



Illinois Department of Natural Resources

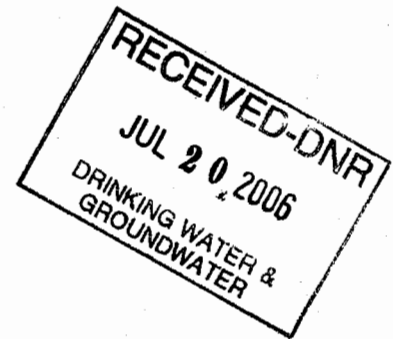
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Rod R. Blagojevich, Governor

Sam Flood, Acting Director

July 14, 2006

Mr. Lee Boushon, P.E.
Chief, Public Water Supply Section
Wisconsin Department of Natural Resources
Box 7921
Madison, Wisconsin 53707-7921



RE: City of New Berlin Water Diversion Proposal

Dear Mr. Boushon:

Governor Blagojevich has asked me to respond to the letter from Secretary Hassett dated June 13, 2006 concerning the application for a water diversion proposal by the City of New Berlin, Wisconsin.

The information submitted clearly indicates that the City of New Berlin is a "straddling community" as defined in the Great Lakes-St. Lawrence River Basin Sustainable Water Resources Agreement. Since this proposal will not result in a new consumptive use of greater than 5 million gallons per day, under the agreement the proposed diversion of water from Lake Michigan to that portion of New Berlin lying outside of the Great Lakes watershed would only be managed and regulated by the State of Wisconsin.

Staff from my Office of Water Resources has reviewed this application for water diversion, and the following comments are provided to assist your office in the evaluation of this proposal.

Although it is assumed, we suggest that a statement be added to confirm that all water services in New Berlin are metered. We also recommend that a short description of New Berlin's water meter repair/replacement program be added to the text.

This application would be strengthened by including the information New Berlin used to develop forecasts of future water use, both inside and outside the Great Lakes basin. In our experience, the three primary factors that are commonly used to forecast water demands are population, employment and household size. These variables are used by my Department to develop forecasts of future water demands in Illinois' Lake Michigan water service area. This information, along with any other site-specific information that affects water use in New Berlin, would allow the reviewer to verify that New Berlin's request for Lake Michigan water is reasonable.

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Although a minor point, we noticed that this report defines "gpcd" as gallons per customer per day. In our experience "gpcd" refers to gallons per capita per day, and is commonly used throughout the country to compare water consumption rates among public water supply systems. Listing current and expected future per capita use information would provide another way for reviewers to evaluate the reasonableness of New Berlin's future water demand forecasts.

New Berlin seems to have an aggressive education program to promote and encourage wise water use and conservation among its residents, and they should be commended for this. It would be interesting to hear how much they think this effort will reduce water demand in the future, and if this fact influenced their future water demands forecasts.

We noticed that New Berlin's lawn sprinkling ordinance limits sprinkling using the odd-even approach. We suggest that they consider adding an additional component to their ordinance that would further restrict lawn sprinkling such that it is not allowed during the time of day (i.e., 10am-4pm) when sprinkling is most inefficient.

Our final comment concerns the discussion in the report on other available supplies for meeting future demands in New Berlin, which is the discussion on pages 5-6 describing compliance with section 4a in the Exception standard. This is an area where we believe the report could be strengthened. We think it would be helpful for New Berlin to include, perhaps as an appendix, the relevant portions of the various reports they summarized. The dot point discussions just served to raise several questions, such as:

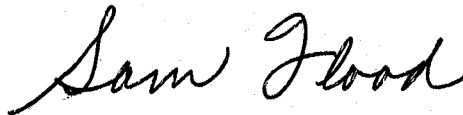
- Is contamination potential an adequate reason to exclude a potential shallow aquifer site from further consideration? Is there a state law that mandates this policy? How many sites were eliminated based on this concern, and how much shallow aquifer water might have been developed from these sites?
- Mention was made that one potential shallow aquifer site was too far away and therefore too costly. How much is too costly and how does it compare to the cost of providing Lake Michigan water to the area east of the divide?

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These issues are important since the projected demand increase for the total service area is only around 1 mgd. The one potential shallow aquifer well site that was mentioned as too costly to develop would produce approximately 650,000 gallons per day, based on 18 hours of operation per day. Is it possible that development of one additional shallow aquifer site that has contamination potential could eliminate the need to expand the use of Lake Michigan water? Please remember that we are not disagreeing with the overall conclusions of the report, but rather that we believe that demonstrating compliance with section 4a in the Exception standard will be a primary focus of the overall review of this proposal.

I hope these comments are useful to your Department in the development of a recommendation to forward to your Governor. If you have any questions regarding these comments, please feel free to contact Daniel Injerd in our Office of Water Resources. He can be reached at 312/793-5746, or by email at dan.injerd@illinois.gov.

Sincerely,

A handwritten signature in black ink that reads "Sam Flood". The signature is written in a cursive, flowing style.

Sam Flood, Acting Director
Department of Natural Resources

SF:GRC:DI:cp:cw

cc: David Naftzger, Council of Great Lakes Governors
