

MEMO

Date: July 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 1 248 project (upgrade and repowering of an existing GMP Solar Facility in Berlin) and an update on the Telecommunications Tower Proposed in Washington.

248 Updates (Electric Infrastructure)

1. 45-Day Advance Notice Petition of GMP to Upgrade and Repower Its Existing Berlin Solar Facility (248j)

The Project Review Committee discussed this project at the previous meeting but the preliminary review was not included in the packet. Likely Action: submit preliminary review as public comment.

CVRPC received the Advance Notice on June 18th (sent June 9th), which notes that GMP is preparing to file a petition for approval to update and repower its existing Berlin Solar facility by replacing the existing panels and inverters with new panels and inverters in the same area to keep generating power for customers. GMP anticipates filing the petition on or around July 24th, 2026. **This project will increase the output to 300kW without any increase to the footprint of the existing project.**

- The existing project was issued a Final Order on May 4th, 2010 in Docket No. 7601 and a CPG pursuant to 30 V.S.A 248(j); the project was constructed at GMP's Berlin Plant #5 on Dog River Road in Berlin, in the 2010 timeframe. The current facility has a capacity of 199.9kW. This project consists of 39 fixed, ground-mounted racks, consisting of 952 PV modules with outputs of 210 watts each, and 2 central inverters with a maximum capacity of 100kW each.
- This project would be modifying the existing CPG. Existing equipment (panels and inverters) will be removed and replaced with:
 - 816 PV modules installed on existing racking (no additional racking needed), these have output of 435 watts.
 - Two inverters will be removed and replaced with three string inverters within existing inverter building. New AC output 300kW.
 - GMP plans to use existing conduits unless repair or replacement is needed.
 - Pole Mounted three phase transformer will be upgraded from 225 KVA to 300KVA (same distribution pole).
- Same footprint, same site access (from Nelson Drive)
- Proposal includes installing a perimeter fence (minimum 7' according to the plan).
- **Project Need:** central inverters are beyond serviceable life (manufacturer no longer in business). Alternatives considered included leaving project as it is and removing it. Repowering it was considered the preferred and least cost option as it maximizes the existing site and equipment,

while allowing for additional generation to support growing Tier II RES obligations (Renewable Energy Standard).

- **Impact:**

- Nelson Drive is a dead-end road leading to the existing electrical substation west of the Project Site after a railway cross. The site is not publicly accessible. There is no change in the use of the area; given existing footprint and facilities this project will not result in undue adverse impacts to aesthetics, scenic, and natural beauty of area even though no aesthetic mitigation is proposed.
- Project setback is approximately 32 feet which is less than the minimum setback from municipal highways (30 V.S.A §248(s))- GMP has entered into a Setback Agreement with the Town of Berlin to allow for this.
- Existing Roads (Dog River Road and Nelson Drive), unlikely to disrupt traffic (and only during construction).

Preliminary Review of Advanced Notice:

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 Site:	Berlin #5 Plant, Nelson Drive
KNOWN STATE CONSTRAINTS	
Confirmed Vernal Pools	No (proximate, north of Berlin #5 plant which is west of project site)
DEC River Corridors	Yes- DEC River corridor overlaps project at northeast and along east side of the project. See blue line on plan.*
FEMA Floodways	No (proximate but not in project footprint; shown on site map as black and light blue dashed line)
Significant Natural Communities & Rare, Threatened, & Endangered Species	No
National Wilderness Areas	No
Class 1 & 2 Wetlands	No (proximate to the east and north of site but not within footprint, wetlands and 50' buffer shown on site map in pink)
Locally or Regionally Identified Critical Resources	Consistent with use of area
POSSIBLE STATE CONSTRAINTS	
Potential & Probable Vernal Pools	No
(Prime) Agricultural Soils	No (not prime; does overlap with statewide (b) agricultural soils)

FEMA Special Flood Hazard Areas	Yes- majority of site overlaps with Special Flood Hazard Area (except for southwest corner) see light blue line on site map.*
Protected Lands (State fee lands and private conservation lands)	
Act 250 Agricultural Soil Mitigation Areas	No
Deer Wintering Areas (DWA)	No (proximate on other side of Berlin Plan #5 west of the project)
Highest Priority Interior Forest Blocks, Connectivity Blocks, Physical Landscape Blocks, Surface & Riparian Areas (ANR)	Yes- entirety of project area overlaps with physical landscape block fine sediments/wet flats representative, and for surface water and riparian areas. No overlap for interior forest blocks nor for connectivity blocks.
Hydric Soils	Yes, entirety of project area and majority of neighboring railway and Berlin #5 Plant and substation)
<i>Regionally or Locally Identified Resources</i>	Consistent with current use of area.
POSSIBLE REGIONAL CONSTRAINTS	
Elevations above 2500ft	No
Slopes greater than 25% (excludes rooftop and associated with existing development- unless new concerns for landslides)	No
250ft Lake Shore Protection Buffers (excludes rooftop and hydroelectric facilities)	No
Other	
• More than half of the existing and repowered project is prime solar. • Consistent with current use of area- repowering existing project. • *staff reached out to GMP (Preston Gregory, Leader of Renewables and Field Operations): the site did not experience flooding in 2023 nor 2024.	

248a Updates (Telecommunications)

2. De Minimis Cases: None ¹

3. Ongoing: 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

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.

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).

- **Summary of process, project materials, and preliminary review can be found in previous meeting materials (April 23rd, 2026; May 28th, 2026; June 2026)²**
- **Update:** Applicant, Town representatives, Public Service Department Representative, and CVRPC staff (Sam Lash), met on June 30th, 2:30pm to discuss other sites, staff will report out on meeting and communication since.
- CVRPC will receive a notification and have 30 days from when the project application is filed and deemed complete to file comments, a motion to intervene, or request for hearing. **No Petition has been filed at this time.**

² https://centralvtplanning.org/wp-content/uploads/2026/04/26-04-23-PRC_Packet_with_Memo.pdf
https://centralvtplanning.org/wp-content/uploads/2026/05/26_05_28_FullPacket.pdf
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