



July 26, 2022

Holly R. Anderson
Clerk of the Commission
112 State Street
Montpelier, VT 05620-2701

Re: NRPC Comments – Industrial Tower and Wireless, LLC- #22-2120-PET

To Whom It May Concern:

The Northwest Regional Planning Commission (NRPC) Project Review Committee has reviewed the Section 248a application from Industrial Tower and Wireless, LLC for a 140' telecommunications tower located off Bordoville Road in Enosburgh, Vermont.

Upon review of the proposed project, the NRPC Project Review Committee has found that the project does not conform to the Regional Plan as currently designed. Under 30 V.S.A. § 248a, the recommendations of the NRPC concerning the Northwest Regional Plan are entitled to substantial deference in the Section 248a proceedings.

Regional Plan Goals and Policies

The following goals & policies of the Regional Plan apply to this proposed project.

Economic Infrastructure Chapter, Goal 3) “Develop and maintain a high-quality, affordable telecommunications infrastructure that provides the most efficient and effective as well as the least obtrusive system possible.”

Economic Infrastructure Chapter, Policy 4b) “Consolidation of new telecommunications facilities on existing sites is preferred over the development of new sites. New telecommunications equipment and towers shall be sited in the least obtrusive and least ecologically sensitive areas possible.”

Economic Infrastructure Chapter, Policy 4d) “Ensure that the telecommunications system and related infrastructure fit within the character of the area as defined by the local and regional plans.”

As stated in both Goal 3 and Policy 4b, telecommunications towers must be the least obtrusive system with the least obtrusive siting possible. In this case, the Project Review Committee believes that the height of the tower is not the least obtrusive system to provide the applicant's service.

Rather it seems that the height of the tower is driven by the design choice to provide 5 opportunities for future co-location of panel antenna. While the Regional Plan supports co-location, it does not support building a significantly taller and more obtrusive tower than necessary when the applicant has not provided evidence that there will be co-located services on the tower. In short, the Project Review Committee believes that the tower is not the "least obstructive system possible" and will create a greater aesthetic impact on the character of the area than is necessary to provide the applicant's service.

The Project Review Committee notes that the application could be found in conformance with the Regional Plan if evidence of co-location of other telecommunication services is provided by the applicant. One member of the Committee dissented from the decision on the grounds that regardless of height, the tower is inappropriate for the site.

The Project Review Committee finds that the project does not constitute a substantial regional impact.

NRPC hopes the items of concern noted above can be addressed during the Section 248a process.. Please feel free to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Emily Klofft". The script is cursive and fluid, with the first name and last name clearly legible.

Emily Klofft
Regional Planner

CERTIFICATE OF SERVICE

I hereby certify on this 26th day of July 2022 a copy of the foregoing comment letter was filed via ePUC.

Parties

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Dated at St. Albans, Vermont, this the 26th day of July 2022.



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