



**LEAGUE OF WOMEN VOTERS®**  
**WISCONSIN**

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March 7, 2018

To: Wisconsin Department of Natural Resources

Re: City of Racine water diversion proposal

The League of Women Voters of Wisconsin advocates for denial of a request by the City of Racine for diversion of an average of 7.0 million gallons of water from Lake Michigan daily to meet the water needs of a private entity in the Village of Mount Pleasant. In addition, we caution that this request may be followed by another proposal for increased diversion since experts indicate larger volumes of 10 to 15.8 million gallons per day is common for such facilities (financial analyst, David Hsieh).

As a member of the multi-state League of Women Voters of the Lake Michigan Region, the Wisconsin League supports preserving and enhancing the environmental integrity and quality of the Great Lakes-St. Lawrence River Ecosystem. We support the Great Lakes Compact, a legal, "responsibility pact" that sets rules for the withdrawal of water from the Lakes, and gives bordering communities a say in any decisions to divert water to areas outside the Great Lakes Basin.

The water of the Great Lakes is not an infinite resource. Rain and streams replenish only one percent of the Lakes' water each year. The results of over-usage are already seen in the drop in water level in Lake Michigan and other Lakes. The Lakes are a gift of the retreating glaciers, and once depleted they will not be restored.

We urge you to examine carefully in light of the requirements of the Great Lakes Compact and potential harm to the environmental health of the region:

- Racine's application is for a private purpose, rather than a public purpose as required by the Compact. As a straddling community interested in the Foxconn proposal, the Village of Mount Pleasant should be the applicant.
- Foxconn indicates a loss of 2 million gallons of water through evaporation each day. Should multiple applicants for diversion expect such losses, the cumulative effect of these losses could further lower Lake levels.
- The future public need for water in the Village of Mount Pleasant may be compromised by this sizeable diversion to a non-public entity. This request for diversion on behalf of a water-intensive, non-public entity threatens future public water use, especially if the entity increases its footprint and need for water.
- Foxconn, the proposed end user of diverted water, intends to send as much as 60 to 70 percent of withdrawn water back to Lake Michigan – with no enforceable, rigorous requirements for measuring contaminants in returned waters.
- Waters returned to Lake Michigan must be pretreated to assure that toxins used in LCD panel production do not enter Lake Michigan. Among these toxins is the cancer-causing chemical solvent, benzene. Also included is a host of toxic heavy metals such as cadmium, chromium, zinc, indium, and copper which pose a variety of significant health threats.

The Compact requires that any evaluation of a proposed diversion consider not only individual impacts of this proposed diversion but the potential cumulative impacts of all future diversions based on the precedent set

here. Countless future requests from municipalities in all eight Great Lakes states and the two Canadian provinces that border the Lakes threaten the future of this commonly held and legally protected resource.

The League of Women Voters of Wisconsin believes water conservation should be a highest priority for all governments in the basin. We urge you not to approve the current proposal in the absence of firm, complete and detailed plans by the City of Racine, the Village of Mount Pleasant and Foxconn for minimizing both the certain and the potential environmental and health impacts of the proposed water diversion.

Thank you.