From:	Laura Gould
To:	DNR Racine Diversion Comments
Subject:	Foxconn Racine Diversion Comment
Date:	Tuesday, March 20, 2018 3:11:46 PM

My comment:

Foxconn water use and returns will be born by the Great Lakes and, having grown up along Lake Michigan for my entire life, I know how important they are to the surrounding areas economically, but also culturally in the quality of life they provide for those living nearby. Great Lakes water is a resource that supplies clean drinking water for those within the basin, abundant recreational opportunities, and fuels extensive economic endeavors. The possibility that Foxconn's business endeavors may pollute Great Lakes water due to a lack of substantial mitigation and reclamation measures is horrifying. Unchecked pollution in this ecosystem would lead to both public health concerns and habitat loss. Mount Pleasant is a “straddling community” according to the Great Lakes Compact. This means that it contains land in both the Great Lakes Basin and the Mississippi River Basin. Mount Pleasant currently sources its water from the city of Racine, and returns its waste water back through the city’s system. This “straddling community” classification triggers the need for the requested Foxconn diversion to be reviewed by the DNR. However, other Great Lakes states do not get a say in the decision because the diversion will not result in consumptive use (or the amount that won’t be returned to the lake as wastewater) of five million gallons a day. Although not five million gallons, Foxconn estimates that an average of 2.7 million gallons of the water it uses daily won’t return to the lake. According to WaterSmart, that’s enough water to supply 9,000 households.

More worrisome than the quantity extracted is the quality of the returns. What chemicals and pollutants will be in the wastewater after Foxconn is through with it? Is Racine’s public wastewater treatment plant equipped to treat it? Foxconn has announced that it will “pre-treat” its wastewater, but hasn’t disclosed how or what for. This leaves the experts and the public unable to form educated stances on the issue. The manufacturing of LCD screens requires the use of heavy metals like cadmium, chromium, zinc, copper and even mercury. Will that water be safe?

Past experience says no.

This will be Foxconn’s first manufacturing complex in the U.S., but it’s known to have polluted rivers in China, according to China's Institute of Public & Environmental Affairs. While it’s true the U.S. has different disclosure requirements and environmental regulation, the path has already been cleared and shortcuts taken to getting the company here, so who’s to say policies will now be enforced? To put it simply, funneling large quantities of heavy metals in the form of manufacturing wastewater into the Great Lakes isn’t worth the environmental and health risks to the 34 million people and over 3,500 plant and animal species that reside in the basin.

Foxconn may bring jobs and some economic prosperity to Racine County—although the

legitimacy and scale of these benefits have been called into question—but that doesn't mean they should get a free pass. Is $3 billion in incentives not enough?

Lake Michigan is a public and highly valued water supply, but it won't be the public from benefiting from Foxconn's requested diversion. If Foxconn wants to use Great Lakes water, they first need to be clear about exactly what will be in that water and how they will treat it to avoid negative externalities. Secondly, it needs to be regulated and these regulations enforced. Because these requirements have not been met, the Racine Diversion request should not be approved.

Thank you,
Laura Gould