

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 26-0574-PET

Petition of Industrial Tower and Wireless PCS, LLC requesting a certificate of public good, pursuant to 30 V.S.A. § 248a, for the installation of wireless telecommunications equipment off Bordoville Road in Enosburgh, Vermont	
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PREFILED TESTIMONY OF SANDRA BRUHN

on behalf of Intervenors Philippa Dorfman, Victor Tirrito, Bordoville SDA Church, Derek J. Jones, Colleen Sheppard, Sandra and Christopher Bruhn

October 9, 2026

Exhibits:

NI-SB-1 Resume
NI-SB-2 Report on Adverse Aesthetics Analysis of Proposed Enosburgh Industrial Tower
NI-SB-4 Letter re: Bordoville Seventh Day Adventist Church
NI-SB-5 Federal District Court Decision
NI-SB-6 Transcript of Evidentiary Hearing in case # 22-2120-PET

Summary of Testimony:

Sandra Bruhn presents testimony about the aesthetics of the area and whether the project would have an adverse aesthetic effect under step 1 of the Quechee Analysis.

PREFILED TESTIMONY OF SANDRA BRUHN

1 **Q1. Please state your name, address, and occupation.**

2 A1. My name is Sandra Bruhn and I am recently retired from a 36 year career in retail where I
3 held the position of New England District Manager for Gap, Inc., Banana Republic. My
4 residences include Chester Arthur Rd., Enosburgh, Vermont, and Connecticut where I reside.
5 That address is 12 Greenwoods Rd, North Granby, Connecticut-06060.

6

7 **Q2. Have you previously testified before the Public Utility Commission or other judicial or**
8 **administrative?**

9 A2. Yes. I testified in the first Industrial Tower and Wireless Petition for a tower at the same
10 location.

11

12 **Q3. What is the purpose of your testimony?**

13 A3. The purpose of my testimony is to present the findings of my review of the proposed
14 Enosburg Tower Project on Bordoville Rd in Enosburgh, Vermont, and its impacts to the
15 aesthetics and scenic beauty to the surrounding area, specifically Quechee Test step 1.

16

17 **Q4. How has your background informed your testimony in this case?**

18 A4. I have a background in visual merchandising and aesthetic training from my career at Gap,
19 Inc., Banana Republic. I have experience in visual aesthetics as well as planning and executing
20 product releases, product placement within architectural design, and space constraints. I have
21 also been a landowner in the historic neighborhood of Bordoville since 1967 and have distinct

1 knowledge of the area as well as Enosburg, and Bakerfield. I know every hiking trail, all the
2 streams, roads, and views on public and private property. I have deep knowledge of the
3 surroundings and if this project is compatible, I know the significance of open spaces, where
4 every view is and understand the impact of this project on the sense of place and the quality of
5 life that a place affords.

6

7 **Q5. When did you first learn about this proposal to construct a lattice tower for radio**
8 **antennas in Enosburgh?**

9 A5. May 27, 2022

10

11 **Q6. What information have you reviewed to prepare your testimony?**

12 A6. I have reviewed the Enosburg Tower Proposal 26-0570-PET filed with the PUC, testimony,
13 public comments, Discovery Responses and other filings, & Town and Regional Plans. For the
14 second petition filing, I have reviewed all the filings including these documents: Exhibits and
15 PreFiled testimony of Louis Hodgetts, Kevin Delaney & Gordon Perkins. The exhibits of Dubois
16 and King and EBI consulting. I have reviewed the updated NW Regional Plan and the Town
17 Plan, as well as Evidentiary Hearing transcripts from Jan 12, 2023, the Federal District Court
18 ruling of case 2:23-cv-00365 gwc and specifically the cross examination of Gordon Perkins by
19 Brooke Dingleline in case # 22-2120-PET.

20 **Q7. The applicant is proposing to erect a lattice tower in a specific location on private**
21 **property in Enosburgh, to support antennas for a private radio network. Please describe**
22 **the area where this tower is proposed.**

1 A7. The proposed tower location description is rural, scenic, undeveloped, with rolling hills and
2 a viewshed to the Cold Hollow Mountains. The farmland and agriculture lend to the scenic,
3 undeveloped character of the area. The specific compound location is on a beautiful class 4
4 country road, set back with filtered views by a stand of trees, but the skyline portion will have no
5 camouflage. The other noteworthy point is the close proximity to numerous residences making
6 up the hamlet of Bordoville, a historic area of Enosburgh, Vermont. The homes on the higher
7 elevation are all oriented toward the views of the Cold Hollow Mountains which is **exactly**
8 where the proposed location of ITW's lattice tower is (44°50'27.6 lat., 72°48'39.42' long.) The
9 Cold Hollow Range is exactly what travelers, church goers and residents look at and appreciate
10 as they walk, hike, bike, horseback ride, drive or just sit on their own private property to enjoy.
11 Some homes pay more taxes for the "view" of the Cold Hollows...they are beautiful and
12 peaceful. To the east of the tower is Rt. 108 and the residents and travelers will see the tower
13 clearly for about a stretch of 1 mile as they travel through or look out their window. The area is
14 extremely quiet and there is NO light pollution so one can gaze at the black sky and see stars at
15 night. There is no noise except for the buzz of insects, chirping of birds, the babbling of a nearby
16 stream, an occasional car, and during the day the sound of a tractor in the distance. The air is
17 clean and fresh and the effect of all this on your body is invigorating. The area isn't high
18 income, but we are rich with the resource of the untouched scenic, undeveloped beauty of the
19 area that most people could only wish for.

20

21 **Q8. Did the applicant provide notice of a balloon test so that you could accurately assess**
22 **the aesthetic impact of the tower on the surrounding area?**

1 A8. No notice was provided to the community or abutters of the balloon test done on January 21,
2 2022 at 3:50pm. The official Enosburg Tower Project notification was sent to the abutters on
3 March 4, 2022. In the second application, ITW appears to have used the DSM and DEM (digital
4 surface model and digital elevation model) used from Gordon Perkin's Aesthetic Analysis from
5 2022 in which a height of 120' was already evaluated. In the NWRP hearing, ITW referenced a
6 Balloon Test for this application, but after searching for that test, nothing was filed with the
7 application of 26-0574-PET.

8

9 **Q9. What methods have you used to analyze the aesthetic impact, in the absence of a**
10 **balloon test?**

11 A9. I have looked at the documents filed in case # 26-0570-PET which includes exhibits LH-1
12 C-1 through C-13 describing the tower location, tower design and elevation, antenna details,
13 detail site plan, and abutter plans, and documents in case # 22-2120-PET. Also reviewed PFT of
14 Kevin Delaney, Louis Hodgetts, and Gordon Perkin's Aesthetic Review as well as the Town and
15 Regional Plan standards for Telecommunications. I have reviewed the Quechee Analysis
16 Standard established in 1985 by the Environmental Board's Quechee Lakes Decision. I used
17 Google Earth and Topographical Map for additional resources for my review and knowledge
18 needed to conduct an analysis. I also have detailed knowledge of the area.

19

20 **Q10. Is it likely that the tower will be visible from private properties that are unaware of**
21 **this proposal?**

22 A10. Yes. The Balloon Test was not conducted in 2022 with the partnership of the community
23 and there has been no sharing of what the actual viewshed analysis results are from Gordon

1 Perkins' DSM and DEM review of the tower's aesthetic impact to the area. Not all the neighbors
2 are 'abutters' and if they are not savvy with the knowledge of the e-PUC's website and case
3 number they are completely ignorant of the facts and what is about to be stolen from this
4 peaceful, scenic area.

5

6 **Q11. Have you talked to neighbors within the viewshed of the proposed tower? What is**
7 **their reaction?**

8 A11. Yes. Most are aware of a "tower" and think that it will be providing them cell service.
9 100% of the neighbors we have spoken with have no details of the radio tower specifications
10 with regards to height and visibility points, and actual location of the site specifications. It has
11 divided the community as well because it is sensitive in nature due to the Landowner's ties to the
12 community.

13 **Q12. Has the applicant taken any steps to mitigate the aesthetic impact of the tower?**

14 A12. ITW's proposal of reducing the tower's height by 20ft is not a mitigating step, so no, ITW
15 has not taken any steps to mitigate. Impactful mitigation would be to move the tower out of the
16 sightline of the Cold Hollow Mountains and away from 25 homes that make up our
17 neighborhood.

18

19 **Q13. Are there alternative locations where radio antennas could be placed to provide**
20 **service to the area, if it is needed?**

21 A13. I am not an expert at tower siting. However, the property owner, Matt Hull has 506 acres
22 that should be explored and there are other landowners that might want to host a

1 telecommunications tower. The mitigation for the tower is to site it not close to a neighborhood
2 and out of the view of the scenic, bucolic, historic area so that many can live a peaceful healthy
3 life.

4

5 **Q14. Does this proposed lattice tower create societal benefits that outweigh societal costs?**

6 A14. No. The societal cost of losing scenic views in a beautiful rural residential area for 99
7 years (proposed lease agreement with landowner) does not outweigh societal benefits of a radio
8 antenna service proposed with potentially 1 co-locator in the distant future when satellite
9 technology may make towers obsolete. The population of our town is low with 2800 residents
10 and there are already 8 existing facilities within a 10 mile radius. In the last four years our
11 neighborhood had the addition of highspeed broadband/internet service as well and we all have
12 wi-fi calling options. I do not see any societal benefits of a 120' industrial tower added to our
13 sightline and within 2000 ft of our house.

14

15 **Q. 15. Would the Project result in an undue adverse aesthetic impact?**

16 A. 15. My report presents findings and conclusions of my investigation as to whether the
17 proposed project impact to the area's visual character is adverse, step 1 in Quechee Analysis. As
18 documented fully in my report, I found the project will have an adverse impact on the visual
19 resources and natural beauty of the area. The project location is out of character with its
20 surroundings due to the scenic, historic, rural residential area with no current land use for
21 industrial purposes. There is expected visibility impact because of several factors that most
22 notably include the tower height (120' AGL plus 5 13' antennas) and location of this project.
23 Intervening topography and vegetation help to mitigate the base of the proposed tower and only

1 in some locations the whole tower. The project location is sited at a higher elevation than Rt 108
2 and a lower elevation than Chester Arthur Rd lending to many locations of visibility and adverse
3 impact to the character and surroundings.

4 An Industrial style lattice tower is out of place in the historic neighborhood of Bordoville,
5 Enosburgh, VT, and will undoubtedly have an undue, adverse effect on the sensibilities of an
6 average resident and person of the area, as evaluated by Derek Jones. Part of what is 'undue'
7 and 'adverse' is the fact we are re-living this nightmare all over again. The fact that ITW has
8 disregarded past court decisions of the Vermont Public Utility Commission, Federal District
9 Court, and The Second Circuit Court of Appeals is unjust and unfair, and ITW has stolen our
10 peace for 4 years now.

11

12 **Q. 16. Does this conclude your testimony?**

13 A. 16. Yes.

AFFIDAVIT OF SANDRA BRUHN

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 Enosburgh, Vermont this 9th day of October 2026.

/s/ Sandra Bruhn

Sandra Bruhn