

## Compact Implementation Coalition's Non-Diversion Solution

## **Executive Summary**

The Compact Implementation Coalition (CIC) collectively represents tens of thousands of Wisconsinites working to protect our Great Lakes. The CIC has a long history beginning with ensuring the adoption of a strong Great Lakes Compact and aiding the Department of Natural Resources (DNR) in the implementation of administrative rules.

For the last five years, the City of Waukesha's ongoing request to divert Great Lakes water has raised numerous concerns about Waukesha's respect for the Great Lakes Compact and for the overall health of the Great Lakes region. The need for multiple versions of the city's application, all lacking sufficient information and evidence to support its request, demonstrates Waukesha's lack of real effort in evaluating all reasonable alternatives before requesting water from the Great Lakes as required under the Great Lakes Compact. By its own words, Waukesha has made it clear that its intent to divert Great Lakes water out of the Great Lakes Basin is a preferred option; it is not born out of current need and it is not a last resort. Further, Waukesha has manufactured a "need" by pulling in portions of communities who do not need or want a new water supply, who have not demonstrated water conservation and who may never ask for water from the diversion.

Since Waukesha has not met the legal and technical requirements set forth in the Great Lakes Compact, the CIC felt it was in the best interest of the Great Lakes region to have two independent engineering firms conduct an independent analysis of Waukesha's alternative water supplies.

The CIC retained GZA GeoEnvironmental, Inc. (GZA) and Mead & Hunt, Inc. to evaluate the City of Waukesha's water supply alternatives included in its application. The CIC also asked GZA and Mead & Hunt to evaluate alternative water supplies based on Waukesha's existing water service supply area since the proposed expanded service area included in its application does not legally adhere to the Great Lakes Compact.

The consultants excluded the neighboring communities of the City of Pewaukee and towns of Delafield, Genesee and Waukesha from the analysis. GZA also averaged the City of Waukesha's actual historical water use data to forecast future demand rather than cherry picking the largest year of consumption as Waukesha did when forecasting future industrial need. GZA and Mead & Hunt used the same exact assumptions found in the City of Waukesha's application when considering cost, the extent to which conservation

measures will be implemented in the future, population growth, and how much water the City of Waukesha is expected to use any given day.

The findings, formally compiled in the accompanying Non-Diversion Solution report, conclude that Waukesha can use its existing deep and shallow water wells to provide ample clean and healthy water to their residents now and in the future if they simply invest in additional water treatment infrastructure to ensure the water supply meets state and federal standards going forward. The Non-Diversion Solution costs dramatically less than a diversion, avoids a regulatory morass and secures independence for Waukesha residents, protects public health, and minimizes environmental impact.

The CIC is confident that the Non-Diversion Solution is a better way forward for the City of Waukesha, its residents, and the Great Lakes region as a whole.

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The Compact Implementation Coalition, collectively representing tens of thousands of Wisconsinites, has a long history of working on the Great Lakes Compact. From ensuring the adoption and implementation of a strong Great Lakes Compact to aiding the Department in the promulgation of administrative rules to implement the Compact, it has consistently advocated for the strongest protections available for the Great Lakes, in keeping with the spirit and the letter of the Compact.

Members of the Coalition include:

Clean Wisconsin
Midwest Environmental Advocates
Milwaukee Riverkeeper
National Wildlife Federation
River Alliance of Wisconsin
Waukesha County Environmental Action League
Wisconsin Wildlife Federation
Peter McAvoy, of counsel

The coalition wishes to thank the Charles Stewart Mott Foundation and the Joyce Foundation for their generous funding in support of this work.

The CIC is encouraging any concerned citizens to stay apprised of any further developments by visiting <a href="https://www.protectourgreatlakes.org">www.protectourgreatlakes.org</a>