

# Mendon Telecommunications Facility

## Aesthetic Assessment & Orderly Development Review

PUC Case #: 20-1149-PET

August 21, 2020

Project Location: U.S. Route 4  
Mendon, Vermont

Prepared For: Vermont Department of Public Service

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TCE Project #: 20-119



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## Introduction and Scope of Work

TCE was retained by the Vermont Department of Public Service (“DPS”), to conduct a visual impact analysis to determine potential visual impact of the proposed Telecommunications Facility on U.S. Route 4 in Mendon, VT (“Project”). This analysis is conducted in response to the requirements set forth for aesthetic review under Title 30 Section 248 of the Vermont Statutes, governing the review of telecommunication facilities and projects. The Public Utility Commission (“PUC”) has adopted the Quechee Analysis, a two-step analysis as set forth originally for the review of aesthetics under Criterion 8 for Act 250 to determine that a proposed project will not have an undue adverse effect on a proposed project site’s aesthetics. This analysis references prefiled testimony, exhibits, and supporting documents as presented in filings to the PUC on behalf of New Cingular Wireless PCS, LLC d/b/a AT&T (the “Applicant”) for PUC Case 20-1149-PET. Documents and exhibits referenced in this report were accessed through the public ePUC online database. This report has been updated to analyze the Project as revised and redesigned by the Applicant in response to comments from Town and Regional bodies.

TCE is a multi-disciplinary consulting firm that specializes in landscape architecture, land surveying, engineering and environmental services with offices in Williston and St. Albans, Vermont. This visual impact analysis presents findings and conclusions of investigation as to whether alterations to the areas visual character are adverse, and if so, whether the changes are unduly adverse as defined by the Quechee Analysis.

The methodologies for the aesthetic assessment of this Project include visual and spatial analyses of aerial photographs, satellite imagery and GIS data, field reconnaissance and site visits, and document research and review. Our primary analysis assesses the Project’s visibility and potential for visual and aesthetic impacts to public vantage points such as state or local roads. Locations that include neighboring properties and residential areas in close proximity to the proposed Project were also considered, although review of aesthetics under Section 248, using the Quechee Analysis, does not specifically guarantee that views from individual private homes and properties will never change. We have used multiple field studies to verify our analyses of the proposed conditions following completion of the proposed Project.

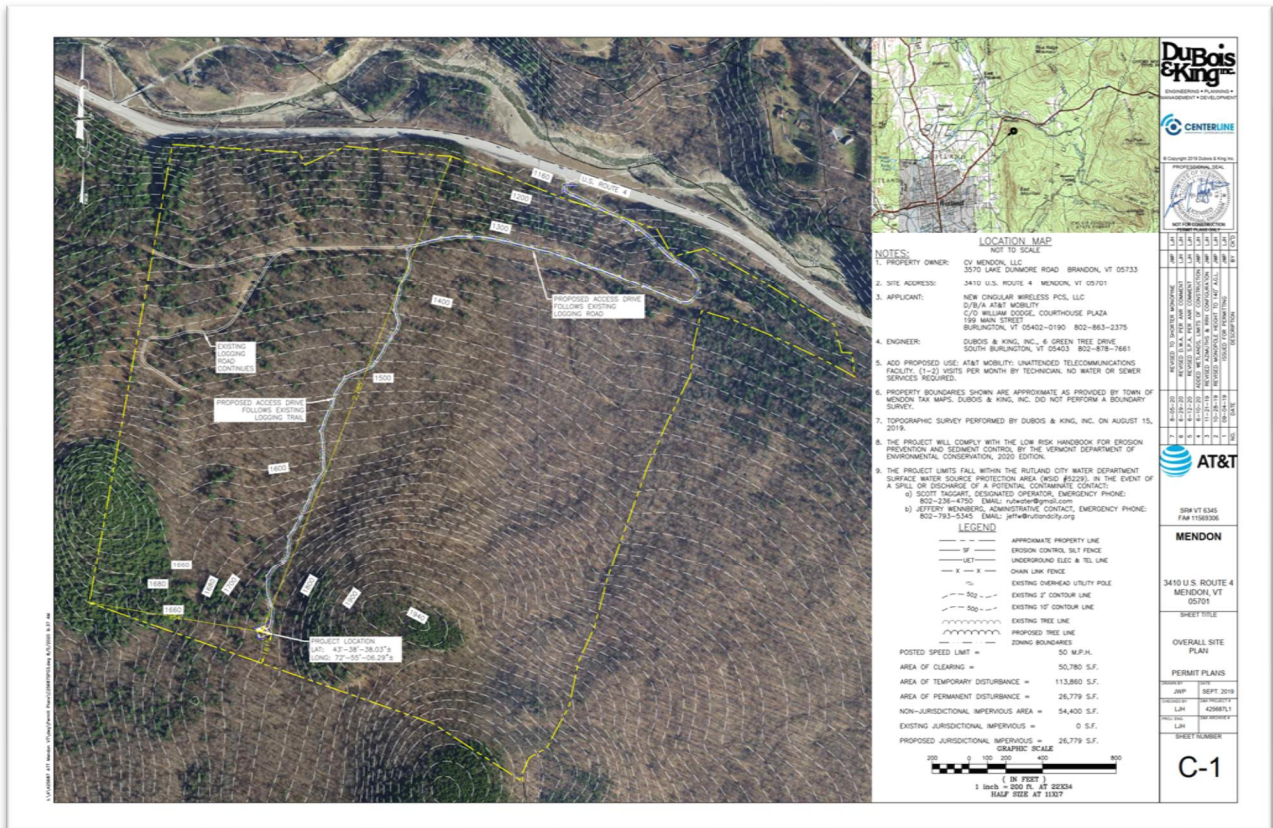
## Report Organization and Contents

This report is organized around and relies on an extensive narrative of the Quechee Analysis as it applies to the proposed Project. This report is accompanied by exhibits and plans as supporting documents which are referenced throughout the document or included as appendices.

## Project Background

## Project Description

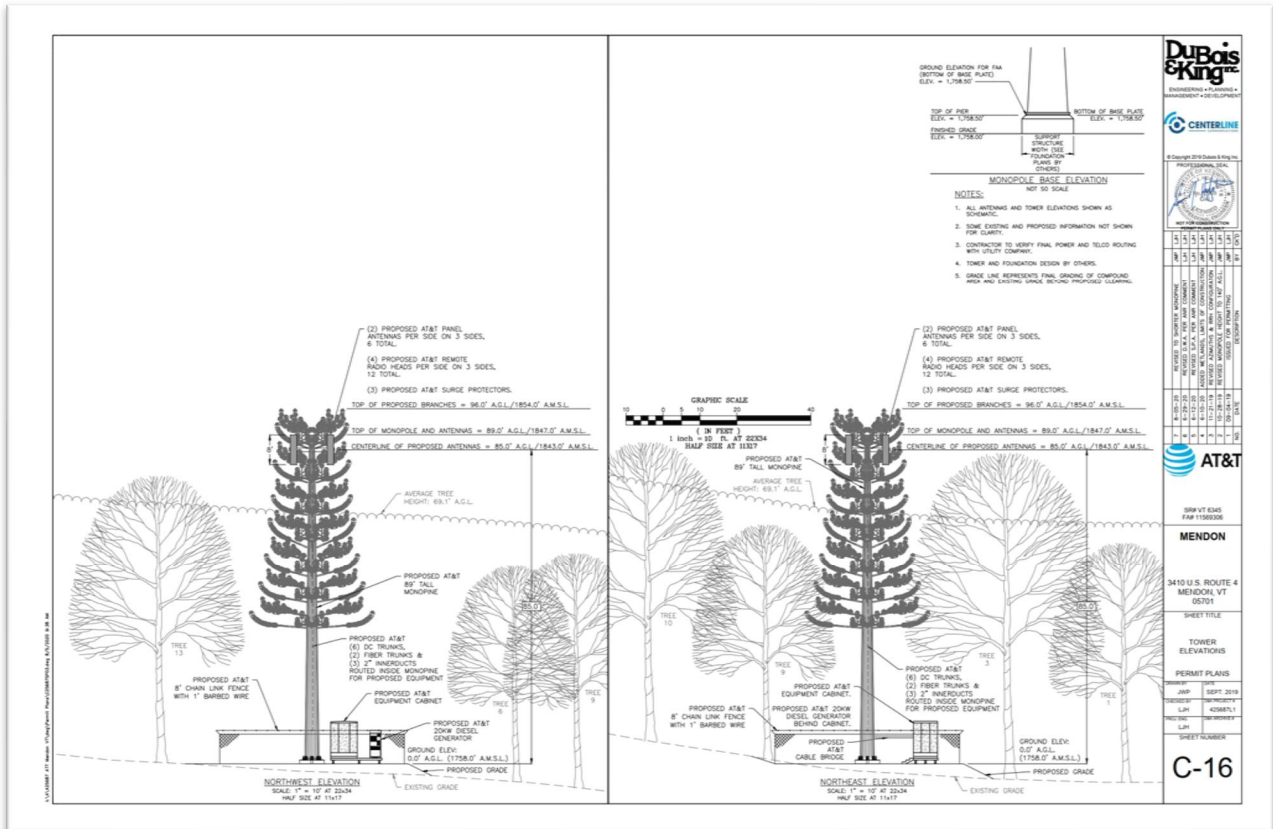
The following description of the proposed Project and components is based on the original *Prefiled Testimony of Jeffrey DelliColli* dated May 6, 2020, and the *Supplemental Prefiled Testimony of Jeffery DelliColli* dated August 10, 2020. The Project is located on an approximately 190-acre parcel in the Town of Mendon, in Rutland County, Vermont. Per *Supplemental Prefiled Testimony of Jeffrey DelliColli* and the original *Prefiled Testimony of Jeffrey DelliColli*, the Project will consist of the construction of a wireless telecommunication facility in what is currently a wooded area.



Site Plan from Exhibit AT&T 5 I

As described in *Supplemental Prefiled Testimony of Jeffrey DelliColli* at page 2, the proposed Project has been revised from a 140-foot above ground level (AGL) monopole (the "Original Tower") of matte grey color to:

A stealth tapered support structure (sometimes called a "monopine") extending to a height of 89' above ground level.... with the six AT&T panel antennas and remote radioheads installed at a centerline height of 85' and topped with a stealth camouflaged "crown" extending to a total height of 96' AGL (the "Redesigned Tower").



Tower Elevations from Exhibit AT&T 51

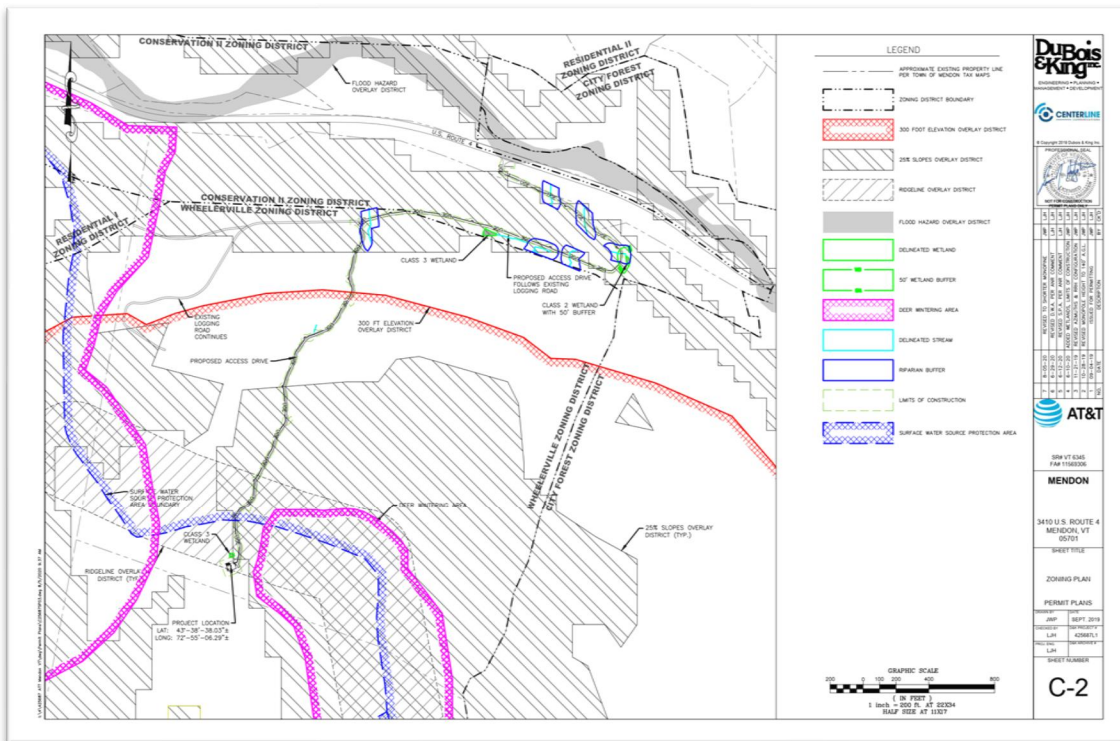
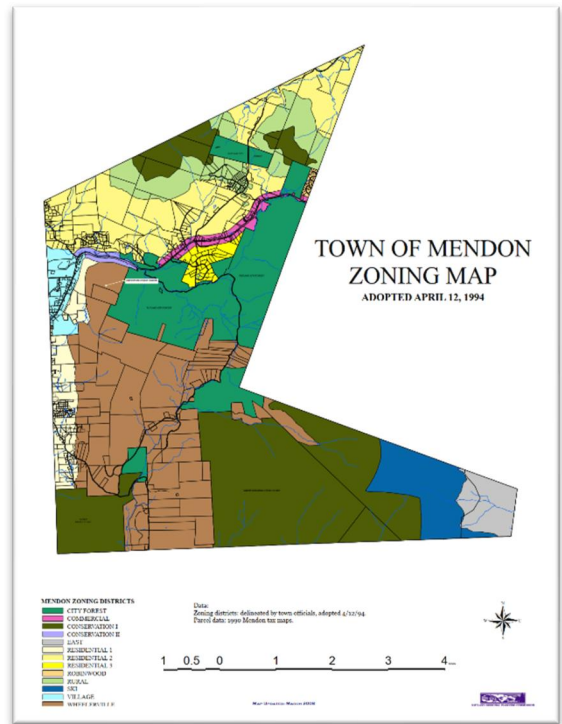
The Project will be located in a 50'x50' compound enclosed by an 8' high chain link fence with a 12-wide gate (the "Compound").

Access to the Project is proposed through the construction of a "12' wide gravel access road extending approximately 1,250 feet off of U.S. Route 4 following an existing logging road, then extending up to the Compound." (*Filed Testimony of Jeffrey DelliColli* at page 5) Grades vary along the access road, reaching 26.88% at the steepest point; this steepest section of the road appears to be on the leg of the access road that diverges from the existing logging road to reach the Project site. Utilities are proposed to be underground and run along the access road. Site grading is proposed for the access road and at the Compound.

Aesthetic Assessment & Orderly Development Review for  
Proposed New Cingular Wireless Telecommunications Facility  
U.S. Route 4 Mendon, VT

The Project will not require lighting or marking. Tree clearing is proposed and will include 50,780 SF (1.17 acres) of clearing and three trees are shown as "to be removed" on sheet C-15 of *Exhibit AT&T 5I*. The *Prefiled Testimony of Jeffrey DelliColli* states on page 5 that the Project "also preserves all existing vegetation surrounding the knoll to the extent feasible, while making use of the existing road."

The Project parcel is primarily located in the Wheelerville zoning district, with the portion of the parcel along U.S. Route 4 zoned as Conservation II zoning district. The parcel is also located within the Ridgeline Overlay district as identified by Town documents which have additional measures for development and preservation of scenic and aesthetic resources.



Zoning Plan from Exhibit AT&T 5I.

## Aesthetic Assessment

The Quechee Analysis is a two-step process that begins with assessing the nature of the project, its context, and whether or not it will lead to an adverse aesthetic impact, and if it is adverse, if the project is unduly adverse.

The first step asks questions of the project to test for adverse impacts. The five questions include the following themes:

1. The nature of the project's surroundings.
2. The project's design and compatibility with its surroundings.
3. The colors and materials selected for the project and suitability for the context.
4. The project's visibility.
5. The project's impact on open space in the area.

If the conclusion from the first step of the analysis is that the aesthetic impact of the project is considered to be in harmony or compatible with its surroundings, then the aesthetic impact of the project is considered not adverse. If this is not the case, then the project is considered to have an adverse impact and the second step of the Quechee Analysis is required to determine if the adverse impact is undue. An aesthetic impact is unduly adverse if any of the following is true:

1. The project violates a clear, written community standard intended to preserve the aesthetics or scenic beauty of the area;
2. The project offends the sensibilities of the average person because it is out of character with its surroundings or significantly diminishes the scenic qualities of the area; or
3. The applicant has failed to take generally available mitigating steps which a reasonable person would take to improve the harmony of the project with its surroundings.

## The Quechee Analysis

### Step One of the Quechee Analysis

#### Project Surroundings

##### *1. A. What is the nature of the project's surroundings?*

The area around the Project site has the mountainous and hilly terrain of the Green Mountains. Killington and Pico ski resort and recreational areas are to the east, 6.15 and 4 miles respectively, and Rutland City is about 3.26 miles to the west. U.S. Route 4 connects Rutland and U.S. Route 7 to Pico, Killington and Route 100 VT (which runs north-south). There are large areas of undeveloped wooded and natural areas, mountains, and ridgelines as well as the renowned ski resorts of Pico and Killington. The adjacent parcels are zoned City Forest and Residential I, and the Project is located in the Wheelerville zoning district, as stated previously in this report. Commercial development is primarily aggregated along U.S. Route 4 with residential neighborhoods in the surrounding areas.

Nearby amenities and services along U.S. Route 4 include commercial businesses, restaurants, inns and hotels, construction services, and state and municipal facilities including the VTrans District 3 Office ( $\pm 1.0$  miles southwest), Rutland Town Transfer Station ( $\pm 1.6$  miles west), and Mendon Town Clerk's Office ( $\pm 1.5$  miles northwest), Best Western ( $\pm 1.11$  miles southwest), and the Red Clover Inn & Restaurant ( $\pm 1.61$  miles east) of the Project site, to name a few.

There are a number of outdoor recreation opportunities in the area, including Killington and Pico ski resorts and recreational areas, the Rutland Town Pool and Northwood Park ( $\pm 1.6$  miles west), Gifford Woods State Park and Kent Pond ( $\pm 5.8$  miles easterly), the Long Trail ( $\pm 3.2$  miles west) and the Rutland City Forest that abuts the subject parcel.

Mendon Brook runs along U.S. Route 4 in the area of the Project and is one of the locations in the state that was hard hit during Tropical Storm Irene in 2011.

##### *1. B. Is the project to be located in an urban, suburban, village, rural or recreational resort area?*

The Project site, and Mendon in general, is situated between the more urban and populated area of Rutland and the recreational resort areas of Killington and Pico along U.S. Route 4, a heavily trafficked route for east-west travel in this portion of the state. The Town has a small commercial area near the western gateway that includes businesses and amenities like Mendon Mountain Orchards, Allen Pools & Spas, Mountain Sun Motor Inn, and Sugar & Spice Restaurant. Outside of the U.S. Route 4 corridor there are more residential neighborhoods, with slower roads and lower density of development, including the residential neighborhoods north of the Project along Sherwood Drive, Helvi Hill Road, and Terra Lane; Journey's end road to the northeast; Wheelerville Road to the east; and in the bordering Rutland Town, along Post Road and Post Road Extension to the west.



The subject parcel is wooded with no development on the site. The surrounding parcels are also generally wooded and undeveloped, including in the Rutland City Forest; the development on these parcels, or lack thereof, is likely due to the topography of the area and zoning and land use regulations.

*1. C. What land uses presently exist?*

The Project area is currently wooded with an existing logging trail. Some silviculture operations occur on the land.

*1. D. What is the topography like?*

The topography varies greatly from the access drive entrance at 1,174 feet elevation to the Project's elevation of 1,758 feet, with approximately 584 feet of elevational change. The Tower and Compound fall within the Ridgeline Overlay District per the Town Zoning Regulations, which is indicative of the site topography.

*1. E. What structures exist in the area?*

The structures in the area include residences, small businesses, restaurants, inns, and municipal buildings, as mentioned previously. Killington and Pico have infrastructure associated with their resorts including ski lifts, antennae and satellite structures near / at their peaks, condos, lodges, large parking lots, and other recreational structures. Casella Construction, Inc has a facility  $\pm 1.0$  mile south of the site. Along the U.S. Route 4 parcel boundary, there is a utility line that runs along the road and this section of Mendon Brook.

There are no obvious cell towers of a similar nature to the Project in the immediate vicinity of the Project site. One nearby structure that is much taller than its surroundings is the water tower is located about 2.81 miles west of the Project.

*1. F. What vegetation is prevalent?*

The Project parcel is wooded with mature deciduous and evergreen tree species. The Detailed Site Plan C-15 in *Exhibit AT&T 5I* catalogued (17) trees in or around the Project and Compound that included mostly deciduous species. The species mix found were oak, maple, birch, and one hemlock; the average height of these trees is calculated to be 69.1 feet.

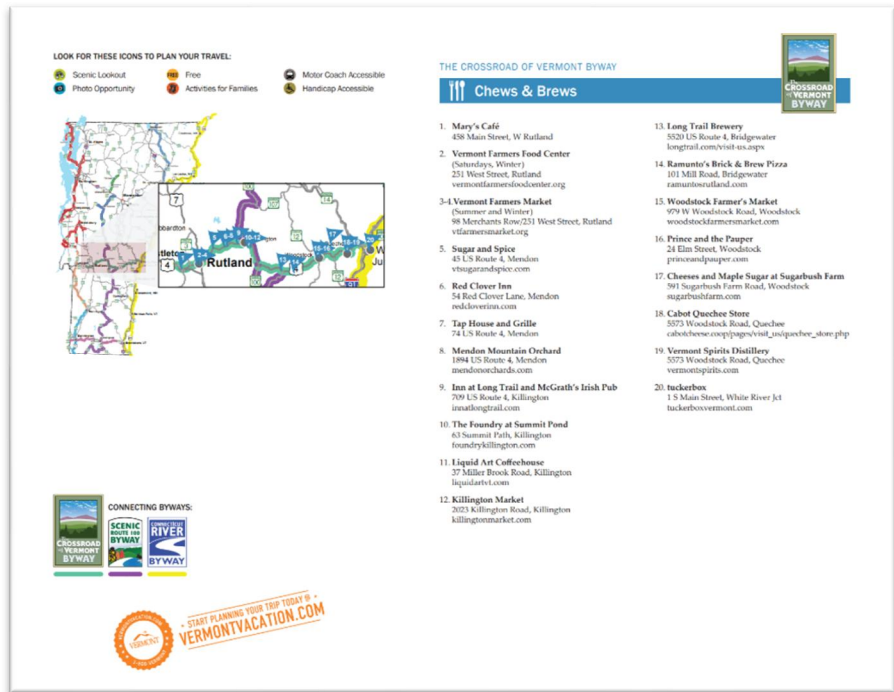
The vegetation in the surrounding area is a mix of mature forested blocks and wooded areas, open fields, and commercial and residential ornamental plantings.

*1. G. Does the area have particular scenic values?*

This area can be considered to have scenic value in that it is part Vermont Byways as part of the Crossroads of Vermont Byway and has been described as having scenic value in town documents. The Vermont State

Tourism website [vermontvacation.com](http://vermontvacation.com) describes the byway as a “classic Vermont excursion” and includes four stops in Mendon in the “Chews & Brews” recommended itinerary.

The Town also considers the area to have scenic value as presented in the Town Plan and Zoning Regulations. The Mendon Zoning Regulations (2010) Section 317(1) - Ridgeline Overlay District - Purpose states “The undeveloped ridgelines and hillsides of Mendon are exceptional aesthetic and scenic resources that significantly contribute to the Town’s extraordinary scenic quality as well as to its rural, pastoral heritage.” The Town has developed zoning regulations and review procedures in this area of the Project site to “protect and preserve the aesthetic and scenic qualities of the Town’s primary ridgelines and hillsides.” Given these considerations, the area can be considered to have scenic value.



The Crossroads of Vermont Byway – Chews & Brews Itinerary from the Vermont State Tourism website ([vacationvermont.com](http://vacationvermont.com))

## Project Design

### 2. A. Is the project's design compatible with its surroundings?

The Project's new proposal for the Redesigned Tower of 96' AGL in overall height can be considered as more compatible with the Project's surroundings than the Original Tower that was 140' AGL, in that it is much closer in height to the surrounding tree line measured at 69.1' AGL. The Redesigned Tower height is proposed to be 89' AGL to the top of the monopole and 96' AGL to the top of the monopine stealth “branching.” With this proposal, the Redesigned Tower height will be approximately 20' taller than the surrounding tree canopy (to the top of the monopole) and 27' taller to the top of the monopine stealth “branching” to the “crown.” Inclusion of tapered “stealth” branching and a “crown” that will allow the Redesigned Tower to more effectively blend in with the surrounding landscape than the Original Tower.

The proposed Project location is sited in a location where there is a taller ridgeline / knoll to the east of the Project that will serve to block or obscure the Redesigned Tower from many locations to the east; and a shorter knoll to the west is expected to obscure the a majority of the lower portion of the Redesigned

Tower for portions of views from westerly locations; these topographical elements will aid in reducing the visual impacts to the Project.

*2. B. Is the architectural style of the buildings compatible with other buildings in the area?*

Aside from the Redesigned Tower, none of the built elements included in the Compound will be visible and are not incompatible with the area.

*2. C. Is the scale of the project appropriate to its surroundings?*

As a telecommunication tower, the Tower structure needs to be taller than the surroundings to allow for the operational and functional use and will be, by design, at a greater vertical scale than its surroundings. The Applicant has greatly reduced the height of the Redesigned Tower from 140' AGL (Original Tower height) to 96' AGL total height (including the "crown"), which is approximately 27 feet taller than the existing surveyed tree line. The top of the monopole structure is proposed at 89' AGL, or approximately just under 20 feet taller than the existing surveyed tree line. The scale of the Redesigned Tower will be more compatible with the surroundings than a taller structure would be.

*2. D. Is the mass of structures proposed for the site consistent with land use and density patterns in the vicinity?*

The mass of the Redesigned Tower that will be visible above the tree line from offsite locations could potentially be considered as inconsistent with land use and density in the event there are prolonged and skylined views of the structure. However, due to the Project siting and the Redesigned Tower components, instances of prolonged visibility and skylined views are not anticipated for the average viewer from public vantage points. Mendon is located between Rutland / Rutland City and Killington, both of which have a greater proliferation of infrastructure and development, so it could be argued that the Project is not inconsistent with land use and density within the greater region.

### Project Materials

*3. Are the colors and materials selected for the project suitable for the context within which the project will be located?*

Based on the Redesigned Tower description provided in the *Supplemental Prefiled Testimony of Jeffrey DelliColli* the Redesigned Tower will utilize "stealth" features like a "camouflaged crown" (at page 2) and "branches" (*Supplemental Prefiled Testimony (Joint Panel) of Jennille A. Smith and David Archambault* at page 3). An average observer is typically able to identify artificial structures placed in the environment that are modified to look "natural" with elements like the monopine camouflage branching and crown that are employed for the Redesigned Tower. In this specific instance, however, given the surrounding forested topography with hills and knolls near and adjacent to the site that will act as a backdrop in several locations where the Project will be visible, the monopine features of the Redesigned Tower will likely aid in camouflaging the Project, particularly due to the reduced height of the Redesigned Tower relative to

the existing tree canopy height. In this regard, the colors and materials are suitable for the context in which the Project will be located.

## Project Visibility

### 4. A. From where can the project be seen?

A site reconnaissance was conducted on April 25<sup>th</sup>, 2020 by TCE along roads near the site during a warned balloon test (the "Balloon Test") that was conducted from 9 am to 2 pm. The Balloon Test was conducted for the Original Tower height of 140' AGL. A list of specific roads and locations as requested by the Town for additional review by the Applicant were also included in this review. Observations described in this report are based on a variety of analyses, including the balloon test which was used to provide field observations of potential visibility, field reconnaissance, and desktop review. The Applicant conducted the balloon test on a reasonable and appropriate day, however wind speeds at elevations above the tree line are unknown and it was evident during the test that the balloon was subject to movement and shifting in position, which could provide an opportunity for misimpression that there may be no visibility from certain locations if the relatively small balloon (3' diameter) was not in the correct vertical position.

A new balloon test was not performed for the Redesigned Tower of 96' AGL (89' AGL to the top of the monopole and antennas). The visibility for the Redesigned Tower is informed by the April 25<sup>th</sup> site visit, relation of the Redesigned Tower to the existing canopy, as well as the *Exhibits AT&A 7I and AT&T 7J* provided by the Applicant. A Photo Inventory is included with the report as *Figure 1*. This inventory was conducted during the April 25<sup>th</sup> Balloon Test and is representative of the Original Tower height of 140' AGL. TCE has not performed visual simulations of the Redesigned Tower, but has relied on the simulations provided by the Applicant along with our own visual analysis and mapping to anticipate the visibility of the Project from the surrounding areas.

The site reconnaissance yielded the conclusion that the Original Tower was expected have visibility from public vantage points in localized areas near to the Project site, generally within a ±2-mile radius, from three general areas to the north, west and southwest. The Redesigned Tower is expected to have much less visibility within the viewshed area that are mostly limited to specific view locations to the north and west from stationary viewpoints in two general areas, further described below. The Redesigned Tower will have much less visual impact overall compared to the Original Tower.

Data resulting from GIS analysis<sup>1</sup> (refer to Figure 2 in the appendix) provides information on potential visibility based on topography. The initial results of a evergreen tree cover analysis of the Redesigned Tower indicated that the Project has limited potential to be seen from the surrounding areas due to the varied terrain of this region and intervening vegetation and structures. In addition to GIS analysis, our

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<sup>1</sup> The viewshed analysis was conducted using ArcGIS 10.2 software and a LiDAR-derived 1.4 meter Digital Elevation Model. Using the Spatial Analysis Viewshed tool we were able to determine the maximum viewshed potential.

examination of the visibility of the Project was confirmed by site investigation and photo reconnaissance of the area to verify the initial GIS analysis, as noted above.

Based on our analysis, visibility for the Redesigned Tower is expected in two general locations, one of which is due north of the Project including the residential neighborhood north of the Tower along Sherwood Drive, Terra Lane, and Helvi Hill Road. The surrounding tree canopy will serve block the Tower below the tree line. The Project is also expected to have some visibility from the locations on Post Road and Post Road Extension, however with the proposed height reduction and inclusion of stealth camouflaging, the Redesigned Tower is expected to blend in with the backdrop of the hills and topography behind and not be readily discernable to the average viewer.

*4. B. Will the project be in the viewer's foreground, middleground or background?*

Sherwood Drive, Terra Lane, Helvi Hill Road: These roads and residences are at higher elevations than the surrounding area and are closer to the Project than other view lotions - within 0.9 miles. These factors will create a greater visual dominance for these viewers than other locations; the most impact will be for residences that have cleared views toward the ridgeline. In the instances where the Project is visible, the Redesigned Tower will be in the viewer's middleground with the surrounding tree canopy serving to block the base and lower sections of the Tower. Given that the Tower will be taller than the average tree canopy height, the top section of the Redesigned Tower will be skylined from most of the view locations in this neighborhood that have visibility. This is visible in *Photo 7 of Exhibit AT&T 7J*.

Post Road, Post Road Extension: The Project is expected to generally be in the background of these views due to the backdrop of the vegetated hillside behind the Tower that will help to absorb visual impact of the Project. This is visible in *Photo 20 of Exhibit AT&T 7J*.

*4. C. Is the viewer likely to be stationary so that the view is of long duration, or will the viewer be moving quickly by the site so that the length of view is short?*

Sherwood Drive, Terra Lane, Helvi Hill Road: Views to the Tower from public and private roads will be a short duration because of intervening vegetation, topography, and structures. Where there are views from private residences, the viewer will be stationary.

Post Road, Post Road Extension: Views to the Tower from public and private roads will be generally short in duration, and obscured by roadside structures, vegetation, and topography breaking up the view in this area.

## Open Space

*5. A. What is the project's impact on open space in the area?*

The Project is not expected to have any significant impact on open space in the area and will not result in the permanent loss of any open space. The Project parcel is not currently an open space or generally

accessible to the public and has not been designated for future or planned public use in any Town of regional documents. The Project is not expected to have visibility from the nearby Northwood Park or other public open space areas.

Nearby and adjacent recreational and outdoor activities will not be affected, and there is not expected to be any affect to the residents or recreational activities in the Wheelerville district.

*5. B. Will it maintain existing open areas, or will it contribute to a loss of open space?*

The presence of the Tower will not contribute to a loss of open space.

## Conclusion of Step One of the Quechee Analysis

Visibility of the Redesigned Tower is expected to be limited to specific areas and vantage points to the north and west of the Project. While visibility to the Tower is expected to be limited, the Town has identified this Project Site as scenic in their Town Plan and Zoning Regulations. This has prompted further investigation of the Project's impacts through evaluation of the second step of the Quechee, see below.

## Step Two of the Quechee Analysis

If it was determined that the impact is adverse by the first step of the Quechee Analysis, the next investigation is will the adverse aesthetic impact be undue. An aesthetic impact is unduly adverse if any of the following is true:

1. The project violates a clear, written community standard intended to preserve the aesthetics or scenic beauty of the area;
2. The project offends the sensibilities of the average person because it is out of character with its surroundings or significantly diminishes the scenic qualities of the area; or
3. The applicant has failed to take generally available mitigating steps which a reasonable person would take to improve the harmony of the project with its surroundings.

### Community Standard

*1. Does the project violates a clear, written community standard intended to preserve the aesthetics or scenic beauty of the area?*

Based on a review of the local and regional plans that include the Mendon Town Plan (2010) (see *Figure 3*), Mendon Zoning Regulations (2010), Mendon Zoning Map (March 2008), Mendon Zoning Bylaw for the Regulation of Wireless Telecommunications Facilities (2011) (see *Figure 4*), and the Rutland Regional Plan (2018) (see *Figure 5*), the Redesigned Tower and revised Project components do not violate clear, written

community standards intended to preserve the aesthetics or scenic beauty of the area. Further exploration of Town and Regional documents is below.

The Project is located in an area the Town has identified to be of scenic value that should be protected, specifically the Ridgeline Overlay District. The purpose of this overlay district in the Zoning Regulations (*Figure 4*) on page 23:

The undeveloped ridgelines and hillsides of Mendon are exceptional aesthetic and scenic resources that significantly contribute to the Town's extraordinary scenic quality as well as to its rural, pastoral heritage. It is in the public good and welfare to protect the rural and pastoral character of Mendon by preserving and conserving Mendon's ridges and hillsides from unregulated land development.

Mendon's rural character and scenic beauty will be protected by ensuring that a forested ridgeline remains uninterrupted, and free of unregulated manmade structures.

It is the purpose of this regulation to permit the Town of Mendon to regulate land development visible from a Town road within the District.

The Ridgeline Overlay district specifies three areas with this district that are to be protected – (1) Ridgeline district, (2) 300 Foot Elevation District, and (3) 25% Slope District. All of which are intended to meet the objectives laid out in Section 317(2):

1. Mendon's Ridgeline Overlay District is intended to protect and preserve the aesthetic and scenic qualities of the Town's primary ridgelines and hillsides. This District is primarily forested, but meadows and pastures have, in the past, dotted the landscape and contributed to the rural, pastoral character of the Town. This regulation is not intended to prohibit land development within the District but, rather, to ensure that such development is situated and designed to avoid an undue adverse impact on this valuable scenic landscape.

2. Mendon's Ridgeline Overlay District is also intended to minimize structural intrusions upon the visual landscape and to maintain the rural character of the Town, this regulation provides standards for regulating the height, design, placement and impacts of structures on lands that lie within the designated Ridgeline Overlay District and driveways/roads that provide access to these structures.

To ensure development occurs in line with these regulations, the Town has set forward a review process, standards, and mitigation techniques for all ridgeline development, which clearly shows the Town values the areas they have identified as ridgelines to be valuable scenic resources for their Town. These

regulations do not prohibit development but do show the Town would like to have due consideration and the opportunity to determine what development is appropriate in these sensitive areas.

The Zoning Bylaws *Regulation of Wireless Telecommunications Facilities*, Section 1.6 *Permitted and Prohibited Locations* states that "H. No tower may be erected which protrudes by more than twenty (20) feet above the average height of the surrounding trees." The average height of the tree line has been documented as 69.1 feet; the Redesigned Tower is proposed to be 89' AGL to the top of the monopole and appurtenances, with a total height of 96' AGL that includes non-essential stealth branching and camouflage materials. While the total height of the Redesigned Tower, including stealth and camouflaging elements, is approximately 7' taller than the 20' allowed in the Zoning Bylaws, the applicant has greatly reduced the height from the Original Tower, so all functional components of the Redesigned Tower will comply with the height limitations. As proposed, the Redesigned Tower does meet the Zoning Bylaws and the Town's *Regulations of Wireless Telecommunication Facilities*.

The Town Plan's (*Figure 3*) section on Telecommunications on page 16 states that "Mendon's goal is to allow for the installation of wireless telecommunications facilities, within the town limits, that will provide good service for the residents and local businesses while preserving the aesthetic character of its neighborhoods, property values, natural areas, ridgelines, historic districts, community preservation goals and environment." The Town Plan also includes ridgelines in the "Special Areas in the Town of Mendon" section on page 23, stating that "The Town, in order to protect the scenic beauty of its neighboring mountains, will restrict construction along high ground ridgelines, thereby protecting the quality of water aquifers, wildlife habitat, and preserving the beauty of the Town and its landscape." Page 26 of the Town Plan discussing Steep Slopes and Ridgelines reiterates the value the Town places on this scenic resource and the importance of limited development in sensitive or valuable areas.

Based on this review of the Town and Regional documents with regard to the Redesigned Tower, the Applicant has made good faith effort to comply with regulations and goals set forward in Town and Regional documents.

### Shocking & Offensive

*2. The project offends the sensibilities of the average person because it is out of character with its surroundings or significantly diminishes the scenic qualities of the area?*

For vehicles traveling on Route 4 and Post Road / Post Road Extension, it is unlikely the sensibilities of the average person will be offended from the Project. Views are generally short in duration and will be filtered by intervening structures, vegetation, topography, and viewer orientation.

For local traffic on municipal and private roads (Sherwood Drive, Helvi Hill Road, and Terra Lane) and views from private properties, some may find the Project to be shocking or offensive, particularly in locations



where the Project is skylined and the ridgeline views change with the introduction of the proposed Tower, as it will be taller than the surrounding tree line. However, even though some residents and observers will have views to the Redesigned Tower, it can't be guaranteed that an individual's view will remain the same.

We conclude the Project will not be shocking or offend the sensibilities of the *average* viewer.

### Project Mitigation & Harmony with Surroundings

*3. The applicant has failed to take generally available mitigating steps which a reasonable person would take to improve the harmony of the project with its surroundings?*

The Applicant has taken generally available mitigating steps that a reasonable person would take to improve the harmony of the Project with its surroundings by reducing the Original Tower height of 140' AGL and adding "stealth" features in response to comments and concerns of the Town. The Redesigned Tower has a height of 89' ALG to the top of the monopole and appurtenances and 96' AGL (to the top of the "branching"). The Applicant has also employed "stealth" features to further camouflage the Project with its surroundings by adding "branches" and a tapered "crown" to create a "monopine" tower. A monopine is not appropriate in many circumstances, however it will be effective in this location where, with the limited height of the Redesigned Tower, the surrounding wooded area and hilly topography will serve to visually absorb the Project from most locations.

## Orderly Development

As explored in the evaluation of criteria pertaining to community standards above in the Second Step of the Quechee Analysis, the Project does not conflict with the orderly development of the Town and Region as outlined in the Town and Regional Planning documents (*Figures 3-5*). Telecommunication facilities are not prohibited in this area or zoning district. Within the Ridgeline Overlay district (*Figure 4*), the emphasis is on preventing undue adverse impacts, stating "this regulation is not intended to prohibit land development within the District but, rather, to ensure that such development is situated and designed to avoid an undue adverse impact on this valuable scenic landscape." (Mendon Zoning Regulations §317(2), page 24). The construction of the Redesigned Tower is unlikely to alter overall development pattern of the region. From our review and analysis, we conclude that the Project will not have an undue adverse impact to the orderly development of the region.

## Final Conclusion

Based on our analysis, we have concluded that the Project, and specifically the Redesigned Tower, will not result in an undue adverse impact to the aesthetics and scenic beauty. As explored in further detail above,

the Project (a) will not be shocking or offensive to the average viewer, (b) does not violate any clearly written community standard, and (b) the Applicant has taken reasonably available mitigating steps to reduce the visual impacts of the Project.

## Appendices

Figure 1. Photo Inventory

Figure 2. Viewshed Analysis Mapping

Figure 3. Mendon Town Plan (Relevant Excerpts)

Figure 4. Mendon Zoning Regulations Plan (Relevant Excerpts)

Figure 5. Rutland Regional Plan (Relevant Excerpts)