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3 **BEFORE THE**  
4 **PUBLIC SERVICE COMMISSION OF WISCONSIN**

5 Re: Joint Application of American Transmission  
6 Company LLC and Northern States Power  
7 Company-Wisconsin, as Electric Public Utilities  
8 For Authority to Construct and Operate a New  
9 345KV Transmission Line from the La Crosse area  
10 In La Crosse, County to the greater Madison area  
11 In Dane County, Wisconsin  
12

Docket No.  
5-CE-142

13 **DIRECT TESTIMONY OF BREA GRACE**  
14 **CRITICAL OF THE JOINT APPLICATION**  
15

16 Q: Please state your name and business address?

17 A: My name is Brea Grace. My business address is 415 Main Street, Onalaska, WI  
18 54650.

19 Q: What is your present position with the City of Onalaska?

20 A: I am the Land Use & Development Director for the City of Onalaska.

21 Q: Please describe your educational background, professional experience and training?

22 A: I received a Bachelor of Arts Degree from the University of Wisconsin-Stevens Point  
23 in 1999. In 2004, I received a Master's Degree in Urban and Regional Planning from  
24 the University of Wisconsin-Madison. I have been the Land Use & Development  
25 Director for the City of Onalaska since May 2012. Prior to this position, I was the  
26 Development Director for the City of Ashland, Wisconsin for eight-years. In my  
27 current position as Land Use and Development Director I am overseeing a 10-year  
28 update to the City of Onalaska's Comprehensive Plan and am responsible for the  
29 enforcement of municipal codes relative to land use, zoning, and inspections. I  
30 oversee and evaluate community development as executive staff to the Community  
31 Development Authority (CDA) to assure that it occurs in a manner consistent with

1 the City's Comprehensive plan and play a key role in economic development in  
2 Onalaska. I provide a wide range of long range planning guidance and  
3 recommendations to the City of Onalaska Plan Commission and Common Council. I  
4 am a member of the American Planning Association, the American Institute of  
5 Certified Planners (AICP) and the Wisconsin Chapter of the American Planning  
6 Association.

7 Q: For whom are you testifying?

8 A: I am testifying on behalf of the City of Onalaska.

9 Q: What is the purpose of your direct testimony?

10 A: The purpose of my testimony is to objectively describe impacts that Segment O of  
11 the proposed Badger-Coulee transmission line will have on City of Onalaska's land  
12 uses. The City of Onalaska has a long history of proactive land use planning. The  
13 City of Onalaska's Common Council has adopted a variety of planning documents  
14 which were developed through public processes and have included community-  
15 wide public participation. Specific planning documents which are applicable for the  
16 proposed siting of the Badger-Coulee transmission line include: the City of Onalaska  
17 Comprehensive Plan (2005); the City of Onalaska Comprehensive Outdoor  
18 Recreation Plan (2010); and the City of Onalaska Central Greenway Master Plan  
19 (2001); and the Menards/Elmwood Master Plan (2004). Additionally, the City of  
20 Onalaska has limitations which are placed on development through the City of  
21 Onalaska Unified Development Code, a chapter of the City of Onalaska's Code of  
22 Ordinances.

23

1 Q: What information did you use for your evaluation?

2 A: The joint application, the Draft Environmental Impact Statement, the Final  
3 Environmental Impact Statement, and ATC's responses to the City of Onalaska's  
4 discovery requests. I also reference the City of Onalaska Comprehensive Plan  
5 (2005); the City of Onalaska Comprehensive Outdoor Recreation Plan (2010); and  
6 the City of Onalaska Central Greenway Master Plan (2001); the Menards/Elmwood  
7 Master Plan (2004); and the City of Onalaska Unified Development Ordinance.

8 Q: Of the route and route segments contained in Applicant's application, are there  
9 routes or segments you conclude are better taking into consideration the needs of  
10 the City of Onalaska and its residents?

11 A: The City of Onalaska is opposed to Segment O. The Northern Route, including  
12 Segments P and N better take into consideration the needs of the City of Onalaska,  
13 its residents and business owners.

14 Q: Which route or routes do you conclude are better and more reasonable routes?

15 A: The Northern Route, including Segments P and N.

16 Q: Why?

17 A: The Northern Route, including Segments P and N will have less impact on existing  
18 residential properties and the Northern Route will not hinder large multi-family and  
19 commercial development that is planned to occur, which Segment O would do. The  
20 City of Onalaska has invested a great amount of time and efforts promoting  
21 economic development, which could be slowed and hampered if Segment O of the  
22 Badger-Coulee is chosen. The Northern Route utilizes a significantly larger  
23 percentage of existing right-of-way corridors. Segment O requires new cross-

1 country right-of-way for 65% of the total right-of-way area. Segment O also passes  
2 through the Coulee Region which is uniquely  
3 covered with ridges and valleys that will certainly impact the transmission line pole  
4 placement.

5 Q: Are there concerns with the potential impact of the Segment "O" on the City of  
6 Onalaska's Comprehensive Plan, Bluffland Protection and Greenway Plan  
7 Requirements for the City of Onalaska?

8 A: Yes, I have concerns about Segment O which are shared by the City of Onalaska's  
9 Common Council, the Plan Commission, and the Community Development Authority,  
10 as well as Onalaska property owners and businesses. The City of Onalaska  
11 Comprehensive Plan recognizes the unique characteristics of Onalaska with its  
12 location in the heart of the Driftless Area composed of scenic ridges and valleys  
13 created by glacial melt water which exposed limestone, sandstone and dolomite  
14 outcroppings. The Plan highlights the extreme importance of protections for  
15 blufflands and ridgetops from development that would negatively impact the land  
16 and the population of the Coulee Region as the area continues to grow. The steep  
17 slopes of the blufflands and ridgetops are sensitive from an environmental  
18 perspective because as development occurs on these slopes, increased amounts of  
19 storm water runoff and erosion of the slope's soils migrate from newly developed  
20 sites and negatively impact surrounding properties, the City's storm water system,  
21 and potentially the quality of surface waters. To protect these unique  
22 environmental areas, as well as surrounding land uses and surface waters, the City  
23 of Onalaska has an erosion control ordinance which requires erosion control plans

1 for land disturbance activities and requires approval of the plan before development  
2 occurs. The City actively monitors plan implementation to ensure that best  
3 management practices are utilized throughout the life of construction activities. An  
4 additional measure to prevent the development of blufflands is the restriction that  
5 land disturbances on sites with more than 4,000 square feet and with slopes greater  
6 than 30%, are prohibited with the exception of access roads or the installation of  
7 underground utilities to the site. Land use regulations in the City of Onalaska also  
8 restrict the development of blufflands with a maximum front yard setback of 40-feet  
9 and the prevention of providing water services to sites above 900-feet in elevation.

10 The City of Onalaska Comprehensive Plan further discourages the disruptive  
11 development on ridge-tops that would be visible outside of the immediate  
12 development area which damages the scenic character of the Coulee Region. This is  
13 one of the reasons as to why the City of Onalaska is objecting to Segment O of the  
14 Badger-Coulee transmission line. The City of Onalaska Comprehensive Plan also  
15 emphasizes that the natural topography of the Coulee Region contributes to the  
16 attractiveness of Onalaska as a unique city to live, work, and partake in outdoor  
17 activities founded on the basis of topography. This value coincides directly with the  
18 purpose and intent of the City of Onalaska Unified Development Code by preserving  
19 and protecting the natural scenic beauty of Onalaska by careful regulation on the  
20 siting of structures in bluffland areas to preserve the unique topography through  
21 requiring good design and architecture. The City has historically and continues to  
22 plan for the development of attractive and safe multi-modal transportation

1 corridors by planning for corridor improvements that enhance the visual character  
2 and identities of all corridors, including burying overhead utility lines.

3 In addition to protecting Onalaska's bluffs for environmental purposes, the  
4 City Onalaska Comprehensive Plan also focuses on protecting the bluffs as  
5 important open space/ environmental corridors which are a recreational and scenic  
6 asset to the community. Over the years the City of Onalaska has taken active steps  
7 to preserve blufflands for their environmental, scenic and recreational benefits.  
8 Successes can be attributed to the implementation of the City of Onalaska  
9 Comprehensive Outdoor Recreation Plan (CORP) which recognizes that Onalaska's  
10 beautiful ridges, bluffs, and valleys contribute much to the attractiveness as a place  
11 to live and recreate, as well as the implementation of the City of Onalaska Central  
12 Greenway Master Plan. The City of Onalaska Central Greenway Master Plan  
13 identifies specific goals to provide public access and public use of Onalaska's natural  
14 resources through a well-planned park and trail system. The Master Plan envisions  
15 a city-wide system that would ultimately connect the Great River State (bicycle)  
16 Trail with the La Crosse River State Trail through the City of Onalaska via the bluffs,  
17 valleys and public right-of-ways.

18 In 1999 the City of Onalaska began working on a comprehensive effort to  
19 conserve a large portion of the La Crosse River marsh area, with the Mississippi  
20 Valley Conservancy, Gunderson Health Systems, and the City of LaCrosse. More than  
21 350-acres of land have been secured by acquisition or conservancy easements for  
22 the development of a nature based recreational area used for non-motorized  
23 boating, wildlife viewing, bird watching, hiking, and scenic viewing. The installation

1 of Segment O, along I-90, would have a negative impact on visitors' experiences to  
2 this natural recreational area, and would work against the objectives of this multi-  
3 partner parkland development.

4 Additionally, as a result of the afore mentioned planning efforts, the City of  
5 Onalaska expanded Greens Coulee Park with the purchase 67-acres in 2000 and an  
6 additional 150-acres in 2015, which is centrally located within Onalaska's urban  
7 growth area and offers views of the Mississippi River, Lake Onalaska, the Minnesota  
8 Bluffs, and the cities of Onalaska and La Crosse. Segment O of the proposed Badger-  
9 Coulee line would impact the scenic views of the region, and the number of  
10 park/greenway visitors, both residents and tourists.

11 Looking at Segment O, the construction of this high voltage power line would  
12 have a detrimental impact on decades of planning which the City of Onalaska has  
13 invested in to protecting the environmental, scenic and recreational characteristics  
14 of Onalaska's blufflands.

15 Q: Are there concerns that should be considered with respect to the potential impact of  
16 the proposed Segment "O" of the Badger Coulee Line on existing and planned land  
17 use and development in the City of Onalaska?

18 A: The majority of land uses in the City of Onalaska, adjacent to the HWY 53 and I-90  
19 corridors, are residential and commercial. Commercial developments in this  
20 corridor include a significant amount of the greater La Crosse area's business,  
21 shopping and office areas. Within 300-feet of the proposed Badger Coulee  
22 Transmission line, the City of Onalaska has \$32,336,900 in commercial property  
23 value, which also includes approximately 175-acres of undeveloped/agricultural

1 holding land. The majority of all new commercial development in Onalaska will  
2 occur on vacant properties along Segment O of the Badger-Coulee transmission line  
3 including around USH 53 and County Highway OT, along Century Place; Abbey Road,  
4 which parallels USH 53; Sand Lake Road and USH 53; Theater Road, Midwest Drive,  
5 and I-90; and North Kinney Coulee Road which runs parallel to I-90. The Badger-  
6 Coulee transmission line will have varying levels of negative impacts on these  
7 properties, depending on location and proximity to the high-voltage transmission  
8 line. In the last 5 years, areas along Subsegments O4 and O5, have experienced  
9 approximately \$31.2 million in new commercial construction including Gunderson  
10 Health System's Medical Center Campus, Shephard of the Hills Lutheran Church,  
11 Springbrook Assisted Living Facility expansions, a facility with over 100 living units  
12 and La Crosse Beverage, a 90,000 square foot bottle distribution facility.

13 The City of Onalaska has invested a great amount of time and efforts  
14 promoting economic development, which could be slowed if Segment O of the  
15 Badger-Coulee is chosen. Two of the goals of the City of Onalaska Comprehensive  
16 Plan are to create a healthy City with a high quality of life to attract and retain a  
17 creative, skilled labor force, and to strengthen and enhance existing business  
18 districts. If the Southern Route is chosen, years of planning, infrastructure  
19 investment for highest and best uses, and goodwill with residents, the development  
20 and business communities could be undone.

21 The two largest vacant land areas for development as commercial districts  
22 which would be negatively impacted are the Menards/Elmwood Master Plan area



1 located off Sand Lake Road and USH 53, and the Elmwood Business Park located off  
2 Theater Road and I-90.

3 The City of Onalaska has developed a long-range planning strategy for the  
4 redevelopment of this area with the Menards/Elmwood Master Plan. This area  
5 incorporates approximately 135-acres of buildable land and 275-acres when  
6 including bluffslands. This area is centrally located and highly visible in Onalaska's  
7 urban growth area. The purpose of this strategy is to create a mix of uses:  
8 commercial/service, retail, corporate office, and mixed density residential, all  
9 arranged around a neighborhood model that would have a positive influence on the  
10 city as a whole and would result in greater economic gain from job creation, tax  
11 base, an increase in property values and investment, and labor force retention and  
12 attraction.

13 Within this area, Mayo Clinic Health System recently purchased 187-acres,  
14 with approximately 75-acres of buildable land, which is planned to be developed as  
15 Mayo Clinic Health System expands their healthcare services (e.g. hospital, clinic,  
16 care facility) to the region. The proposed Badger-Coulee transmission line would  
17 significantly impact how the site is laid-out and build-out, because an easement for  
18 the Badger-Coulee line would further limit the buildable area. Assuming a 120-foot  
19 wide right-of-way for the transmission line, the easement would limit the  
20 development of approximately 2.8-acres of the 75-acre buildable site, as typically  
21 buildings are prohibited from being constructed within powerline easement areas.  
22 Another challenge that the Badger-Coulee line would bring to this property is the  
23 timing and layout of the construction activities. With such a large site being

1 developed additional utility and roadway infrastructure will need to be added to  
2 serve the site, which will occur before the larger site development occurs.

3 North of the property acquired by Mayo Clinic Health Systems, along Sand  
4 Lake Road, is an 80-acre tract of land owned by Elmwood Partners Limited  
5 Partnership. This site is planned to be developed in parallel to Mayo Clinic Health  
6 Systems with a mix of commercial and residential uses. If Segment O is chosen for  
7 the Badger-Coulee transmission line, it would reduce the marketability and  
8 development potential of the Menards/Elmwood Master Plan area, as businesses  
9 would ultimately locate in areas that will not have the negative perceptions and  
10 which would be more aesthetically pleasing.

11 The other commercial district which would be negatively impacted is the  
12 Elmwood Business Park off Theater Road and I-90. This district is one of the City's  
13 newest commercial development areas and much of the City's newest commercial  
14 growth has been in this area. If Segment O is selected the Badger-Coulee  
15 transmission line would run along I-90, parallel to this newly developed area. Due  
16 to constraints with the underpass at Theater Road, the transmission line would  
17 require a pole outside of the I-90 right-of-way, which will run the transmission line  
18 over three highly valuable development sites. One site was developed by Bremer  
19 Bank in 2014 on west side of Theater Road. The high-voltage transmission line  
20 would run approximately 57-foot from the newly constructed building. The other  
21 two sites are located on the east side of Theater Road and are owned by Weber  
22 Holdings, LLS and Midwest Security Life Insurance Company/United Health Group  
23 MN. Assuming a 120-foot wide right-of-way for the high-voltage transmission line,

1 the easement would limit the development of approximately 1.9-acres of the  
2 western 6-acre site (Weber) and 1.2-acres of the 5.2-acre site (Midwest Security). In  
3 this easement area, the construction of buildings would be prohibited, the type of  
4 landscaping would be limited and other site modifications would need to be made to  
5 ensure appropriate traffic flow through the site. Land in this corridor is retailing for  
6 approximately \$12-15 a square foot.

7 Looking at all the properties in the Elmwood Business Park, outside of the 2  
8 sites mentioned above, there are at least 11 vacant properties which are highly  
9 marketable and desired commercial locations, without Segment O being built.  
10 Segment O runs along I-90 the entire length of the Business Park including over four  
11 undeveloped parcels. The perceived negative effect of the transmission line along  
12 with the unsightly poles could stunt growth and lower property values in this prime  
13 development area. Visibility and proximity to I-90 has proven to be important for  
14 developments that have occurred in this Business Park. The proposed transmission  
15 lines would affect visibility to businesses and commercial signage. This may have  
16 the effect of driving business and development out of the City of Onalaska to other  
17 area business districts that are not encumbered by high-voltage transmission lines.  
18 If development slows in these areas, it could affect the many businesses already in  
19 those areas resulting in a loss of business as consumers choose to take their  
20 business elsewhere, away from the power lines. The City of Onalaska relies on these  
21 businesses and new development to fund City operations, initiatives to improve the  
22 City and the quality of life for its residents.

1 Additional land use impacts that would occur if Segment O is selected is the  
2 disturbance of archeological sensitive areas. The City of Onalaska has, through the  
3 Unified Development Code, designated Archeological Districts in several locations,  
4 which include a much larger land area than the 9 archeological sites that were  
5 identified in the Cultural Resources Assessment of the joint application for the  
6 Badger-Coulee transmission line. The City of Onalaska requires that Archaeological  
7 Surveys be completed by a regional qualified archaeologist prior to disturbances  
8 and that the archaeologist is granted uninhibited access to the site during ground  
9 disturbing activities and after archaeological artifacts are found. The ordinance also  
10 identifies that any artifacts found would remain the property of the land owner  
11 unless the owner relinquishes ownership of the artifacts to the Mississippi Valley  
12 Archaeology Center as a public repository. The regional qualified archaeologist will  
13 need to provide an itemized inventory report of all artifacts following such removal.  
14 Any human remains discovered will need to be dealt with in accordance with  
15 applicable state and federal law. The City of Onalaska values its cultural resources  
16 and has adopted these land use restrictions to safeguard the City's historic,  
17 prehistoric and cultural heritage, as embodied by the Archeological Districts and  
18 their protections.

19 Q: What measures has the City of Onalaska taken in the past with respect to Bluffland  
20 Protection and cell phone towers or other utility structures that may interfere with  
21 the scenic beauty of the Blufflands?

22 A: The City of Onalaska has taken a very proactive position as far as design,  
23 aesthetics, and placement of telecommunication structures and towers in Onalaska

1 to minimize adverse visual effects. The City of Onalaska Unified Development Code  
2 requires that proposed or modified towers be designed to blend into the  
3 surrounding environment through the use of color and camouflaging architectural  
4 treatment, except in instances where the color is dictated by federal or state  
5 authorities such as the Federal Aviation Administration and be of a monopole  
6 design.

7 The following are two examples of cell phone tower construction approved  
8 by the City of Onalaska with design standards and compatibility with surrounding  
9 land uses and the environment as a key component of the approval consideration.

10 An Ariadign cell phone tower was constructed on the west side of USH 53, between  
11 I-90 and Main Street near Luther High School. This cell tower was designed as a  
12 stealth flag pole. This tower is approximately 70-feet tall and was limited in height  
13 so as to not exceed the La Crosse Municipal Airport Overlay Zoning District's Height  
14 Limitations. An US Cellular cell phone tower is also located on the west side of USH  
15 53, near the Sand Lake Road intersection with USH 53. This cell phone tower was  
16 also built as a stealth flag pole. The tower is approximately 100-feet in height, and is  
17 also limited in height so as to not exceed the La Crosse Municipal Airport Overlay  
18 Zoning District's Height Limitations.

19 In addition to careful oversight of the design of cell phone towers, the City of  
20 Onalaska has historically also taken measures to ensure that distribution of  
21 powerlines are designed to blend into the surrounding environment. The City of  
22 Onalaska has worked with Dairyland Power Cooperative to provide architectural

1 treatments and to paint powerline poles a light blue so as to camouflage the poles  
2 and to better blend into Onalaska's blufflands and scenic beauty.

3 Q: Will the proposed Segment "O" of the Badger Coulee Line run through the City of  
4 Onalaska's Airport Overlay Zoning District?

5 A: Yes.

6 Q: What is the purpose of the Onalaska Airport Overlay Zoning District?

7 A: The La Crosse Municipal Airport lies west of the City of Onalaska, however two of  
8 the Airport's four runway approach surfaces lie within the same area proposed for  
9 the Badger-Coulee transmission line. State Statutes allows municipalities to  
10 regulate all properties within 3-miles of the La Crosse Municipal Airport property  
11 lines. Both the City of Onalaska and City of La Crosse adopted an Airport Overlay  
12 Zoning District (AOZ) to regulate within the 3-mile area of the La Crosse Municipal  
13 Airport. The City of Onalaska enforces the ordinance and height limitations adopted  
14 by Onalaska's Common Council through the Unified Development Code, to protect  
15 public safety, both on the ground and in the air.

16 The purpose of the City of Onalaska AOZ is to restrict the height of structures  
17 and objects of natural growth, concentrations of people, visual obstructions (smoke,  
18 steam, dust, etc.), electrical and navigational interference, noise sensitive land uses,  
19 and wildlife and bird attractants and to restrict building sites, placement of  
20 structures, and land uses by separating conflicting land uses and prohibiting certain  
21 land uses that are detrimental to airport operations, navigable airspace, and the  
22 Airport within the City of Onalaska 3-mile jurisdictional boundary of the AOZD.

1           One of the regulatory protections of the Airport Overlay Zoning District are  
2 height limitations which establish a maximum height for all structures within 3-  
3 miles of the airport. An adopted “La Crosse Municipal Airport Height Limitation  
4 Zoning Map” identifies geographical cells and associated elevations of the maximum  
5 permissible height above mean sea level (MSL), which buildings, structures, objects  
6 or vegetation in that cell cannot exceed. Segment O will run through areas within  
7 the Airport Overlay Zoning District and structures within this district will be  
8 restricted to a maximum height as established by these zoning regulations.

9 I’ve reviewed the correspondence from the FAA which was part of Exhibit H of the  
10 Joint Application and see a challenge with transmission line structures O-10 through  
11 O-15 and FAA’s determination of a “notice of presumed hazard.” I compared the  
12 FAA correspondence with the maps from ATC titled “City of Onalaska Document  
13 Request Floodplain and Preliminary Structure locations” dated October 2014 and  
14 with City of Onalaska parcel records and aerial photography. There are several  
15 instances where the FAA has made a “determination of no hazard to air navigation”  
16 for a number of transmission line structures, however the maximum height cited by  
17 the FAA is different than the height limitations established by the “La Crosse  
18 Municipal Airport Height Limitation Zoning Map.” The LaCrosse Municipal Airport  
19 Overlay Zoning District (AOZ) is more restrictive than FAA height limitations in  
20 certain areas as the AOZ is intended to protect future air approaches whereas the  
21 FAA only protects current airspace. FAA determinations may allow a structure, such  
22 as a transmission line pole, because it doesn’t impact a current approach, however

1 the structure may impact a future approach which local regulations are intended to  
2 protect.

3 Between transmission pole structures O-25 and O-34 the AOZ is more restrictive  
4 than the FAA, which will result in maximum structure heights between 81-feet and  
5 100-feet. Between transmission pole structures O-35 and O-41 the FAA is more  
6 restrictive than the AOZ, which will result in maximum structure heights between  
7 54-feet and 107-feet. The AOZ is more restrictive than the FAA on transmission pole  
8 structure O-42, which will result in maximum structure height of 82-feet.

9 Between transmission pole structures O-43 and O-45 the FAA is more restrictive  
10 than the AOZ, which will result in maximum structure heights between 91-feet and  
11 119-feet. Between transmission pole structures O-46 and O-47 the AOZ is more  
12 restrictive than the FAA, which will result in maximum structure height of 83-feet.  
13 For transmission pole structures O-48, O-49, and O-50 the FAA is more restrictive  
14 than the AOZ, which will allow the proposed structure heights of between 135-feet  
15 and 145-feet. For transmission pole structures O-51 and O-52 the AOZ is more  
16 restrictive than the FAA resulting in maximum structure heights of 80-feet to 81-  
17 feet.

18 Q: What if any effect or potential impacts could that have?

19 A: With the stated impacts of the LaCrosse Municipal Airport Overlay Zoning District  
20 (AOZ), shorter transmission pole structures will likely result in a greater quantity of  
21 pole structures to span the necessary distances. Additionally with shorter poles,  
22 verification will be necessary to ensure that appropriate ground clearances will be  
23 met to avoid negative impacts on adjacent residences and commercial properties.



1 With more poles, more land areas especially commercial developments, would be  
2 encumbered with the transmission lines serving as a visual obstruction to their  
3 development. Additionally, with more poles, there will be more conflicts with  
4 existing underground utilities and options for the future design and realignment of  
5 the USH 53/ Sand Lake Road intersection and East Main Street/ Green Coulee  
6 intersection will be further limited, and costs for City infrastructure projects will be  
7 significantly greater.

8 Q: If Segment "O" is chosen, could the siting and placement of the transmission line and  
9 of any poles impact existing communications structures or be within the fall zone of  
10 any cell phone towers in the City of Onalaska and what if any potential impact could  
11 that have?

12 A: The cell phone tower with the closest proximity to the proposed Badger-Coulee  
13 transmission line in the city of Onalaska is a 120' T-Mobile cell phone tower, which  
14 is designed as a stealth flag pole. It is sited 240' east of Germann Court and  
15 approximately 134-feet from the transmission line centerline. Assuming a fall zone  
16 of 33% of the total tower's 120-foot total height, the cell phone tower would need a  
17 clearance of at least 40-feet for the fall zone. Siting of the proposed Badger-Coulee  
18 transmission line would need to take this into consideration. However, concerns  
19 about potential impacts to the cell tower's signals and electronics have been raised  
20 by the City's Plan Commission.

21 The Joint Application, Appendix K includes a Communication Facility Impact Study-  
22 Phase I which reviews existing FCC licensed communication facilities within 10km  
23 of the proposed Badger-Coulee transmission line. Seven cell phone/ communication

1 towers located in the city of Onalaska are not included in this analysis. They  
2 include: An Alltel/Verizon cell phone tower/stealth flag pole located near 252  
3 Mason Street; a US Cellular cell phone tower/stealth flag pole located near 1109  
4 Venture Place; a cell phone tower/stealth flag pole located near N5558 Commerce  
5 Road; an Ariadigm cell phone tower/stealth flag pole located near Luther High  
6 School and 524 Oak Forest Drive; a cell phone tower/stealth light pole near 9348  
7 State Road 16, in the Ciatti's parking lot; a Centurytel radio tower located at 580  
8 Lester Avenue; and a communications tower located near the LaCrosse County  
9 Landfill at 6500 State Road 16.

10 The Communication Facility Impact Study-Phase I also identifies that the cell  
11 phone tower at 5538 Abbey Road, in the Town of Onalaska, is less than 500-feet  
12 from the proposed transmission line, which needs further study and analysis so as  
13 to avoid transferred voltages to the communication structure's grounding systems.  
14 As noted above, not all the cell phone towers which currently exist in the city of  
15 Onalaska are noted in the Study. In addition to the T-Mobile cell phone tower  
16 located along I-90 and Germann Court, listed above which isn't in the Study, the  
17 following cell phone towers are also located within 500-feet of the proposed  
18 centerline of the Badger-Coulee transmission line. An AT&T cell phone tower  
19 located adjacent to a City of Onalaska water reservoir, on the east side of USH 53,  
20 between Sand Lake Road and Main Street. This tower will be approximately 435-  
21 feet from the centerline of the proposed transmission line. An Ariadigm cell tower  
22 located on the west side of USH 53, between I-90 and Main Street near Luther High

1 School. This tower will be approximately 500-feet from the centerline of the  
2 proposed transmission line.

3 Q: What, if any, problems have businesses or residences experienced with respect to  
4 induced voltage in the City of Onalaska and what affect, if any, could the proposed  
5 Segment "O" of the Badger Coulee line have on induced voltage problems in the City  
6 of Onalaska?

7 A: The City's Building Inspection Department was involved with induced voltage issues  
8 for properties in the Chestnut Estates subdivision approximately 10-years ago.  
9 Residential property owners at 1444 and 1436 Cliffview Lane, located  
10 approximately 50-feet from the 161kV Dairyland Power Cooperative electrical line,  
11 were having issues with induced voltage. A contractor was working from a lull and  
12 installing aluminum soffit on a new house which did not yet have electrical service  
13 installed; when the contractor would place a the piece of soffit onto the house, he  
14 would receive a shock. Around the same time period, an adjacent property owner  
15 was hanging Christmas decorations on the house, was working from a ladder, and  
16 similarly was getting shocked.

17 Based on these past issues, I am concerned about the impacts the proposed 345kV  
18 transmission line will have on the 62 residential structures (with 90 dwelling units)  
19 and 22 commercial properties that currently exist within 300-feet or less of the  
20 proposed Badger-Coulee centerline. Of these properties, 3 residential dwellings on  
21 Esther Drive, 2 commercial buildings on East Main Street, 1 commercial building on  
22 Theater Road, and the Childfirst daycare play-area (off East Main Street) will be less  
23 than 100-feet from the proposed centerline of the high-voltage transmission line. Of

1 additional concern, are the experiences that the Wisconsin Department of  
2 Transportation has had with an increase in induced voltage in streetlights, traffic  
3 signals, and overhead signs after the Rockdale to West Middleton transmission line  
4 was installed on the Madison Beltline Highway and USH 14. These issues raise  
5 concerns about the protection of City of Onalaska employees who change street  
6 lights, traffic signal lights, and street signs.

7 The USH 53 and I-90 corridors currently have 6 overhead signs which direct  
8 traffic flow, plus an additional 18 freestanding signs which primarily identify exit  
9 information, located in the USH 53 and I-90 rights-of-way on the same side of the  
10 highway as the proposed transmission line,. The corridor has a number of traffic  
11 signals, street lights, and at least 15 freestanding commercial signs which are well  
12 within 300-feet. The majority of these 15 commercial freestanding signs are well  
13 within 100-feet of the proposed transmission line centerline and one sign is  
14 approximately 12-feet from the centerline which raise concerns that these signs  
15 could be susceptible to induced voltage.

16 Q: Are any of the areas in the proposed route for Segment "O" within the flood plain  
17 and what, if any, challenges does that create for the City of Onalaska or Applicants?

18 A: Segment O of the proposed Badger-Coulee transmission line is projected to run  
19 through a portion of the City of Onalaska's Sandalwood Park, located off Esther  
20 Drive, northeast of the USH 53 and I-90 intersection. This park was developed as a  
21 neighborhood park to serve residents living south of County Highway OS and east of  
22 Main Street. Amenities include a playground, hard surface trails, a skating rink, and  
23 a basketball court. Portions of the Sandalwood Park are located within the 100-year

1 and 500-year floodplain. The City of Onalaska adopted a Floodplain Zoning  
2 Ordinance, as part of the City of Onalaska Unified Development Code to ensure that  
3 all new construction is designed to minimize flood damage to adjacent properties.

4 Specific impacts will need to be prepared by the applicant indicating what  
5 the proposed construction activities and woody vegetation removal activities within  
6 a 120-foot right-of-way strip through this park will have on the 100-year and 500-  
7 year floodplains areas. Maintaining woody vegetation within a floodplain is  
8 especially important as trees and other vegetation directly reduce flood hazards as  
9 they allow greater water infiltration through the root system, reducing water runoff  
10 and by slowing the rate of water flow. The more trees and vegetation in a flood zone  
11 decrease the speed of water flow allowing time for water to be absorbed into soil,  
12 thus reducing the amount of flooding.

13 Q: What does the Applicant's data regarding the number of residential and commercial  
14 or industrial buildings within a given distance from each proposed route's center  
15 line tell you?

16 A: In reviewing the maps from ATC titled "City of Onalaska Document Request  
17 Floodplain and Preliminary Structure locations" dated October 2014, I compared  
18 the transmission line pole locations with City of Onalaska parcel records and aerial  
19 photography. (It should be noted that the distances may not be exact, but are  
20 approximations based on the best available data.) From this information I was able  
21 to determine the impact on City of Onalaska properties. Overall, Segment O through  
22 Onalaska would impact a significant number of existing residences and businesses.  
23 Within 300-feet or less of the proposed high-voltage transmission line currently

1           there are 66 residential structures with a total of 108 dwelling units as well as 26  
2           commercial buildings.

3                       Following are the specific locations of these homes and business, starting at  
4           the northern extent of the proposed transmission’s line impact on the City of  
5           Onalaska, along USH 35. On the northern end of Abbey Road, the City has issued  
6           Occupancy Permits in the past 6-months for a 13-unit multi-family housing  
7           development (located within 2 buildings) which is approximately 120-feet from the  
8           estimated centerline of the transmission line. Immediately south of this  
9           development, a 32-unit multi-family development has plans prepared which are  
10          under City review, but has not proceeded with construction; this development  
11          would be located approximately 120-feet from the centerline of the transmission  
12          line. Two additional vacant lots appropriately zoned and ready for development as  
13          multi-family residential housing also are within 300-feet of the transmission line  
14          and will need to adjust their development plans because of the Badger-Coulee  
15          transmission line if Segment O is chosen.

16                      Across from USH 53, 3 residences on Flint Court are located within 300-feet  
17          of the transmission line centerline.

18                      South of the intersection of USH 53 and East Avenue, 2 duplexes are within  
19          250 to 300-feet of the transmission line centerline. In the Chestnut Estates  
20          neighborhood, 15 homes are within 200-feet of the transmission line centerline, 2  
21          additional homes are within 250-feet of the transmission line centerline. Also in this  
22          area are five commercial warehousing structures that are within 150-feet and a

1 manufacturing facility that produces forced air heaters within 220-feet from the  
2 transmission line centerline.

3 On the east side of USH 53, located on Franklin Street, 12 duplexes (for a total  
4 of 30-residential units) are approximately 300-feet from the transmission line  
5 centerline. South of Rider's Club Road, on the west side of USH 53, off Oak Ave  
6 North and Parkridge Place, 4 homes are between 130-feet and 150-feet; 2 homes are  
7 between 150-feet and 200-feet, and 2 homes are between 230-feet and 265-feet  
8 from the transmission line centerline.

9 An existing daycare, Childfirst is located at 1828 East Main Street, which  
10 abuts the east side of USH 53. This commercial structure is approximately 160-feet  
11 from the proposed transmission line centerline however the children's outdoor play  
12 area is only 80-feet from the centerline. It should be noted that two additional  
13 daycares in the City of Onalaska are located within 500-feet of the proposed  
14 transmission line centerline. Shepherd's Flock Preschool at 1215 Redwood Street is  
15 within 405-feet of the proposed centerline, while the outdoor playarea is within  
16 340-feet. The Education Station at 903 Riders Club Road is within 475-feet of the  
17 proposed centerline.

18 Back along the East Main Street area, there are an additional 2 commercial  
19 structures which are less than 100-feet from the proposed transmission centerline,  
20 2 commercial structures are between 100 and 150-feet, and 4 commercial structures  
21 less than 250-feet. South of this commercial area, along Esther Drive and Germann  
22 Drive, 3 homes are approximately 85-feet, 90-feet and 95-feet from the proposed  
23 transmission line centerline. An additional 3 homes are between 100 and 150-feet,

1 6 homes are between 150 and 200-feet ; 4 homes are between 200 and 250-feet;  
2 and 3 homes are between 250 and 300-feet from the proposed transmission line  
3 centerline. In the residential area south of I-90 2 homes are between 200 and 250-  
4 feet, and 1 home is between 250 and 300-feet from the proposed transmission line  
5 centerline. Additionally, 3 multi-family buildings are within 250 to 300-feet from  
6 the transmission line centerline; within these 3 multi-family buildings are 20  
7 residential units.

8 Following I-90 to the east, 11 commercial buildings are within 300-feet of the  
9 proposed transmission line centerline. This includes three hotels, which are  
10 between 100 and 150-feet from the proposed centerline.

11 Q: What does the Applicant's data regarding the use of existing corridor for Segment  
12 "O" and Segment "P & N" tell you?

13 A: Overall Segment O will require more right-of-way for the transmission line to be  
14 acquired, as compared to the amount of existing right-of-way for Segments P and N.  
15 Segments P and N utilize existing right-of-way for 92% of the length of the route,  
16 while Segment O will utilize existing right-of-way for 57% of the length of the route.  
17 Looking at the total land area which will need to be acquired for right-of-way,  
18 Segment O will require that 65% of the right-of-way area be newly acquired.  
19 Segments P and N will only require the acquisition of 29% of the right-of-way area  
20 be newly acquired.

21 Q: What, if any, issues would be remedied by burying the high voltage transmission  
22 line for the five (5) miles that it is proposed to run through the City of Onalaska  
23 along U.S. Highway 53 and Interstate 90 from roughly the intersection of County



1 Road OT and U.S. Highway 53 along U.S. Highway 53 and Interstate 90 until  
2 Interstate 90 intersects with State Road 16?

3 A: If the proposed high-voltage transmission line was buried through the City of  
4 Onalaska, there would be significantly less negative impacts on land uses, including  
5 existing residences and businesses, on new development that is considering  
6 construction along the USH 53 and I-90 corridors, on tourism and the recreational  
7 enjoyment of Onalaska's unique Greenway Park and Trail System through the bluffs  
8 and to our water resources including the La Crosse River valley.

9 Developers and property owners who are considering the commercial  
10 development of properties along USH 53 and I-90, including but not limited to  
11 Abbey Road, Sand Lake Road, Theatre Road, Midwest Drive, N. Kinney Coulee Road,  
12 are pausing their development plans until a decision is made about the Badger-  
13 Coulee line's route. If the route is chosen to include Segment O through Onalaska  
14 with above ground transmission lines, I believe we'll see developers and businesses  
15 reconsider locating in this corridor and/or changing the types of uses and  
16 businesses that would have otherwise considered the locations. The above ground  
17 transmission line will have an impact on decisions made by developers about the  
18 highest and best use for properties along the route. On the other hand, if the  
19 transmission line is buried through Onalaska, I believe this would not have as much  
20 impact on the development of sites because the concerns about aesthetics,  
21 viewsheds, impacts to property values, the loss of customers, induced voltage,  
22 health impacts of employees, etc. would be substantially lessened.

23 Q: Are you sponsoring any exhibits?

1 A: No.

2 Q: Does this complete your direct testimony?

3 A: Yes.