From:	Roger Packard
To:	DNR Racine Diversion Comments
Subject:	Foxconn diversion
Date:	Wednesday, March 14, 2018 6:58:50 PM

You are obliged to reject the City of Racine's request to divert 7 million gallons of water from Lake Michigan to the proposed Foxconn facility under the terms of the Great Lakes Compact.

- **First, this facility will not be located within the Great Lakes Basin, but rather in the "straddling" community of Mount Pleasant.** The City of Racine is the applicant, rather than Mount Pleasant. This is troubling because cities within the Basin with extra capacity do not qualify to request a diversion. Under the spirit and intent of the Great Lakes Compact, cities within the Great Lakes Basin are able to apply for additional capacity, not diversions. This is to protect the primary tenant of the Great Lakes Compact: a ban on diversions except in rare and unique instances. The City of Racine has the capacity to provide water to Foxconn without requesting larger withdrawal amounts, but it cannot provide the water without permission for a diversion since Mount Pleasant is outside the Basin. Given the twisting of the application process, review by the Regional Body should be triggered.

- **Second, the water delivered to Mount Pleasant will not be diverted for public consumption, as required by the Great Lakes Compact, but rather to a private, foreign corporation.** A key tenant of the Great Lakes Compact is to protect Great Lakes Water for the public.

- **Third, the Foxconn proposal says that nearly 40% of the 7 million gallons would be lost to the manufacturing process, and not returned to the lake.** Another key tenant of the Great Lakes Compact is that water taken must be returned, less consumptive use. But when does consumptive use, not related to public use, become so great that it has a cumulative negative impact on the Great Lakes? What happens when we have 20-30 Foxconn's around the Great Lakes failing to return water at such high levels? This is precedent setting and concerning.

- **Fourth, there is no specificity about how the water will be used, treated, or managed, or whether Foxconn will be exempt from certain permitting requirements.**

Over 40 million people rely on the Great Lakes for drinking water, and only 1% of that lake water is renewed by rain and snow melt. The Great Lakes Compact was enacted to protect this water for current and future generations. Wisconsin signed on to this international agreement governing consumptive use and water diversions from the Great Lakes. This proposal does not meet the spirit of the Great Lakes Compact for the reasons listed above. The application is being made by Racine and not by the straddling community of Mount Pleasant, the water diverted will not be used primarily for public water supply, and there has not been a review of whether the cumulative consumptive use from this precedent setting diversion will negatively impact the Great Lakes over time.

Sincerely,
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