

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 25-1679-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 Tinmouth, Vermont.	)

**SUPPLEMENTAL PREFILED DIRECT TESTIMONY OF LOUIS HODGETTS, P.E
ON BEHALF OF INDUSTRIAL TOWER AND WIRELESS, LLC**

April 3, 2026

Summary:

This supplemental pre-filed testimony documents a lowering of the proposed tower height from 160' AGL to 130' AGL.

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 and experience testifying before the PUC.

A2. Please see my prefiled testimony dated August 8, 2025 filed in the present case for responses to this question.

Q3. Please identify the location of the Project that is the subject to this § 248a filing.

A3. ITW intends to construct a telecommunications facility on a portion of the approximately 32.35-acre parcel of land owned by George Herrick and Paul Herrick on 402 VT Rt 140, Tinmouth, Vermont. ITW refers to the project as "Tinmouth." The property owners have given ITW permission to proceed with this Application. The coordinates for the Project are latitude 43°27'00.05" North and longitude 73°02'24.05" West. *See* Permit Plans, Exhibit LH-1, for a visual depiction of the Project's location.

Q4. Have there been any changes in the design of the Project and what impact do these changes have on the applicable criteria of 30 V.S.A. § 248a?

A4: Yes, ITW has heard the "concerns" of the Town regarding the tower height and potential visibility. ITW undertook a review of its coverage areas. As documented in the supplemental pre-filed testimony of Kevin Delaney, ITW then made the determination to reduce the Tower height to 130 ft AGL. Accordingly, I prepared revised permit plans depicting the tower at 130' AGL. *See* Exhibit LH-1 - Permit Plans (Revised). As shown

1 therein, tower will look the same as the plans provided with the initial application but is
2 lowered to 130'. In addition, I created revised photo simulations depicting the tower at
3 130' AGL. *See* Exhibit LH-6 – Photosimulations (Revised).

4 As shown on Exhibit LH-6 (revised), the reduction in tower height has resulted in
5 a reduction in the visibility, and by extension, the aesthetic impact of the tower. The
6 reduction in height has allowed the tower to be further masked by the existing vegetation
7 in the area (see viewpoint #5, where the majority of the facility would now be screened).

8 The Town identified the intersection of Route 140 and East Road as a scenic
9 resource, this location is depicted as #2 on Exhibit LH-6 (revised). As shown therein, the
10 reduction in the tower height significantly reduces the visibility from this vantage, with
11 the tower now being backdropped by the hilly topography behind the facility, rather than
12 extending above it.

13 In my professional experience, there are limited options available to mitigate the
14 aesthetic impact of a telecommunications facility. The most significant way to mitigate
15 the visual impact is to reduce the height of the facility, where the lowered height will still
16 allow coverage goals to be met. As discussed in the Supplemental Prefiled Testimony of
17 Kevin Delaney, ITW can accomplish its coverage objectives at the lower height of 130'
18 AGL. The lowered height will reduce the potential for future co-location and will likely
19 result in the construction of additional telecommunications facilities. However, ITW has
20 heard the concerns of the Town and sought to implement all reasonable methods to
21 mitigate these concerns.

22 The Town of Tinmouth Zoning Bylaw provides the following with respect to the
23 height of proposed telecommunication facilities:

1 “Height. In addition to other standards herein, no tower or structure shall exceed
2 130 feet in height. No tower or structure may be higher than 10 feet above the
3 average height of buildings within 300 feet of the proposed facility. The Facility
4 will not project more than 20 feet above the average elevation of the tree line
5 measured within 50 feet of the highest vertical element of the Wireless
6 Telecommunication Facility on lands owned or leased by the applicant.”

7 Exhibit LH-7 at Page 112 (Page 20 of Zoning Bylaw).

8 The proposed tower will not exceed 130 feet in height. There are no buildings
9 within 300 feet of the proposed facility as the closest structure is over 400 feet away. See
10 Exhibit LH-1 (Revised) at Page 3. The top of the tower will extend 71 feet, and the
11 highest vertical element of the facility (the antennas) will extend 84 feet above the
12 average elevation of the tree line within 50’ feet of the proposed facility. Accordingly,
13 ITW has sought to comply with the conditions of the zoning regulations, to the greatest
14 extent feasible while still providing coverage.

15 Any reference in any prior testimony asserting the tower would be 160’ AGL
16 should now be read to replace the 160’ AGL with 130’ AGL.

17 **Q5: Are there any other changes with the Project?**

18 **A5:** No. The project location, compound, access, screening, and natural resource impacts
19 remain the same. The only thing that has changed is the proposed height of the tower is
20 30’ lower than previously proposed.

21 **Q6: Does the reduction in tower height represent a substantial change from what was**
22 **previously proposed?**

23 **A6:** No. The change does not have the potential for significant impact with respect to any of

1 the criteria applicable to the project. The reduction in height will *reduce* the impact of the
2 project with respect to the applicable criteria.

3 **Q7: Does this conclude your Supplemental Testimony?**

4 **A7.** Yes.

Exhibits to Prefiled Testimony of Louis Hodgetts

Exhibit LH-1 Permit Plans (Revised 3/13/2026)

Exhibit LH-6 Photosimulations (Revised)