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December 17, 2021

To: Parties on attached Service List

Re: Application for a Certificate of Public Good, pursuant to 30 V.S.A. § 248a

Applicant: Industrial Wireless Technologies, Inc. ("Industrial")
Project: Construction of a Wireless Telecommunications Facility
Location: 334 Norton Road, Worcester, Vermont; Parcel 00TR030
Landowner: Nova-Leigh Dodge Krupa and Richard F. & Irene Dodge

Dear Statutory Party:

Our firm represents Industrial. You are receiving this notification because Industrial intends to file an application with the Public Utility Commission ("Commission"), under the provisions of 30 V.S.A. § 248a ("Section 248a"), for a Certificate of Public Good to allow the construction of a wireless telecommunications facility in the Town of Worcester, Vermont. The "Notice" provision of the Section 248a process, as amended, requires that:

The applicant must provide written notice, at least 60 days in advance of filing a Section 248a application, to the following entities:

- (a) the legislative bodies and municipal and regional planning commissions in the communities where the project will be located;
- (b) the Secretary of the Agency of Natural Resources;
- (c) the Agency of Transportation;
- (d) the Division for Historic Preservation;
- (e) the Commissioner of the Department of Public Service and its Director for Public Advocacy;
- (f) the Natural Resources Board...;
- (g) the landowners of record of property adjoining the project sites; and
- (h) the Public Utility Commission...

The application will be filed in accordance with the Amended Order Implementing Standards and Procedures for Issuance of a Certificate of Public Good for Communications Facilities Pursuant to 30 V.S.A. § 248a, issued by the Commission on September 21, 2018, ("Amended Order"), and the Standards and Procedures Applicable to Electronic Filing Using ePUC, eff. January 17, 2017 ("ePUC Procedures").

Copies of the Amended Order and ePUC Procedures are available on the web at http://puc.vermont.gov and at the Commission's offices, on the 4th Floor of the Peoples United

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Bank Building, 112 State Street, Montpelier, Vermont 05620. Documents filed with the PUC are available electronically through the PUC's website at http://epuc.vermont.gov/.

Project Location

Industrial intends to construct a telecommunications facility on an approximately 20-acre parcel of land owned by Nova-Leigh Dodge Krupa and Richard F. & Irene Dodge (together "Dodge") at 334 Norton Road in Worcester, Vermont. The Town of Worcester has designated this lot as Parcel 00TR030.

Industrial refers to the project as "Worcester." The property owners have given Industrial permission to proceed with this Application. The coordinates for the Project are latitude 44° 21'32.39" North and longitude 72°32'54.07" West. *See* attached Permit Plans for visual depiction of the Project's location.

Project Description

Industrial will create an 80' x 80' compound ("Compound") enclosed by an 8' high chain link fence, with a locked gate. Industrial will construct a 185' above ground level ("AGL") telecommunications self-supporting lattice tower ("Tower") within the Compound.

Six (6) thin, "whip" antennas ("Antennas") will be mounted at the 185' AGL level of the Tower. Five (5) of the Antennas will extend upward to a maximum height of 198.8' AGL. The remaining Antenna will reach downward from the 185' AGL mounting level. Each Antenna will measure approximately 13' long and 2.75" in diameter.¹

Industrial has designed the Tower and Compound to accommodate the equipment of other wireless communications providers. Sheet 4 of the permit plans illustrates possible locations for the antennas that such carriers would seek to place on the Tower.

Industrial will install its equipment cabinets ("Cabinets") in the Compound near the Tower. The Cabinets will sit on a 10' by 10' concrete pad and will contain the electronics equipment necessary for the operation of the Project.

¹ From time to time, equipment manufacturers may alter their products or Industrial may purchase from different suppliers. Therefore, there is a possibility that the actual antennas and other equipment may be slightly different from but of similar dimensions as those described in this notice.



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Co-axial and fiber optic cables from the Antennas will descend along one of the three (3) legs of the Tower. The cables will exit near the base of the Tower and will connect with the Cabinets via a proposed cable bridge.

To provide access ("Access") to the Compound, Industrial proposes to construct a 12' wide gravel drive from Norton Road. Approximate clearing limits are shown on the enclosed plans.² The contractor will limit clearing to the minimum required to construct the Access and Compound, which is estimated to be approximately 21,795 square feet. Culverts, check dams, water bars and silt fencing will be placed along the Access and at the Compound as indicated on the enclosed plans to control erosion both during and after construction.

Construction shall meet the requirements of the State of Vermont Low Risk Site Handbook for Erosion Prevention and Sediment Control. After the completion of construction, the amount of new impervious surface area will be approximately 10,086 square feet. Total permanent earth disturbance will be approximately 21,795 square feet.

Underground utilities will follow the Access from the closest existing utility connection point on Norton Road to the Compound and will be placed in a trench adjacent to the Access.

As part of the design for this Project, Industrial RF engineers evaluated existing telecommunications facilities and existing structures for possible co-location opportunities. No such facilities or structures that would fulfill the objectives for this site exist.

Although holding an FCC license ("License") to do so, Industrial does not yet provide telecommunications services in this area. This site will be part of the interconnected network that Industrial is constructing pursuant to that License.

Conformance to Local and Regional Plans

According to 30 V.S.A. § 248a(c)(2), during the Commission's review, "substantial deference [will be] given to the land conservation measures" in the local and regional plans of the "affected municipality." We are, therefore, addressing the relevant provisions of the Draft Town of Worcester Town Plan (draft date October 16, 2021) ("Town Plan")³ and the 2016 Central Vermont Regional Plan (amended on November 17, 2020) ("Regional Plan") to illustrate that the proposed Project will comply.

³ It appears likely that the draft Town Plan will be adopted before Industrial files its application in this matter.



² Clearing limits may need to be adjusted based on conditions encountered during construction.

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The Town Plan states that "in support of a growing local economy, Worcester will advocate for a Town infrastructure that provides improved public transportation, improved telecommunications, and increased use of appropriate renewable energy." *Id.* at 66-67. Similarly, the Town Plan states the following strategy to achieve the goal of improved telecommunications:

Worcester will seek improvements to the telecommunications infrastructure that expand access to good service. Tower facilities are encouraged to accommodate multiple service providers. New tower, antennae, and other transmission and receiving equipment shall be sited, designed, maintained, and operated to minimize negative impacts on natural and scenic resources.

Id. at 35.

The "Telecommunications and Internet" section of the Town Plan describes the situation in Worcester as follows:

In 2021, cell-phone service is spotty to non-existent in Worcester. Internet service is fragmented and provided by a variety of vendors including, satellite and cable providers.

Id. at 38.

Industrial's proposed facility will allow multiple carriers to provide cell phone and broadband Internet service to individuals in Worcester, in addition to allowing Industrial to provide wireless services to area businesses. Industrial has designed the facility to minimize impacts on natural and scenic resources.

The Regional Plan contains an observation about the importance of telecommunications services in opening "fairly insular" rural Vermont to the world:

Over the past several decades, Vermont has witnessed dramatic cultural change. Technological advances in the areas of transportation and telecommunications have been the primary agents of this transformation, opening up what was a fairly insular, self-sufficient rural society to the "outside world." With this exposure came new people, new development, and new social, economic, and land use patterns. Some of the changes the State has experienced have been beneficial; some have not. While people may always argue about the pros and cons of technology and land development, they are part of our current reality. The challenge before us now is to guide these forces of change so as to bring about a marriage between our culture and our place that is sustainable, harmonious, and mutually



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beneficial. In the years to come, nothing will say more about the success of our efforts than the way in which people use the land and its resources.

Id. at Land Use 2-1.

The Regional Plan also discusses the expanding role of wireless in serving the region's communications needs:

Mobile wireless voice service is becoming more available. Vermonters' use and reliance on mobile voice technology has increased since the publication of the last telecommunications plan. Twenty nine percent of Vermont households are wireless-only households. As of 2013, thirteen of Central Vermont's twenty-three communities have between 90-100% of addresses served by a wireless voice provider according to voice tests that were conducted throughout the state (displayed in Figure 1). Mobile data for smartphones or mobile hotspots is also typically available from these carriers in the same service areas that voice is available.

Id. at Utilities, Facilities & Services 5-26.

Regarding the build out of wireless networks and the balance between increasing service and promoting aesthetic values, the Regional Plan states:

While Central Vermonters want and expect good cellular service, they also expect the placement and design of new facilities to be guided by a respect for the integrity of the Region's landscape and compliance with microwave emissions standards. As such, it is important to balance aesthetics, signal quality, health, business and personal needs when deciding whether and where to build new towers and other facilities.

Id. at 5-27. To achieve this balance, the Regional Plan looks to the constituent municipalities to incorporate language in their local plans:

Communities planning for the appropriate sitting of wireless facilities have to ask themselves many questions as they proceed. Would they rather have several small-scale, less visible, facilities closer to the population or a few large, highly visible sites in less populated spots? Are there certain locations that are so environmentally or visually sensitive that they should be "off-limits"? What areas are providers most interested in serving? Through careful planning and clear language in the duly adopted municipal plan, cities and towns can ensure good service without compromising their character or the welfare of their residents.



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Id. at 5-28.

Industrial shares the goals of the Town and Regional Plans regard improving access to wireless communications. The telecommunications services that Industrial will provide through the Project will primarily be targeted to business customers seeking a reliable, reasonably-price means of communicating between their offices and remote users. As such, the Project will promote a balanced, diverse economic base, with a focus on locally owned businesses. The deployment of Industrial's service in Worcester will also attract commercial development, especially for business that require reliable two-way mobile communications. Further, the provision for the co-location of multiple cellular carriers on the Tower and in the Compound will improve the accessibility of cellular voice and high-speed broadband services in the areas served by the Project.

Please feel free to contact me, either by email or at the address or telephone number below, if you have any questions or comments regarding the proposed Project. We would like to receive comments no later than 30 days from your receipt of this Notice so that they can be considered prior to the application filing.

As a recipient of this notice, you will also be notified when the application is filed, which will be at least 60 days from the date of this letter. You will then have 30 days from receipt of that notification to file comments, a motion to intervene or request for hearing with the Commission. Please review the Amended Order for additional information and procedures.

Very truly yours,

Brian J. Sullivan

bsullivan@mskvt.com

cc: Statutory Parties on attached Service List (w/enclosure)

Adjoining Landowners on attached Service List (w/enclosure)

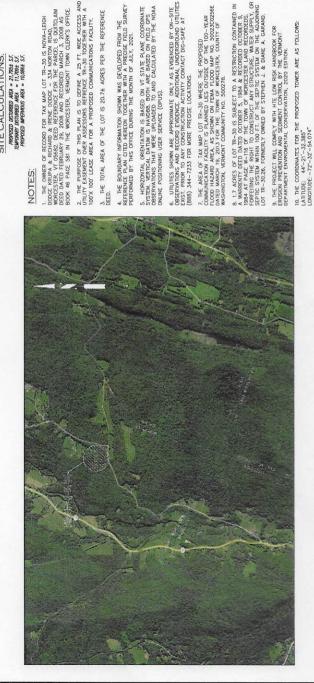
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TAX MAP LOT TAX MAP LOT 788-251-10132 334 NORTON ROAD WORCESTER, VT

WORCESTER VERMONT VT-10172

| Industrial | Communications

Engineering Division 40 Lone Street Marshileld, MA 02050



SITE CALCULATIONS: PROPOSED DISTURBED AREA = $21,795\pm S.F.$ TEMPORARY DISTURBED AREA = $11,709\pm S.F.$ PROPOSED IMPERVOUS AREA = $10,086\pm S.F.$

NO.	0	0	0	0	0	0
TITLE	TILE SHEET	EXISTING CONDITIONS PLAN	AERIAL OVERLAY	PROPOSED SITE PLAN	TOWER ELEVATION & DETAILS	SITE CONSTRUCTION DETAILS
NO.	-	-	2	ы	4	ın

SHEET INDEX

NO.	0	0	0	0	0	0
TITLE	TILE SHEET	EXISTING CONDITIONS PLAN	AERIAL OVERLAY	PROPOSED SITE PLAN	TOWER ELEVATION & DETAILS	SITE CONSTRUCTION DETAILS
NO.	-	-	2	М	4	10

12/8/21

12/8/21 DATE

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PROJECT NO: SITE-WORCESTER, VT - VT-10172 DRAWN BY: RICK

OWNER:
NOVALEIGH DODGE KRUPA
AND
RICHARD F. & IRENE DODGE
334 NORTON ROAD
WORCESTER, VT 05682 ASSESSORS REFERENCE: TR-30

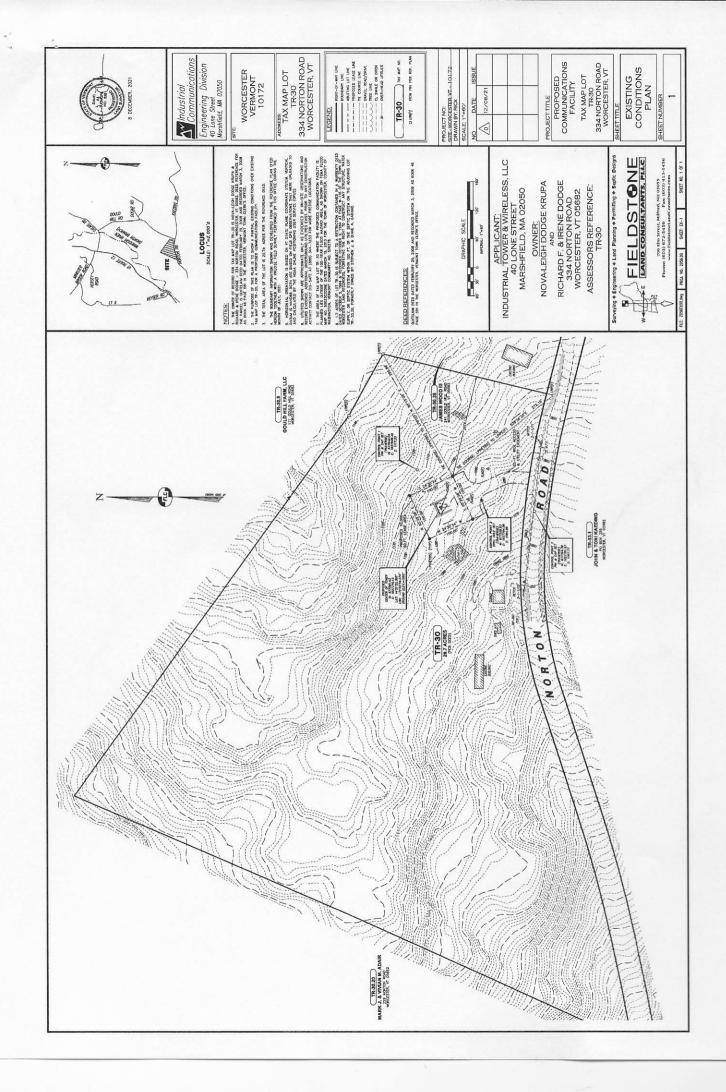
DEED REFERENCE:

QUITCLAIM DEED DATED FEBRUARY 29, 2008 AND RECORDED MARCH 5, 2008 AS BOOK 46 PAGE 581 IN THE WORCESTER, VERMONT TOWN CLERK'S OFFICE.

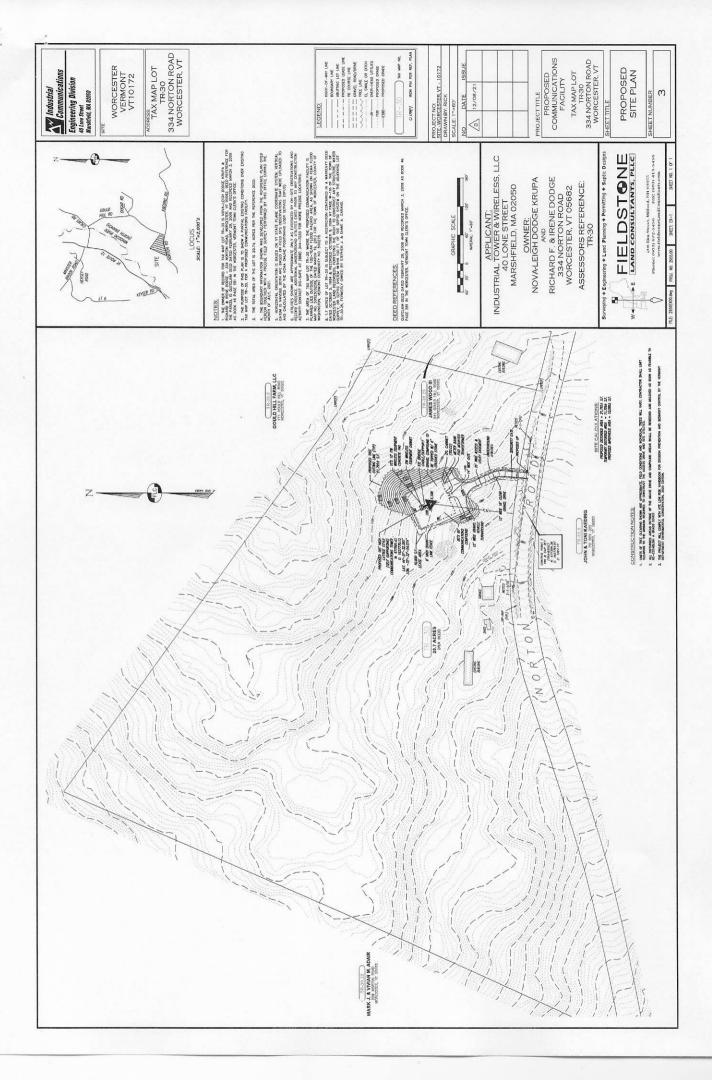
APPLICANT: INDUSTRIAL TOWER & WIRELESS, LLC 40 LONE STREET MARSHFIELD, MA 02050

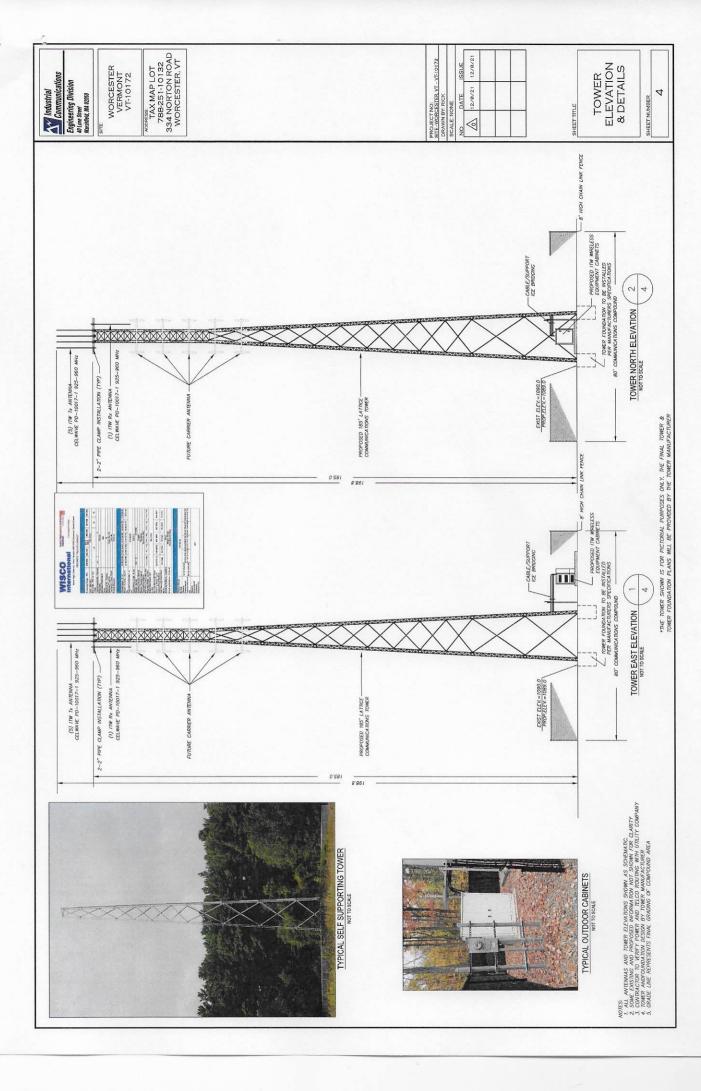
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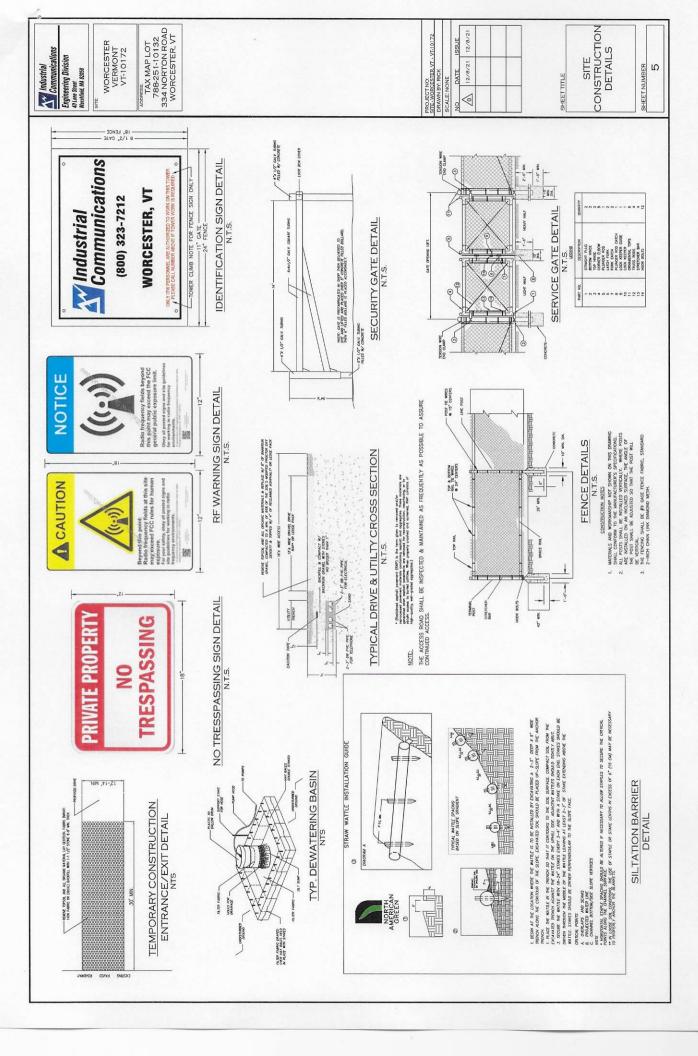
SHEET NUMBER











SERVICE LIST FOR 60-DAY NOTICE

Toni Kaeding, Interim Chair Town of Worcester Planning Commission Drawer 161 Worcester, VT 05682

Ted Lamb, Chair Town of Worcester Selectboard Drawer 161 Worcester, VT 05682

Steve Lotspeich, Chair Central Vermont Regional Planning Commission 29 Main Street, Suite 4 Montpelier, VT 05602

Last Name	First Name	Address	Parcel No.	
Dodge/Krupa	Richard F. and Irene (life estate)/Nova-Leigh Dodge	334 Norton Road Worcester, VT 05682	Parcel No. 00TR030	
Libbey	Richard	171 Gould Hill Farm Road Worcester, VT 05682	Parcel No. 00TR0308	
Wood	James III	umes III 241 Gould Hill Farm Road Worcester, VT 05682		
Kaeding	John H. & Toni	PO Box 325 Worcester, VT 05682	Parcel No. 00TR0331	
Adair Mark J. & M. Vivienr		259 Norton Road Worcester, VT 05682	Parcel No. 00TR0302	