

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 24-1755-PET

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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

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**PRE-FILED TESTIMONY OF CYNTHIA KRIEBLE**

on behalf of Intervenors Ronald and Kathy Holmes, Elizabeth Tucker,  
Andrew Zebrowski, Megan Patton, Donna Dzugas-Smith and Robert Fitzpatrick

March 28, 2025

**Exhibits:**

Exhibit CK-1 Resume  
Exhibit CK-2 Painting of Lake from Hinton Hill by Krieble  
Exhibit CK-3 "Images of the Northeast Kingdom" The Newport Daily Express", June 12, 2024  
Exhibit CK-4 <https://www.vermonter.com/lake-willoughby-westmore-vermont/>  
Exhibit CK-5 The Newport Daily Express  
Exhibit CK-6 Rutland Daily Herald  
Exhibit CK-7 Seven Days  
Exhibit CK-8 The Vermonter  
Exhibit CK-9 The Boston Globe  
Exhibit CK-10 The Burlington Free Press, August 1986  
Exhibit CK-11 The Burlington Free Press, June 13, 1999  
Exhibit CK-12 Vermont Public Sale of Wheeler Mountain Ridgeline  
Exhibit CK-13 Willoughby from South, photo by Steve Wright

**Summary:** Cynthia Krieble presents testimony about the aesthetics of the area and whether the project would have an undue adverse aesthetic effect.

**Pre-filed Direct Testimony  
Of Cynthia Krieble**

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

2   A.1   My name is Cynthia Krieble. I received a BA in art history from Middlebury College,  
3   BFA in painting from San Francisco Art Institute and an MFA in painting from Stanford  
4   University. I have been a professional artist since 1973 and was a professor of painting and  
5   drawing at Central Washington University for 28 years. My legal address is 1610 North Water  
6   St., Ellensburg, WA 98926. From May through October my address is at my residence in  
7   Westmore, 1176 Old Cottage Lane, Barton, VT 05822. *Resume Exhibit CK-1.*

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

9   A.2   The purpose of my testimony is to attest to the natural beauty of the area and how an  
10   industrial tower would have an undue adverse aesthetic effect.

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

12   A.3   First, as a third generation summer resident of Westmore, my roots run deep in this area.  
13   To me it is my real home. My Sanborne grandparents first came to Willoughby in 1929 and  
14   started spending summer vacations here with their children, my mother and my uncle, living in  
15   an army tent pitched on their acre of land off of Peene Hill Road. Post World War II, after renting  
16   on Willoughby for several summers, my parents, Jim and Amanda Krieble, eventually bought  
17   property on Lunge Cove where I am now. In 1970 when Karl and Dorothy Wheeler were forced  
18   financially to sell some of their property at Wheeler Mountain, including the very popular hiking  
19   trails leading to Willoughby Lake overlooks, my parents purchased that land, fearing it would

1 otherwise be commercially developed. Having spent years at Willoughby before I can even  
2 remember, I have strong attachments to the lake and its surroundings; also a calling to follow in  
3 the footsteps of the generations before ours to protect Willoughby's unique natural landscape and  
4 rural character.

5 Secondly, the visual beauty of the natural world has always been the inspiration for my artwork.  
6 The landscape in Westmore and surroundings have been a major influence over the years.  
7 *Exhibit CK-2.* My partner, Jay Hudson, and I had an exhibition of our paintings, "Images of the  
8 Northeast Kingdom" last June 2024 at Satellite Gallery in Lyndonville. *Exhibit CK-3* One could  
9 say that I have been studying landscape as an aesthetic experience for my entire painting career  
10 and at the same time attempting to engage viewers to share, celebrate, and preserve its beauty  
11 through my artwork.

12 Thirdly, in a more general sense, as a teacher I have focused on visual relationships in my  
13 teaching as they create aesthetic, psychological, and emotional experiences for the viewer.

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

16 A.4 No

17 **Q.5 What have you reviewed to prepare your testimony?**

18 A.5 I have reviewed the plans for the ITW radio tower, the Westmore Town Plan, the  
19 Westmore Telecommunication Ordinance, testimony and exhibits posted by other Westmore  
20 residents, the Westmore ITW Information Session transcript *Exhibit MP-2*, the National Natural  
21 Landmark Registry, and multiple articles about Willoughby.

1    **Q.6    What is the nature of the project surroundings?**

2    A.6    I have not been to the specific site where the ITW tower is to be constructed, but know  
3    the general area to be rural and wooded less than a mile from the north beach. However the  
4    project surroundings which will be impacted by the tower extend far beyond the adjacent  
5    property owners. They include Lake Willoughby, its surrounding shores, farmlands, forests,  
6    ridges and mountains, all of which have remained remarkably unspoiled compared with many  
7    scenic places in the United States.

8    The exceptional nature of the surroundings has been lauded repeatedly over 150 years: Here  
9    are just a few selected descriptions to flesh out the pristine and awe inspiring nature of the place  
10   as seen through others' eyes:

11            **“Discover the Magic of Beautiful Lake Willoughby”**, Vermonter.com, William  
12            Alexander, March 21, 2025

13            “[Vermont](#) is home to some of the most picturesque and tranquil lakes in the  
14            United States. One of the most stunning of these is Lake Willoughby, located in  
15            the heart of [Vermont's Northeast Kingdom](#). With its crystal-clear waters,  
16            breathtaking views, and unspoiled natural surroundings, Lake Willoughby is a  
17            true hidden gem that should be on every nature lover's bucket list.” *Exhibit CK-4*

18            **“Willoughby Lake, America’s Lucerne”** the Newport Daily Express, Aug. 16, 1951

19            “Only one thing has seemed to be on everyone’s agenda and that is to be sure and  
20            see Willoughby Lake...this year and group were no exception. Scenically, Lake  
21            Willoughby was the highlight of their trip...and that included up Mt. Mansfield  
22            and Smuggler’s Notch...It [Willoughby] really is awe inspiring.” *Exhibit CK-5*

23            **“Vermonter tells of “Lake that Lures”**, Rutland Daily Herald, 1916.

24            “Mortimer R. Proctor writes from California: “Vermont possesses no one natural

8           **“Mind the Gap: A Getaway on and Around Lake Willoughby”**, Paula Routly, July 27,  
9           2021

10                   “Nothing adequately prepares you for the spectacle of Lake Willoughby, a glacial  
11                   gash between two fjord-like mountains in Vermont's Northeast Kingdom.  
12                   Although it's been around for at least 11,500 years, the state's most dramatic  
13                   landscape has a way of surprising visitors — including returning ones, like me. Its  
14                   ice-carved splendor reveals itself, like a secret, and takes your breath away.”  
15                   *Exhibit CK-7*

16 "Willoughby Lake" by James P. Taylor, The Vermonter, July 1912, Vol. XVII No.7.

17                   “Willoughby is in the heart of the lake district of the Green Mountain  
18                   State... Willoughby is the most beautiful of them all... There are, in fact, two  
19                   Lakes Willoughby, the lake of the forest and cliff and landslide, and the lake of  
20                   groves and sloping hills and open country.” *Exhibit CK-8*

21 "Vermont's Mystical Lake Willoughby Springs Back", Boston Globe, Sept. 03, 1989

22 "Lake Willoughby is Vermont's most mysterious, magnificent, magical lake...It's  
23 the kind of "romantic" landscape beloved by 19<sup>th</sup>-century tourists." *Exhibit CK-9*

24       **“Success Hasn’t Spoiled It - Lake Willoughby has the Power to take Your Breath**  
25       **Away”**, The Burlington Free Press, Candace Page, August 14, 1986.

1       “Each time we crest the hill, round the bend and look down on Willoughby  
2       Lake...the view hits us somewhere beneath the breast bone. There’s an  
3       involuntary intake of breath. Two mountains plunge into a narrow lake, their  
4       mottled cliffs like the abandoned fortresses of an ancient race.” *Exhibit CK-10*

5       **“Willoughby and Groton: Crown Jewels”**, The Burlington Free Press, June 13, 1999

6       “Lake Willoughby...The scenery is breathtaking and like most of the Northeast  
7       Kingdom, there is little to detract from the beauty. ‘It’s the best of both worlds  
8       because there are all the amenities but it’s still largely undisturbed’, McCann  
9       said.” *Exhibit CK-11*

10      Lake Willoughby also has the distinction of being designated as a National Natural Landmark  
11      Here is how the Willoughby Lake Area is described in the National Natural Landmarks  
12      Directory (2009).

13       *“Lake Willoughby, a deep, cold-water lake within Lake Willoughby Natural Area lies in  
14       a u-shaped trough cut into granite by glacial scouring. Mountains and 1,500-foot cliffs  
15       rise abruptly from the lake’s east and west shores. It is the deepest lake in Vermont and  
16       one of the most significant and scenic examples of glacial erosion in the northeast.”*

17      As Raymond Lanier says so clearly in his testimony, this designation “brings a responsibility of  
18      keeping the area surrounding Lake Willoughby in accordance with this designation so that it  
19      remains a National Natural Landmark for future generations. The proposed tower puts in  
20      jeopardy and infringes on this status as it will be visible from the lake as well as from portions of  
21      VT-5A.” *Exhibit RL-2, p.102*

22      **Q.7      Is the project’s design compatible with its surroundings?**

23      A.7      Absolutely not! The existence of the 140-153 foot structure with its industrial lattice  
24      design rising up above the tree line by 70 to 100 feet is totally incompatible with its rural

1   surroundings. It will contaminate the natural beauty of the area with its industrial presence  
2   dominating the surrounding woodlands, rolling hills and mountains. It alters the overall natural  
3   character of the entire Willoughby basin as it is visible from nearby places like the north beach to  
4   further away vantage points like Hinton Hill or Pisgah. If I were to paint an imposing manmade  
5   structure into an otherwise natural landscape painting, the picture would become an entirely  
6   different experience. It would no longer be a celebration of nature, but rather a statement  
7   exposing encroachment of human industrialization upon the wonders and beauty of the natural  
8   world. It is not the experience that most people living or visiting Westmore come here for; to the  
9   contrary, it is the experience they are often trying to escape.

10   **Q.8   What is the project's impact on open space?**

11   A.8   Even if rising vertically in a clearing in a forested area, I would say that psychologically  
12   the tower would impact the feeling of open space. Its massive scale, especially its height at 140'  
13   with added antennae up to 153', will by comparison diminish the scale of its nearby natural  
14   surroundings, tree lines, fields, the ridges, as well as mountains including the majestic glacially  
15   formed gap between Pisgah and Hor which earned Lake Willoughby its National Natural  
16   Landmark designation. Willoughby and the surrounding area will feel smaller and closed in.  
17   Claustrophobic might be a bit extreme, but definitely the feeling of the natural landscape  
18   expanding in all directions will be negated. The natural scale of relationships between elements  
19   in the landscape will be altered. For instance the Willoughby gap might not seem so dramatic  
20   anymore by comparison with a 150 foot tower in the foreground. *Exhibit DD-4*

21   **Q.9   Where is the project visible from?**

1    A.9    Of course the residents whose properties abut the proposed tower location will have the  
2    tower visible in their daily lives as they have attested. From the simulations and balloon tests it  
3    is clear that it will be seen along the VT scenic byway 5A, out on the lake, from cottages,  
4    residences, The Willoughby Store, Willoughvale Inn, from Hinton Hill Road up to Sentinel Rock  
5    Park, Pisgah trails and other mountaintop trail lookouts, and from Cooke Road. Most likely it  
6    will be possible to see it from the furthest outlook on the very popular Wheeler Mountain hiking  
7    trail which has views of Willoughby. In 2024 the state of Vermont made a significant public  
8    investment in the purchase of the mountain's iconic ridgeline, cliffs, and summit encompassing  
9    all of the trail. *Exhibit CK-12*. Given the radio tower's certain visibility, without a doubt this  
10   project will have an intrusive visual impact throughout the area.

11   **Q.10   Would the project have an adverse effect on the aesthetics of the area?**

12   A.10   Most definitely the industrial and out-of-scale tower would scar the area's natural beauty.  
13   That natural beauty is fundamental to why many people choose to live here and tourists come to  
14   visit. The aesthetics of the area are enhanced by the feeling of the natural surroundings being left  
15   "untouched", "unspoiled", "pristine", and "undisturbed". In my lifetime I have watched  
16   generations, past and present, as stewards of this precious landscape, devote themselves to  
17   keeping it as unspoiled as possible. The presence of a towering industrial structure would  
18   definitely negate those feelings of connection with the natural landscape and its geological  
19   history that makes Willoughby such an exceptional place and a rarity in this ever  
20   commercializing and industrializing world.

21   **Q.11   Does the project violate a clear, written community standard intended to preserve  
22   the aesthetics or scenic, natural beauty of the area?**

1 A.11 This project is not in compliance with Westmore Town Plan in regards to maintaining  
2 Willoughby's NNL designation as well as protecting the scenic landscape of the entire Lake  
3 Willoughby area.

4 The Westmore Town plan under section **3. POLICY STATEMENTS** states:

5 4. Any development 100 feet or higher that can be viewed from any point in the National  
6 Natural Landmark designation area should be considered a development of substantial  
7 regional impact. (Overall Vision)

8 Also the ITW project violates the Westmore TeleCommunication Ordinance Article VIII stating  
9 that "a permit shall not be granted for a tower or facility built on speculation of a future  
10 letter of intent or contract with a licensed telecommunications provider". This ITW has  
11 no requests from either cell or internet providers to use the tower so its construction  
12 appears to be based more on speculation than demand. *See the letter from the Westmore*  
13 *Planning Commission's March 6, 2025 detailing the sections of the Westmore Town Plan*  
14 *and Telecommunications Ordinance that the tower does not comply with, and the*  
15 *Westmore Select Board's March 25, 2025 letter recommending denial of the tower based*  
16 *on the Planning Commission's review.*

17 **Q.12 Is the project out of character with its surroundings; does it offend the sensibilities**  
18 **of the average person?**

19 A.12 Yes. All the residents and visitors that I know cherish the natural beauty and character of  
20 Willoughby and its surroundings. They come to escape the industrialization and urbanization  
21 elsewhere. The offensiveness of an unnatural structure like this intruding into a place where

1 people come to experience the joy and relaxation of being in a natural environment is similar to  
2 the offensiveness you would feel if you were listening to a harmonious, soothing piece of  
3 instrumental music and it was suddenly interrupted with a loud screeching noise. That jarring  
4 sound in the midst of harmony experienced by the listener is similar to the viewer seeing a  
5 massive industrial tower rising up in the midst of an aesthetically pleasing natural landscape.  
6 Only it would not be there just creating momentary distress, it would be there permanently day in  
7 and day out throughout all seasons of the year.

8 **Q.13 Have the applicants failed to take generally available mitigating steps that a  
9 reasonable person would take to improve the harmony of the proposed project with  
10 its surroundings?**

11 A.13 I have not heard or read anything indicating that they have done anything to take  
12 mitigating steps in order to make the project more in harmony with its surroundings.

13 **Q.14 Would the project have an undue adverse effect on the aesthetics of the area?**

14 A.14 Yes. The extraordinary beauty of the Willoughby basin with its dramatic granite cliff  
15 mountains forming the deep glacial gap at one end of the lake and the more gentle rolling  
16 countryside of woods and fields at the other would be permanently marred by an industrial  
17 structure towering up over the trees. This much lauded area has been called “the last piece of  
18 paradise in the lower 48”. *Exhibit CK-11*. It should not be allowed to lose that acclaim! With the  
19 addition of the ITW tower, which would be clearly visible in this vista *Exhibit CK-13*, the  
20 landscape of Westmore, treasured and protected over the generations, would never again be the  
21 same “crown jewel” of the Northeast Kingdom were this project to go ahead. I would also like to  
22 stress that the undue adverse aesthetic effect of this project would also degrade the quality of life

1 for those who know the area well. For many Westmore residents as well as visitors this  
2 aesthetically unique place has become a part of their own identities; to industrialize the landscape  
3 and compromise its natural beauty would destroy a piece of themselves.

4 **Q.15 Does this conclude your testimony?**

5 A.15 Yes

**AFFIDAVIT OF CYNTHIA KRIEBLE**

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 28<sup>th</sup> day of March 2025.

/s/ Cynthia Krieble

CYNTHIA KRIEBLE