T.J. BOYLE ASSOCIATES
LANDSCAPE ARCHITECTURE & PLANNING

MEMORANDUM

To: John Fiske, Green Mountain Power

From: Jeremy B. Owens

Date: March 31, 2026

Re: GMP Georgia Substation Rebuild Project – Aesthetic Analysis

I. Project Description

Green Mountain Power ("GMP") is seeking approval under 30 V.S.A. § 248 from the Vermont Public Utility Commission ("Commission") for a Certificate of Public Good to upgrade and expand an existing substation located at 2066 Ballard Road in the Town of Georgia, Vermont (the "Project"). The Project consists of upgrading the existing substation equipment and retiring obsolete equipment in order to increase the reliability of service and improve substation safety and operability for the towns of Georgia, Milton, and St. Albans.

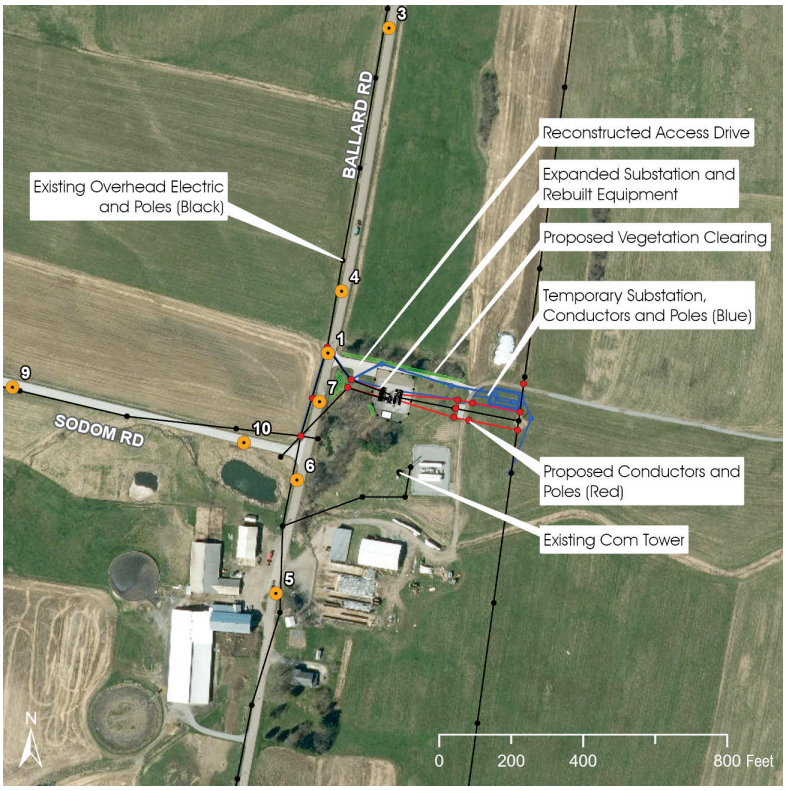


Figure 1. Aerial photo of the Project site and surrounding area.

The upgrades to the substation yard will include new 34.5 kV and 12.47 kV equipment, a new expanded substation yard, new fence, oil containment system, security, lights, animal fence, surface material, new access drive, and ground grid. This includes, among other things, installation of new transformer, circuit breakers, circuit regulators, remote terminal unit, switches, a new 18' x 28' control building, and other standard equipment to upgrade the existing substation with modern substation equipment. The overall height of the substation equipment will be approximately the same, and the fenced substation yard will increase from approximately 6,014 square feet to approximately 13,862 square feet. Additionally, the permanent access drive is proposed along the northern fence line of the rebuilt substation, which will facilitate access to the temporary substation yard and the transmission line serving the east side of the substation. The construction of the new access drive will require removal and/or trimming of existing vegetation north of the proposed access drive expansion.

The existing 34.5 kV radial transmission line serving the east side of the existing substation will be removed and new poles, wires and a remotely controlled switch will be installed to create a loop feed into the rebuilt substation. The transmission line changes will consist of removing four existing poles ranging from 40' to 60' in length and approximately 382' of existing three phase overhead transmission line. The installation of the new looped feed will consist of installing nine new poles ranging from approximately 45' to 55' in length. Immediately west of the substation, two existing 40 to 45' distribution poles will be replaced with new 50' poles, and three existing distribution poles along Ballard Road will be replaced with 50' poles. The proposed pole lengths described above are longer than each pole's above-ground height, with approximately 10% plus 2' of each pole's length buried below ground.

Vegetation trimming and/or removal to the west of the rebuilt substation will be required to provide access to the eastern portion of the Project, maintain the safety and reliability of the existing distribution lines west of the substation, as well as to facilitate safe sight lines for vehicles exiting the Project site. See Prefiled Testimony of John Fiske and Exhibits GMP JRF-3 through GMP JRF-8 for further information. An aerial view of the proposed Project and surrounding area is depicted in Figure 1.

II. Methodology – Quechee Test

Section 248(b)(5) of Title 30, Vermont Statutes Annotated requires the Commission to make a finding that a proposed electrical transmission Project will not have an undue adverse effect on aesthetics, as outlined in the so-called "Quechee Lakes Decision."[1] As explained in the Commission's order in Docket No. 6860, the Commission applies the Quechee Test in Section 248 proceedings, as follows:

> The Public Utility Commission has adopted the Environmental Board's Quechee analysis for guidance in assessing the aesthetic impacts of proposed projects under Section 248. We have previously explained the components of the Quechee analysis as follows:
>
> > In order to reach a determination as to whether the project will have an undue adverse effect on the aesthetics of the area, the Board employs the two-part test first outlined by the Vermont Environmental Board in Quechee, and further defined in numerous other decisions.
> >
> > Pursuant to this procedure, first a determination must be made as to whether a project will have an adverse impact on aesthetics and the scenic and natural beauty. In order to find that it will have an adverse impact, a project must be out of character with its surroundings. Specific factors used in making this evaluation include the nature of the project's surroundings, the compatibility of the project's design with those surroundings, the suitability of the project's colors and materials with the immediate environment, the visibility of the project, and the impact of the project on open space.
> >
> > The next step in the two-part test, once a conclusion as to the adverse effect of the project has been reached, is to determine whether the adverse effect of the project is "undue." The adverse effect is considered undue when a positive finding is reached regarding any one of the following factors:

[1] Quechee Lakes Corporation, Applications #3W0411-EB and #3W0439-EB at pgs. 18-20

> 1. Does the project violate a clear, written community standard intended to preserve the aesthetics or scenic beauty of the area?
>
> 2. Have the applicants failed to take generally available mitigating steps which a reasonable person will take to improve the harmony of the project with its surroundings?
>
> 3. Does the project offend the sensibilities of the average person? Is it offensive or shocking because it is out of character with its surroundings or significantly diminishes the scenic qualities of the area?
>
> Our analysis, however, does not end with the results of the Quechee test. Instead, our assessment of whether a particular project will have an "undue" adverse effect on aesthetics and scenic or natural beauty is "significantly informed by overall societal benefits of the project."[2]

T.J. Boyle Associates interprets the first prong of the Quechee test to first require an assessment of the project's visibility. Visibility establishes the underlying method for which all visual aesthetics are evaluated to comply with the purpose of the Quechee Test. For instance, a project's design, materials and colors may be completely out of character with its surroundings, but if such project is not visible to the general public (or "average person"), then there will be no adverse visual effect. Likewise, when a project is determined to be out of character with its surroundings, one solution that the Quechee Test offers to mitigate this is to visually obscure the project with landscape mitigation or other screening, which itself is a simple reduction or occlusion of project visibility. In this way, TJB interprets the first prong of the Quechee Test to be asking, "What is the project's visibility, and is that visibility out of character with its surroundings?" In our experience, if the Quechee Test were not interpreted in this way then a given project could be considered adverse even if it was completely invisible from surrounding areas, which would be an unreasonable interpretation and inconsistent with the purpose of the test.

Our study area for potential adverse aesthetic effects typically extends approximately two miles from a project location. This distance tells us whether a given project is, or is not, visible from prominent or protected locations in the study area, or, perhaps more importantly, if a project itself is in a prominent or highly visible location.

In conducting the Quechee Analysis and preparing this report, three distinct methods have been used: (1) background data collection, (2) GIS viewshed analysis mapping, and (3) field investigation. The GIS viewshed mapping and field investigation are used to identify areas with potential visibility of the Project. The background data and field investigation are used to characterize the study area. All three methods are used to evaluate whether there are in fact 'adverse' impacts and, if so, whether those impacts could be considered 'undue.'

III. Quechee Test Part I – Evaluation of Potential Adverse Impacts

As noted above, GIS aerial and viewshed mapping was utilized as a preliminary evaluation method, the results of which are attached as Appendix A, Maps 1 through 3. During the field review of the proposed Project, it was observed that the potential visibility indicated on the Vegetated Viewshed Map is generally accurate, and visibility is concentrated in the area near the Project site. Visibility from the vast majority of

[2] Petitions of Vermont Electric Power Company, Inc. (VELCO), Vermont Transco, Docket No. 6860, Vt. Pub. Serv. Bd. (Jan. 28, 2005) at 79-81.

the study area was determined to be either highly limited or not possible due to intervening vegetation, buildings and/or landform that surrounds the site and exists along roadways in the area.

Ballard Road

The adjacent portion of Ballard is a paved town highway that connects Route 7 and St. Albans to the north with a separate part of Route 7 to the south. In the area around the Project, Ballard Road runs in a roughly north-south orientation as it proceeds through the town of Georgia, passing west of the Project site. This nearby area of Ballard Road is characterized by low-density residential structures, agricultural structures and fields, scattered forested areas, and substantial electrical distribution infrastructure alongside the road. A farm complex straddles the roadway immediately south and southwest of the Project, and an existing communications tower and battery storage system lie immediately to the south. The landform visible in the area around the Project includes gently sloping terrain in all directions. At the closest location, the expanded substation yard will be located approximately 123' east of Ballard Road, and the fenced substation yard is situated approximately 10' higher than this portion of the roadway (see Appendix B – Photographic Inventory, Viewpoint 1). The existing views along the nearby area of Ballard Road includes at least some visibility of the existing electrical substation, distribution and transmission poles and associated conductors, an existing battery storage facility, an existing communications tower and various agricultural buildings that stand out from the environment.

For travelers approaching the proposed Project from the north on Ballard Road, large existing farm fields on both sides of the road allow for open views of the landscape to the south. When approaching from the north, the proposed vegetation removal and/or tree limbing north of the Project will allow for potential visibility of the substation upgrades, particularly during leaf-off conditions, for a total distance of approximately 1,800' (see Viewpoints 2 through 4 and 1). Project elements such as the proposed substation equipment, transmission line upgrades east of the substation, and rebuilt distribution equipment are expected to be at least partially screened by existing vegetation that will remain immediately north of the Project. Where travelers pass the west side of the Project, existing vegetation near the roadside will be removed in order to maintain the safety and reliability of the existing distribution lines that are located immediately west of the substation, as well as provide adequate sight lines for vehicles exiting the Project property (for a view of the existing roadside vegetation west of the substation, see Viewpoint 7). This vegetation removal will open views to the substation site from Ballard Road for an additional 115', after which the Project will move beyond 90 degrees from the direction of travel and out of view. At a speed of 35 miles per hour, some portion of the Project upgrades will potentially be visible for approximately 37 seconds when traveling south on Ballard Road.

When headed northbound on Ballard Road, intervening vegetation and buildings will highly screen the proposed Project as travelers approach from the south (see Appendix B, Viewpoints 5 through 7). At Viewpoint 7, the Project will become visible due to removal of vegetation near the road (discussed above) for approximately 115', after which the Project will move beyond 90 degrees from the direction of travel and out of view. Due to intervening vegetation and substation, views of the proposed transmission structure upgrades are expected to be less noticeable for northbound travelers. At a speed of 35 miles per hour, a total of approximately 2 seconds of potential visibility of the Project will be possible when heading north.

Sodom Road

Sodom Road is a paved town highway that connects Sand Hill and Sandy Birch Roads at its southwest extent, and dead-ends at Ballard Road at its eastern extent. In the area around the Project, Sodom Road extends in an east-west orientation, dead-ending just southwest of the Project site. This nearby area of Sodom Road is characterized by agricultural buildings and fields, as well as a forested area and low-density

residential uses to the west. A farm complex lies south of the eastern terminus of the road, and the existing communications tower is visible to the east. At the closest location, the Project will be setback approximately 260' from the eastern terminus of Sodom Road, and is situated approximately 14' higher than the eastern end of Sodom Road. The existing views along the nearby area of Sodom Road includes at least some visibility of the existing electrical substation, distribution and transmission poles and associated conductors, an existing battery storage facility, an existing communications tower and various agricultural buildings that stand out from the environment.

For eastbound travelers on Sodom Road, the proposed Project will be highly screened until travelers exit the surrounding forest approximately 1,750' west of the substation (see Viewpoint 8). From this location, the proposed clearing immediately west of the Project (along Ballard Road) will allow for visibility of the proposed substation rebuild, as well as the proposed transmission structures to the east of the substation. Similar visibility of the Project will continue for approximately 1,400' as travelers approach the Sodom Road terminus at the "T" intersection with Ballard Road (see Viewpoint 9), after which the proposed substation and transmission improvements will become substantially screened by intervening deciduous vegetation (see Viewpoint 10). The proposed Project will continue to be well screened for travelers stopped at the intersection of Sodom and Ballard Roads, particularly during leaf-on conditions. At a speed of 35 miles per house, potential Project visibility from Sodom Road would occur for approximately 27 seconds.

When headed westbound on Sodom Road, the Project is behind the direction of travel and out of view.

Other Surrounding Areas and Distant Views

During the field review of the proposed Project, it was observed that surrounding roadways other than Sodom and Ballard Roads will not have significant visibility of the Project due to intervening topography and/or vegetation. These include, but are not limited to, US Route 7, Decker Road, Plains Road and Interstate 89.

Private Residences

The nearest residence is located on Ballard Road, approximately 725' south of the proposed substation fence. Due to the presence of intervening vegetation, agricultural buildings, and landform, this and other residences further south are not expected to have substantial visibility of the proposed Project.

North of the Project on Ballard Road, the nearest residence is located approximately 1,670' north of the proposed substation fence, and a view to the south across the nearby agricultural fields is currently possible from this residence. Due to removal and/or trimming of the existing vegetation immediately north of the Project, new visibility of the Project site will be possible from this residence. Several other residences are located further north, though potential visibility of the proposed Project decreases in this direction due to intervening vegetation and buildings.

On Sodom Road, a residence is located approximately 1,725' west of the proposed substation fence, and new visibility of the Project site will likely be possible from this residence due to the removal of vegetation west of the substation along Ballard Road.

Similar to existing views from nearby portions of Sodom and Ballard Roads, existing views from this direction already include at least some visibility of the existing electrical substation, a communications tower, distribution and transmission poles and associated conductors, a battery storage facility, and various agricultural buildings that stand out from the environment.

Suitability of Colors and Materials for the Project

The Project materials and colors will be galvanized steel equipment and associated frame structures, galvanized steel mesh fence, gravel access drive, metal conductors and wooden pole structures. Other similar materials and colors currently exist at the site and in the nearby area, including the galvanized metal materials of the existing substation and fence, metal conductors and wooden poles of the existing nearby transmission and distribution lines, a galvanized metal monopole communications tower, nearby agricultural structures of various materials and colors that stand out from the environment, and the existing gravel access drive and substation yard. For these reasons, the Project colors and materials are considered compatible with the existing conditions at and around the Project site.

Impact on Open Space

Previous Act 250 and Section 248 decisions do not clearly define the term "open space." The *Northwest Region Plan*, amended September 24, 2024 ("Regional Plan"),[3] does not clearly define the term "open space" or depict areas where it is located. The *Town of Georgia, Vermont 2024 Town Plan*, adopted January 6, 2025 ("Town Plan")[4] also does not define open space. The Town Plan does insinuate that agricultural "land use types" are associated in some way with open space (see Appendix E – Regional and Town Plan Excerpts, Town Plan at pgs. 31 and 33). The Town Plan goes on to state that "[m]uch of Georgia outside of the traditional village centers has historically been agricultural lands and open space which contribute greatly to the rural character of the town" and that "[l]and here should be developed so that large contiguous (non-fragmented) expanses of agricultural, forestry, significant geological areas, wildlife habitat, scenic areas, and other important open space land will be protected" (Town Plan at p. 33-34). Neither the Regional nor Town plan describes how impacts to open space should be described or evaluated, though the Town Plan does include a goal to "[p]rotect the existing open spaces, agricultural lands and scenic views which define Georgia's rural character" (Town Plan at p. 57).

Because the site is an existing electrical substation that currently connects to GMP's existing transmission and distribution lines, is not publicly accessible, and is not currently used for agricultural or recreational use, or otherwise identified as open space in the Town Plan mapping, the Project site is not considered "open space." While the proposed substation equipment upgrades and interconnection will potentially be visible from Ballard Road and Sodom Road, the Project is in the context of the existing substation, existing transmission and distribution lines, existing communications tower, and existing batter storage facility. As such, the Project is not considered to have an impact to "open space."

Summary of Quechee Test Part I

This review of aesthetic impacts found that the proposed Project will be visible from the two nearest public roadways in the study area, with minor to no visibility from other roadways. Where visible, the proposed Project elements will appear similar to the existing substation, transmission lines and distribution lines that are currently visible in the landscape. The colors and materials of the proposed Project will be compatible with the existing substation, existing transmission and distribution lines, existing communications tower, existing battery storage facility, and various agricultural buildings that stand out from the environment. The Project will not result in an impact to "open space" in the area. However, the Project will introduce an incremental increase in substation infrastructure, particularly for views from adjacent areas of Ballard and Sodom Road, and will remove or trim vegetation that currently screens the existing substation. For this reason, the Project will result in an adverse impact to the aesthetics and scenic and natural beauty of the area. Therefore, a review under the second part of the Quechee Test is provided below.

[3] https://www.nrpcvt.com/wp-content/uploads/2024/09/ADOPTED_RegionalPlan_2023_Updated.pdf
[4] https://www.townofgeorgia.com/media/6251

IV. Quechee Test Part II – Evaluation of Potential Undue Adverse Impacts

i. Community Standards Review

Although Section 248 projects are exempt from municipal zoning and related permits, local plans and regulations are reviewed under the second prong of the Quechee test where it has been determined that a project may have a potential adverse visual impact. Under Quechee, this involves an assessment as to whether or not a project violates a clear, written community standard intended to preserve the aesthetics or scenic beauty of the area. In Docket No. 7508, the Public Utility Commission held that "[i]n order for a provision to be considered a clear, written community standard, it must be 'intended to preserve the aesthetics or scenic beauty of the area' where the proposed project is located and must apply to specific resources in the proposed project area." The Commission clarified that generalized statements and general scenic resource policies that are not focused on a particular scenic resource or that fail to offer specific guidance or measures to protect the resource cannot be considered "clear written community standards." The Commission has further clarified that any such standard must expressly "designate the [project] parcel as a scenic resource worthy of protection."

The Vermont Supreme Court ("VSC") has also shed light on the scope of what qualifies as specific, clear written standards, stating that "[i]n contrast to the Act 250 context, § 248 review supplants rather than supplements local zoning regulation."[5] Accordingly, the VSC held that language such as "the purpose of the Rural Conservation Districts is to preserve this distinctive rural character while accommodating low density residential development . . . Agriculture, forestry, very low density single-family residential development, and certain limited uses that are suitable in rural areas are permitted in the district" are "broad and general statements in the Town and Regional Plans [that] are not sufficiently specific to constitute a basis for denying a permit under § 248."[6] The VSC clarified the issue further, stating "our case law supports the conclusion that indications in the Town and Regional Plans that development in the Rural Conservation District or outside of the urban center should be compatible with the area's rural character are not clear, written community standards such that violation renders the project's adverse impact undue under § 248(b)(5)."[7] As such, the particular language used within Town and Regional Plans is important for determining whether a standard is clearly written and specifically applies to a given Project.

Available local and regional planning documents were reviewed to determine if the Project would violate a clear written community standard. The following sections of this review discuss the community scenic quality standards as detailed in the Regional Plan, the *Northwest Regional Energy Plan* adopted September 25, 2024 ("Regional Energy Plan")[8] and the Town Plan; the relevant pages from these plans are included in Appendix E – Regional and Town Plan Excerpts.

1. Regional Plan

PHYSICAL REGION – NATURAL & CULTURAL RESOURCES

Beyond the historical richness of the region, Northwest Vermont boasts a robust mosaic of diverse landscapes, from the Adirondacks-backed agricultural viewsheds of the Lake Champlain islands to the heavily wooded western slopes of the Green Mountains. With sensitive siting and design, it's possible for scenic landscapes to be developed and still retain

[5] In re *Petition of Apple Hill Solar LLC*, 2021 VT 69 at ¶ 33
[6] *Id* at ¶¶ 34 and 36.
[7] *Id* at ¶ 37.
[8] https://www.nrpcvt.com/wp-content/uploads/2024/09/FinalEnergyPlan_9.25.2024.pdf

much of their intrinsic character. Aesthetic considerations are recognized as a legitimate public concern under Criterion 8 of Act 250. Conserving the region's aesthetic resources is crucial to maintaining its sense of place.
(Regional Plan at p. 85)

Scenic Resources:
The region's scenic resources are plentiful and include both natural and human-influenced elements. Undeveloped ridgelines are among the region's highly valued natural scenic resources, serving both as vantage points (the areas we enjoy views from) and as terminal views (and create the scene we are enjoying through our observation). Because impacts on scenic resources are assessed as part of the Act 250 development review process, communities in the Region may wish to incorporate a scenic resource assessment as part of their planning processes.

GOAL 1 Protect significant natural resources, including air, wetlands, wildlife, lakes, ponds, woodlands, earth resources, open spaces, groundwater resources and wildlife habitat.

GOAL 2 Protect and conserve historically significant buildings and locations, archaeological resources, and important scenic and aesthetic resources identified in local and regional plans.

d. Encourage energy generation and distribution facilities to minimize their visual impact on ridgelines, slopes and open areas.

(Regional Plan at pgs. 96-97)

PHYSICAL REGION – LAND USE

Proposed Land Use
The NRPC has divided the region into several proposed land use planning areas to encourage the conservation of valued resources and a development pattern that will maintain the character and quality of life that is important to this region…

Land Use Planning Areas
Agricultural Resource Planning Areas: Agricultural Resource Planning Areas represent the best farmland in the region and shall be given the highest level of support for their continued use as active agricultural lands. Nearly 39% of the region is included in this category, reflecting the significant acreage of prime agricultural soils, the large number of farms in the Northwest and the importance of agriculture in the region's economy. Strategies that support the long-term protection of these lands from conversion to non- agricultural use are supported by NRPC. Where development does occur, it shall be located to minimize impact to primary agricultural soils. Recognizing the importance of farming to the region's character and economy, and also recognizing that existing farms may occupy some good farming lands that would otherwise be categorized as Forest and Conservation Planning Area, Agricultural Resource Planning Areas were given precedence over the Forest and Conservation designation. For example, if a particular area has characteristics of both an Agricultural Resource Planning Area and a Forest and Conservation Planning Area, the area would be characterized as the former.
(Regional Plan at pgs. 103-104)

Goals and Policies
Goal 1 Ensure the region continues to be characterized by compact villages and growth centers separated by rural countryside and the working landscape.

e. Ensure that the scale, siting, design and management of new development respect the existing landscape and the character of the area's built environment.

(Regional Plan at p. 108)

2. Regional Energy Plan

SECTION VI. FEASIBILITY AND CHALLENGES

B. Implementation Challenges

• Grid Limitations – The Vermont electrical grid was developed to have a one-way flow of electricity and distributed renewable generation can impact the function of the electrical grid…

… According to Green Mountain Power, its portion of the regional grid should be able to deal with additional solar generation, but there is less information available from VEC, the Village of Swanton, and the Village of Enosburg Falls. If the region and state are going to become more reliant on distributed solar generation, or even become a net exporter of renewable energy, Vermont public utilities and Vermont Electric Power Company (VELCO) will need to increase the pace of system-wide upgrades.

(Regional Energy Plan at p. 54)

3. Town Plan

PART II – GEORGIA TODAY
The Community Setting - Location and Boundaries
The Town is characterized by a narrow shoreline, a broad, relatively flat plain, the foothills of the Green Mountains, the Lamoille River and tributaries, as well as various other smaller streams, tributaries and wetlands. The Town is roughly half open land and half forested, with much of the open land devoted to agriculture.
(Town Plan at p. 5)

Electric and Gas Service
…Green Mountain Power (GMP) serves a majority of the residential, commercial and industrial electrical needs of the town…
(Town Plan at p. 14)

Existing Land Use
Agricultural/Open Space. Much of Georgia outside of the traditional village centers has historically been agricultural lands and open space which contribute greatly to the rural character of the town…These lands provide agricultural industry, popular scenic vistas, and important wildlife habitat which must be balanced against the desire for future development.

Existing Zoning
Agricultural/Rural Residential (AR-1). The primary purpose of this district is to provide a place in Georgia for agriculture and silviculture uses, and encourage development in other areas of town. Residential and other uses permitted in the district are intended to be very low density and should not interfere with the agricultural and rural nature of the district, and should not place an unreasonable burden on the town's ability to provide and maintain services to all residents. Land here should be developed so that large contiguous (non-fragmented) expanses of agricultural, forestry, significant geological areas, wildlife habitat, scenic areas, and other important open space land will be protected.
(Town Plan at pgs. 33-34)

Existing Physical Setting
Scenic Resources
The views and scenic beauty of the Georgia landscape are greatly valued and appreciated by residents and visitors alike. Georgia's gradual transition from the foothills to the lake provides beautiful scenery: The juxtaposition of rolling farmland, historic settlements, and forest within the Champlain lowlands creates a landscape that enhances our community and our quality of life. The scenic resources of our town take many forms, including ridgelines, the foregrounds of distant views, open agricultural lands, vistas of the lake, scenic roadways and historic village settlements. Lake Champlain is particularly important as visual and aesthetic resource for the Town of Georgia. To the west, we enjoy beautiful views of the Adirondacks and to the east we see the Green Mountains. The shoreline itself is a scenic resource and is particularly sensitive to human and natural change. These resources are highly regarded yet often difficult to quantify and map like other elements, though they are no less important.
(town Plan at pgs. 46-47)

PART III – GEORGIA TODAY
Protection of Local Character & Natural Resources
An overarching theme emerging from the public input was a strong desire by many residents to protect the Town of Georgia from changes which would erode its historic rural setting and natural resources. This position was supported in the public comments and responses to several survey questions. When asked in the survey to identify which factors were most important for managing future growth and development in the town, the top three responses were: protection of water quality and natural resources, protection of local working farms and agricultural lands, and protection of small-town rural character and scenic views…
Specific natural resources suggested for protection included Lake Champlain, Arrowhead Lake, Silver Lake, as well as local wetlands and streams. The view of Lake Champlain along Georgia Shore Road was often suggested as an area for viewshed protection.

Plan Goals:
Protect the existing open spaces, agricultural lands and scenic views which define Georgia's rural character.

Protection of Historic & Cultural Resources
Much like our natural resources, the cultural and historic artifacts of our community help to define the rural character of Georgia. As with many Vermont towns, the value of Georgia's cultural and historical resources is greater than the sum of its parts. The development pattern of villages and countryside, the context for Georgia's historic sites, is a valuable asset.
Plan Goals:
Ensure that Georgia's noteworthy historic and cultural resources remain intact.
(Town Plan at pgs. 56-58)

Energy, Sustainability and Resilience
Plan Goals:
Public utilities and services should be enhanced in ways that improve economic development opportunities and quality of life, but that do not jeopardize public health, the environment or scenic resources.
(Town Plan at p. 70)

PART IV – VISION, GOALS & POLICIES
Future Land Use
Agricultural Residential. The Agricultural / Residential character area largely covers the areas currently zoned as "Agricultural / Rural Residential" (AR-1), covering a significant percentage of town. This character area largely defines the natural and rural residential character of Georgia as an agricultural community… Land should be developed so that large contiguous expanses of agricultural, forestry, significant geological areas, wildlife habitat, scenic areas, and other important open space land will be protected.
(Town Plan at p. 75)

PRIORITY RECOMMENDATIONS
Protection of Town Character and Resources. A top priority and theme emerging from this planning effort was the desire to protect and maintain the existing rural character which defines much of Georgia. The town should begin by considering regulatory options for the protection of important local viewsheds…
(Town Plan at p. 83)

A – Historic & Cultural Resources
Policies:
A3. To encourage innovation in design and layout of development so that the visual impact can be minimized.
A4. To encourage the use of vegetative buffers and other screening methods to reduce the visual impact of development.

B – Scenic & Natural Resources
Policies:
B13. Conduct a study of specific scenic resources and viewsheds within the town to identify locations and potential protection options.
B14. Site planning should try to take into consideration the preservation of unique or sensitive site features such as old growth trees, historic stone walls, hedgerows, streams, viewsheds and similar elements to design with the land.
B20. Development on ridges and hilltops shall be discouraged and their adverse aesthetic and environmental impacts should be prevented.
(Town Plan at pgs. 87-88)

F – Town Services & Infrastructure
Policies:
F16. All commercial telecommunication facilities, utilities, solar and wind energy systems shall be located in appropriate areas, respecting the integrity of residential areas, aesthetic concerns, and natural resource issues. As noted elsewhere in the Plan, the protection of scenic and natural areas is very important to the Town of Georgia.
F18. Locate infrastructure facility and service improvements in existing development areas and areas that are designated for future growth.
(Town Plan at p. 98)

H – Future Land Use
Policies:
H1. Encourage the preservation of land in an agricultural, wooded or open state, particularly in areas of the town which are important scenic viewsheds and not well connected to service systems.

H7. Georgia's rural landscape shall continue to be characterized by open land agricultural fields and forests. Agriculture shall be the predominant use in the Agricultural/Rural Residential District ("AR 1").
(Town Plan at pgs. 102-103)

Analysis of the Regional Plan, Regional Energy Plan and Town Plan
In general, the Regional Plan and Regional Energy Plan cover a wide range of topics for the region including land use, housing, economics, cultural resources, energy generation and consumption, as well as other community issues. No clearly written standards or recommendations were found in the Regional Plan or Regional Energy Plan indicating specifically that the Project site is considered to be a scenic resource. A review of the Regional Plan Maps and Regional Energy Plan maps did not identify any specific scenic resources at or around the site, and the Project is not within a conservation area (see Appendix E, Regional Plan, Map 10 – Conserved Land at p. 93).

Regarding the Town Plan, while the Project is located within the "Agricultural/Rural Residential, AR-1" district and within the "Agricultural Residential" future land use type (see Appendix E, Town Plan Existing Zoning Map at p. 32 and Future Land Use Vision Map at p. 77, respectively), the Project is also clearly within an existing "Utilities Electric" area (see Appendix E, Town Plan Assessed Land Use Map at p. 30). Because the Project does not compromise any specific standards related to the aesthetics of the area, is located on an existing electrical substation with existing adjacent transmission and distribution lines, and is adjacent to a communications tower and battery storage facility, it is determined that the Project as proposed is compatible with the existing site and adjacent development.

Based on this review of the Regional Plan, Regional Energy Plan and Town Plan, the proposed Project will not violate any clearly written community standard intended to preserve the aesthetics or scenic beauty of the area. These plans generally encourage the development of renewable energy sources and do not clearly specify the Project site as a scenic resource. As such, it is determined that the Project as proposed is compatible with the Regional Plan and Regional Energy Plan. However, language in the Town Plan was found regarding the preservation of existing open views of agricultural landscapes as well as preserving wooded areas (see Appendix E, Town Plan at pgs. 87-88 and 102-103). Based on this language, landscape mitigation is warranted to help screen the proposed improvements and maintain the existing character where feasible.

ii. Generally Available Mitigating Steps which a Reasonable Person would Take to Improve the Harmony of the Project with its Surroundings

The Project includes mitigating elements that help to reduce potential adverse aesthetic impacts. Mitigation for the Project includes the following components:

- The Project utilizes existing facilities where a substation and associated equipment is already visible from the surrounding landscape. The Project proposes upgrades to an existing substation with an expanded fenced yard, reconfigured access drive and associated changes to nearby transmission and distribution structures.

- Landscape mitigation plantings are proposed to help soften potential views of the Project and harmonize the rebuilt substation with the surrounding landscape, including providing new screening north and west of the proposed substation expansion to help screen the Project from Ballard and Sodom Roads and offset vegetation removal needed for the Project upgrades, electrical clearances and traffic safety. A landscape mitigation plan is included in the petition (see Appendix C –Landscape Mitigation Plan).

iii. Shocking or Offensive

When evaluating whether a project will offend the sensibilities of the average person, the criterion to make this assessment is related back to the first part of the Quechee Test: how the project 'fits' within its surroundings. An 'average person' is considered a disinterested party, not an affected neighbor. The threshold for a project to be shocking or offensive is high, and a project will need to be entirely inconsistent with the surrounding land uses or exceptionally out of scale with the surroundings.

Although the Project is considered adverse to the aesthetics and scenic and natural beauty of the area, the Project will not offend the sensibilities of the average person and it will not be offensive or shocking. This determination is based on factors that were assessed during the aesthetic analysis:

- The Project represents an upgrade to an existing electrical substation facility that is an established component of the visual landscape in the Project location. New substation components will be approximately the same overall height as existing conditions, proposed transmission and distribution poles will be similar to existing transmission and distribution poles, and the Project is located in an area with existing electrical transmission and distribution infrastructure that is currently visible from the adjacent roadways and residential uses.
- Landscape mitigation is proposed to help reduce visibility of the proposed Project elements, as well as help offset the proposed vegetative clearing and cutting, helping to visually harmonize the Project with its surroundings.

For the above reasons, we find that the Project as proposed will not be shocking or offensive.

V. Conclusions of the Aesthetic Analysis

In review, the findings of this analysis conclude the overall visual impact of the GMP Georgia Substation Rebuild Project will result in an ADVERSE impact to the aesthetics of the area in which it is being proposed. However, these impacts will NOT be considered UNDUE for the following reasons:

1) The conformance review found that the Project will not violate a clear, written community standard intended to preserve the aesthetics or scenic beauty of the area.

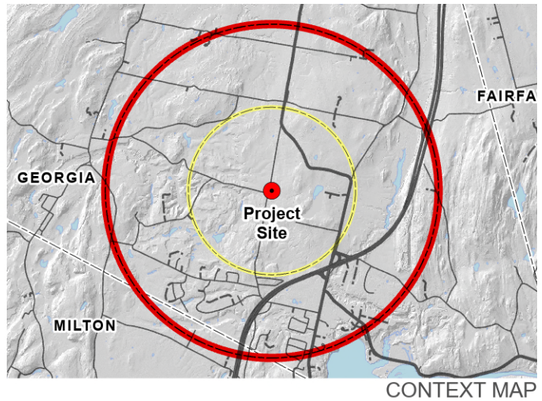
2) GMP has proposed reasonable mitigation steps to mitigate the Project, including:
    a. Upgrading the substation on the existing site, where existing electrical transmission and distribution infrastructure is currently visible in the landscape.
    b. A proposed landscape mitigation plan has been prepared that will help screen the Project from Ballard and Sodom Roads and offset vegetation removal needed for the Project upgrades, electrical clearances and traffic safety.

3) The Project will not be shocking or offensive:
    a. The Project represents an upgrade to an existing electrical substation facility that is an established component of the visual landscape in this location. New substation components will be approximately the same overall height as existing conditions, and the Project is located in an area with existing electrical transmission and distribution infrastructure that is currently visible from the adjacent roadways and residential uses.
    b. Landscape mitigation is proposed to help reduce the impact of the proposed vegetative clearing and harmonize the Project with its surroundings.

In conclusion, the GMP Georgia Substation Rebuild Project meets the Quechee Test insofar as its impact on aesthetics will NOT be UNDULY ADVERSE.

VI. List of Appendices

Appendix A - Map 1 Aerial
Appendix A - Map 2 Terrain Viewshed
Appendix A - Map 3 Vegetated Viewshed
Appendix B - Photographic Inventory
Appendix C - Landscape Mitigation Plan
Appendix D - Cross Sections
Appendix E - Regional and Town Plan Excerpts



CONTEXT MAP

Georgia Substation Rebuild

Appendix A

MAP 1: AERIAL CONTEXT MAP

March 2026

LEGEND

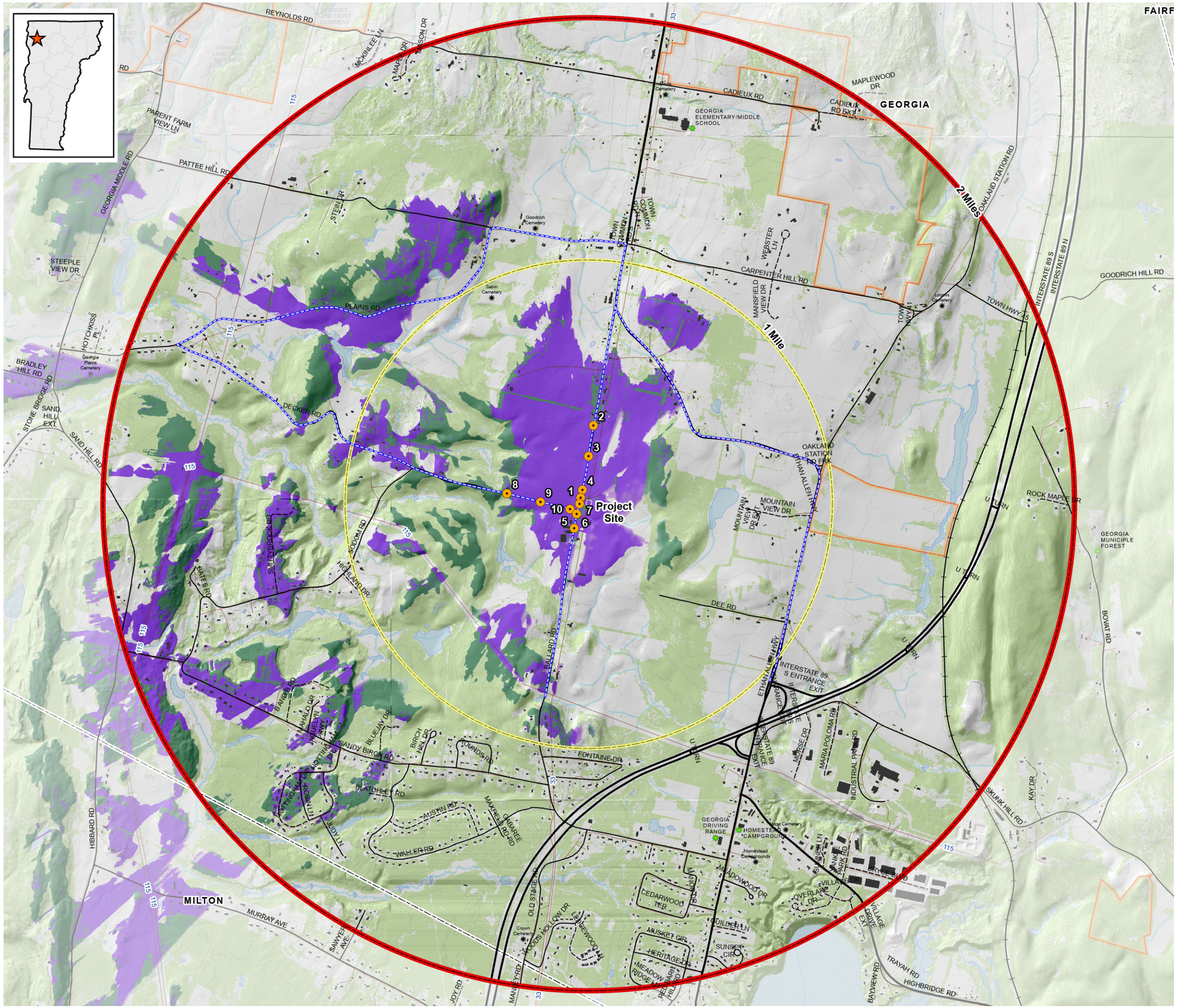
- Viewpoint Location
- Landmarks
- Utility Lines
- Inventory Route
- 1-Mile Radius
- Town Boundary
- Vermont Protected Lands
- Hydrology

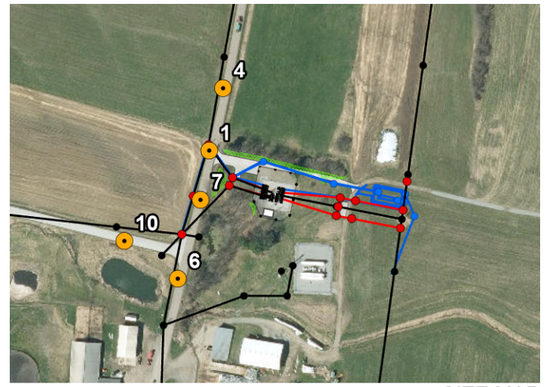
NORTH

0 0.25 Miles

Service Layer Credits: World Imagery: Vantor

T.J. BOYLE ASSOCIATES
LANDSCAPE ARCHITECTURE & PLANNING





SITE MAP

Georgia Substation Rebuild

Appendix A

MAP 2: TERRAIN VIEWSHED MAP

[2-Mile Study Area]

March 2026

LEGEND

- Viewpoint Location
- Landmarks
- Recreation Sites
- Utility Lines
- Inventory Route
- 20' Contours
- Railroads
- 2-Mile Study Area
- Town Boundary
- Hydrology
- Vermont Protected Lands

Potential Visibility within Forested Areas

Low High

Potential Visibility within Non-Forested Areas

Low High

NORTH

0 0.25 0.5 0.75 Miles

GIS viewshed mapping is a preliminary means of visual analysis. While beneficial for preliminary orientation and investigation, because of data assumptions and omissions, viewshed maps are not a definitive indication of visibility. Potential visibility needs to be confirmed through field investigation and other visualization techniques.

Elevation data derived from LiDAR data and/or the National Elevation Dataset.

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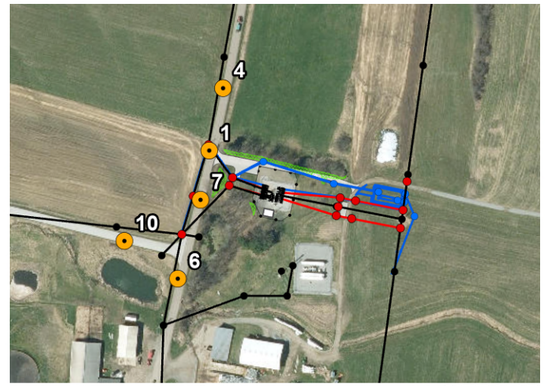

SITE MAP

Georgia Substation Rebuild

Appendix A

MAP 3: VEGETATED VIEWSHED MAP

[2-Mile Study Area]

March 2026

LEGEND

- Viewpoint Location
- Landmarks
- Recreation Sites
- Inventory Route
- Utility Lines
- 20' Contours
- Railroads
- 1-Mile Radius
- 2-Mile Study Area
- Town Boundary
- Hydrology
- Vermont Protected Lands

Potential Visibility within Non-Forested Areas

Low — High

NORTH

0 0.25 0.5 0.75 Miles

GIS viewshed mapping is a preliminary means of visual analysis. While beneficial for preliminary orientation and investigation, because of data assumptions and omissions, viewshed maps are not a definitive indication of visibility. Potential visibility needs to be confirmed through field investigation and other visualization techniques.

Elevation and obstruction data derived from LiDAR data, aerial imagery, the National Elevation Dataset and the National Land Cover Database.

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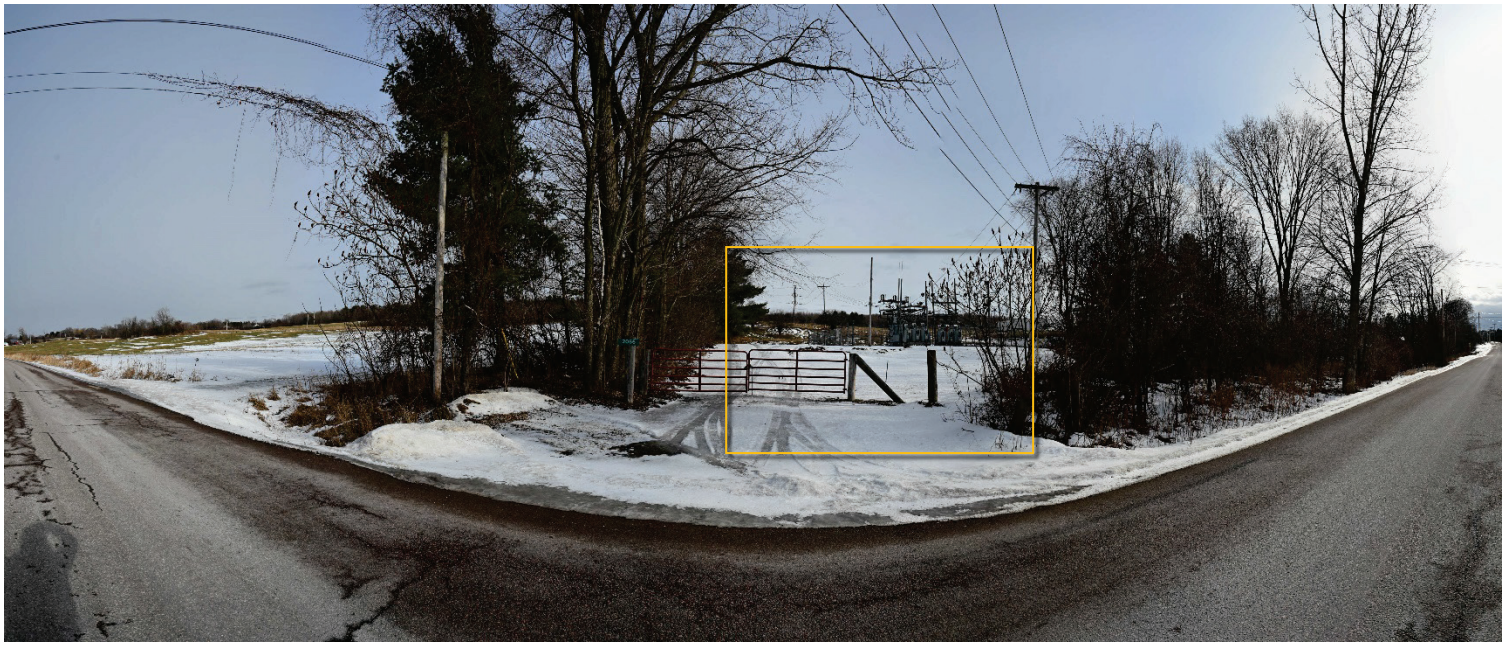


Viewpoint 1: Approximately 180° panoramic view from Ballard Road west of the Project site, panning from northeast (left) to southwest (right). The orange rectangle represents the image below, which is captured with a 50mm focal length.

Viewpoint 1: View from Ballard Road looking southeast at the existing substation and background transmission lines. (50mm)

Viewpoint 2: Approximately 180° panoramic view from Ballard Road north of the Project site, panning from northeast (left) to southwest (right). The orange rectangle represents the image below, which is captured with a 50mm focal length.

Viewpoint 2: View from Ballard Road looking south towards the Project site. Existing transmission poles and communications tower are visible at far left and center left, respectively. (50mm)

Viewpoint 3: Approximately 180° panoramic view from Ballard Road north of the Project site, panning from northeast (left) to southwest (right). The orange rectangle represents the image below, which is captured with a 50mm focal length.

Viewpoint 3: View from Ballard Road looking south towards the Project site. Existing transmission poles and communications tower are visible at far left and center left, respectively. (50mm)

Viewpoint 4: Approximately 180° panoramic view from Ballard Road north of the Project site, panning from northeast (left) to southwest (right). The orange rectangle represents the image below, which is captured with a 50mm focal length.

Viewpoint 4: View from Ballard Road looking southeast towards the existing substation. (50mm)

Viewpoint 5: Approximately 180° panoramic view from Ballard Road south of the Project site, panning from west (left) to east (right). The orange rectangle represents the image below, which is captured with a 50mm focal length.

Viewpoint 5: View from Ballard Road looking northeast towards the Project site. (50mm)

Viewpoint 6: Approximately 180° panoramic view from Ballard Road south of the intersection with Sodom Road, panning from west (left) to east (right). The orange rectangle represents the image below, which is captured with a 50mm focal length.

Viewpoint 6: View from Ballard Road looking northeast towards the Project site. (50mm)

Viewpoint 7: Approximately 180° panoramic view from Ballard Road north of the intersection with Sodom Road, panning from north (left) to south (right). The orange rectangle represents the image below, which is captured with a 50mm focal length.

Viewpoint 7: View from Ballard Road looking east towards the existing substation. (50mm)

Viewpoint 8: Approximately 180° panoramic view from Sodom Road west of the Project site, panning from northwest (left) to southeast (right). The orange rectangle represents the image below, which is captured with a 50mm focal length.

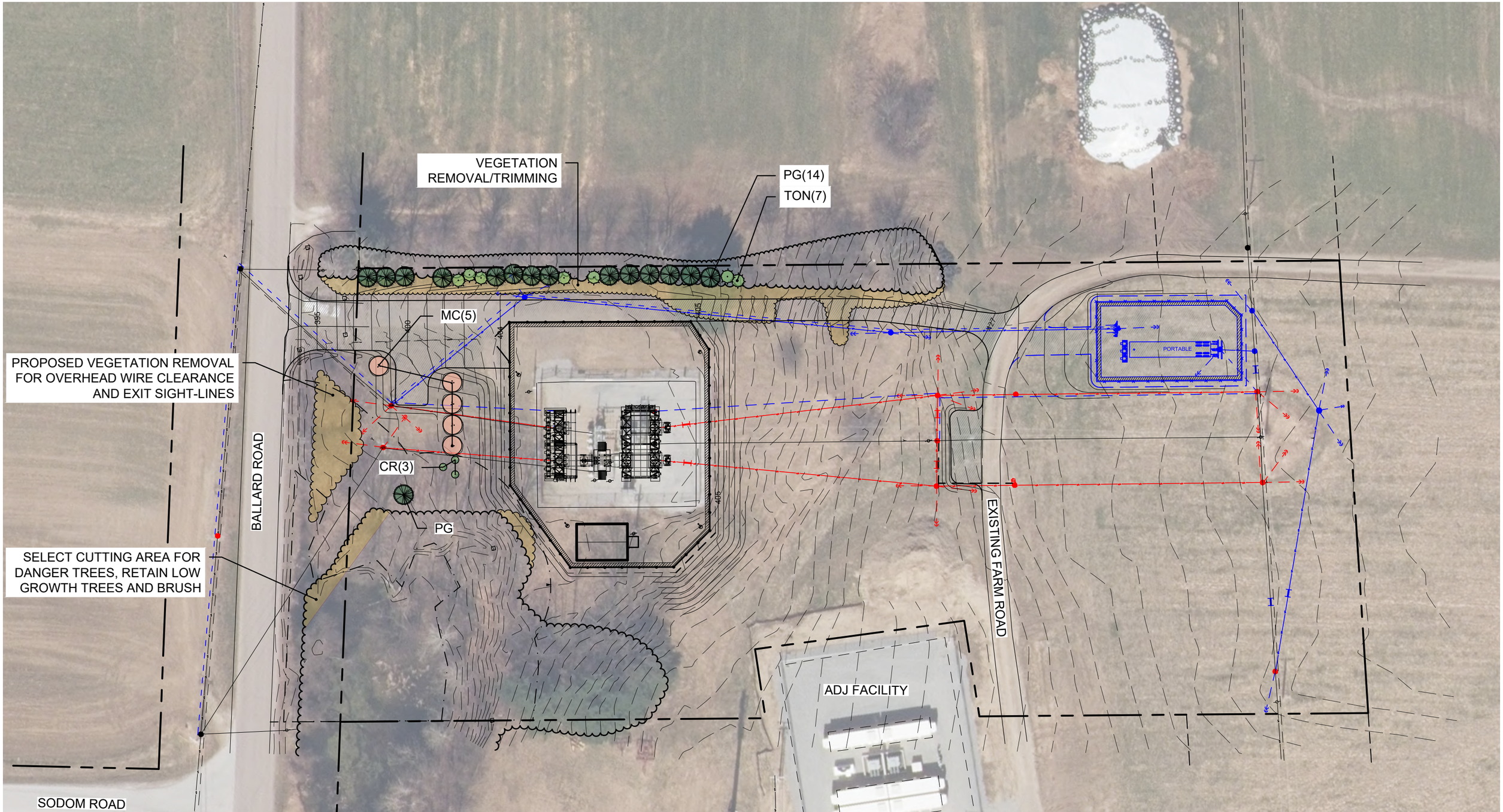
Viewpoint 8: View from Sodom Road looking east towards the Project site. Existing transmission poles and conductors are visible crossing the view in the background, distribution poles and conductors are visible along the roadsides, and the communications tower is visible beyond the end of Sodom Road. (50mm)

Viewpoint 9: Approximately 180° panoramic view from Sodom Road west of the Project site, panning from north (left) to south (right). The orange rectangle represents the image below, which is captured with a 50mm focal length.

Viewpoint 9: View from Sodom Road looking east towards the Project site. Existing transmission poles and conductors are visible crossing the view in the background, distribution poles and conductors are visible along the roadsides, and the communications tower is visible beyond the end of Sodom Road. (50mm)

Viewpoint 10: Approximately 180° panoramic view from Sodom Road west of the intersection with Ballard Road, panning from north (left) to south (right). The orange rectangle represents the image below, which is captured with a 50mm focal length.

Viewpoint 10: View from Sodom Road looking northeast towards the Project site. Distribution poles and conductors are visible along the roadsides as well as connecting to the existing substation. (50mm)



NOTES:

- ALL PLANTINGS TO BE FIELD LOCATED
- PLANTS WITHIN WETLAND BUFFERS TO BE HAND-DUG
- ALL PLANTS INSTALLED AT OR BEYOND 10' FROM SUBSTATION FENCE AS SHOWN

PLANTING SCHEDULE

TREES/LARGE SHRUBS

QTY	CODE	SCIENTIFIC NAME	COMMON NAME	SIZE	SPEC	NOTES	MAX SIZE
3	CR	CORNUS racemosa	Gray Dogwood	3'	#7		10'-15'H x 10'-15'W
5	MC	MALUS 'Donald Wyman'	Donald Wyman Crabapple	1.5" cal.	B&B	Substitutions: M. 'Cardinal', M. 'Louisa'	15-20'H x 20-25'W
15	PG	PICEA glauca	White Spruce	6' Ht.	B&B		50-80'
7	TON	THUJA occidentalis 'Nigra'	Dark Green Arborvitae	5' Ht.	B&B		15-30'

T.J. BOYLE ASSOCIATES
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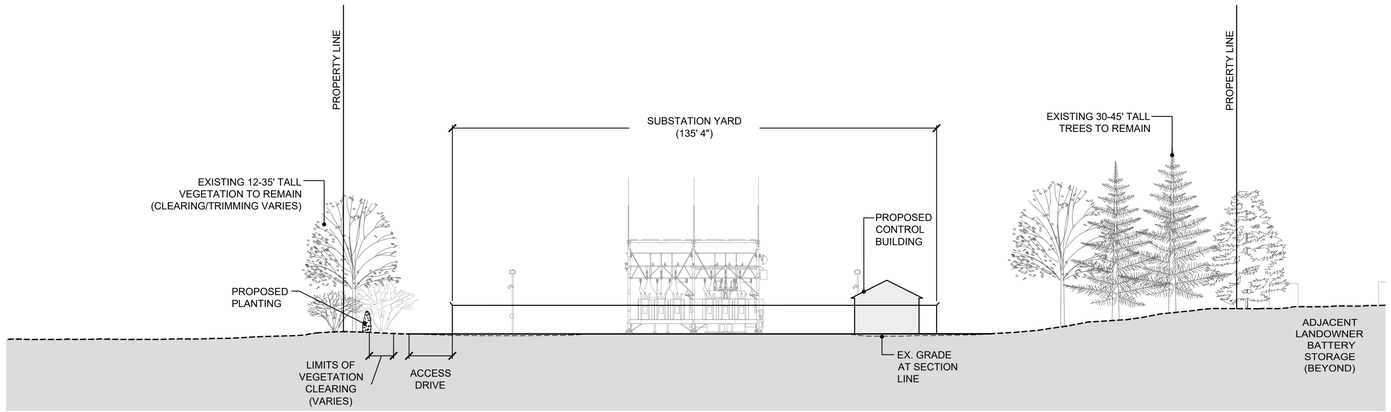
SCALE: 1" = 50'
0 25' 50' 100'

GEORGIA, VT
DATE: MARCH, 2026

GMP GEORGIA SUBSTATION REBUILD

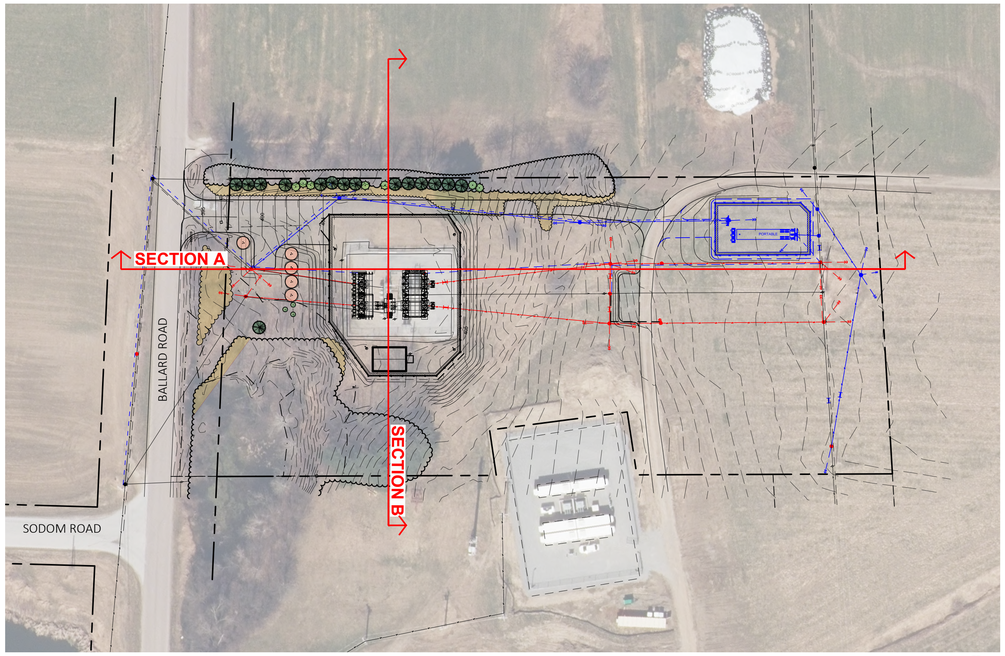
APPENDIX C - LANDSCAPE MITIGATION PLAN

SHEET: L1

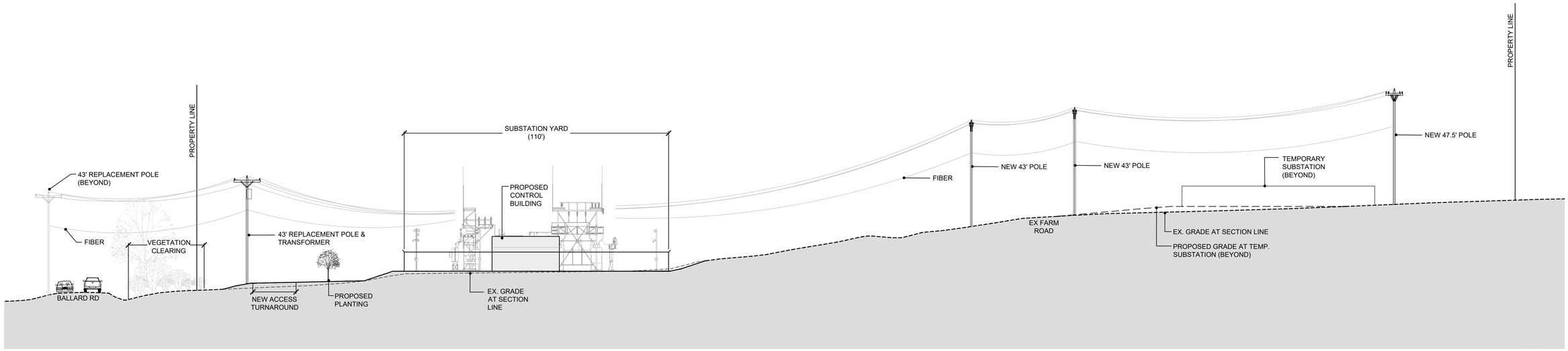


B SECTION B: LOOKING EAST

SCALE 1" = 20'



CONTEXT MAP



A SECTION A: LOOKING NORTH

SCALE 1" = 20'

NOTES:
* POLE HEIGHTS SHOWN AS ABOVE GROUND LENGTH ("AGL")
* CONDUCTORS, FIBER AND TRANSFORMER SHOWN IN APPROXIMATE LOCATION/SIZES

T.J. BOYLE ASSOCIATES
LANDSCAPE ARCHITECTURE & PLANNING

REVISIONS	DATE	REVISIONS	DATE

SCALE: 1" = 20'
0 10' 20' 40'

GEORGIA, VT

DATE: MARCH, 2025

GMP GEORGIA SUBSTATION REBUILD

APPENDIX D - CROSS SECTIONS SHEET: L2