

MEMO

Date: April 20th, 2026

To: Project Review Committee

From: Sam Lash, Climate & Energy Planner

Re: Updates on Recent Section 248, and Section 248a Permit Applications

Summary: This memo includes a variety of updates on ongoing projects, one new solar project (preferred site), one De Minimis 248a project, and a third Advance Notice for the Washington Cell Tower.

General Updates:

1. Monthly Report on Small-Scale Distributed Energy Generation Projects:

- a. See regional total by town, along with year-to-date monthly tracking updates in the table at the end of this memo- we are still seeing a small handful of residential-scale projects each month.

248 Updates (Electric Infrastructure)

2. One new solar project in Waitsfield is a 108kW rooftop project- this qualifies automatically as a preferred site- no review required.

3. Minor Update: GMP Irasville Substation Upgrade, Waitsfield & Fayston (25-2468-PET)

The petition was filed for the GMP Irasville Substation Upgrades in Waitsfield/Fayston on 10/10/2025. The Project would include rebuilding the Irasville #39 and reconfiguring both 34.5kV transmission line 3310 and 12.5kV distribution circuits. GMP states that the substation is at the end of its useful life and that the rebuild will improve backup capacity for the Madbush #38 substation. **Last Meeting (March 26th, 2026)** reviewed Department of Public Service affirmative comments and 202(f) determination (consistent with VT Electric Plan) and proposed filings and draft CPG from 3/19/2026 (see previous meeting packet for full summary and context).

Updates:

- Additional testimony was provided that the tree removal planned is consistent with the conservation measures for the protection of potential summer habitat for protected bat species (4/2/26).
- The PUC requested that The Agency of Agriculture, Food, and Markets (VAAFAM) reply to questions from GMP and concerns from the hearing officer regarding language from their previous comments (reviewed at the February 26, 2026 Project Review Committee Meeting)- the language in question requested the Commission find in any order issued approving the Project “that any future substantial or nonsubstantial change that will impact PAAS should take into consideration the total cumulative impacts to PAS, including the impacts of this project.”. The Hearing Officer noted that future changes or upgrades will be reviewed under the requirements of 30 V.S.A 248 and Commission Rule 5.400; a finding regarding future changes is not appropriate. **AAFM is expected to reply by 4/27/2026.**

248a Updates (Telecommunications)

1. **De Minimis Cases:** 1 (Waterbury & Berlin) reviewed & met criteria¹
2. **Update: Marshfield Cell Tower (25-1543-PET)**

Staff continue to follow the case and all activities are logged. See the previous meeting memo for background and extensive summaries and links. Notably, the Vermont Department of Public Service submitted an Aesthetic & Orderly Development Analysis Report on 1/30/2026². This was summarized comprehensively in the memo from the **February 26th, 2026 Project Review Committee meeting (7d)**³. CVRPC received notice of the amended hearing schedule (see below), of the filing of the Intervenor's response to Discovery (3/6/26), and of the Depositions of Michael Xenakis, Alice Peal, and Robin Gomez (3/16/26). The deadline for prefiled rebuttal testimony was 4/20/2026 (additionally the deadline for dispositive motions, completion of depositions, and non-Petitioners to respond to discovery have also passed). **The Evidentiary Hearing via videoconference will be on April 30, 2026 at 9:30am.**

3. **NEW: The Towers, LLC (Vertical Bridge) and Bell Atlantic Mobile Systems (Verizon Wireless) 97 Hart Hollow Road, Washington (26-0622-AN)**

CVRPC received a 60 day advance submission of Bell Atlantic Mobile Systems LLC and The Towers, LLC pursuant to 30 V.S.A 248a(e), proposing to request a certificate of public good authorizing the installation of wireless telecommunications equipment at 97 Hard Hollow Road in Washington. **This is the third 60-day Advance Notice for this project at this location- the first AN was filed on 10/9/2024 and the second on 4/15/2025. The present filing addresses concerns previously raised by CVRPC regarding the generator and incorporates updated equipment specifications (propane instead of diesel).**

- December 3rd, 2024 Project Review Committee Meeting concern was expressed regarding the project's siting by a groundwater source protection area (see checklist below- "other") particularly regarding the use of a diesel-fueled backup generator with onsite diesel fuel storage. **These comments were shared with the project and this project iteration has changed the generator to a propane generator in light of these comments. ([25-01-30 PRC-Meeting-Packet.pdf](#))**
- At the December 3rd, 2024 Project Review Committee meeting aesthetic concerns adjacent to Washington's historic village.
- February 27th, 2025 Project Review Committee meeting included a description of the public meeting held by the Town of Washington with the developer on February 11th, 2025. There was some support from Washington residents, but many in attendance expressed opposition to the proposal citing concerns about the potential impacts on aesthetics and the town's rural

¹ Project qualifies as a de minimis modification under 30 V.S.A. § 248a(b)(2) as long as: Excluding equipment, antennas, and ancillary improvements, the Project does not involve increasing the height or width of the existing structure. The Project will not increase the total amount of impervious surface by more than 300 square feet. The Project will not result in any new antennas or equipment on the support structure that will extend more than 10 feet above the structure or more than 10 feet horizontally from the structure. Finally, the net increase in surface area from new equipment on the structure will be less than 75 square feet. The project as proposed does not conflict with any existing permits.

² <https://epuc.vermont.gov/?q=downloadfile/796647/205750>

³ https://centralvtplanning.org/wpcontent/uploads/2026/02/7d.PRC_Memo_Draft26_02_26.pdf

character as well as concerns about the generator fuel type and questions about the potential for co-location. [25-02-27-PRC-packet.pdf](#).

- At the December 11th, 2025 Selectboard meeting, the Town of Washington's Selectboard voted to oppose the project noting the primary concern was on the visual impact of the tower on the village. A public meet was held February 11th, 2025 after a balloon test in January.
- Washington's Town Plan (Nov. 2024) notes that telecommunication towers have emerged as a planning concern due to their visibility but also that a previous Town Meeting Survey showed that a substantial majority of respondents believe that "cell service and broadband [is] important to the future of Vermont's economy." And thus the plan supports the development of communication towers (page 36).
- Map 8 of Washington's Town Plan shows the site is proximate to the Village and Housing Growth Locations (page 76)
- Map 14 of Washington's Town Plan shows the site is proximate but appears to be outside of Zone 2 of Well Head Protection Areas (page 82)
- The project appears to be sited at the border of the wetland protection area identified in the Town of Washington's Town Plan Map 1.

Mapping layers checked per Regional Plan (consistent with Act 174 Planning Atlas Tab) are represented in checklist below (248 Energy Infrastructure Siting Review). CVRPC staff's preliminary review was based on all available information at the time and reserves the right to review future materials submitted concerning this case should they become available.

Project Basics: The project is located at 96 Hart Hollow Road just after the intersection with Turnpike Road off Route 110 and south of the village.



The project will consist of a 50'x50' compound enclosed by a 7' high chain link fence, with a locked gate around a 135'AGL monopole tower with 9 antennas in 3 sectors with a centerline height of 130'AGL (highest appurtenance of the Tower, a lightning rod, extends to 139'AGL), 6 remote radio heads, and one OVP distribution box. There will be a 6'x10' equipment canopy. The canopy will sit on a 12'x20' concrete foundation with cabinets with electronics and a 50kw propane generator to be tested weekly (and with an above ground propane tank).

- Additional impervious surface: 3,634.6sq feet; total permanent earth disturbance approximately 5,227.2sqft (of which clearing is estimated to be approximately 4,791.6sqft);
- Culverts, check dams, water bars and silt fencing placed along the access and at the Compound as necessary to control erosion in conformance with the Vermont Low Risk Site Handbook for Erosion Prevention and Sediment Control;
- Access will include an approximately 12' wide gravel access drive extending from the existing driveway;
- Utilities will follow the access from an existing utility pole on Hart Hollow Road.

See attached AN and permit drawings.

Received April 3rd, 2026- 60 days notice

- **Developer requests comments within 30 days (May 3rd) to be considered prior to the application filing but 60 day period does not end until June 2nd**

After June 2nd, the project application will be filed and CVRPC will receive a notification and have 30 days (July 2nd) to file comments, a motion to intervene or request for hearing with the Commission.

Project Site:	97 Hart Hollow, Washington
KNOWN STATE CONSTRAINTS	
Confirmed Vernal Pools	N
DEC River Corridors	N (approx. 0.2miles away at shortest distance)
FEMA Floodways	N
Significant Natural Communities & Rare, Threatened, & Endangered Species	N
National Wilderness Areas	N
Class 1 & 2 Wetlands	existing wetlands within the parcel proximate see Z2
Locally or Regionally Identified Critical Resources Wetland Protection Area (Map 1 (Town Plan 2024)	The project appears to be sited at the border of the wetland protection area identified in the Town of Washington's Town Plan Map 1
POSSIBLE STATE CONSTRAINTS	
Potential & Probable Vernal Pools	N
(Prime) Agricultural Soils	N (but proximate overlapping with highest priority blocks and existing wetlands shown on plans)
FEMA Special Flood Hazard Areas	N
Protected Lands (State fee lands and private conservation lands)	N
Act 250 Agricultural Soil Mitigation Areas	N
Deer Wintering Areas (DWA)	N
Highest Priority Interior Forest Blocks, Connectivity Blocks, Physical Landscape Blocks, Surface & Riparian Areas (ANR)	Y (highest priority physical landscape, interior forest, and connectivity forest block; no surface water highest priority but proximate)
Hydric Soils	N but proximate (see figure below, as close as 0.2 and overlapping also with existing wetlands noted on plans)
<i>Regionally or Locally Identified Resources</i>	
POSSIBLE REGIONAL CONSTRAINTS	
Elevations above 2500ft	N
Slopes greater than 25% (excludes rooftop and associated with existing development- unless new concerns for landslides)	N
250ft Lake Shore Protection Buffers (excludes rooftop and hydroelectric facilities)	N
Other	
<ul style="list-style-type: none"> • Map 8 of Washington's Town Plan shows the site is proximate to the Village and Housing Growth Locations (page 76) • Map 14 of Washington's Town Plan shows the site is proximate but appears to be outside of Zone 2 of Well Head Protection Areas (page 82) • Additional impervious surface: 3,634.6sq feet; total permanent earth disturbance approximately 5,227.2sqft (of which clearing is estimated to be approximately 4,791.6sqft); • Culverts, check dams, water bars and silt fencing placed along the access and at the Compound as necessary to control erosion in conformance with the Vermont Low Risk Site Handbook for Erosion Prevention and Sediment Control; 	

- Existing telecommunications facilities and structure for possible co-location were evaluated, while not identified for this project, to support 30 VSA 202c (availability of wireless telecommunication services) this tower was designed to accommodate co-location in the future by other wireless communication providers.

The project is in line with the Wireless Telecommunication Facilities Goal of Effective and efficient communication systems (Utilities, Facilities, & Services, 5-55, page 138) policies 1, 2, and 3. ([2016-CVRPC-Regional-Plan-readopted-2024 Effective-July-9-2024.pdf](#)). The projects proximity to wetlands is of note and could be further evaluated.