



Ohio Department of Natural Resources

BOB TAFT, GOVERNOR

SAMUEL W. SPECK, DIRECTOR

Division of Water

Richard S. Bartz • Chief

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October 31, 2006

DRINKING WATER & GW

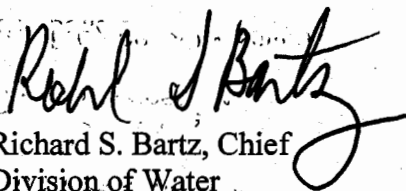
Lee Boushon, P.E., Chief
Public Water Supply Section
Wisconsin Dept. of Natural Resources
Box 7921
Madison, WI 53707

Dear Mr. Boushon:

This letter is in reply to the Scott Hassett, Director, Wisconsin Department of Natural Resources, June 9, 2006, letter to Ohio Governor Taft requesting comments on the City of New Berlin's application for a water diversion permit. In his letter, Mr. Hassett indicated that comments should be sent directly to you. Staff of the Ohio Department of Natural Resources, Division of Water have reviewed the information and comments are enclosed. These comments do not represent approval of or objection to the project, or concurrence with the information that has been submitted. This additional information would assist our review if this project were submitted for approval in the future.

If you have any questions regarding the comments, please call me at (614) 265-6730.

Sincerely,



Richard S. Bartz, Chief
Division of Water

RSB/mh/dl

Enclosure

cc: Office of the Governor
Office of the Director, Ohio Department of Natural Resources

Ohio Department of Natural Resources, Division of Water
2045 Morse Road/Bldg. B-2, Columbus, Ohio 43229

Ohio Department of Natural Resources

Comments on
Water Diversion Proposal

New Berlin, Wisconsin

October 31, 2006

1. More information should be provided about the existing withdrawal and its impacts, such as, but not limited to the following:
 - The location and draw down area of the existing wells;
 - The quantity of water diverted;
 - The fact that this is an existing diversion into the Great Lakes Basin and the quantity of water diverted;
 - The watershed/river basin from which this water is diverted (Secretary Hassett's letter tells us it's the Fox River, but it is not mentioned in the report);
 - The quantity of water other than what is withdrawn by New Berlin that gets into the wastewater system and is subsequently discharged/diverted (there appear to be significant areas in the wastewater service area indicated on Map 1 that are not currently served by New Berlin);
 - The location of the discharge;
 - The quantities of radium and other pollutants introduced into the Great Lakes Basin by the discharge.

2. More information should be provided about the proposed use of Lake Michigan water and the associated impacts, such as, but not limited to the following:
 - How the quantities of Lake Michigan water diverted out of and returned to the Great Lakes Basin will be measured,
 - How New Berlin's service area is projected to expand into currently unserved areas (note on Map 1 the large area to the southwest of where the existing water mains appear to extend; it appears to be developed--where does this area currently obtain drinking water and will New Berlin take over water service to currently-unserved areas or to other systems that currently obtain ground water in the Fox River Basin?);
 - How the discontinuation of the existing ground water withdrawals will impact streams in the Great Lakes Basin and/or Fox River Basin, if at all;
 - How the quantity of pollutants discharged into the Great lakes Basin will change, if at all.

3. More detail should be provided regarding analysis of alternative water supplies in the Fox River Basin (presented on page 6 of the report), such as, but not limited to the following:
 - How much suitable-quality ground water could be developed at the two sites recommended for further exploration by the Geological Reconnaissance in 2000;
 - How much additional ground water could be pumped at other sites developed in Phase II Geologic Exploration in 1991-92 and Site Testing in 2001;
 - The site discovered by Site Testing in 2001 that was "dismissed as too costly to develop"--how far away and how costly was it?;
 - Surface water alternatives in the Fox River Basin that were assessed, and an explanation if none were investigated.

4. Appendix A, which shows New Berlin's Stormwater and Infiltration/Inflow Control Efforts, quantify the efforts in terms of dollars spent. This is commendable, but it would be more appropriate to quantify in terms of the amount of water infiltrating into the system. A focus on quantifying goals and results rather than quantifying efforts would provide a more effective analysis.
5. Appendix B would be improved if projected population served were included. Information concerning the per capita rate for residential use and the proportion of projected water use that would be provided to commercial and industrial customers would also be useful.
6. On the first page of Appendix C, the first entry refers to a "Lawn Sprinkling Water Conservation Schedule Even/Odd" while the fourth entry states "We also have a sprinkling ban that is in effect year round." These two entries would appear to be incompatible (i.e., if you have a permanent sprinkling ban, why is there a lawn sprinkling schedule?). Clarification is needed on this point.
7. The leak detection section of Appendix C focuses on the number of leak tests completed; this is commendable, but it would be more appropriate to quantify in terms of goals and results (i.e., the percentage of unaccounted for water) rather in terms of efforts. Also, what are the leak detection programs currently being undertaken by New Berlin?
8. Information should be provided on Wisconsin's current regulatory framework for managing diversions.