stream habitat. The existing access drive
2 does parallel a stream however there is an existing 50' vegetated buffer which will be
3 maintained throughout construction of the facility.

4 **Criterion 1(B) – Waste Disposal:** Following construction, the proposed Project will not
5 generate any waste. Construction waste generated during construction of the project will
6 be removed from the site and recycled or disposed of at approved waste processing
7 facilities.

8 **Criterion 1(C) - Water Conservation:** The proposed Project will be unmanned and will
9 not require water or sewer facilities.

10 **Criterion 1(D) - Floodways:** According to the FEMA Flood Insurance Rate Map
11 (Firmette) for the Town of Enosburgh, VT (Exhibit LH-3), the Compound is not located
12 in any flood hazard area.

13 **Criteria 1(E) and 1(F) - Streams and Shorelines:** There are no stream crossings or
14 shoreline improvements proposed on this project. The existing access to the field
15 parallels an unnamed tributary to the Branch. However, project disturbance is outside the
16 50' riparian buffer and there are no proposed impacts to the stream or the buffer.

17 To ensure the protection to the unnamed tributary to the Branch, the Agency of Natural
18 Resources (“ANR”) requested the Petitioner maintain an undisturbed, naturally vegetated
19 riparian zone along the unnamed tributary of The Branch, which shall begin at the
20 water’s edge at base flow conditions, and shall further extend 50 feet measured inland
21 from, perpendicular to, and horizontally from the Top of Bank and contiguous delineated
22 wetland as depicted on Exhibit LH-1. The term “undisturbed” means that there shall be
23 no activities that may cause or contribute to ground or vegetation disturbance or soil

1 compaction, including but not limited to construction, earth-moving activities, storage of
2 materials, tree trimming or canopy removal, tree, shrub, or groundcover removal;
3 plowing or disposal of snow, grazing or mowing. Where the Project is within 100 feet of
4 any riparian zone boundary, Prior to site preparation or demolition, the Permittee shall
5 install a continuous line of visible flagging outside the riparian zone boundary, to remain
6 for the duration of construction. The Petitioner has not proposed any disturbance within
7 the area highlighted by ANR as it is outside of the limit of proposed disturbance shown
8 on Exhibit LH-1, and agrees to comply with this condition consistent with the Petitioner's
9 lease rights to the subject parcel.

10 Wetlands were identified on the Project parcel, as described in Criterion 1(G), below the
11 Petitioner obtained Wetlands Permit #2022-0430 and will comply with the conditions
12 therein.

13 The contractor shall install the facility using sound construction methods in accordance
14 with the State of Vermont Low Risk Site Handbook for Erosion Prevention and Sediment
15 Control.

16 **Criterion 1(G) - Wetlands:** Aimee N. Rutledge from DuBois and King, Inc. conducted
17 an initial site visit on November 4th and 8th, 2021 and prepared a report dated December
18 16, 2021 based on her findings. (Exhibit LH-4 Natural Resource/Habitat Review). Three
19 wetlands ("Wetland A, B, and C") were delineated in the vicinity of the Project.

20 Wetland A is a palustrine forested (PFO) wetland, flagged as A1 through A12. The
21 wetland is located in the northern portion of the study area, adjacent to a perennial
22 stream. Wetland A is situated between the stream and a steep slope which receives
23 drainage from Wetlands B and C to the south. The wetland is sparsely vegetated and is

1 dominated by eastern hemlock (*Tsuga canadensis*) and sensitive fern (*Onoclea*
2 *sensibilis*). The wetland is small, and its principal values and functions include
3 stormwater runoff and flood storage. Wetland A is Class II due to its connectivity with
4 the stream.

5 Wetland B is a palustrine emergent (PEM)/scrub-shrub (PPS) slope wetland located in
6 the western portion of the study area. It receives stormwater runoff from a drainage
7 channel located along the forest access road to the south. The wetland is dominated by
8 sensitive fern, tall goldenrod (*Solidago altissima*), and reed canary grass (*Phalaris*
9 *arundinacea*). The wetland connects to Wetland A via a poorly-defined channel on the
10 northern portion of the wetland. Wetland B is presumed to be Class II due to its
11 connectivity with Wetland A.

12 Wetland C is also a palustrine emergent (PEM) wetland. It is essentially a continuation of
13 Wetland B. Wetland B and C are connected via an approximate 12-inch CMP under an
14 overgrown driveway that accesses the small cabin mentioned above. The wetland is also
15 dominated by sensitive fern, tall goldenrod, and reed canary grass. Wetland C also
16 connects to Wetland A via a poorly-defined channel. Wetland B is presumed to be Class
17 II due to its connectivity with Wetland A.

18 The Wetland B/C complex does not exhibit significant functions and values. The
19 wetland's principal values and functions include wildlife habitat. The overall width of the
20 Wetland B/C complex is narrow, influenced by microtopography, and continues to the
21 west for a short distance maintaining the narrow slope wetland characteristic.

22 The project does propose driveway improvements within the Wetland B buffer.
23 Accordingly, the Petitioner obtained Wetland Permit #2022-0430 and will comply with

1 the conditions therein. Further, at the request of ANR to provide additional protection to
2 the wetland and wetland buffer from accidental encroachment outside of authorized
3 impacts the Petitioner will install a continuous line of orange snow fence or flagging tape
4 along the limits of disturbance prior to the start of construction as discussed above. The
5 Petitioner will remove selected trees, maintain stumps, and restore according to site plans
6 approved in the Wetland Permit #2022-0430 application package.

7 Best management practices (BMP's) (i.e. Silt fencing, wattles, erosion controls, etc.) will
8 be employed during construction to ensure stormwater runoff does not carry construction
9 related debris into nearby wetland features.

10 **Criteria 2 and 3 - Water Supply:** The proposed Project will be unmanned and will not
11 require water or sewer facilities.

12 **Criterion 4 - Soil Erosion:** The erosion prevention sediment control measures outlined
13 below shall meet all applicable Department of Environmental Conservation regulations.
14 This project has less than one (1) acre of proposed disturbance, and therefore does not
15 require a State of Vermont Stormwater Discharge Permit for Construction Activities,
16 however construction will follow the best management practices as outlined in the State
17 of Vermont Low Risk Site Handbook for Erosion Prevention and Sediment Control.

18 Stormwater runoff during construction of the Project will be diverted or collected and
19 treated as outlined in the State of Vermont Low Risk Handbook for Erosion Prevention
20 and Sediment Control. Silt fence will be installed parallel to grade and down gradients
21 from construction to prevent eroded sediment from leaving the site. The effective
22 increase in impervious area is approximately 6,724 square feet. The resulting increase in
23 total jurisdictional impervious area will remain below the one (1) acre threshold for a

1 stormwater operational permit. The proposed improvements will utilize the existing
2 terrain and natural treatment systems to ensure water quality and that runoff rates do not
3 adversely impact the existing drainage ways or wetlands.

4 Additionally, the impact of the new impervious area to the groundwater supply is
5 negligible considering the existing conditions and proposed improvements. The proposed
6 improvements consist of installation of an Access and Compound, on an existing field, to
7 be resurfaced with crushed stone material. As proposed, this Access will see very limited
8 use consisting of infrequent maintenance inspections and equipment deliveries following
9 construction. The proposed Project will not require a water supply, will have no draw on
10 the groundwater aquifer, nor will the Project have an in-ground waste treatment system
11 that could potentially contaminate the groundwater.

12 Within the proposed compound, a crushed stone surface with a gentle slope will
13 be provided to capture rainfall and enhance infiltration. The runoff collected by the
14 proposed equipment cabinets will discharge across this surface and disperse in the
15 surrounding field.

16 Should winter earthwork take place, additional winter erosion control measures
17 will be applied. These measures include minimizing the soil disturbance, installation of
18 silt fencing prior to the ground freezing, and protecting the disturbed area with hay
19 mulch, at twice the normal rate, as soon as feasible. To limit the effect of the spring
20 snowmelt, all snow removed from the site shall be kept down gradient of the site work
21 and all erosion control measures shall be inspected regularly. Permanent vegetative
22 controls will be installed as early as practical to further protect the site.

23 **Criterion 5 - Highways and Other Means of Transportation:** The Project will not

1 cause unreasonable congestion or unsafe conditions with respect to the use of highways.
2 The site is accessed from Bordoville Road, an existing road off of Vermont Route 108.
3 After construction, the Project will generally be visited once or twice a month by a service
4 technician for routine inspections.

5 **Criterion 6 - Educational Services and Criterion 7 - Municipal Services:** The
6 proposed Project will have no effect on the ability of the Town of Enosburgh to provide
7 educational services.

8 Except for a remote possibility of the need for emergency service, the Project will
9 not require municipal services. The Project will not place an unreasonable burden on the
10 ability of the local governments to provide municipal or governmental services. In fact,
11 because its ability for colocation for wireless services, it would enhance the Town's
12 ability to provide those services. Increased wireless services will also enhance the
13 Town's ability to provide those services.

14 **Criterion 8 – Scenic Beauty, Historic Sites and Natural Areas:** The Project will not
15 have an undue adverse impact on known historic sites. With regard to Historic Sites,
16 please see the Historic Resources Review completed by EBI on April 13, 2022
17 (concluding that there are “No Historic Properties in the Area of Potential Effects-Direct
18 Effects” and “No Historic Properties in the Area of Potential Effect-Visual Effects.”) for
19 the Tower at a proposed height of 140’ AGL. The State Historic Preservation Office
20 concurred with these findings on May 23, 2022 (*see* Exhibit LH-5) Accordingly, as the
21 only change from the previous proposal was a reduction in height which will lessen any
22 visual impact on historic resources, it is my professional opinion that the project will
23 have no undue adverse impact on historic resources.

1 A visibility analysis was conducted to review the potential visibility of the
2 proposed installation and balloon float was conducted on January 21, 2022, to confirm
3 the visual impact of the proposed Tower on the surrounding community. A 3' diameter
4 red balloon was inflated, connected to a 150' long string, and tethered at the proposed site
5 location. While the balloon was in the air at the proposed height, our staff drove the
6 primary public roads within a two-mile radius of the project location to determine the
7 visibility of the proposed installation. Views of the proposed installation were limited to
8 about 1 mile on VT 108 and from more limited spots of short duration due to the steep
9 terrain and foreground vegetation. We attempted to see the balloon from ten (10)
10 different viewpoints, identified in Exhibit LH-6. Of those, the balloon was only visible
11 from four (4) viewpoints and simulations were developed of the proposed installation. As
12 the proposed tower height was reduced to 120 feet, the photo simulations have been
13 adjusted to account for this reduction which further reduced the visibility of the tower.
14 The photo simulations at a 120 foot height are submitted as Exhibit LH-6.

15 On the previous project submitted for this site, the Petitioner received comments
16 expressing concern about the potential visibility of the Tower. As was previously noted,
17 most of the comments on this subject come from property owners along Bordoville and
18 Chester A. Arthur Roads. During the Balloon Float, we attempted to see the balloon
19 from various viewpoints along those roads. We were largely unsuccessful due to the
20 terrain and intervening softwood tree cover, as depicted in viewpoints 6, 7, and 8 of
21 Exhibit LH-6. Viewpoint 6 is located at the intersection of Bordoville Road and Chester
22 A. Arthur Road, approximately 190' northeast of the Seventh Day Adventist Church
23 ("Church"). Viewpoint 7 is located at 494 Bordoville Road which is the House/Lombardi

1 property. Viewpoint 8 is located at 401 Jones Road, at the south end of the Chalifoux
2 property. There was some very slight visibility from viewpoint 3 (at the intersection of
3 Jones and Chester A. Arthur Roads), but only the topmost part of the proposed tower
4 (“Tower”) and whip antennas are visible through the trees, where it is also backdropped
5 by higher terrain. It would be unlikely the average observer would be able to identify the
6 Tower from Bordoville Road or Chester A. Arthur Road. Further, any view would likely
7 disappear when the leaves came on to the deciduous trees in the foreground

8 As the updated photo simulations demonstrate, the Tower is generally screened by
9 the surrounding vegetation and in many instances, cannot be seen by the surrounding
10 area.

11 In addition to preparing the photo simulations, I have reviewed the Prefiled
12 Testimony and Aesthetic Analysis and Orderly Development Review prepared by
13 Gordon Perkins, an independent aesthetics expert hired by the Department of Public
14 Service in Case No. 22-2120-PET with respect to the previous proposal for a 140’ AGL
15 Tower. *See* Exhibit LH-7 Prefiled Testimony of Gordon Perkins and LH-8 Aesthetic
16 Analysis and Orderly Development Review. I agree with the conclusion that even at 140’
17 AGL, “the Facility will not violate a clear, written community standard intended to
18 preserve the aesthetics or scenic beauty of the area, will not offend the sensibilities of the
19 average person or appear shocking or offensive, and additional mitigation measures
20 would have minimal effect on the potential impacts associated with the tower or appear
21 shocking or offensive, and additional mitigation measures would have minimal effect on
22 the potential impacts associated with the tower. Therefore, it is EDRs conclusion that the

1 tower will not result in undue adverse impacts on the surrounding visual environment.”
2 Exhibit LH-7 at Page 4.

3 While Mr. Perkins notes that additional mitigation measures would have a
4 minimal effect on the potential impacts associated with the Tower, the Petitioner has
5 nonetheless adopted these measures by reducing the Tower height to 120’ AGL.
6 According to Mr. Perkins, the implementation of this mitigation measure means that the
7 proposed tower “could be visible from approximately 2.5% of the VSA [Visual Study
8 Area, defined as two-mile radius around the proposed tower] (i.e., the tower would be
9 entirely screened from 97.5% of the VSA).” Exhibit LH-8 at Page 27.

10 Accordingly, it is my opinion that the proposed installation will not have an undue
11 adverse impact on the scenic beauty of the area.

12 The project’s impact on natural areas is discussed at length under Criterion 1A,
13 1(E), 1(F), 1(G), 4, and 8(A). The project is proposed in an existing open field, which
14 was not shown to have significant or unique natural areas. As the Petitioner has
15 consented to and incorporated the additional conditions proposed by the ANR, it is my
16 opinion that the proposed installation will not have an undue adverse impact on natural
17 areas.

18 **Criterion 8(A) - Wildlife and Endangered Species:** In addition to the review completed
19 by Aimee N. Rutledge of Dubois & King, ITW retained EBI to complete a Natural
20 Resource Review Update for the Project dated February 25, 2026. See LH-9 EBI Natural
21 Resource Review. As the Natural Resource Review demonstrates, there are no known
22 rare or irreplaceable natural areas, wildlife or endangered species or exemplary natural
23 communities that would be impacted by this proposed Project. Further, none were

1 identified during our site review. As discussed above under Criteria 1(E) and 1(F), the
2 Agency of Natural Resources, including the Vermont Department of Fish and Wildlife,
3 provided proposed conditions which the Petitioner has incorporated into the application.
4 The proposed tower site is in a mowed hayfield, which is too disturbed to be classified as
5 a natural community.

6 **Criterion 9(K) – Development Affecting Public Investments:** The Project does not
7 impact any known areas of public investment.

8 **Conformance with Local and Regional Plans** - Pursuant to 30 V.S.A. § 248a(c)(2),
9 during the Commission's review, "unless there is good cause to find otherwise,
10 substantial deference [will be] given to the plans of the affected municipalities; to the
11 recommendations of the municipal legislative bodies and the municipal planning
12 commissions regarding the municipal plans; and to the recommendations of the regional
13 planning commission concerning the regional plan." Accordingly, I have reviewed
14 provisions of the Town of Enosburgh Town Plan adopted April 20, 2020 ("Town Plan";
15 excerpts attached as Exhibit LH-10), and the Northwest Region Regional Plan 2015-
16 2023 and amended June 28, 2017 ("Regional Plan"; excerpts attached as Exhibit LH-11)
17 to demonstrate that the proposed Project is in alignment with applicable planning goals
18 and policies.

19 The Town Plan contains a section devoted entirely to Telecommunications. That section
20 provides, in pertinent part:

21 Accesses [sic] to telecommunication services are increasingly important to the
22 security, quality of life and economic needs of residents and businesses. Cable,
23 DSL, and cellular service are available in the Village and in select areas of the

1 Town. Many town residents have access to high speed internet.

2 Telecommunication towers and related infrastructure require careful consideration.

3 These structures tend to be located in highly visible locations such as on
4 mountaintops and ridgelines. The need for additional facilities is projected to
5 increase dramatically in the coming years. The Federal Telecommunications Act of
6 1996 placed certain limitations over municipal control of these structures; however,
7 within those confines, Enosburgh must act to protect the community's historic
8 character, rural nature, and aesthetic beauty.

9 Town Plan at 49.

10 ITW's proposed project will provide opportunities for additional voice and data services,
11 including high-speed Internet access. The project's location has been chosen to minimize
12 any effects on Enosburgh's historic character, rural nature and aesthetic beauty.

13 In the "Policies" section following its discussion of Telecommunications, the Town Plan
14 provides:

15 Where co-location of telecommunications facilities with other towers or structures
16 is not feasible, new structures must be sited in appropriate areas, respecting the
17 integrity of residential areas, aesthetic concerns, and natural resource issues.

18 Id. at 56.

19 Again, ITW has chosen this location so that it is away from residential areas and minimizes
20 aesthetic concerns and impacts on natural resources. Furthermore, the height of the
21 proposed facility was reduced by 20' to mitigate perceived aesthetic concerns.

22 The Regional Plan specifically addresses wireless telecommunications facilities through the
23 following goals:

- 1 • Develop and maintain a high-quality, affordable telecommunications infrastructure
2 that provides the most efficient and effective as well as the least obtrusive system
3 possible;
- 4 • Ensure the availability of broadband access in order to increase economic
5 opportunity and support economic diversity.
- 6 • Support the development of a telecommunications infrastructure that enhances
7 high- quality education and lifelong learning opportunities.
- 8 • Consolidation of new telecommunications facilities on existing sites is preferred
9 over the development of new sites. New telecommunications equipment and towers
10 shall be sited in the least obtrusive and least ecologically sensitive areas possible.
- 11 • Promote universal access to high-speed broadband and emerging
12 telecommunications technologies.
- 13 • Ensure that the telecommunications systems and related infrastructure fit within the
14 character of the area as defined by the local and regional plans.
- 15 • Target higher broadband speeds for village centers, downtowns and growth centers
16 to encourage development.

17 Regional Plan at 35.

18 As stated above, the Project will allow ITW to offer high quality, affordable services to
19 business customers in the Enosburgh area. Those services will promote economic growth.
20 Further, the provision for the co-location of multiple cellular carriers on the Tower and in
21 the Compound will improve the accessibility of high-speed broadband services in the areas
22 served by the Project.

23 ITW shares the goals of the Regional Plan to use existing infrastructure rather than building

1 new towers where feasible. However, in this case, there is no existing infrastructure that
2 will allow ITW to accomplish its objectives of enhancing coverage and capacity in this
3 area. *See* Prefiled Testimony of Kevin Delaney with respect to ITW's co-location analysis.

4 The telecommunications services that ITW will provide through the Project will primarily
5 be targeted to business customers seeking a reliable, reasonably-price means of
6 communicating between their offices and remote users. As such, the Project will promote a
7 balanced, diverse economic base, with a focus on locally owned businesses. The
8 deployment of ITW's service in Enosburgh will also attract commercial development,
9 especially for business that require reliable two-way mobile communications.

10 Both the Town of Berkshire and Town of Enosburg's fire and emergency response crews
11 have voiced strong support for the facility as meeting a critical need for their radio services
12 to be enhanced. This is reflected in the Regional Plan's desire for enhanced communication
13 networks to enhance business and public safety development. In addition, the Petitioner is
14 conscious of the concerns raised by the Northwest Regional Planning Commissions in Case
15 No. 22-2120-PET. Accordingly, the Petitioner has revised the tower design by reducing the
16 height such that it is the least obtrusive possible system to provide the ITW's service.
17 Based on the foregoing, it is my opinion that the proposed project complies with the Town
18 Plan and Regional Plan and will not have an undue adverse impact on the orderly
19 development of the region. This conclusion is further supported by the analysis contained
20 in Exhibits LH-7 and LH-8.

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

23 A7. The Petitioner has obtained Wetland Permit #2022-0430 for improvements to the access

1 for this Project. The Petitioner is bound by the conditions of this permit and has
2 incorporated them into this Petition by reference. There are no other known permits with
3 conditions that would affect this project.

4 **Q8. Can you certify that Industrial Tower and Wireless, LLC or any of its affiliates has**
5 **not obtained or been denied a permit or permit amendment for the improvements**
6 **covered by the current application or substantially similar improvements, under**
7 **applicable provisions of Title 24 or chapter 151 of Title 10?**

8 A8. Yes, I can certify that Industrial Tower and Wireless, LLC or any of its affiliates has
9 neither applied for, obtained, nor been denied a permit or permit amendments under
10 applicable provisions of Title 24 or chapter 151 of Title 10 for the improvements covered
11 by the current application or substantially similar improvements. As referenced above,
12 the Industrial Tower and Wireless, LLC previously applied for and was denied a
13 Certificate of Public Good in Case No. 22-2120-PET for a 140' AGL tower at this
14 location. The present application incorporates feedback received and mitigation measures
15 requested as a part of that process.

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

17 A9. Yes.

Exhibits to Prefiled Testimony of Louis Hodgetts

Exhibit LH-1	Permit Plans
Exhibit LH-2	Cabinet Specifications
Exhibit LH-3	FEMA Flood Insurance Rate Map
Exhibit LH-4	Natural Resources/Habitat Review
Exhibit LH-5	Historic Resources Review
Exhibit LH-6	Photosimulations
Exhibit LH-7	Prefiled Testimony of Gordon Perkins (Case No. 22-2120-PET)
Exhibit LH-8	Aesthetics Analysis and Orderly Development Review
Exhibit LH-9	EBI Natural Resources Review
Exhibit LH-10	Excerpts of Enosburgh Town Plan
Exhibit LH-11	Excerpts of Northwest Region Regional Plan