



September 13, 2021

Jason Peters
Village Administrator
P.O. Box 197
Somers WI 53171

Subject: Great Lakes Diversion Application - Additional Information

Dear Mr. Peters:

The Department of Natural Resources (DNR) is reviewing the Village of Somers (Village) diversion application. The Village provided additional information to the DNR on August 17, 2021 (August Submittal). Our goal of this review continues to be to determine if the Village's application and supplemental information meets the Great Lakes Compact and state statutory criteria for a diversion to a straddling community. The DNR has identified some additional elements from the recent information that are incomplete.

We require the following information:

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.
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.

Water Supply Service Area 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.
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>.

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.
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.
 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.

The DNR continues to review the Village of Somers diversion application. The DNR requires the Village to submit the requested information above to complete our review. Please contact me if you have questions related to request for additional information listed above.

Sincerely,



Chief, Water Use Section
Bureau of Drinking Water and Groundwater

Cc: Steve Elmore, Director, Bureau of Drinking Water and Groundwater Bureau (email only)
Jim Zellmer, Deputy Director, Environmental Management Division (email only)
Doug Snyder, Baxter and Woodman (email only)