

**STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION OF
XCEL ENERGY AND ITC MIDWEST LLC FOR
A CERTIFICATE OF NEED AND A ROUTE
PERMIT FOR THE HUNTLEY-WILMARTH
345-KV TRANSMISSION LINE PROJECT

DOCKET NO. E-002, ET6675/CN-17-184

DOCKET NO. E-002, ET6675/TL-17-185

OAH Docket No. 82-2500-35147
(Combined)

DIRECT TESTIMONY OF

MICHAEL FISCHER

On Behalf of

THE CITY OF NORTH MANKATO

November 7, 2018

Table of Contents

I. INTRODUCTION	3
II. ROUTE OPTIONS OPPOSED BY THE CITY OF NORTH MANKATO	5
III. NORTH MANKATO’S LAND USE AND COMPREHENSIVE DEVELOPMENT PLAN.	6
IV. CONFLICTS POSED BY RED AND GREEN ROUTE ALTERNATIVES AND ALTERNATIVE SEGMENTS A AND B	9
V. CONCLUSION.....	19

I. INTRODUCTION

Q: Please state your name and business address.

A: Michael Fischer, 1001 Belgrade Avenue, North Mankato, MN 56003.

Q: By whom are you employed, and in what capacity?

A: I am the Community Development Director in the department of Community Development at the City of North Mankato.

Q: What is the purpose of your testimony?

A: The purpose of my testimony is to describe the objections of the City of North Mankato regarding those portions of the Proposed Red and Green Route Alternatives, as well as Alternative Segments A and B, that traverse through the western and southern areas of North Mankato that are already developed or planned for future development, as explained below. Those portions of the Red and Green Route Alternatives, as well as Alternative Segments A and B, will result in detrimental impacts to North Mankato and its residents and should be rejected as viable routes.

Q: Please describe your professional background.

A: I earned a B.A. in Geography and a minor in Local and Urban Affairs from St. Cloud State University in 1991. I have been employed by the City of North Mankato as Community Development Director since 1997. From 1994 to 1997, I was employed by the Upper Minnesota Valley Regional Development Commission as a Regional Development Planner. From 1992 to 1994 I was employed by the City of New Ulm, Minnesota as a Planning Assistant. Combined, I have 26 years of planning and land use experience.

1 **Q: Have you ever testified before the Minnesota Public Utilities Commission?**

2
3 **A:** No.

4 **Q: Are you including any exhibits with your testimony?**

5 **A:** Yes, in addition to my Testimony (**Exhibit No. NM-1**), I am submitting these additional
6 exhibits:

7 Exhibit No. NM-2: Full Scoping Map (Scoping Decision Map 1 of 13)

8 Exhibit No. NM-3: North Mankato, Location Views, and Legend

9 Exhibit No. NM-4: North Mankato Comprehensive Plan

10 Exhibit No. NM-5: Planned Commercial Development in North Mankato

11 Exhibit No. NM-6: View at North Mankato Location 1

12 Exhibit No. NM-7: View at North Mankato Location 2

13 Exhibit No. NM-8: View at North Mankato Location 3

14 Exhibit No. NM-9: View at North Mankato Location 4

15 Exhibit No. NM-10: View at North Mankato Location 5

16 Exhibit No. NM-11: View at North Mankato Location 6

17 Exhibit No. NM-12: View at North Mankato Location 7

18 Exhibit No. NM-13: View at North Mankato Location 8

19 Exhibit No. NM-14: Map Depicting Existing and Proposed Residences in North
20 Mankato Within 500' of Red and Green Route Alternatives

21
22 Exhibit No. NM-15: Sanitary Sewer Service Area Served by Aspen Lift Station

23 Exhibit No. NM-16: Chart Summarizing Investment in Roads to Accommodate
24 Westward Expansion of North Mankato

1 **II. ROUTE OPTIONS OPPOSED BY THE CITY OF NORTH MANKATO**

2
3 **Q: Please describe the specific Proposed Route Alternatives and Alternative Segments**
4 **that are of concern to the City of North Mankato.**

5
6 **A:** North Mankato objects to specific portions of the Red and Green Route Alternatives, as
7 well as Applicants' Alternative Segments A and B. Attached hereto as **Exhibit No. NM-2** is a
8 map pulled from the Department of Commerce's "Environmental Impact Statement Scoping
9 Decision," dated July 17, 2018, labeled "Map 1 of 13." This is one of the maps showing the
10 route alternatives being considered. The objectionable portions of the Red and Green Route
11 Alternatives begin north of North Mankato where the Red and Green Route Alternatives turn
12 south from the existing 345 kV Wilmarth-Lakefield Junction Line at Belgrade Township, and
13 end where the Red and Green Route Alternatives meet Alternative Segment E. North Mankato
14 objects to all of Alternative Segments A and B.

15 **Q: Does North Mankato object to the entirety of the Proposed Red and Green Route**
16 **Alternatives?**

17
18 **A:** North Mankato objects to those portions of the Red and Green Route Alternatives
19 described above, as well as Alternative Segments A and B. **Exhibit No. NM-3** is a close-up of
20 the proposed Red and Green Route Alternatives and Alternative Segments A and B in the North
21 Mankato area, depicting the areas of concern to North Mankato. There are two route alternatives
22 that would connect a portion of the Purple Route Alternative (running north of North Mankato)
23 to the more southern portions of the Red and Green Route Alternatives south of North Mankato
24 using "Alternative Segment E." North Mankato does not object to the "Purple – E – Red" Route

Alternative or the “Purple – E – Green” Route Alternative because these alternatives avoid North Mankato’s existing and planned development.

Q: Please summarize North Mankato’s objections to these portions of the Proposed Red and Green Route Alternatives and Alternative Segments A and B.

A: The portions of the proposed route alternatives described above interfere with the City’s near- and long-term growth plans. Because the City of Mankato and the Minnesota River are to the east and south of North Mankato, North Mankato has limited areas for growth. Growth opportunities for North Mankato are primarily to the west and north. However, to the north of North Mankato is the existing 345 kV Wilmarth-Lakefield Junction Line (running east-west). With that 345 kV transmission line already abutting the northern growth area, locating the 345 kV Huntley-Wilmarth Line on the community’s western and southern boundaries will have a negative impact on the future growth planned and expected as identified in North Mankato’s comprehensive land use plan. North Mankato effectively would be surrounded by 345 Extra High Voltage (“EHV”) transmission lines.

III. NORTH MANKATO’S LAND USE AND COMPREHENSIVE DEVELOPMENT PLAN

Q: Does North Mankato have plans to grow?

A: Yes. North Mankato is growing and it has a vision for how the City plans to manage and foster that growth. The City’s plans are documented in its Comprehensive Development Plan (the “Comprehensive Plan”), as adopted in 2015, which sets forth the City’s vision and roadmap for approximately the next 20 years (**Exhibit No. NM-4**). The vision gives the community a

1 stated goal of what its future will be and is paramount in managing the growth and development
2 within the community. The ideas and goals expressed in the Comprehensive Plan reflect the
3 community's values and desires for the future of North Mankato.

4 **Q: Please describe the significance of North Mankato's Comprehensive Plan?**

5 **A:** The Comprehensive Plan is vitally significant to North Mankato. The Comprehensive
6 Plan guides the City Council and city management team as they make decisions involving
7 infrastructure, development, land acquisition, sales of public land, capital improvements, and
8 zoning and regulatory changes—all toward a consistent vision for the benefit of the citizens of
9 North Mankato. The City's management, staff, and residents use the plan on a daily basis to help
10 understand and implement this vision.

11 The Comprehensive Plan articulates North Mankato's long-standing City goals for
12 attracting investment in the form of new housing, retail, general commercial, industrial,
13 transportation infrastructure, neighborhood amenities, and jobs. The plan identifies geographic
14 locations where land use regulations will align with public and private investment aimed at
15 accommodating and encouraging growth.

16 The Plan represents the City's efforts to meet the process set forth in Minnesota Statutes
17 § 462.356 for putting into effect a "comprehensive municipal plan." The statute states:

18 Upon the recommendation by the planning agency of the comprehensive
19 municipal plan or sections thereof, the planning agency shall study and propose to
20 the governing body reasonable and practicable means for putting the plan or
21 section of the plan into effect . . . After a comprehensive municipal plan or section
22 thereof has been recommended by the planning agency and a copy filed with the
23 governing body, no publicly owned interest in real property within the
24 municipality shall be acquired or disposed of, nor shall any capital improvement

1 be authorized by the municipality or special district or agency thereof or any other
2 political subdivision having jurisdiction within the municipality until after the
3 planning agency has reviewed the proposed acquisition, disposal, or capital
4 improvement and reported in writing to the governing body or other special
5 district or agency or political subdivision concerned, its findings as to compliance
6 of the proposed acquisition, disposal or improvement with the comprehensive
7 municipal plan.
8

9 The Red and Green Route Alternatives and Alternative Segments A and B are inconsistent and
10 conflict with our planned growth initiatives.

11 **Q: Please describe the effort the City undertook to create and document its**
12 **Comprehensive Plan.**

13 **A:** This was a significant undertaking for the City of North Mankato that began in 2013 and
14 is summarized at pages 1-2 of the Introduction to the Plan:

15 The Comprehensive Plan process began in the summer of 2013 and is the first
16 comprehensive plan for the City of North Mankato. At the beginning of the
17 process, relevant background information was collected and reviewed,
18 including demographic data, zoning and subdivision regulations, and historic
19 housing and building permit data. The process included a review of existing
20 pertinent planning documents such as the Downtown Planning Study Envision
21 2020, Mankato Area Transportation and Planning Study, Nicollet County
22 Comprehensive Plan, Greater Mankato Transit Redesign Study, Benson Park
23 Master Plan, Mankato City Center Renaissance Plan, and MPO planning
24 documents. Because this is the first Comprehensive Plan for North Mankato,
25 an inventory of all land uses in the City was conducted.

26 Valuable input was also gathered from those in the community. Focus group
27 meetings were held with specific stakeholders including local government
28 representatives, the business community, institutional stakeholders, and other
29 organizations including Nicollet County Environmental Services, Region 9
30 Development Commission, BENCO Electric, and CenterPoint Energy.

31 The Plan's introduction goes on to describe the City's community outreach efforts,
32 including open houses and solicitation of comments and input on the Comprehensive
33 Plan.

1 **IV. CONFLICTS POSED BY RED AND GREEN ROUTE**
2 **ALTERNATIVES AND ALTERNATIVE SEGMENTS A AND B**
3

4 **Q: Could you please identify some of the specific conflicts posed by the Applicant's**
5 **proposed Red and Green Route Alternatives and Alternative Segments A and B?**

6 **A:** The Red and Green Route Alternatives and Alternative Segments A and B traverse directly
7 through the planned “North Ridge Residential Development” area, which is planned for low
8 density, single family homes, and is the blue shaded area identified in Exhibit No. NM-3. The City
9 also has plans for general commercial growth in the blue shaded area. *See also Exhibit No. NM-5,*
10 depicting area proposed for general commercial development. The same route alternatives traverse
11 directly through another new residential community called the “North Mankato South Boundary
12 Residential Development,” which is the pink shaded area identified in Exhibit No. NM-3. *See also*
13 North Mankato’s Comprehensive Plan (Exhibit No. NM-4 at Figure 3-2: Future Land Use). The
14 Red and Green Route Alternatives also conflict with the planned North Port Industrial Park
15 expansion and other mixed use areas, as identified in North Mankato’s Comprehensive Plan, and is
16 the orange shaded area in Exhibit No. NM-3. The conflicts presented by the Red and Green Route
17 Alternatives are not cured by Applicants’ Alternative Segments A or B. Alternative Segment A
18 (which would connect the Purple and Red/Green Routes in the North Mankato area) also directly
19 conflicts with the North Ridge Residential Development area. Alternative Segment B is
20 problematic because it also traverses directly through the middle of the North Ridge Residential
21 Development. There has been and continues to be active development along North Mankato’s
22 western boundary into the North Ridge Residential Development area, and North Mankato expects
23 that growth to continue. Additionally, the land encompassed by the South Boundary Residential

1 Development area was recently purchased by a developer with the intent to develop the residential
2 area as indicated on Exhibit No. NM-3.

3 **Q: Have you evaluated where the proposed new EHV transmission line would be situated**
4 **relative to the North Ridge Residential Development and the North Mankato South**
5 **Boundary Residential Development if any of the proposed Red or Green Route Alternatives**
6 **or Alternative Segments A or B were to be approved?**

7
8 **A:** Yes. I have included with my testimony a series of exhibits that superimpose the proposed
9 EHV transmission line along the Red and Green Route Alternatives and Alternative Segments A
10 and B in North Mankato's planned growth areas. These exhibits, labeled **Exhibit Nos. NM-6**
11 **through NM-13**, show how each of these route alternatives would place a new, above ground
12 EHV transmission line directly through or in close proximity to planned development, existing and
13 planned infrastructure, and existing homes. The exhibits show views from various locations as
14 indicated in each of the explanations below.

15 **Q: Please describe Exhibit No. NM-6.**

16
17 **A:** Exhibit No. NM-6 is an aerial view of the westernmost ridge of the North Ridge
18 Residential Development from the viewpoint of "Location View 1" (as that location is identified
19 on Exhibit No. NM-3) facing north by northwest. This exhibit shows the planned residential streets
20 and individual residential plots west of Minnesota Highway 41 for the North Ridge Residential
21 Development, and shows how the proposed new EHV Transmission Line, following the proposed
22 Red and Green Route Alternatives, would be situated directly on and over the residential streets
23 and plots.

1 **Q: Please describe Exhibit No. NM-7.**

2
3 **A:** Exhibit No. NM-7 is another aerial view of the North Ridge Residential Development area
4 along Minnesota Highway 41, from “Location View 2” (as that location is identified on Exhibit
5 No. NM-3), facing north. This exhibit shows some of the residential streets and individual
6 residential plots for the North Ridge Residential Development, and shows how a new EHV
7 transmission line following Alternative Segment B would be situated directly in the middle of that
8 residential development, in close proximity to the residential plots and streets, traversing directly
9 over and on some of those residential plots.

10 **Q: Please describe Exhibit No. NM-8.**

11
12 **A:** Exhibit No. NM-8 is an aerial view of the southwestern ridge of the North Ridge
13 Residential Development area from “Location View 3” (as that location is identified on Exhibit
14 No. NM-3), facing south by southwest. This exhibit shows the individual residential plots on the
15 southwest point of the North Ridge Residential Development area, east of Minnesota Highway 41,
16 and shows how the proposed new EHV Transmission Line would be situated directly on and
17 traverse over these residential plots, following the proposed Red and Green Route Alternatives, as
18 well as the southern portion of Alternative Segment B.

19 **Q: Please describe Exhibit No. NM-9.**

20
21 **A:** Exhibit No. NM-9 is an aerial view from the southern border of the North Ridge
22 Residential Development at “Location View 4” (as that location is identified on Exhibit No. NM-
23 3), facing south by southeast toward the North Mankato South Boundary Residential Development
24 area. This exhibit shows how the proposed new EHV transmission line would be situated in close

1 proximity to the North Mankato South Boundary Residential Development area, following the
2 proposed Red and Green Route Alternatives. This also shows the proximity (225 - 450 feet) of the
3 proposed Red and Green Route Alternatives to five existing homes in that area.

4 **Q: Please describe Exhibit No. NM-10.**

5
6 **A:** Exhibit No. NM-10 is an aerial view of the North Mankato South Boundary Residential
7 Development area from “Location View 5” (as that location is identified on Exhibit No. NM-3),
8 facing south near the Minnesota River. This exhibit shows some of the individual residential
9 streets and plots of the South Boundary Residential Development area, and shows how the
10 proposed Red and Green Route Alternatives would be situated directly on, and traverse over, these
11 residential plots. These plots are situated on a plateau and in an aesthetically desirable location
12 near the river.

13 **Q: Please describe Exhibit No. NM-11.**

14
15 **A:** Exhibit No. NM-11 is another aerial view of the North Mankato South Boundary
16 Residential Development area from “Location View 6” (as that location is identified on Exhibit
17 No. NM-3), also facing south near the Minnesota River. This exhibit shows more of the individual
18 residential plots of the South Boundary Residential Development area, and shows how the
19 proposed new EHV Transmission Line would be situated directly on and near these residential
20 plots, following the proposed Red and Green Route Alternatives, and would detract from the view
21 and location.

1 **Q: Please describe Exhibit No. NM-12.**

2
3 **A:** Exhibit No. NM-12 is another aerial view of the easternmost edge of the South Boundary
4 Residential Development area from “Location View 7” (as that location is identified on Exhibit
5 No. NM-3), facing south by southeast near the Minnesota River. This exhibit shows the individual
6 residential plots of the South Boundary Residential Development area and how the proposed new
7 EHV transmission line would be situated directly on and near these residential plots, following the
8 proposed Red and Green Route Alternatives.

9 **Q: Please describe Exhibit No. NM-13.**

10 **A:** Exhibit No. NM-13 is an aerial view from “Location View 8” (as that location is identified
11 on Exhibit No. NM-3) facing east. This exhibit shows how the proposed new EHV transmission
12 line would be situated within 310 feet from an existing residence, following the proposed Red and
13 Green Route Alternatives. This exhibit also shows the close proximity of the Red and Green Route
14 Alternatives and Alternative Segment B to the North Ridge Residential Development area and the
15 South Boundary Residential Development area.

16 **Q: How close in proximity would the Applicants’ proposed Red or Green Route**
17 **Alternatives and Alternative Segments A and B be to existing and planned North Mankato**
18 **residences?**

19
20 **A:** There are more than 200 existing and proposed North Mankato residences up to and within
21 500 feet of the proposed Red and Green Route Alternatives and Alternative Segments A and B.
22 These include 56 proposed homes that are less than 150 feet from the Red and Green Route
23 Alternatives and Alternative Segments A and B, and 26 homes that are zero to 75 feet of the
24 proposed Red and Green Route Alternatives and Alternative Segments A and B. Of these, 22 are

1 existing homes, including 9 that are within 300 feet of the proposed route, and 2 existing homes
2 that are within 150 feet of the proposed route. *See* Exhibit No. NM-14. As I understand it, these
3 impacts are significantly greater than any other route option under consideration.

4 **Q: How do these impacts compare with those of the Purple or Blue Route Alternatives or**
5 **other Route Alternatives proposed by the Applicants?**

6
7 **A:** The Route Permit Application and the Department of Commerce's Scoping Decision
8 indicate that there are more than four times as many existing homes in close proximity to the Red
9 and Green Route Alternatives than when compared to the Blue or Purple route options. *Compare*
10 Exhibit No. NM-14, *with* DOC-EERA Scoping Comments, Table 2. And, this only considers
11 existing homes, not the 183 expected new North Mankato homes that would also fall within zero
12 to 500 feet of the proposed Red and Green Route Alternatives and Alternative Segments A and
13 B, and even hundreds more North Mankato residences that would be within view of the EHV
14 transmission line from the North Ridge Residential Development and North Mankato South
15 Boundary Residential Development. Taking into account existing and proposed residences in
16 North Mankato that are unaccounted for in the Route Permit Application, there are slated to be
17 more than fifteen times as many homes within close proximity to the Red or Green Route
18 Alternatives than the Purple or Blue Route Alternatives. *Compare* Exhibit No. NM-14, *with*
19 DOC-EERA Scoping Comments, Table 2. The Red and Green Route Alternatives in the North
20 Mankato area, including Alternative Segments A and B simply fail to maximize distance
21 between transmission lines and existing and planned residential homes when compared to other
22 route options.

1 **Q: Please describe some of the aesthetic impacts that a new EHV transmission line would**
2 **have on proposed and existing residences in these areas?**

3
4 **A:** The structures and transmission lines would distract from the enjoyment and appreciation
5 of scenic views along North Mankato's west and south boundaries. The North Ridge Residential
6 Development area is situated along a ridge where some homes will enjoy sweeping views from
7 the vista. The South Boundary Residential Development area is situated on a plateau in a very
8 desirable location with proximities to scenic views, including ravines along the west of North
9 Mankato and the Minnesota River along the south of North Mankato. North Mankato expects
10 these residential developments to be very attractive areas to live. Adding transmission structures
11 would compromise the integrity of the setting, feeling, and association and would result in an
12 adverse effect to views from and within these residential communities.

13 **Q: Is North Mankato concerned about the marketability or demand for future housing**
14 **if the Red or Green Route Alternatives or Alternative Segments A or B are selected?**

15
16 **A:** Yes. The proposed Red and Green Route Alternatives and Alternative Segments A and B
17 traverse within 150 feet of existing development and zero to 75 feet from future development.
18 The City is concerned that if built, the Red or Green Routes' close proximities to existing and
19 planned residential, commercial, and industrial areas would negatively impact the marketability
20 and demand for future housing and business in North Mankato's primary growth areas, as well as
21 the tax base.

22 **Q: What limitations are there on North Mankato's growth opportunities?**

23
24 **A:** As noted, North Mankato's primary growth opportunities exist along its western and
25 southern boundaries. To the east of North Mankato lies the City of Mankato, across the

1 Minnesota River. Directly to the north of North Mankato is the existing 345 kV Wilmarth-
2 Lakefield Junction Line. Locating a 345 kV transmission line on the community's western and
3 southern boundaries will have a profoundly negative influence on planned growth.

4 **Q: Are North Mankato's growth expectations important to the City's tax base?**

5 **A:** Yes. The city is relying on future economic development efforts to diversify the property
6 tax base to balance collections between homeowners and industrial users.

7 **Q: Are there any other long-term impacts that concern North Mankato?**

8 **A:** The proposed EHV structures would be permanent fixtures. I'm not an expert on federal
9 financing guidelines, but I am generally aware that there exist federal guidelines concerning
10 mortgages for homes in the fall zone of high voltage transmission towers or support structures.
11 North Mankato is concerned that the existence of these structures might adversely affect the
12 ability of a developer or future homeowner near the line from obtaining needed financing.

13 **Q: What types of investments or commitments has North Mankato made or obtained to**
14 **implement its Comprehensive Plan that would be affected by the proposed Red and Green**
15 **Route Alternative and Alternative Segments A and B?**

16
17 **A:** Various investments or commitments have been made or obtained to facilitate North
18 Mankato's Comprehensive Plan. These include, for example, investments in transportation
19 infrastructure. North Mankato, along with Nicollet County and the Minnesota Department of
20 Transportation, funded and constructed a new Highway 14 interchange, an essential investment
21 needed to facilitate the growth contemplated by North Mankato's Comprehensive Plan. This was
22 an approximately \$20 million project. North Mankato has also invested in wastewater

1 infrastructure to accommodate new residential neighborhoods, including the installation of the
2 Aspen Lane Lift Station serving the area of the North Ridge Residential Development and North
3 Mankato South Boundary Residential Development. *See Exhibit No. NM-15.* North Mankato
4 has in recent years also continued to invest in infrastructure to accommodate growth on the
5 western edge of North Mankato, including approximately \$3,441,750 to construct local
6 residential streets. *See Exhibit No. NM-16.* These investments represent a commitment of
7 significant resources by the City to implement the community's desired growth vision. That
8 vision would be significantly and permanently harmed by the siting and construction of an EHV
9 transmission line directly in the path of the expected growth. Selection of the Red or Green
10 Route Alternatives or Alternative Segments A or B would deprive North Mankato of the fully
11 intended benefit of these resources, which have been committed for the intended purpose of
12 facilitating North Mankato's growth and development.

13 **Q: To your knowledge, what other impacts are posed by the Red and Green Route**
14 **Alternatives that would be avoided if another route option is selected?**

15
16 **A:** The Red and Green Route Alternatives near North Mankato may interfere with the
17 aesthetic enjoyment of Minnemishinona Falls Park (Nicollet County), including its scenic 42
18 foot high waterfall. The Red and Green Transmission Route Alternatives are approximately 1800
19 feet from Minnemishinona Falls Park and Native American burial mounds located near the park.
20 *See Exhibit No. NM-3.*

1 **Q: Did North Mankato participate in the Advisory Task Force established for this**
2 **proceeding?**

3
4 **A:** Yes. I participated in the Advisory Task Force (“Task Force”) on behalf of North
5 Mankato and was an active participant at Task Force meetings. The conclusions and
6 recommendations of the Task Force were submitted to the Department of Commerce in May
7 2018 for purposes of conducting the Environmental Impact Statement for this proceeding.

8 **Q: Did the Task Force make a suggestion concerning the northern portion of the route?**

9 **A:** Yes. The Task Force’s conclusions are listed on page six of its Report. Appendix E to
10 that Report is a “Map of Mitigation Measures and Route Alternatives,” which shows the “Task
11 Force Suggested Route” highlighted in yellow. For the “Northern Portion” of the route, the Task
12 Force suggested following the Purple Route using Alternative Segment E to connect with the
13 Red and Green Route Alternatives further south to avoid the northern portions of the Red and
14 Green Route Alternatives. *See* May 2018 Report of Advisory Task Force, Appendix E: Map of
15 Mitigation Measures and Route Alternatives (Huntley-Wilmarth Task Force Notes: Northern
16 Portion).

17 **Q: Are there any Route Alternatives that would avoid the issues you have identified**
18 **with the Red and Green Route Alternatives?**

19
20 **A:** Yes. As identified by the Task Force, use of Route Segment E to create the “Purple – E –
21 Red” or the “Purple – E – Green” route alternatives would circumvent the North Mankato area,
22 yet still provide a route from the Huntley station to the Wilmarth station. Alternative Segment E2
23 would also circumvent North Mankato.

1 **Q: Based on your review of the Route Permit Application and the Department of**
2 **Commerce's Scoping Decision, how would you compare the use of Alternative Segment E or**
3 **E2 to the unaltered Red or Green route proposals?**

4
5 **A:** The reduced impact of using Alternative Segments E or E2 is corroborated by the Route
6 Permit Application which states that Alternative Segment E is within 500 feet of only 13
7 residences. *See* Route Permit Application at 173. This is less than one-fifteenth the number of
8 existing homes within 500 feet of the Red and Green routes in North Mankato alone. *See* Exhibit
9 No. NM-14. To my knowledge, the Purple or Blue routes pose no imminent issues for the City of
10 North Mankato.

11 **V. CONCLUSION**

12
13 **Q: Do you have any further testimony to offer at this time?**

14
15 **A:** No, I do not.
16