From:	Julie Lang
To:	DNR Racine Diversion Comments
Subject:	Decline City of Racine Water Diversion Application for Foxconn
Date:	Wednesday, March 21, 2018 3:43:08 PM

Dear DNR (Adam Freihoefer):

I am a southeastern Wisconsin resident and I'm very concerned about Racine's water diversion request for Foxconn. I am writing to you in the somewhat FUTILE request that you decline the city of Racine's water diversion application. You see, those of us who care deeply about this issue realize that the dye has already been cast because you are no longer stewards of our environment but a rubber-stamping agency for the Walker administration.

My specific objections:

1.) The assertion from the city of Racine that the diverted water provided to the diversion area is “solely for public water supply purposes" when so much of it is obviously going to Foxconn and its operations. This is against the spirit of the Great Lakes Compact and maybe even against it in letter. I can only hope that other entities outside the state will decide to step in with this egregious interpretation.

2.) The application itself is incomplete. All of the numbers for the amount of water needed and returned to Lake Michigan are from Foxconn with no independent verification.

3.) Industry experts have stated that Foxconn will need more water than what they are requesting: have you examined that? Your spokesperson shrugged it off at the public hearing a few weeks ago that if Foxconn needs more water, the city of Racine will just have to submit another application. How about the DNR does its due diligence NOW and either decline or postpone approval of this application until you get all the information you need to make an informed decision?

For me, the main issue is how much water Foxconn will actually need in their day-to-day operations and how it appears they've totally low-balled the MPD to be below that 5.0 MPD consumptive use threshold which would trigger a regional review by the Great Lakes Compact. In the application to the DNR, the only numbers presented are either coming straight from Foxconn or are estimates that the city of Racine did based on other (smaller) industrial areas in the community. Reading the application, one can't seem to shake the feeling that Racine had to do a lot of guestimating because they didn't get enough information from Foxconn which irritates me because this diversion is so precedent-setting.

4.) On page 21 of the application, Foxconn states that "Over half of Foxconn’s forecasted water demand would be for manufacturing-process water. Foxconn informed Racine that it intends to repeatedly recycle its process water. Recycling this water would significantly reduce the demand for this facility, lowering the volume of water needed from 20.6 mgd on an average day to the current estimate of 5.8 mgd."

Now, industry expert David Hsieh has said that Foxconn could use as much as 15.8 MGP but he also said that SOME of the water from the process can be recycled. My question is whether that recycling process can actually be so significant that it would drop the need for diverted water from 20.6 MGD to 5.8 MGD. Now, that seems like a huge drop to me. And why even submit that number (20.6) in the application if it's not pertinent to the final request? Unless that 20.6 MGD is closer to the true amount needed.

From my rudimentary math using the 39% consumptive loss, it appears that anything above 12.8 MGD of water diverted would automatically trigger a regional review by the Great Lakes Compact. Again, what concerns me is that when asked at the public meeting what happens if Foxconn needs more water than the 7.0 MGD they're requesting, the DNR spokesperson sort of shrugged it off, saying that the city of Racine will just need to submit another application. Well, this deal has felt rushed and not clearly thought-through from the beginning so what happens if Foxconn says they need more water much further down the road? Once construction has begun? The pressure on the DNR will be huge to keep on course no matter what. It just seems like a huge clusterf*ck waiting to happen even through the

DNR has an obligation to do its duty now.

Okay, so let's go with Foxconn recycling much of its process water. What is the exact process and which chemicals are used in order to cleanse the water so it can be reused? Also, what would the waste stream be from that process – which opens up a whole other can of unanswered questions.

"The key to maximizing water reclaim, recycle, and reuse is having a well thought out water management plan. A successful water management plan includes full understanding of how the rinse waters are used in the manufacturing process including chemicals used and their by products."

Will there be a water management plan that the public can see? NO because, as you well know, Act 58 passed by WI lawmakers sets up an Electronics and Information Technology Manufacturing Zone in this "straddling community," Foxconn is not required to submit a "water supply service area plan" to the DNR that would have stated how the diverted water would be used and the environmental and economic impacts of that.

What is Foxconn hiding because it sure doesn't seem to be inclined (or required) to share that information with the agency supposedly charged with its oversight and that agency doesn't seem to be inclined to ask. This is a recipe for disaster for our state and our environment.

5.) What about nano particles? Again no answers. Will the pre-treatment process at Foxconn and further treatment by the city of Racine will be able to filter them out? That seems like an important set of issues too.

In conclusion, it took the Waukesha diversion and the New Berlin diversion several years to be approved, so I don't understand why something with such huge ramifications for our state and the Great Lakes region should be allowed to be so rushed. This application is incomplete and if you approve it, you will be the guilty party when something goes horribly wrong.

Thank you,

Julie Lang
Milwaukee, Wisconsin