

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 24-1755-PET

Petition of Industrial Tower and Wireless, LLC
requesting a certificate of public good, pursuant to
30 V.S.A. § 248a, authorizing the installation of
wireless telecommunications equipment at 160
Frog Hollow Lane in Westmore, Vermont

PRE-FILED TESTIMONY OF RONALD HOLMES AND KATHY HOLMES
On behalf of interveners Andrew Zebrowski, Robert Fitzpatrick, Donna Dzugas-Smith, Elizabeth
Tucker, and Megan Patton.

March 7, 2025

Summary: Ronald Holmes and Kathy Holmes present testimony about the aesthetics of the area and whether the project would have any undue adverse impact on aesthetics.

**Pre-filed Direct Testimony
of Ronald Holmes and Kathy Holmes**

1 **Q.1 Please identify yourself by full legal name, occupation, and address.**

2 A.1 Our names are Ronald Holmes and Kathy Holmes, and we are abutters to the proposed
3 facility. We live at 942 Peene Hill Road, Westmore, VT, 05822 which we have owned for 40
4 plus years.

5 Ronald has been employed as a commercial truck driver for 50 plus years and self employed as a
6 mechanic and welder for 40 plus years.

7 He has also served his community as a volunteer fire fighter.

8 Kathy has been employed in health care and has been self employed in property management for
9 50 plus years.

10 She has also served her community as a volunteer fire fighter and EMT.

11 She is also a Justice of the Peace and a member of the Westmore Board of Civil Authority for 20
12 plus years.

13

14 **Q.2 What is the purpose of your testimony?**

15 A.2 The purpose of our testimony's are to address issues associated with the aesthetics for the
16 proposed ITW Westmore Tower Project on Frog Hollow Lane in Westmore, Vermont, and its
17 impact on the unique aesthetic characters of the surrounding area.

18

19 **Q.3 How has your background informed your testimony in this case?**

1 A.3 Ronald's background entails being born and raised in this community that we live in for 70
2 years as well as family descendants that date back over 150 years. We have extensive knowledge
3 of the proposed tower location as well as the entire Hyslop property which was previously
4 owned by Ronald's family member. We are homeowners and abutters to the proposed area for
5 over 40 plus years. Ronald and Kathy were both firefighters and Kathy was an EMT in the
6 community and as such have knowledge with the type of radio system ITW wishes to install on
7 their proposed tower. With that information and first hand knowledge of the actual local EMS
8 radio system that they were using during their tenure on both the Fire service and Ambulance
9 there were no known reports of any patient/homeowner who may have suffered a loss due to a
10 dropped call in the immediate area.

11

12 **Q.4 Have you previously provided testimony before the Vermont Public Utility
13 Commission or in other judicial or administrative proceedings?**

14 A.4 No.

15

16 **Q.5 When did you first learn about this proposal to construct a lattice tower for a radio
17 antenna in Westmore?**

18 A.5 We personally as abutters were notified and received via ITW our service packets in
19 January 2024.

20 We do see in their application filing that ITW submitted to the PUC in December 2023.
21 As noted in other filings to this case some of the current abutters were either notified late or as of
22 this date still not notified. Due to the fact that the list of abutters names and address were grossly
23 out of date by several years with some even being deceased.

1 **Q.6 What information have you reviewed to prepare your testimony?**

2 A.6 We have reviewed the ITW Westmore Tower Proposal Case No. 24-1755-PET filed with
3 the PUC, testimony, public comments; Discovery Responses and other filings. We have also
4 reviewed the Westmore Town Plan. The NVDA Regional Plan and the Westmore Telecom
5 Ordinance.

6

7 **Q.7 The applicant is proposing to erect a lattice tower in a specific location on private
8 property in Westmore, to support an antenna for a radio network. Please describe the area
9 where this tower is proposed.**

10 A.7 The specific proposed tower compound location is in a quiet forested area with undeveloped
11 landscape. We would describe the proposed tower location as rural, thickly forested, and on a
12 private right of way. Several primary residences are nearby on the adjacent road. The location is
13 less than a mile from Westmore's North Beach. The sensitive nature of the area enveloping
14 fragile acknowledged wetlands with underground springs currently serves as a potable water
15 supply.

16

17 **Q.8 Did the applicant provide notice of a balloon test so that you could accurately assess
18 the aesthetic impact of the tower on the surrounding area?**

19 A.8 No. A second service packet was received from ITW in June 2024; it contained
20 information stating a Balloon test was held February 15, 2024 with no public notification given.
21 On February 22, 2024 an informational meeting that was held by ITW (*EX MP-2*) via zoom with
22 no mention of their test being performed or shared to those present.
23 In March 2024, without knowledge of a balloon test taking place, we along with other Westmore

1 residents requested Westmore Planning Commission to require ITW to schedule a balloon test
2 and to give sufficient public notice of such test. Such test took place 4/26/2024 with notice
3 given on 4/22/2024.

4

5 **Q.9 What methods have you used to analyze the aesthetic impact**

6 A.9 Kathy attended the balloon test held on 4/26/24 and could clearly see the balloon from
7 different vantage points in Westmore as well as Barton and Brownington, Vermont.
8 Lawrence Nixon, a licensed FCC drone operator, took photos and videos from Robert
9 Fitzpatrick's backyard which directly abuts the proposed tower site. From Megan Patton's front
10 yard which directly abuts the proposed tower site as well as other highly visible vantage points in
11 the area which clearly showed the balloon being flown. (*EX MP-7*)

12 Kathy also noticed the balloon was not held at a consistent height.

13 Kathy attended a second balloon test on March 3, 2025.

14 This test was performed by abutter David Anderson on his private Right of Way adjacent to the
15 proposed tower site.

16 It was clearly evident that the balloon was noticeable from the same set of vantage points as the
17 ITW test as well as several others. (*EX MP-7, EX ET-1*)

18

19 **Q.10 Is it likely that the tower will be visible from private properties that are unaware
20 of this proposal?**

21 A.10 Yes, most definitely. Reviewing the balloon tests video and related photos(*EX MP-4,*
22 *EX MP-7, EX ET-1, EX DD-1, EX DD-2*) many unaware residents will have a clear view of the
23 proposed tower. We have spoken with abutting and non abutting residents of Westmore and

1 surrounding areas. Many of whom either expressed they had no knowledge of the proposed
2 tower until we brought it to their attention or others whom only familiarity with the proposed
3 tower was ITW's promise it would provide better cellular and internet service to the area.

4

5 **Q.11 Has the applicant taken any steps to mitigate the aesthetic impact of the tower?**

6 A.11 No, We are not aware of any steps ITW has taken to mitigate any aesthetic impacts of
7 the tower.

8

9 **Q.12 Are there alternative locations where radio antennas could be placed to provide
10 service to the area, if it is needed?**

11 A.12 Not that we are aware of particularly since ITW refused to share their findings of their
12 Site Acquisition Department when asked at the February 2024 meeting. (*EX MP-2*)

13

14 **Q.13 Does this proposed lattice tower create societal benefits that outweigh societal
15 costs?**

16 A.13 No. The societal cost of losing our scenic viewshed in this naturally beautiful National
17 Natural Landmark (NNL) area which was designated in 1967 would be put in jeopardy. This in
18 turn could put us at risk and thus cost Westmore to lose its prestigious national designation if
19 allowed to be built.

20 Any private radio service ITW is offering from this radio tower would not benefit any
21 community members or visitors to the Lake Willoughby Area.

22

23 **Q. 14 Would the Project result in an undue adverse aesthetic impact?**

1 A. 14 Yes. The area's visual character would be forever greatly diminished. This tower will
2 have a direct daily adverse aesthetic impact on the visual and natural beauty of the entire area.
3 Our breath taking panoramic views will forever be exploited by a needless piece of metal rising
4 far above the tree line (*EX MP-4*) that will not serve any public good.
5 This tower will affect the vistas that are within the Viewshed and Ridgelines of Willoughby Lake
6 North Beach, The federally designated RT 5A Scenic Byway, The federally designated National
7 Natural Landmark (NNL), The Historic Registry of The Fox Hall Inn as well as many other local
8 vantage points.
9 Lake Willoughby is described "as one of the most spectacularly scenic lakes in the north-eastern
10 United States". In addition to its striking scenery it is one of the deepest lakes in Vermont. Its
11 ridge lines possess a rich assemblage of arctic flora and other rare plants that grow on the
12 towering, precipitous Willoughby Cliffs. The area also supports the most notable fern population
13 in all of Vermont.

14 Significance:

15 Lake Willoughby is a deep cold water lake within the (Lake Willoughby Natural Area). It
16 lies in a U- shaped trough cut into granite by glacial scouring. The mountains and 1500
17 foot cliffs rise abruptly from the lake's shores. It is the deepest lake in Vermont and one
18 of the most significant and scenic examples of glacial erosion in the northeast.

19 (Paul Favour) National Park Service, April 1967
20

21 **Q. 15 Are there any other concerns you have concerning undue adverse aesthetic impact?**

22 A. 15. Yes, With ITW's blatant lack of transparency we are a bit hesitant to take them at their
23 word at this point. They have no plan in place to preserve the use of Westmore's infrastructure
24 and resources.

25 We feel that placing this tower in our town of Westmore, particularly in this location infringes on
26 our unspoiled landscape that has withstood the test of time for centuries. The lack of forethought
27 is unconscionable.

1 We can live anywhere but choose to live here in the beauty of this naturally preserved area due to
2 its therapeutic and relaxing qualities. We that live here and most that visit here come not for the
3 best cell service or the fastest internet but for the majestic vistas and sites to behold. The tower
4 will only detract by obstructing our scenic views and degrading the unspoiled landscape which in
5 the National Natural Landscape (NNL) Viewshed. (as acknowledged in ITW's second discovery
6 response) (*EX MP-9*)

7

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

9 A.16 Yes.

AFFIDAVIT OF RONALD HOLMES AND KATHY HOLMES

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 Westmore, Vermont this 7th day of March 2025.

/s/ RONALD HOLMES

RONALD HOLMES

/s/ KATHY HOLMES

KATHY HOLMES