



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
OFFICE OF THE GREAT LAKES
LANSING



JON W. ALLAN
DIRECTOR

April 24, 2018

VIA U.S. MAIL AND E-MAIL

Mr. Adam Freihoefer
Water Use Section Chief
Wisconsin Department of Natural Resources
Drinking Water and Groundwater Program
101 South Webster Street
Madison, Wisconsin 53703

Re: The City of Racine's January 26, 2018, Application for Water Diversion

Dear Mr. Freihoefer:

The Michigan Office of the Great Lakes respectfully requests additional information regarding the water diversion request submitted by the City of Racine on behalf of the Village of Mount Pleasant ("Diversion Request"). Michigan and Wisconsin have worked together closely in the interest of strengthening and securing the integrity of the Great Lakes-St. Lawrence River Water Resources Compact ("Compact"), and we look forward to further mutual progress. Ensuring a balanced and thoughtful approach to the protection of the Great Lakes is of utmost importance to Michigan and as such we appreciate your thoughtful review of the pending Diversion Request.

In that spirit, the nature of this application raises important questions to fully understand the implications to the Compact and the potentially important precedent approving this request may create. As noted below, the Office of the Great Lakes has the following questions regarding the Diversion Request:

1. Because the City of Racine is not a Straddling Community it is not clear how its water authority (which is also not "straddling," because it has no customers in the Mississippi River Basin) can file an application for another Straddling Community. Please describe how the diversion application is consistent with the principles adopted for the Waukesha request regarding what constitutes a "Community" under the Compact.
2. The application was filed by the City of Racine on behalf of the Village of Mount Pleasant; however, the City of Racine relies on the City's metrics including its annual water withdrawal, water conservation plan and population served. Please explain why, as the Straddling Community, the Village of Mount Pleasant metrics were not used to support its request.
3. Please describe how the public water supply serving the Diversion Request primarily serves residential customers, as required in the Compact.

Mr. Freihoefer
Page 2
April 24, 2018

4. To better understand the proposed impacts on water use and water quality, please provide further information on the nature of the effluent to be treated by the proposed primary user and the effort used to evaluate best practices to reduce the proposed consumptive use.

We look forward to reviewing Wisconsin's analysis of the application and continuing our partnership with Wisconsin to ensure the integrity of the Compact while also ensuring access to safe, clean drinking water. If you have any questions regarding the issues outlined, please feel free to contact me at 517-284-5035 or allanj@michigan.gov or Mr. Grant Trigger at 313-670-6226 or gtrigger@racertrust.org.

Sincerely,



Jon W. Allan
Director

cc (via E-mail):

Great Lakes-St. Lawrence River Water Resources Regional Body
Great Lakes-St. Lawrence River Basin Water Resources Council
Ms. Angela Ayers, Governor's office
Mr. Eric Brown, Governor's office
Mr. Grant Trigger, Governor's Designate, Compact Council/Regional Body
Ms. C. Heidi Grether, Director, MDEQ
Mr. Keith Creagh, Director, MDNR