



July 9, 2025

The Honorable Cory Mason
Mayor's Office
730 Washington Ave
Racine WI 53403

Subject: 2025 Documentation of Reporting Requirements for the City of Racine Diversion of Great Lakes Water

Dear Mayor Mason:

On February 26, 2025, the Department of Natural Resources (the DNR) received the *2024 City of Racine Annual Report on Water Diversion* (Report).

The DNR issued the diversion approval on April 25, 2018, that requires the City of Racine (City) to submit annual reporting information to the DNR by March 1st of the following year. Thank you for submitting your report. Specifically, Section 6 of the diversion approval requires the City to report the following information for the prior year (2024) to the DNR:

1. The total amount of water sold monthly or quarterly to each category of customer within the approved diversion area.
2. The total monthly sewerage flow to the City of Racine Wastewater Plant from the diversion area.
3. The total consumptive use as specified by the DNR.
4. A summary of the impact of the implemented conservation and efficiency measures required under Wisconsin Administrative Code NR 852.04 and NR 852.05, including quantifiable impacts to water use intensity, as defined in Wisconsin Administrative Code NR 852.03(29).
5. A description of any additional conservation and efficiency measures implemented.

The following paragraphs briefly summarize the DNR's review.

1. *The total amount of water sold within the approved diversion area.* The City sold 15,702,016 gallons of water in the diversion area in 2024 (or an average of 43,019 gallons per day). The City is authorized to divert an average of 7,000,000 gallons per day.
2. *The total monthly sewerage flow to the City of Racine Wastewater Plant from the diversion area.* The City reports that 7,518,377 gallons of water from the diversion area was returned to the City of Racine wastewater plant in 2024, based on the measurements from the Hwy H meter. The Hwy H meter was recalibrated on April 27, 2023.
3. *The total consumptive use.* The Report indicates that the total consumptive use in 2024 was 52%. The Foxconn consumptive use is difficult to calculate with the very low wastewater flows. See report for details.
4. *Water use intensity metrics.* The Report includes three water use intensity metrics for 2024:
 - residential per capita water use: 38 gallons per capita per day
 - the ratio of the maximum day to average day water use: 1.55

5. *A summary of the impacts of the implementation of conservation and efficiency measures.* Table 11 of the Report details the City's efforts to implement water conservation and efficiency measures.
 - The City replace 3950 feet of water main, surveyed 22% of the City's water mains for leak and repaired all water main leaks found. The City's leak detection and repair program has resulted in a decreasing trend of non-revenue water from 2019 – 2023. Note: Data for non-revenue water from 2024 was not available at the time the Report was submitted.
6. *A description of any additional conservation and efficiency measures implemented.* Water conservation measures may apply to the entire City, not just the diversion area.
 - The City has eliminated the need for water main flushing in the diversion area by recirculating water through the diversion area. The City began this practice in 2022 and continued the practice through 2024.
 - The City's Development Department promotes green building certifications that include building water audits and prioritize water efficiency.

The diversion report provided indicated that water use is still very low in the diversion area. In addition to the reporting requirements above, the City has also submitted documentation demonstrating compliance with Tier 3 water conservation as required by section 6 of the Approval and ch. NR 852, Wis. Admin. Code. The information provided in the Report appears to meet the annual reporting requirements. The City's 2025 Annual Report is to be submitted to the DNR by March 1, 2026.

Please contact Shaili Pfeiffer, shaili.pfeiffer@wisconsin.gov, (608) 219-2216, with any questions regarding your annual reporting.

Sincerely,



Adam Freihoefer
Manager, Water Use Section
Bureau of Drinking Water and Groundwater

cc.

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