

September 17, 2021

Adam Freihoefer
Chief, Water Use Section Wisconsin DNR
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Subject: Response to Great Lakes Diversion Application – Request for Additional Information

Dear Mr. Freihoefer:

On behalf of the Village of Somers we are providing a response to your comments dated September 13th, 2021. Below is a list of your comments and the indicated response follow:

Wisconsin DNR Comments on the Somers Water Diversion Application

1. *The DNR is still noting discrepancies in the calculation of land area (specific to the diversion area) from what we calculate to what is reported in the August Submittal.*

Response:

- The Diversion Application indicates 2,300 acres of the total Village is included in the diversion area. This value is incorrect and has been revised to 3,100 acres of diversion area of a total 13,250 acres in the village.

2. *The August Submittal provided an updated maximum day diversion but did not have an updated volume for average day water use. Please confirm that the requested average daily diversion amount is 1.2 million gallons.*

Response:

- The average daily diversion amount is 1.2 million gallons and remains unchanged due to rounding.

Wisconsin DNR Comments on the Somers Water Service Area Supply Plan

3. *Update Tables 2, 3, and 4 in the Water Supply Service Area Plan to reflect the area added to the Water Supply Service Area in January 2021 and updated water use type demand estimates provided in the August Submittal. For example, Table 3 should provide the breakdown for the water use projection for the diversion area including the January 2021 addition to the Water Supply Service Area.*

Response:

- All three reports have been updated and are attached in the email submitted with this response.

4. *Confirm that the Village of Somers comprehensive plan and amendments are described and codified in chapter 18 of the Village of Somers Ordinances and is available at <https://ecode360.com/37202385>.*

Response:

- The Village of Somers Comprehensive plan is located within Chapter 18 of the Village Ordinances. The Village of Somers adopted the Kenosha County multi-jurisdictional plan as its approved comprehensive plan 2010. The Comprehensive Plan has been amended several times including in 2018 to include the land use changes described in the Foth 2018 Land Use Study as part of the Village's Comprehensive Plan. The Comprehensive Plan and amendments are available electronically at <https://ecode360.com/37202385>.

Wisconsin DNR Comments on the Somers Water Conservation Plan

5. *Section NR 852.05(5) requires diversion applicants to have implemented cost-effective CEMs identified in Ch. NR 852, Table 2. PWS-R2 and PWS-R3 requires the Village to have a residential water management program. Please provide evidence that these programs are implemented and available to residential, commercial, and industrial customers.*

PWS – R2: Establish and publicize a program to complete residential customer water use audits and leak surveys upon customer request based on high or aberrant water use. In developing the program, a waiver of liability and written permission from the customer may be needed.

PWS – R3: Establish and publicize a program to complete commercial and industrial customer water use audits and leak surveys upon customer request based on high or aberrant water use. In developing the program, a waiver of liability and written permission from the customer may be needed.

Response:

- The Village currently provides this service to its residents who report high or aberrant water use after their monthly bill. To clarify the availability of the service to its residents the website will be updated in the near future with appropriate changes.
6. *The DNR believes there are errors on August Submittal, Attachment D, page 2, third table. Please check this table and make any necessary revisions.*

Response:

- The percentage of total population served was incorrect for all years and 2020 indicated an incorrect number of meters for residential customers. The revisions were made and the attachment is included in Appendix B of the Water Conservation and Efficiency Plan.
7. *Submit the revised water conservation plan to DNR (and update your water conservation webpage with the updated version), with the following revisions to the July 22, 2021 Water Conservation Plan (Water-Conservation-and-Efficiency-Plan_Final_July-2021.pdf (somers.org)):*
1. *Section 2.3: Table 2 indicates a new source for the table, but no updates to the values in the table to match the source of the data, update this table with population and water use projections from Appendix B/C.*
 2. *Section 3.2.3: Update PWS – 3 to indicate it is implemented and include webpage link*
 3. *Section 3.2.6 and 3.2.7: After updating website with information described in 5., update these sections to reference website that describe program.*

4. *Section 3.3: Include that the Tier 3 water conservation requirements include evaluation of additional CEM's and that the AWE tool was used to determine if additional CEM's were cost effective.*
5. *Include and reference Attachment E and G from the August Submittal to the Water Conservation and Efficiency Plan.*
6. *Appendix B: page 21, second table address errors in the number of residential meters (2020 and 2040) - and any other locations this error propagates.*

Response:

- The Village
 1. *Revised table with corrected values.*
 2. *Revised first paragraph, last sentence, of Section 3.2.3 as follows:*
 - *This measure has been implemented by the village and the information can be found at the following link:*
<https://www.somers.org/news/2021/07/23/water-conservation/>.
 3. *Website link has been provided in section 3.2.6 and 3.2.7.*
 4. *Revised first paragraph, first sentence, of Section 3.3 as follows:*
 - *The Village of Somers falls under the Tier 3 water conservation requirements, which includes evaluation of additional CEM's. The Alliance for Water Efficiency maintains the Water Conservation Tracking Tool to assist in the evaluation of water savings, costs, and benefits of additional CEM's required for Tier 3 water conservation.*
 5. *Attachment E was included as Appendix D. Attachment G was included as Appendix E. Both were referenced in their respective sections.*
 6. *Two errors in this table, one the percent of total population was incorrect for most of the years. Second, the number of residential meters for 2020 was incorrect. Both are now corrected in the final Water Conservation Plan report.*

Please be advised that the website revisions could take up to a week to complete, they have been submitted to the webpage designer today (September 17th, 2021). Should you have any additional questions or comments on these plans please let us know.

Sincerely,

BAXTER & WOODMAN, INC.
CONSULTING ENGINEERS



Douglas R. Snyder, PE

Encl: Water Diversion Application, Water Service Area Supply Plan, Water Conservation and Efficiency Plan

CC: Jason Peters, Village of Somers,
Shaili Pfeiffer, Wisconsin DNR
Chris Fuchsteiner, Wisconsin DNR