

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Docket No. 22-2120-PET

Petition of Industrial Tower and Wireless,
LLC requesting a certificate of public good,
pursuant to 30 V.S.A. § 248a, authorizing the
installation of wireless telecommunications
equipment off of Bordoville Road in
Enosburgh, Vermont

PREFILED DIRECT TESTIMONY OF

Gordon W. Perkins

ON BEHALF OF THE

VERMONT DEPARTMENT OF PUBLIC SERVICE

December 9, 2022

Q1. Please state your name, occupation, and affiliation.

A1. My Name is Gordon Perkins, and I am a visual resource assessment expert and Visualization Services Practice Leader at Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C (EDR).

Q2. What is the purpose of your testimony?

A2. I am testifying in support of the Aesthetic Analysis and Orderly Development Review (Exhibit PSD-GP-2) completed by EDR to review the proposed Industrial Tower and Wireless, LCC Telecommunication Facility located in the Town of Enosburgh, Franklin County, Vermont

Q3. Please state your credentials and experience.

A3. I have a degree in landscape architecture, and am a Certified Geographic Information Systems Professional (GISP) with 22 years of experience in visual impact assessment, scenic resource assessment, and mitigation design. Additional relevant experience is contained in my curriculum vitae, provided as Exhibit PSD-GP-1.

Q4. Have you ever testified before the Commission?

A4. No. However, I have provided testimony on cases before public utility commissions in New York, Rhode Island, New Jersey, Massachusetts, and Connecticut.

Q5. Did you prepare Exhibit PSD-GP-2 (the Aesthetics and Orderly Development Report)?

A5. Yes.

Q6. Please summarize Exhibit PSD-GP-2.

A6. EDR completed a visibility analysis, an assessment of the Applicants visual simulations, and an aesthetics analysis and orderly development review. The purpose

1 of this report is to evaluate the aesthetic effects of the Facility utilizing the two-part
2 Quechee Analysis and evaluate the Facility's potential impacts on orderly development
3 of the region as dictated in town and regional planning documents. The findings of this
4 report include the following:

5 Within the majority of the visual study area (defined as the area within two miles of the
6 proposed facility), the Facility will not result in adverse impact to the aesthetics of the
7 surrounding area. However, from locations where the tower is viewed from a close
8 distance, contrast with existing elements of the landscape in terms of line, form, and
9 scale are likely to occur, and therefore the Facility would result in minimal to moderate
10 adverse visual impacts from these discrete public vantage points.

11 The Quechee Analysis is a two part test. The first part subjects the project to the
12 following test:

13 1.) The nature of the project's surroundings, the compatibility of the project's design with
14 those surroundings, the suitability for the project's context of colors and materials
15 selected for the project, the locations from which the project can be viewed, and the
16 potential impact of the project on open space.

17 a. The lidar viewshed analysis confirms that the proposed tower would only be
18 visible from approximately 3.1 percent of the 2-mile study area when
19 considering the height of the tower and screening provided by topography,
20 vegetation, and structures. The visibility predicted by the viewshed analysis is
21 almost entirely contained within a narrow corridor at the base of the valley
22 floor. While views within one half mile may appear somewhat incongruous

1 with other built and natural elements in the visual environment, the viewing
2 opportunities are discrete, short duration, and do not typically coincide with
3 open space resources.

4 Part 2 of the Quechee Analysis includes three subparts, presented below:

5 1.) *Does the project violate a clear, written community standard intended to preserve the*
6 *aesthetics or scenic beauty of the area?*

7 a. A review of municipal planning documents and zoning bylaws was undertaken
8 to identify clear, written community standards intended to preserve the aesthetic
9 and scenic beauty of the area. No visibility is indicated from the portion of the
10 Natural Resource Overlay zoning district, which was the only location
11 identified for its scenic value within the VSA. From locations where views are
12 more expansive and distant mountains or hills coincide with the Facility,
13 substantial screening by intervening vegetation substantially limit the
14 geographic extent of visibility and the amount of the tower that would be
15 visible, resulting in minimal to negligible impacts.

16 2.) *Does the project offend the sensibilities of the average person? Is it offensive or*
17 *shocking because it is out of character with its surroundings or significantly diminishes*
18 *the scenic quality of the area?*

19 a. The height, design, and material of the proposed Facility are fairly standard for
20 telecommunication towers, which are common landscape features throughout
21 the region; as indicated in the VCGI Telecommunication Facilities geospatial
22 database, there are a total of 20 telecommunications towers within 20 miles of

1 the Facility. Therefore, it is reasonable to conclude that the appearance of the
2 Facility would not appear unusual or shocking and offensive to an average
3 person. The Facility will not diminish the scenic quality of the area.

4 *3.) Has the applicant failed to take generally available mitigating steps which a*
5 *reasonable person would take to improve the harmony of the project with its*
6 *surroundings?*

7 a. No. In EDR's opinion additional mitigation would have a minimal incremental
8 effect on potential impacts associated with the Facility. The construction
9 material (steel lattice) is an appropriate choice of material in this region because
10 it has greater transparency than monopole towers. Additionally, the siting of the
11 tower (within the valley) on the downslope of a hill minimizes its visual effect
12 on ridgelines and long distance vistas. While camouflaging could further reduce
13 the contrast presented by the tower by reducing glare, the natural weathering
14 process will achieve commensurate results in as little as six months after the
15 tower is installed.

16 In conclusion, the Facility will not violate a clear, written community standard intended to
17 preserve the aesthetics or scenic beauty of the area, will not offend the sensibilities of the
18 average person or appear shocking or offensive, and additional mitigation measures would
19 have minimal effect on the potential impacts associated with the tower. Therefore, it is
20 EDRs conclusion that the tower will not result in undue adverse impacts on the surrounding
21 visual environment.

1 The proposed Facility supports the need to improve telecommunications, which is a priority
2 reflected in local, regional and town plans. The proposed Facility has been located and
3 designed so as to minimize disturbance to existing natural resources, farmland, and
4 housing. The Facility proposal reflects the priorities of the town and region to protect the
5 natural resources of the area, while also introducing telecommunication infrastructure that
6 will enhance the quality of life of the community. Considering the siting, design, and
7 limited visibility of the proposed tower, the Facility will not result in adverse visual impacts
8 or interfere with the orderly development of the region.

9 **Q7. Does this conclude your testimony?**

10 **A7.** Yes, it does.