

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Petition of Northland Solar LLC for a Certificate of Public Good, pursuant to 30 V.S.A. § 248, authorizing the installation and operation of a 4.999 MW solar electric generation facility off Route 100 in Lowell, Vermont to be known as the “Northland Solar Project”	Case No. 25-2346
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PREFILED TESTIMONY OF
WALTER CUDNOHUFsky ON BEHALF OF THE TOWN OF LOWELL

March 27, 2026

Exhibits:

Exhibit TL-WC-1: Résumé of Walter Cudnohufsky

Exhibit TL-WC-2: Aesthetic Assessment Report

Exhibit TL-WC-3a-b: Photographic Inventory

Exhibit TL-WC-4a-f: Maps & Studies

Exhibit TL-WC-5a-d: Diagrammatic Sketches

Mr. Cudnohufsky’s testimony outlines his analysis and assessment of the potential impacts of the proposed Project with respect to Aesthetics, in compliance with 30 V.S.A. § 248 (b)(5).

1 **Q1. What is your name and business location?**

2 A1. My name is Walter L. Cudnohufsky. I am a licensed and Registered Landscape
3 Architect (MA 51), Land and Community Planner with Walter Cudnohufsky
4 Associates Inc. 455 Bug Hill Rd, Ashfield, MA 01330.

5
6 **Q2. Please explain your educational and professional background?**

7 A2. I received a BS in Landscape Architecture with honors in 1962 from Michigan State
8 University and a Masters of Landscape Architecture with Honors in 1965 from
9 Harvard Graduate School of Design. I have sixty-eight years of landscape
10 architecture professional experience in a wide variety of planning and design
11 services, including Federal, State, Regional, Civic, Institutional and Private Clients.
12 Seven or more years (1965-1972) of my career focused upon Visual, Aesthetic and
13 Cultural assessments primarily of the Northeast landscapes. Virtually every project
14 of the several hundred I have participated in has contended with a visual/aesthetic
15 argument and often includes their application under common Scenic Mountain or
16 similar zoning.

17

18

1 **Q3. What is the reason for your testimony?**

2 **A3.** Walter Cudnohufsky Associates, Inc. has been retained by the Town of Lowell to
3 provide an Aesthetic Assessment of the proposed Northland Solar Project (the
4 “Project”). The purpose of my testimony is to describe the independent work that I
5 and our firm’s colleagues have conducted. I also provide an opinion and attending
6 rationale regarding the Project’s compliance with the requirements of Section 248
7 with regard to aesthetics: § 248(b)(5).

8

9 **Q4. Have you previously testified before the Public Utility Commission?**

10 **A4.** I have not testified before the Public Utility Commission. Over the many years of
11 professional practice, I have provided public testimony and orchestrated
12 presentations on numerous projects seeking local, city or state approval.

13

14 **Q5. What analyses did you use to assess the Aesthetic impact of the proposed project?**

15 **A5.** We have used site reconnaissance and notation, photographic documentation, map
16 study, including reference to a supplied 3D interactive terrain modeling. We have
17 conducted client interviews, studied views from the area roads. We have reviewed
18 the proposed plan and project documentation. We have conducted graphic studies

1 and simulations as to the character of the area and the proposed Project. We have
2 consulted the relevant literature and reviewed and applied past studies from our
3 related professional practice.

4

5 **Q6. What is the nature of the projects viewshed?**

6 A6. The Project's 43.9-acre site is set back approximately 300 ft. from RT 58 and
7 partially, intermittently and seasonally screened from RT 58, by topography and
8 vegetation.

9

10 Conversely, the Project is very proximate and visible to Rt 100 along its frontage. It is
11 clearly visible from Lowell's civic buildings and to drivers on Rt 100. This is
12 especially true for those heading south. Even after proposed mitigation, the Project
13 will be unavoidably visible from the Village Center. It will always be sensed and
14 psychologically present even after the fifteen or more years of mitigation growth.

15

16 While there may be trail or other sitings of the proposed solar installation from
17 beyond the village center, the project site is in a relatively obscured location for such
18 longer distance viewing.

1

2 The relevant and operative viewshed for the solar installation is the approximately
3 one square mile in which it is located. The potentially affected area is the one quarter
4 to one half mile of the solar site boundaries.

5

6 The question "Can the project be seen?" is answered in the affirmative, from
7 numerous locations around its perimeter including several private residences. The
8 installation will be visible, in some cases prominently, even with the mitigation. This
9 is the active village center and its residences are proximate and several oriented to
10 the proposed solar field.

11

12 An accompanying and more important question is: What views and character are
13 lost by proceeding with this installation? We address that question in our
14 assessment.

15

16 **Q7. Will the project have an adverse impact on the scenic beauty of Lowell ?**

17 A7. The long cherished and existing rural character of Lowell has been derived over
18 decades and in modest incremental changes, of and at domestic and small-town

1 scale. Institutional or grid-scaled solar, when visible, is usually an unwanted
2 intruder. The unavoidable prominent attributes of large ground-mounted solar
3 arrays are contrary and disruptive to the established rural landscape character. The
4 widely implemented impulse, to screen them from viewing, is common sense and
5 points to the fact that they are seen as visually impactful.

6
7 The simple answer is, yes. The proposed solar project will have a substantial
8 aesthetic impact on the Town of Lowell. The only slightly harder question is can this
9 impact be deemed and characterized as “unduly adverse?”

10
11 **Q8. Will the project have an undue adverse impact on the scenic beauty of the area?**

12 A8. As will be ascertained by reading our supporting report, we believe and contend
13 that we have made a factually supported argument that this project, of this scale, in
14 this location, with this particular configuration and this specific proposed
15 mitigation, reaches the level of undue adverse impact. In short the proposed project
16 is egregiously offensive.

17

1 The thrust of our assessment work has gone to the cause of understanding the
2 existing Town character as fully as possible, noting its specific attributes, and
3 witnessing key views from public and private property.

4
5 While the proposed mitigation is predictable and includes welcomed native species,
6 we note that not unlike a colored band aid, it begins to call attention to itself and
7 thus the solar installation as well. In other instances, the blocks important views,
8 including from the Town Hall and the School.

9
10 It must be stated that while the mitigation is incomplete, and in some cases
11 unhelpful exacerbating, the solar installation remains the key intruder.

12
13 Try as we are prone to do, we have not yet imagined a mitigation that could and
14 would work sufficiently, other than drastic down-sizing of the installation and
15 locating it to the more remote and least visible portions of the property.

16

1 We conclude and have provided in our report our belief that the proposed project is
2 offensively impactful and has risen to undue adverse impact. We stand ready to
3 supplement the rationale as is requested.

4

5 **Q9. Does this conclude your testimony?**

6 A9. Yes

AFFIDAVIT OF NAME

1. I have provided pre-filed testimony and exhibits in the above-captioned matter.
2. I have personal knowledge of the information provided in my pre-filed testimony.
3. I am able to testify as to the validity of the information contained in my pre-filed testimony and exhibits.
4. I declare that the foregoing statements are true and accurate to the best of my knowledge and belief. I understand that if the above statement is false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

Dated at _____ Ashfield _____ Massachusetts this 27th day of MARCH 2026.

Name

