

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 25-2346-PET

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 in Lowell, Vermont	
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**PREFILED DIRECT TESTIMONY OF
GORDON W. PERKINS
ON BEHALF OF THE
VERMONT DEPARTMENT OF PUBLIC SERVICE**

March 27, 2026

Summary: Mr. Perkins summarizes the analysis and conclusions of the Aesthetic Analysis Report prepared by Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C, on behalf of the Vermont Department of Public Service, regarding the petition of Northland Solar, LLC for authorization to construct and operate a 4.999 MW solar electric generation facility in Lowell, Vermont (the “Project”). Having used various professional diagnostics and metrics in evaluating the Project using the *Quechee Test*, Mr. Perkins concludes that the Project will present an undue adverse effect on aesthetics under 30 V.S.A. § 248(b)(5).

Mr. Perkins Sponsors the Following Exhibits:

Exhibit DPS-GP-1	Curriculum Vitae of Gordon Perkins
Exhibit DPS-GP-2	Aesthetics Report
Exhibit DPS-GP-2.1	Attachment A_Viewpoint Photolog
Exhibit DPS-GP-2.2	Attachment B_Photosimulations
Exhibit DPS-GP-2.3	Attachment C_Technical Methodology Memorandum

1 **PREFILED DIRECT TESTIMONY OF GORDON W. PERKINS**

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

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

6
7 **Q2. What is the purpose of your testimony?**

8 A2. The purpose of my testimony is to introduce the Aesthetics Analysis Report as **Exhibit**
9 **DPS-GP-2**, completed by EDR, on behalf of the Vermont Department of Public Service
10 (the “Department”), to review the potential visual effects associated with the proposed
11 Northland Solar Project located in the Town of Lowell, Orleans County, Vermont.

12
13 **Q3. Please state your credentials and experience.**

14 A3. I have a degree in landscape architecture, and am a Certified Geographic Information
15 Systems Professional (“GISP”) with 25 years of experience in visual impact assessment,
16 scenic resource assessment, and mitigation design. Additional relevant experience is
17 contained in my curriculum vitae, provided as **Exhibit DPS-GP-1**.

18
19 **Q4. Have you ever testified before the Vermont Public Utility Commission**
20 **(“Commission”)?**

21 A4. Yes, I provided pre-filed direct testimony in Case Nos. 22-2120-PET, 22-2442-PET, 23-
22 0170-PET, and 25-2412-PET. I have also provided testimony on cases before the Public

1 Utility Commissions in New York, Rhode Island, New Jersey, Massachusetts, and
2 Connecticut.

3

4 **Q5. Was Exhibit DPS-GP-2 prepared by you or under your direct supervision?**

5 A5. Yes.

6

7 **Q6. Please summarize Exhibit DPS-GP-2.**

8 A6. The report evaluates the potential visual effects associated with the proposed Facility
9 utilizing the two-part Quechee Test.

10

11 **Q7. What were your conclusions under the Quechee Test?**

12 A7. According to the viewshed analysis performed by EDR, the Project would be visible from
13 1.4 percent of the 2-mile visual study area (“VSA”). Potential visibility of the PV array is
14 concentrated in areas with limited or no vegetation within approximately a quarter mile of
15 the Project Site, including portions of the State Route 100, State Route 58, and Gelo Park
16 road corridors; the Catamount Trail corridor; lands within Mountain View Cemetery,
17 Lowell Elementary School, and the Town Clerk’s Office properties; and lands within 11
18 residential properties. Considering Part one of the Quechee Test and based on the viewshed
19 analysis and photosimulations from the Lowell Cemetery, State Route 100, and a residence
20 at 411 State Route 58, it is my opinion that the Project is out of character with its
21 surroundings from the simulation locations, which are adjacent to the town center. The

1 Projects colors and materials are not suitable with the immediate environment, resulting in
2 an adverse aesthetics impact on the scenic and natural beauty of the area.

3 Considering part two of the Quechee Test, the Facility will not violate a clear,
4 written community standard intended to preserve the aesthetics or scenic beauty of the area.
5 However, the Project would be out of character with its surroundings, significantly
6 diminish scenic quality of the area, and would be shocking and offensive to the average
7 person. In addition, the Applicant has not considered reasonable mitigation measures that
8 could be effective in reducing visual impacts, resulting in improved harmony within the
9 existing visual environment. For these reasons, I recommend that the Commission find that
10 the Project would have an undue adverse effect on aesthetics.

11
12 **Q8. What were your conclusions regarding Orderly Development?**

13 A8. It is my opinion that the Project does not interfere with the orderly development of the
14 region because the relevant goals in the open spaces and village character provisions of the
15 Lowell Town Plan are too general in nature to qualify as land conservation measures.

16
17 **Q9. Does this conclude your testimony?**

18 A9. Yes.