From:	Dianne Dagelen
To:	DNR Racine Diversion Comments
Subject:	Comment to DNR on Racine water diversion
Date:	Thursday, March 15, 2018 5:02:07 PM

To Wisconsin Dept. of Natural Resources:

This is my Comment on the requested Racine Lake Michigan water diversion to Mount Pleasant's Foxconn facility of 7 million gallons of water per day.

I am against the above proposed water diversion for the following reasons:
1. Per your website, the diverted water would go to the "Foxconn facility" which has announced its intention to be a multi-acre manufacturing facility. According to your website's "Review criteria" for diversion approval, the water diverted must be used for "public water supply purposes". Foxconn's proposed billion dollar industrial facility does not meet the criteria for "public" water use. It is a private, foreign corporation. It is doubtful that the "public" will be visiting Foxconn to drink 7 million gallons of water each day from its bubblers. (The average Milwaukee household use of public water for a family of four is 124.66 gallons per day.) Racine's request does not meet the Compact's criteria for "public", nor your own criteria.

2. Foxconn is reportedly expected to have a consumptive use of 2.7 million gallons of water a day, or 39% of the 7 million gallons it will be using daily. That's a loss of 985.5 million gallons of water lost from Lake Michigan every year. I don't believe that Lake Michigan and our Great Lakes can sustain this loss over the decades to come. How will it be replaced? More than 40 million people depend on Lake Michigan for their drinking water. Public drinking water must be the top priority for water use. In addition, the fishing industry alone accounts for more than $7 million a year in our economy. Foxconn will set a poor precedent for other industries needing large quantities of water for manufacturing. Their extreme use of water with more than a third not returned will affect our drinking water supply as well as our fishing economy.

3. Toxic chemicals will be used at the Foxconn facility. We are not told what they are, nor how they will be removed prior to the used water returning to Lake Michigan. This information should be required before any permission to take water for manufacturing is considered. Toxic chemicals will pose a risk to our drinking water supply as well as to the general health of surrounding communities.

Please respond by answering these Questions:
What is the average daily use of water by Foxconn industries in South Korea, China, Taiwan and Japan?
What is their percentage of consumptive water use? What is the basis for predicting their future use and consumptive loss of water in Mount Pleasant?
What are the toxic chemicals that Foxconn will be using with the Lake Michigan water that they use?
How will Racine's treatment plant remove these toxic chemicals before returning the water to Lake Michigan?

I strongly object to any approval for Racine to divert Lake Michigan water to Mount Pleasant for Foxconn's use. I strongly recommend and request that there be both an Environmental Impact Study by WI DNR and by the US Army Corps of Engineers, and a Review by the Great Lakes Compact states and provinces. Such studies and review are warranted for the reasons cited above.

Respectfully submitted,
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From Wis. DNR website:
The city has applied to the department for approval to divert up to an annual average of 7 million gallons of water a day to areas of the village of Mount Pleasant in the Mississippi River Basin. The diversion area includes part of the area that Racine County identified as the future site of the Foxconn facility.

Review criteria
The requirements for a straddling community diversion application are identified in s. 281.346 (4)(c), Wis. Stats. To be approved for a straddling community diversion application, Racine must demonstrate the following:

- that Racine Water Utility is a public water supply system and the water diverted will be used for public water supply purposes;

The application identifies a consumptive use of up to 2.7 million gallons per day associated with the diversion. Consumptive use is water that is not returned because it is either incorporated into a product or lost through evaporation. The consumptive use is primarily associated with the projected Foxconn water use needs. The application identifies that most of the Foxconn consumptive use may occur in the Lake Michigan Basin, but has been included in the application for flexibility in facility design.

Review process

The review process for the city of Racine's diversion request includes the following steps.

1. DNR issues public notice of Racine diversion application, public hearing and public comment period.
2. DNR holds a public hearing to receive public comment on the application.
3. DNR reviews application and the public comments.

4. DNR determines if the application meets the requirements of the Great Lakes Compact, and if so, issue an approval.
5. Racine's proposed diversion will not result in a new or increased withdrawal of Great Lakes water and will not result in a new or increased consumptive use of 5 million gallons a day of water or greater, therefore no regional review by the Great Lakes states and provinces is required and the Great Lakes Compact exception standard does not apply to the application review.