

Hoekstra, Ashley N - DNR

From: Lori Hein <lhein@new.rr.com>
Sent: Thursday, August 27, 2015 6:11 PM
To: DNR Waukesha Diversion App
Subject: public comment on Waukesha water diversion

Dear DNR,

I am concerned about Waukesha's desire to take water from the Great Lakes. Waukesha has not adequately considered reducing their demand for water through water conservation and increased efficiency. The rest of our state does not conserve enough, either. In the coming decades, water conservation is going to be a necessity. So, rather than allowing Waukesha (and the rest of us as well) to continue to waste water at will, please ask Waukesha to make a serious attempt at conservation of water first, before diverting from the Great Lakes.

Thank you,

Lori Hein

Hoekstra, Ashley N - DNR

From: Kenneth Hall, CPA <cfotogo@sbcglobal.net>
Sent: Friday, August 28, 2015 4:38 PM
To: DNR Waukesha Diversion App
Subject: Waukesha Water Diversion Comment
Attachments: Non-Diversion+Alternative+Report_City+of+Waukesha+Water+Supply_Full.pdf0.pdf

Say No To The Waukesha Water Diversion

This DNR/Waukesha water diversion scheme could be dismissed as a hopelessly costly and overcomplicated contraption to perform a simple task, something a Rube Goldberg cartoon could mock, but this power play to bleed Great Lakes water resources and set a low standard for other water diversions from the great lakes is not funny.

Sitting on the deep aquifer they sucked dry was not enough; it took a 2009 court order to get Waukesha thinking about water. "Spring City" as it used to be called, chugged their endowment and flushed it to the Mississippi and now their deep wells yield radium water. Poor choices, unsustainable practices, and short-term thinking caused it; but instead of accountability and self reliance, they thirst for a Lake Michigan water bail out.

The DNR/Waukesha Rube Goldberg plan will cost \$207 million to build and \$8 million/year to operate: Oak Creek Wisconsin sells Lake Michigan water and pumps it 20 miles outside the basin for thirsty sprawling Waukesha and its outlying areas who then return treated water to the degraded Root River which empties into Lake Michigan at Racine.

As a Racine County Supervisor, I was briefed on the Waukesha water plan submitted to the DNR in the fall of 2013. My public comment then was that Waukesha wanted more water than it needed, had conserved too little, offered nothing to aid Root River watershed or Lake Michigan Basin management efforts which more intensive use would further degrade, and more. Now, the DNR is on board and asking for comments prior to seeking approval of the other signers of the Great Lakes Compact.

The DNR and Waukesha did not offer it, but a reasonable alternative costing \$88 million to build and \$5.5 million/year to operate is now on the table, thanks to the Compact Implementation Coalition and consultant GZA GeoEnvironmental, Inc.(see attached). The good news is that Waukesha can fully meet its needs by investing in new water treatment osmosis infrastructure to bring its wells up to standards while also remaining water independent, improving public health, and minimizing environmental impact.

The consultants used the same cost, conservation, water use, and population growth assumptions that Waukesha did, but changed two things. One, they projected from the current actual water trend, rather than cherry picking the largest year of industrial water consumption as Waukesha and the DNR did. Two, they left out Pewaukee, and the towns of Delafield, Genesee, and Waukesha. These outlying areas have not demonstrated a need under the compact, are not currently served, and their water is fine. As such, projected water demand drops from 10.1 to 6.7 million gallons/day.

The great lakes endowment is 21% of the world's fresh water; ours to use and steward after the last ice age, for generations yet unborn, and for the animals and plants that share the interconnected web of what remains of the ecosystem.

Why is Waukesha asking for so much more water than it needs? At best, they want to build their Rube Goldberg water diversion sprawl contraption so they can expand their economy and not have to think about water, clearly, that thinking conflicts with the goals of the Great Lakes Compact. At worst, securing a long term commitment for a water diversion beyond need creates an asset of huge value which down the road might even be privatized (changes in ownership need not be approved under the compact, see Article 207).

In any case, the right precedent for Lake Michigan and the great lakes is to stay say no to this unneeded water diversion.

Ken Hall
205 East Four Mile Road
Wind Point, WI

office 262-898-9741 fax 262-639-8413

Hoekstra, Ashley N - DNR

From: Melinda Hughes <melinda.hughes@sbcglobal.net>
Sent: Thursday, August 27, 2015 2:13 PM
To: DNR Waukesha Diversion App
Subject: NO

Good afternoon,
I do NOT support the Waukesha Diversion under any circumstances. Thank you,
Melinda Hughes 714 Aspen Street South Milwaukee 53172

Hoekstra, Ashley N - DNR

From: Shirley Hugdahl <sdhugger@gmail.com>
Sent: Monday, August 17, 2015 1:06 PM
To: DNR Waukesha Diversion App
Subject: water

doesnt all of this have to be ok'd by the surrounding Lk. Mich states and canada? if we know that we'll know whether we can go on w/ all this public stuff.

Hoekstra, Ashley N - DNR

From: Mary Hotle <MaryHotle@wi.rr.com>
Sent: Monday, August 24, 2015 12:44 PM
To: DNR Waukesha Diversion App
Subject: Opposed

I oppose the request from Waukesha to draw water from Lake Michigan.

Respectfully,

Mary Hotle
4925 25th Street
Kenosha, WI 53144

Hoekstra, Ashley N - DNR

From: Barbara Holtz <holtzfarms85@gmail.com>
Sent: Friday, August 28, 2015 6:02 PM
To: DNR Waukesha Diversion App
Subject: Draft technical review comment

Thank you for considering my 3 comments:

1. Waukesha is and has been a water rich community. How can we say "yes" to "spring city" and then say "no" to truly water poor communities?
2. All municipal water systems are treated to some degree. Treat the water.
3. Waukesha could have spent it's monetary resources on upgrading it's leaking municipal water and sewage systems. Waukesha could have spent taxpayer money towards far more meaningful conservation measures. Waukesha chose to pay lawyers and consultants instead.

Wise Water policy includes sustainable recycling systems within the users watershed.

Bolton Hall 868D
P.O. Box 413
Milwaukee, WI 53201
(414) 229-6493 *phone*
(414) 229-2860 *fax*



College of Letter and Science
Department of Economics

August 28, 2015

Ashley Hoekstra
DNR Bureau of Drinking Water and Groundwater
Box 7921
Madison, WI 53707-7921
DNRWaukeshaDiversionApp@wisconsin.gov

Dear Ms. Hoekstra:

I submit this letter and its attachment for your record of public comment on the Waukesha Diversion Application. Thank you for making this opportunity available.

On June 26, 2013, I wrote a long letter to the DNR on the economics of water. I am attaching that letter to this email to be part of the record for this comment period.

Since writing my earlier letter I see nothing in the Diversion Application Environmental Impact Statement to indicate that a professional economic study of the demand for water in Waukesha has been conducted. When establishing the “need” for water, no economist would accept an assertion of need without reference to price. In our economy, a mixture of market forces and government forces, there is no question that the number one coordinating device for society is the price system. It provides us with efficiencies and wealth creation far beyond the imagination of our predecessors. It does so because of the incentive structure that it presents to people as they make the vast preponderance of their consumption and investment decisions. In that context, people decide they “need” a good or service on the basis of “opportunity cost,” what they are willing to trade-off for what they are buying. Car drivers “need” more gasoline when it is \$2.00 per gallon than they “need” when gas sells for \$3.50 per gallon. They “need” a five bedroom home if they live in rural Wisconsin where such a home is relatively inexpensive, but don’t “need” five bedrooms if they choose to live in the downtown of one of our great cities where such huge dwellings are priced out of reach.

So, assertions of “need” independent of price are inherently incomplete and not sufficient for an application to divert water as under this application. As I set forth in the attached letter, to prove “need,” economists and statisticians should be brought in to study the elasticity of demand for water.

I am privileged to have this letter, together with its attachment, entered into your record of public comment.

Sincerely,

A handwritten signature in cursive script that reads "W L Holahan".

William L. Holahan
Professor Emeritus
Economics Department



Bolton Hall 868D
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College of Letter and Science
Department of Economics

26 June 2013

Kenneth Johnson, Water Division Administrator
Eric Ebersberger, Water Use Section Chief
Wisconsin Department of Natural Resources
101 S. Webster Street
P.O. Box 7921
Madison, WI 53707-7921

Re: Economic Analysis in the Environmental Impact Statement

Dear Mr. Johnson and Mr. Ebersberger:

I am an Emeritus Professor of Economics, recently retired from the Department of Economics at the University of Wisconsin – Milwaukee after forty years, nine and a half as its chair. I was the economist on the founding executive committee of our new School of Freshwater Sciences, a school that will produce scientific and policy research and academic degrees in several areas related to fresh water. I am writing to comment on the City of Waukesha’s proposed Water Diversion Application under the Great Lakes Compact. I offer these remarks to the Wisconsin Department of Natural Resources and other state officials and regional stakeholders to suggest how economics is an appropriate and important tool for evaluating some key elements of the diversion application. The views expressed here are my own and are independent of any held by the department of economics or the university.

An important threshold requirement in any request for a diversion under the Great Lakes Compact is whether such large amounts of water from any of the Great Lakes are actually needed, and whether current water supplies are insufficient and that alternative measures, including conservation measures, will not serve the same purpose. I believe economic analysis should be central to this determination. In particular, to determine whether residential and commercial demand for water will be as projected, we have to examine the potential impact of price as well as “command and control” measures on current and future water use such as lawn irrigation regulations and/or programs such as appliance buyouts. The quantity of water demanded is not fixed, but instead is significantly related to the price per unit as well as other non-price conservation

measures. The City of Waukesha's early experience with pricing and non-price conservation measures indicates some real progress in using such measures to effect water use reductions. This positive result should prompt more rigorous analysis and research to determine how much additional reduction in water use could be expected from additional efforts to conserve. Such analysis and research would help determine whether the proposed water diversion from Lake Michigan is really needed now or in the foreseeable future.

Although early efforts to employ different price-based conservation methods have resulted in a substantial decrease in water usage, pricing strategies alone may not provide sufficient reductions in quantity of water use so that local supplies can satisfy demand. Combinations of pricing and non-price means of reducing quantity demanded may be required. We need further sound research on the best way to refine these early results, and to combine them to solve the problem in a manner that would be less expensive for the City and its taxpayers and to ensure that the provisions and requirements of the Great Lakes Compact are being effectively followed and implemented.

PRICE ELASTICITY OF DEMAND FOR WATER

To convey the relationship between price and the quantity of water demanded, economists use the concept of elasticity of demand. Elasticity measures are numerical estimates of the changes people make in their usage of water in response to changes in incentives such as price; command and control regulations such as limits on showerhead flow rates; and moral suasion such as public service announcements urging conservation. Econometric studies of the elasticity of demand for water show price to be a particularly strong motivator for reductions in quantity demanded.¹

Economists categorize demand elasticity into "long run" and "short run." In the "short-run" people respond to changes in price by changing the amount of water they use but without changing their previously-installed equipment. That is, they respond to higher prices not by making large investments in changing the equipment -- appliances and fixtures -- that enable them to use water but rather by using that equipment less intensively, e.g., by taking shorter showers, washing the car less frequently, or watering the lawn less frequently and at night. In the "long-run" people not only change the way they use their water delivery equipment, but they can invest in changes in that equipment. Examples of long-run responses to higher prices include investment in the latest in water conserving equipment, choosing smaller lot sizes, forgoing water-intensive features like hot tubs, planting less thirsty ground cover instead of grass, installing rain gardens, and building condominiums instead of single-family homes. Because longer time periods permit people to plan and implement more changes in the way they use water, long-run elasticity tends to be greater than short run elasticity.

¹There are a large number of excellent water economists around the country and they have produced a vast research literature on the elasticity of demand for water. Included among these are Professor Sheila Olmstead of Resources for the Future and Professor Robert Stavins of Harvard.

As a numerical measure, elasticity is expressed as a ratio of the percentage change in the quantity of water people use in response to a price change divided by the percentage change in the price. Indeed, the consensus among economists who make empirical measurements of the elasticity of demand for water is that it is substantially less than 1. In fact, the consensus average of long-run demand elasticity is measured at .6: buyers consume 6 percent less water in response to a 10 percent increase in expected price. As expected, short-run elasticity is less than long-run elasticity; the consensus is that short-run elasticity is .3.

Relevance to the Diversion Application

All elements of this or any diversion application will depend on the quantity of water to be diverted. The Compact requires demonstration that “there is no reasonable water supply alternative in the basin in which [Waukesha] is located, including conservation of existing supplies” and the further requirement that “the need for the proposed diversion cannot be reasonably avoided through efficient use and conservation of existing water supplies.” This is precisely the kind of “reasonable” estimate of quantity demanded that elasticity provides. To economists the reasonableness of any diversion amount cannot be determined without estimating the amount that will be demanded at alternative prices per unit.

Block Pricing

The difficulty in imposing pricing to regulate water usage is that some uses of water are essential for life’s basic requirements while other uses are more optional and some much more optional. In such circumstances economists recommend “non-linear pricing.” With non-linear pricing, often called “increasing block pricing (IBP),” the price for the first quantum of daily water use -- say, forty gallons for personal hygiene, cooking, sanitary waste disposal -- would be at a low price whereas higher quantities would be at higher prices. Economists point out four advantages when they prescribe IBP pricing to regulate water use. First, while water is essential, not all uses of water are essential. Second, essential uses tend to be low volume while more optional uses are typically high volume uses. Third, although the essential uses of water are very unresponsive to price changes, i.e., demand is very inelastic, more optional uses are much more responsive to price changes, i.e., more elastic. Fourth, because IBP is a price system and not a command and control regulation, IBP leaves the rate of usage up to the user and not a direct government intervention into private decision-making, as with sprinkling bans. However, coupling pricing mechanisms with direct government action such as sprinkling bans is likely to achieve even greater water conservation.

Evidence on Pricing from Waukesha Conservation Report

On March 1, 2011 Waukesha issued its “Water Utility Conservation Report” to the Wisconsin Public Service Commission. The report reveals a number of opportunities for efficiencies and savings of both money and water.

First, the report shows reductions in quantity of water demanded in response to a block pricing program with just over 15,000 participating families. Although there have been just a few years of experience with block pricing there is initial evidence of considerable demand elasticity. The results are spread over numerous tables beginning on page 2 of the report, showing the results for various building sizes and types. For illustrative purposes, consider the charges imposed on single family houses. At first, during the period June 2007 to June 2009, the first block was very large, 30,000 gallons per month for a single family. The large size of that first block reduced the incentive effect of block pricing. That is, with the first block so large, the customer was so unlikely to get to block two (e.g. the higher pricing block) that there was little reason to try hard to avoid it. But in 2009 the size of the first block was cut back to just 10,000 gallons/month and its price raised to \$2.05 per thousand, the second block was the next 20,000 gallons and its price was \$2.65, and quantities beyond 30,000 gallons were charged \$3.40 per thousand. Once again, the first and second blocks together are so large that the third block is largely irrelevant for many users. Still, the incentive to avoid the second block was greatly strengthened since the first block was cut by two-thirds.

Waukesha’s early experiences with the block pricing is optimistic, with a 6% reduction in usage despite a nearly 4% increase in residential customers served (page 21).² Moreover, while the data reported in the report is not sufficient to determine elasticities within the three blocks, we expect that there is greater elasticity in the third block than in the second, and in turn more elasticity in the second than in the first.

These promising early results show the potential to save a lot of money. I hope the City would experiment to make the pricing even more effective. As more is learned about how people are responding to the price blocks, many variables could be adjusted such as creating more blocks, and making them smaller. This would have the effect of increasing price more quickly on more optional uses while keeping the price lower for more essential uses of water.

A major cost savings could be gained if it can be shown that the city can provide water without the expense of the currently proposed pipeline to convey diverted Lake Michigan water. The capacity requirements are reduced when peak-time usage is reduced. If there are several blocks, the higher blocks can be raised during the peak months without penalizing those who use much less water. This would create an incentive for people to stay off the peak, reducing the ratio of peak to average usage.

² Precipitation patterns appear to have not been taken into account, and should be if they have not.

The overall lesson from the block pricing experience is clear: this strategy for conserving water is working and should be applauded, and frankly, expanded from the residential sector to other sectors such as the commercial and industrial users which are not included in the City's current increased block pricing structure. In addition, experiences from other cities that have employed pricing mechanisms successfully should be thoroughly researched for lessons learned.

Low-flow Toilet Program

The conservation report also shows success in swapping low-flow toilets for 65 toilets in the city. While the number of participants is small -- 65 -- demonstrating that this program is just getting started, the results so far are promising. By participating in this program, plus other measures the City has apparently undertaken to heighten awareness of the need to conserve, the residential participants in the low-flow toilet program reduced their water use from roughly 19,000 gallons per month to 16,000 gallons per month. Only three years are reported, so it would take a more complete statistical analysis to separate out all of the causes taking place at the same time. But, these participants reduced their total water usage by 15.37% (page 19) from this one conservation measure. Given this experience, the City should significantly expand this program and provide even greater incentives/subsidies for the installation of these water conserving appliances and techniques. The cost saving with reduction in water treatment, less pumping, less infrastructure maintenance, could be reinvested to support these incentive programs.

CONCLUSION

In conclusion, the "Water Utility Conservation Report" shows promising results for reductions in water usage, and water usage is substantially down, not up (page 21). It seems reasonable to expect that the way to optimize water conservation is to go beyond what has been started to an aggressive push forward to coordinate and integrate a combination of approaches including not only the usual command and control practices, such as limiting lawn sprinkling and appliance swaps and buyouts or assisting residents and businesses to switch to "native" grasses and rain gardens, but more use of pricing strategies. The effect of doing so over time will not only save water, but save the City and its residents money for reduced pumping, treatment, distribution and maintenance.

The other significant point is that pricing should be part of any overall strategy of meeting the City's long term water needs with existing water supplies. In addition, the City of Waukesha would be able employ these practices to maintain control over its destiny rather than pursue an expensive diversion that must comply with stringent

requirements under the Great Lakes Compact that is administered by Wisconsin, seven other states and two Canadian provinces.

I hope these remarks are helpful.

Sincerely,



William L. Holahan
Professor Emeritus
Economics Department

Cc: Mayor Jeff Scrima, City of Waukesha
Ed Henschel, Administrator, City of Waukesha
Joe Pieper, President, Waukesha Common Council
Dan Duchniak, Director, Waukesha Water Utility
Dan Warren, President, Waukesha Water Utility Commission
Jeff Ripp, Public Service Commission

Dear DNR,

As a resident of the Great Lakes region, I support the protection of the Great Lakes as a vital natural resource and a national treasure. The Great Lakes provide the foundation of our identity as a region. The City of Waukesha's request for Great Lakes water threatens that identity. I urge the DNR to deny Waukesha's application to divert Great Lakes water for the following reasons:

- Waukesha's application does not pass legal muster under the federally ratified Great Lakes Compact.
- Waukesha has a safe, sustainable and treatable water supply available to its residents that does not require using water from the Great Lakes.
- Investing in existing infrastructure is the cheapest, fastest and safest option for Waukesha to meet radium and public health standards by 2018.

Sincerely,

PRINT NAME KATHLEEN Hoyer SIGNATURE Kathleen M. Hoyer
ADDRESS 5110 W 26210 CRAIG AVE CITY MUKWAGONAGO
ZIP 53149 PHONE 262-462-4375 EMAIL Kayheyoar@qskso.com

RECEIVED DNR

AUG 28 2015

DRINKING WATER & GW

ADDITIONAL COMMENTS:

After reading the Compact I feel there are a number of areas where the requirements of the Compact have not been properly applied in the DNR's study of the application. In the broad picture for the future it is very important to get this absolutely correct or the hard work of developing the Compact will be for naught.



Ashley Hoekstra
DNR Bureau of Drinking Water and Ground Water
Box 7921
Madison, WI 53707-7921

August 24, 2015

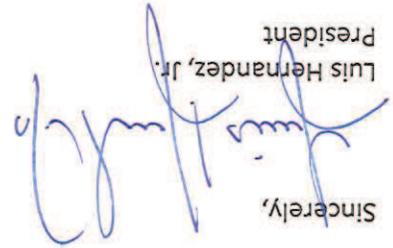
Dear Ms. Hoekstra,

I am in support of the City of Waukesha's application for Lake Michigan water. Based upon the City's application and the detailed scientific evidence and extensive modeling studies, I believe that Lake Michigan water is the only reasonable water supply alternative for the city. Waukesha's current water supply source is unsustainable and short-term solutions are not the answer. This decision clearly takes into account the future needs of the Waukesha community.

As a local resident and small business owner of a manufacturing plant based in Waukesha, I am invested in procuring a safe and reliable water supply that will protect the health of my family and community while being environmentally responsible and see this solution as being the most reliable and the most sustainable long-term water source.

This proposal fully meets the requirements of the Great Lakes Compact, does not negatively impact the Great Lakes, does not create a precedent for future diversions and will improve the quality and levels of the Root River. In addition, the potential business collaboration with the City of Oak Creek for obtaining water is an excellent example of how governments can work together to efficiently utilize taxpayer assets.

I want to thank the DNR for its commitment to thoroughly reviewing this issue and providing us with the confidence that this decision is the right one.

Sincerely,

Luis Hernandez, Jr.
President

810 Progress Avenue | PO Box 233 | Waukesha, WI 53187
262.544.2077 | 262.544.2080-f | www.urethanesp.com

RECEIVED-DNR
AUG 26
DRINKING WATER

Hoekstra, Ashley N - DNR

From: Erik Helgestad <erik.helgestad@gmail.com>
Sent: Monday, August 17, 2015 9:15 AM
To: DNR Waukesha Diversion App
Subject: RE: Waukesha Water Diversion Application

Hello,

I am writing in regards to the City of Waukesha's water diversion application.

I am hoping that this diversion application is approved. As a resident, homeowner, and soon to be raising a child in the city of Waukesha, I have been paying very close attention to the process of getting a sustainable, safe, and compliant water source for our city's water needs. Like other residents, we have followed our Water Utility's lead on reducing our water usage through new fixtures, capturing rain water for our plants, and overall being more mindful of our usage.

I urge you to please approve and allow us to move forward with our diversion request. Doing so will allow us a stable water supply for many years to come while returning treated water to Lake Michigan, will no longer draw down our shallow and deep aquifers, and prevent damage to our natural wetlands.

Thank you,
Erik Helgestad
Waukesha, WI

Hoekstra, Ashley N - DNR

From: Stephen Haynes <shaynes@wi.rr.com>
Sent: Friday, August 28, 2015 8:25 PM
To: DNR Waukesha Diversion App
Subject: Waukesha Water

My feeling about the Waukesha Water situation is that if you do not have the water, you should not permit people to built homes and develop businesses. I think it is irresponsible for government to allow, and even encourage, people to move into an area when you are not able to provide the necessary resources. I doubt that the other states and Canada will allow water to be diverted to Waukesha. It is a dangerous precedent to set.

Stephen Haynes
Menomonee Falls

RECEIVED-DNR
 AUG 28 2015
 DRINKING WATER & GW

<p>Name</p> <p>Roxie Harrington</p>	<p>Email Address</p> <p>imaveganru@hotmail.com</p>	<p>Address</p> <p>PO Box 401 Holmen, Wisconsin 54636 United State of America</p>	<p>Comment to the Wisconsin DNR</p> <p>The Great Lakes Compact was created to protect the Great Lakes as a vital economic and cultural resource. Wisconsin needs to make the smart decision in refusing Waukesha's request for water and lead our region in protecting our Great Lakes. We need to save our resource of water and The Great Lakes is already under huge pressure from the world from oil companies and other countries. No sense in our State allowing one singular city to even over ruling any compact we hold with other countries. >> Non-Diversion Solution << ONLY</p>
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Hoekstra, Ashley N - DNR

From: kjharrington@aol.com
Sent: Friday, August 28, 2015 8:56 AM
To: DNR Waukesha Diversion App
Subject: Comments on Diversion Application

DNR Bureau of Drinking Water and Groundwater:

Please deny the City of Waukesha Diversion Application.

Waukesha has not demonstrated that Lake Michigan water is its "last resort".

It has inflated its service area to include communities not in need.

It has relied on outdated deep aquifer data to support its request.

It has failed to give adequate genuine consideration to proven treatment alternatives for its existing water supply.

Allowing relaxed standards for a Waukesha Diversion Application allows the bar to be lowered for future applications.

Thank you for your consideration of these comments.

Kathryn Harrington
2345 Memorial Dr
Brookfield, WI 53045

Hoekstra, Ashley N - DNR

From: Annette Harpole <diamondah1@gmail.com>
Sent: Friday, August 21, 2015 10:33 AM
To: DNR Waukesha Diversion App
Cc: Annette Harpole
Subject: Waukesha (WI) Diversion Application - Public Meeting Comment - August 2015

Attn: Ashley Hoekstra (DNR Bureau of Drinking Water & Groundwater) & Wisconsin Department of Natural Resources Officials

RE: Public Hearing on the City of Waukesha's Application for Diversion of Great Lakes Water - A Follow-up to the Racine, WI Public Hearing on Tuesday, 8/18/15 (Masonic Center).

Dear Ms. Hoekstra and Wisconsin DNR Officials:

I am opposed to the request by the Waukesha Water Utility & Waukesha municipality to divert water from Lake Michigan initially and then return wastewater back to Lake Michigan via the Root River. I referenced the Great Lakes - St. Lawrence River Basin Water Resources Compact Agreement (12/13/2005) and read Section 4.9 Exceptions to the Prohibition of Diversions - Item 3D Straddling Communities which states: "*There is no reasonable water supply alternative within the basin in which the community is located, including conservation of existing water supplies...*" Based on recent public hearing testimonies and what I have read, Waukesha has not satisfied the above standard - has not exhausted all of its avenues for access to potable water. Here are some of the concerns that seem to not have been addressed by Waukesha and would make Waukesha "not a community in need":

- A Waukesha School District member testified at the Racine Public Hearing that Waukesha has not followed through with inserting radium filters on all the wells of the Sandstone Aquifer as per the WI DNR lawsuit by 2018. The representative indicated that Waukesha should finish the work to help protect the health of their citizens with particular concern for their children.
- Waukesha should implement a dual plumbing system to accommodate gray water for non-potable use (irrigation, manufacturing, laundry, toilets).
- Another Waukesha County citizen who lives in the proposed annexed area around Genosee Depot indicated their water supply via wells is just fine and does not understand why Waukesha wants to divert water from Lake Michigan to support their expanded development needs.
- Several scientists and non-profit group representatives at the 8/18/15 Public Hearing in Racine stated that there has been relatively little data analysis performed examining the environmental and health impact of effluent, phosphorous (resulting from agricultural land runoff & barnyard/livestock waste runoff), chloride and other contaminants that may end up in the returned waste water via the Root River which effectively could become Waukesha's toilet to Racine and Lake Michigan. The increase in water flow may increase which could be a boon for fishing but what about the water quality? Think of the huge problem with PCBs back in the 1970's and 1980's showing up in fish in the Great Lakes and thus adversely impacting human consumers of fish.
- Concerns about increased flooding resulting in more frequent property damage due to increase in water flow from returned Waukesha wastewater. Several areas along the Root River where people live in Racine County are prone to flooding. One such resident spoke up at the meeting about this.
- Waukesha's returned wastewater to Lake Michigan via the Root River could negatively impact efforts to help restore the health of the Root River as explained by the Root River Watershed Restoration Plan

(2014 - 2019) [Source: <http://www.sewrpc.org/SEWRPCFiles/Publications/CAPR/CAPR-316-root-river-executive-summary.pdf>] The Root River Watershed "lies east of the subcontinental divide and thus its rivers and streams flow directly into Lake Michigan." It originates in the City of New Berlin in eastern Waukesha County and ends in the City of Racine before flowing into Lake Michigan. Its tributaries extend from Kenosha to Racine, Milwaukee and Waukesha Counties.

[Reference: <http://www.sewrpc.org/SEWRPCFiles/Publications/CAPR/capr-316-root-river-restoration-plan-part-I.pdf>] The contaminants returned by Waukesha would not only negatively impact the water & aquatic life in the Root River but would ultimately negatively impact the water quality of Lake Michigan/Lake Huron.

Waukesha's application could set a dangerous precedent for municipalities wanting to tap into any one of the five Great Lakes for fresh water.

The five Great Lakes of North America comprise the largest body of freshwater in the world. I just learned too that Lake Michigan and Lake Huron are virtually considered one lake via the straits of the Mackinac. Wisconsin also is bordered by Lake Superior, another Great Lake. Wisconsin has a great responsibility to its people, the region, and the world for ensuring that the fresh water bodies that we are surrounded by are taken care of wisely. Water diversions from any one of the Great Lakes by municipalities in Wisconsin, California (as Racine's Mayor John Dickert indicated at the public hearing of someone in San Francisco wanting to construct a pipeline from Lake Michigan to California), or anywhere else could endanger the supply of the Great Lakes in addition to runoff harming the water quality of the Great Lakes.

Diverting water from Lake Michigan may be the most expedient but it may not be the most prudent. I strongly urge the Wisconsin DNR, Waukesha, and other influential entities/persons on this matter to tread very cautiously. Ensure that all available steps/remedies have been pursued and data analysis done measuring environmental impact of diverting water with wastewater return back to Lake Michigan via the Root River) before making such a historical, grave decision to approve Waukesha's application for Lake Michigan diversion.

Sincerely,
Annette G. Harpole - A concerned City of Racine resident
1030 Wisconsin Avenue
Racine, WI 53403
262/619-2346

Hoekstra, Ashley N - DNR

From: tamara harbach <tamaraharbach@gmail.com>
Sent: Friday, August 28, 2015 6:26 AM
To: DNR Waukesha Diversion App
Subject: Lake Michigan

Please do NOT approve Waukesha request for water from Lake Michigan. Let's protect our lake for future generations.

RECEIVED-DNR
 AUG 28 2015
 DRINKING WATER & GW

Name	David Hansen
Email Address	moon93.2@earthlink.net
Address	4207 N. Pine Tree Rd Hobart, Wisconsin 54155 United States of America
Comment to the Wisconsin DNR	<p>I have been aware of and following this issue rather closely some years now; waiting for it to get to this point. It should never even have been considered. It is patently wrong. The Compact of 2008 is good law and needs to stand. Enough is enough.</p> <p>No water leaves the Great Lakes Basin. NONE! This is worth fighting viciously for. While we destroy our planet with endless GREED! Stop This Crap!</p> <p>If there is no water where they are they should simply pull up stakes and move on...too bad!...but they DO have water....just not enough for for their limitless greedy imaginations.</p> <p>Audacious arrogance. Whatever you give these types of people they will use up an destroy anyway...it's what they do on this planet. Harvest of ignorance..of limitless self interest, ego.No! No! No! No exceptions to the 2008 Compact. (</p> <p>(Oh, I'm sorry...I forgot..you are not really the DNR anymore, just a tool of rapacious developers...the new "Walker meme")....and Waukesha is the capital city of such monsters....</p>

Hoekstra, Ashley N - DNR

From: susan susan <sunlightrising@gmail.com>
Sent: Monday, August 17, 2015 1:19 PM
To: DNR Waukesha Diversion App; Phil Haney
Subject: Fwd: FW: Great Lakes water diversion.

Please accept this testimony from Phil Haney of Kenosha WI. I have been previously told that email addresses are not case sensitive. Why would Phil have had this rejected from reaching the DNR hearing testimony? Susan Michetti

----- Forwarded message -----

From: **Phil Haney** <philhaney@hotmail.com>
Date: Sun, Aug 16, 2015 at 2:13 PM
Subject: FW: Great Lakes water diversion.
To: "sunlightrising@gmail.com" <sunlightrising@gmail.com>

Sue; I tried sending this e mail, but for some reason it was rejected by the server. If you could redirect it so that it becomes part of the testimony record I would appreciate it.

From: philhaney@hotmail.com
To: dnrwaukeshadiversionapp@wisconsin.gov
Subject: Great Lakes water diversion.
Date: Sun, 16 Aug 2015 14:08:30 -0500

Please accept this as testimony opposing any and all diversion of Great Lakes water to regions outside our Great Lakes watershed. It should be obvious to all that any such diversion would be detrimental to the lakes region, would create, quite literally an opening of the "floodgates", creating a precedent which would be argued by any and possibly most communities all the way from Georgia to Kansas. Everybody would want that water. What would be left, eventually, of Lake Michigan and the other 4 of the Great Lakes? Large mud holes or sun baked bare lake beds, such as we see in photographs of former lakes located the our western states?
Thank you for considering my testimony.--- Phil Haney; Kenosha Wisconsin.

Hoekstra, Ashley N - DNR

From: Patricia Hammel <attyhammel@herricklaw.net>
Sent: Friday, August 28, 2015 10:26 PM
To: DNR Waukesha Diversion App
Subject: Waukesha Request for Great Lakes Water Diversion

Dear Ms. Hoekstra;

I was not able to attend the hearing on Waukesha's diversion request August 11, but wanted to present my concerns.

- 1) Under the terms of the Great Lakes Compact diversion should only be permitted as a last resort when there is no reasonable alternative. The compact is an international agreement that supersedes state and provincial statutes.
- 2) Waukesha has not met its obligation to qualify for a diversion. As a number of citizens testified, it has not fully pursued conservation options. Also it has chosen to pursue the costlier diversion option rather than treat its existing water supplies for radium, apparently inexplicably (and illegally? Without a court order to protect it??) exposing its residents to untreated water.
- 3) The numbers in Waukesha's application have been skewed to increase the area of its sewer service to nearly twice the area of the city and to include a number of other municipalities, all apparently contrary to the express language and intent of the Great Lakes Compact as described by the former director of the DNR's water division who negotiated the compact before 2008 on behalf of the State of Wisconsin. They also seem to have understated the extent of supply in the aquifers from which existing wells draw water.
- 4) The DNR's Environmental Impact Statement fails to consider the alternative put forward by the Compact Implementation Coalition to utilize existing wells and treat the water now available to the city of Waukesha, and is therefore legally inadequate.
- 5) The effects of discharging wastewater into the Root River in order to comply with the requirement to return the water to the Great Lakes basin would have significant adverse effects on that river, which do not seem to have been addressed in the EIS.
- 6) Allowing Waukesha to evade the requirements of the Great Lakes Compact puts our Great Lakes at risk from other, potentially much larger and more serious illegal diversions from communities near and outside the Great Lakes basin.

Good evening. My name is Sandy Hamm. I am a lifelong resident of Waukesha. My family owned The Waukesha Freeman for over 100 years until my mother, along with her sister and brother sold it in 1979 to the Des Moines Register.

Through my mother's family my great uncle was Art Kuranz, and his son Joseph Kuranz was my second cousin; each in turn ran the Waukesha Water Utility.

Joe served as the General Manager from 1958 - 1985. For those of you who might remember, Joe was involved in this radium issue before his retirement, including a plan he put forth to take the City's effluent, clean it, put it back into the Fox River downstream, and build a lake to reuse the water. I am deeply versed in this history.

In our modern age to answer with a "No" has become unfashionable.

In my opinion the state of Wisconsin and the other great lake states should reply to the City of Waukesha's requests with a simple. "No."

I don't have a detailed legal argument against the application, but I know what the City wants, and how the City has acted since 1987, when the more stringent EPA standards were imposed.

The City wants growth, internal *and* by annexation. They are in the business of growth. The City wants development. They make no secret of it.

For decades the City has annexed what for me are countless acres, and expanded internally, all while being unable to supply clean water to their current constituents.

It exercises no restraint at all while under the EPA order. In the past three years alone the City has annexed many, many 100s of acres from the Town, all annexed by the owners so they could tag onto the city's water and sewer services.

By this time next year the city will have 100s of new apartments on recently annexed land along with a Meijer's store, not to mention the, again, literally 100s of new apartments within its existing borders.

When one doesn't have the resources to serve those for whom they are presently responsible, the responsible thing to do is to stop expanding. "If you are feeding your 6 kids poison, best you don't birth a 7th."

Milwaukee County has plenty of space, *and they* have the water. Milwaukee didn't develop on Lake Michigan by accident. The population should move to the water, not the other way around.

Based on the City's blatant disregard for the EPA's order, expanding all the while, I believe that giving the City a drinking straw to Lake Michigan is the last thing that should happen.

The City should make do with what it has. The water table is rising. Stop annexing and adding apartments hand-over-fist.

Can't anyone say "No" anymore?

Sandy Hamm
W230 23827 Milky Way Rd
Waukesha, WI 53189
262-549-1965

Hoekstra, Ashley N - DNR

From: Robert Haglund <rhaglund@firstweber.com>
Sent: Wednesday, August 19, 2015 5:09 PM
To: DNR Waukesha Diversion App
Subject: Waukesha's application for Great Lakes water.

Please approve the City of Waukesha's application for Great Lakes water. It is vital to sustaining area growth and stability.

Sincerely,

Robert Haglund
City of West Allis Resident

Robert Haglund
First Weber Group
Assistant Manager, Relocation Specialist, Buyer Agency
262.389.5193 C
414.962.3000 O
www.roberthaglund.firstweber.com

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Wisconsin Department of Natural Resources
Public Hearing on the City of Waukesha's Application for Diversion for Great Lakes
Comment Form

Hearing Location: Milwaukee, WI

Date of Hearing: Aug. 18, 2015

Name: RFA Ann Haderer, OSF

Address: 3250 S Griffin Ave, Milwaukee WI 53207

Who you represent: Sr. St Francis of Assisi - Milwaukee

Comments:

I am 100% against the Lake

Michigan Division for Waukesha for these

reasons 1) If handled honestly, we

all know that they have enough water

for their city. Use Waukesha water supply only.

2) The radiation they claim is

in their water does them no harm. That's

not honest to us.

3) The facts presented are botched

and not honest facts. They are weighted and

mic leading. Waukesha tries to use NITRATED to

its advantage only.

If you are unable to submit your comment today please send comments to:

definitely. suffer, this sets a terrible

President - don't break the

treaty - this will bring

Michigan and the Great Lakes

ferret by.

Ashley Hoekstra
DNR Bureau of Drinking Water and Groundwater
Box 7921
Madison, WI 53707-7921

All public comments must be submitted by August 28th, 2015.

Hoekstra, Ashley N - DNR

From: Peter Jensen <p.jensen@eagleweather.com>
Sent: Sunday, August 16, 2015 6:21 PM
To: DNR Waukesha Diversion App
Subject: Re: Proposal Comments

Gentlemen:

I am writing in **OPPOSITION** to the proposed diversion of Lake Michigan water to the City of Waukesha.

As can be seen with the severe drought in the western states, clean fresh water is a precious resource that cannot be squandered or misused. In my opinion society in general must learn to live within the resource base that it occupies. This is the case for the City of Waukesha. It is not that they do not have water; it is that they do not wish to pay the costs of removing the radium contamination they are dealing with. Furthermore, there are many additional water saving options that can be taken, from eliminating leaking infrastructure both public and private as well as limitations in landscape use of water only to name a few that will extend their existing water supply for years.

Without a doubt some of these options are costly and may be unpopular but they are necessary to live within their water means.

The diversion of Lake Michigan water is critical re-allocation of resources that is not needed and sets a very unwise precedent. I strongly urge the rejection of the water diversion proposal.

Peter Jensen
W345S10489 County Road E
Mukwonago, WI 53149
p.jensen@eagleweather.com
414-791-5751

Hoekstra, Ashley N - DNR

From: Susan Knorr <sknorr@tm.net>
Sent: Thursday, August 13, 2015 8:45 AM
To: DNR Waukesha Diversion App
Subject: Ensure Lake Michigan water stays where it belongs

Dear Ms. Hoekstra,

I think it would be wrong to allow Waukesha to take Lake Michigan water. The whole point of having rules is lost if you make exceptions.

In addition, I don't think we know enough about the way the Great Lakes function to alter the natural processes any more than we already have.

I understand Waukesha wants more water to allow for growth: perhaps they should make their goal be stability and sustainability instead.

Please deny Waukesha's plan to divert water.

Susan Knorr
16929 Lakeshore Road
Two Rivers, WI 54241

Hoekstra, Ashley N - DNR

From: Susan Knorr <sknorr@tm.net>
Sent: Tuesday, July 21, 2015 10:53 AM
To: DNR Waukesha Diversion App
Subject: Waukesha water diversion

As a resident of the Great Lakes Basin, I request that you deny Waukesha's proposal to take water from Lake Michigan. I believe they must work with the water supply they have.

I am currently visiting the Central Valley in California and seeing first hand the problems diverting water can cause. Each area of the country should live with the resources they have. Waukesha may want to increase their manufacturing capacity but that doesn't mean they have to. It's time we stopped thinking growth is necessarily a good thing.

Susan Knorr
Two Creeks, WI



ASHLEY:

8-26-15

STOP THE GREAT LAKES
WATER DIVERSION TO THE CITY OF
WAUKESHA!

IF THIS IS ALLOWED - WHERE
WILL IT END?

RECEIVED-DNR

AUG 28 2015

DRINKING WATER & GW

THANK YOU
Ken Klumb
KEN KLUMB
JACKSON, WI



Ken Klumb
N167W20904 Reynolds St.
Jackson, WI 53037

MILWAUKEE WI 530
25 JUL 2005 PM 11



ASHLEY HOEKSTRA
DNR Bureau of Dendrology WAPEN
Box 7921
MADISON, WI 53707-7921



Hoekstra, Ashley N - DNR

From: Angie Klemm <kangiek@wi.rr.com>
Sent: Friday, August 28, 2015 6:13 PM
To: DNR Waukesha Diversion App
Subject: Lake Michigan water is NOT Waukesha's best option

Dear Ms. Hoekstra,

I'm writing to ask that you deny the City of Waukesha's request for Great Lakes water.

Waukesha residents can have clean, safe drinking water by treating their water. They can combine water from deep and shallow wells to stay under the radium limits. Diverting water from the Great Lakes would set a bad precedent, would take longer to implement, and would cost more money.

The City of Waukesha's proposal to divert water is inconsistent with the Great Lakes Compact. The City includes towns in Waukesha County (Pewaukee and the Towns of Delafield and Waukesha, among others) that are not in their current service area and have not demonstrated that they are without adequate supplies of safe drinking water. In fact, some officials in these areas have indicated that they do not need any water either now or in the foreseeable future.

Please deny the City of Waukesha's application.

Thank you,

Angie Klemm
1752 Church St
Wauwatosa, WI 53213

Hoekstra, Ashley N - DNR

From: Scott Klaas <sklaas@kw.com>
Sent: Wednesday, August 19, 2015 7:13 PM
To: DNR Waukesha Diversion App
Subject: Waukesha Lake Water

Hello,

Why does Waukesha need Lake Michigan water?

- Waukesha's primary water source is depleted and has radium levels in excess of federal drinking standards.
- Recharging of the aquifer currently serving Waukesha from rain and snowmelt is limited because of a layer of shale. Continuing to use groundwater in Waukesha is not sustainable. It makes no sense to exhaust current groundwater resources before switching to a sustainable alternative.
- The aquifer is used by many communities in the densely populated region of southeastern Wisconsin and northeastern Illinois.
- We agree with the DNR that the only reasonable solution is for Waukesha to switch to Lake Michigan water.

What will the impact on Lake Michigan be?

- Waukesha will not affect lake levels. The daily withdrawal would be 1/1,000,000 of 1% of Great

Lakes volume, and Waukesha will return approximately the same amount that it withdraws.

- Waukesha is not a precedent for water to go beyond to California or other far-off places. That issue was resolved with the adoption of the Compact which states that water cannot be pumped beyond the boundaries of counties that straddle the Lake Michigan Basin divide (i.e. Waukesha County).

Impact on housing?

- Clean water is a basic utility and governmental service that homeowners rely on for their quality of life.
- Just as spotty electrical service, bad roads, or underperforming schools negatively impact a property's value, so too will a poor water supply to the homes and businesses in Waukesha.
- The limited alternatives to diverting Lake Michigan water to Waukesha would be cost prohibitive and cause further economic hardship to property owners in Waukesha.

Other comments.

- Waukesha's application helps improve the flow in the Root River, improving the fishery and the recreational fishing economy.
- Waukesha's application lives up to the Great Lakes Compact – Waukesha has shown it does not have an alternative and will return the water to the lake.
- The Compact was designed to ensure that decisions would be based on science, not politics. · Most of the opponents will oppose water for Waukesha under any circumstances, regardless of what the Compact actually says.
- The DNR has a legacy of basing its decisions on sound environmental science, not on emotion, anecdotal evidence or NIMBY'ism. We would like the department to continue that legacy.

Hoekstra, Ashley N - DNR

From: CK <dudette53147@yahoo.com>
Sent: Friday, August 14, 2015 5:50 PM
To: DNR Waukesha Diversion App
Subject: Waukesha Water Rites

Ms. Ashley Hoekstra,

Hello, I am a concerned citizen, and I want to relay these talking points to you because they seem extremely relevant and important, and water becoming a more precious resource.

Despite its location outside the Great Lakes basin, the Wisconsin Department of Natural Resources has tentatively OK'd Waukesha's application to divert water out of the Great Lakes; thankfully, the Compact sets a very high bar for these requests and allows them only as a last resort. And while everyone deserves clean, safe water, we're concerned Waukesha's application doesn't meet some of the Compact's most important requirements.

For starters, Waukesha has not fully enacted its water conservation plan to reduce its water use; the city has long had a plan for water conservation but has failed to commit sufficient effort or resources to it. Waukesha has also included communities outside its service area that do not need or want water from the city in its application, falsely inflating the city's need. ***And most importantly, Waukesha has a reasonable, cost-effective alternative that does not involve a diversion.***

Waukesha was yet to prove that it's plan to divert water from the Great Lakes is truly its last resort. **As such, I ask the DNR to deny Waukesha's application for Great Lakes water today.**

Please consider this decision carefully because if you set this precedent it may affect our children, and grandchildren for generations to come. Thank you for your kind attention.

Sincerely,

Colleen K.

Hoekstra, Ashley N - DNR

From: Jorgy Johnson <christ_js_sovereign@yahoo.com>
Sent: Wednesday, August 26, 2015 1:24 PM
To: DNR Waukesha Diversion App
Subject: Waukesha diversion project
Attachments: img008.jpg

To Whom It May Concern:

I am very concerned about this issue on behalf of my mother and father, Rebecca and Patrick Lawrence. They live directly on the banks of the Root River, and back in 2008 they had a flood for the **first time** since they lived there in **40 years**. That flood was caused by runoff from the deep sewer project in Milwaukee. This flood caused my parents considerable money to replace their furnace, washer, sump pump, and dehumidifier as well as clean up costs, not to mention the valuable items they lost memories etc. that cannot be replaced. For the things that can be replaced, Fema gives only a fraction of the cost to replace them.

If Waukesha is allowed to dump their waste not only will it pollute the river which has problems already, but my parent's house will be flooded perhaps on a yearly basis or more! Why should my parents have to risk flooding and paying for damage by a city that they do not live in especially since the city has already stated it would not be responsible for damages. How is this fair? People cannot just resolve a problem by harming others.

I am attaching a form with reasons I don't want this plan to go through, in addition to the above reasons.

I am respectfully asking the DNR to refuse Waukesha the right to do this. These problems have, I imagine, been existent for many years now, and this is the only solution they have come up with that they think will work? Harming others property or at the very least putting their property at risk is wrong.

Thank you for considering our request.

Jorgy Johnson daughter of Patrick and Rebecca Lawrence

Hoekstra, Ashley N - DNR

From: C Johnson <chazj@ticon.net>
Sent: Thursday, August 27, 2015 7:27 PM
To: DNR Waukesha Diversion App
Subject: Waukesha DNR Diversion Proposal opposition

Importance: High

Sent: Thursday, August 27, 2015
Subject: Waukesha DNR Diversion Proposal opposition

Hello,

We are opposed to the proposal for Waukesha to dump waste water in to the Root River, for the following reasons; 1) Other options do exist, 2) the proposal isn't legal, 3) the proposed discharge water quality is currently questionable, 4) today, the technology exists for Waukesha to use a closed loop system to process and reuse the water and in that way it will be certain that the water quality will absolutely be maintained, 5) there is no certainty the water quality would be maintained if the waste is dumped into the river!, 6) all of the other opposition items noted by others at the Racine public hearing.

Several of us live along the River and were flooded out in June 2009? This was the first time since our home was built in 1950 and with the greatly increased water flow this will cause this to happen again. This would place the direct legal responsibility for damage to property, shore erosion, etc. on Waukesha and the DNR for allowing this to proceed.

Sincerely,

Charles Johnson
7211 Linwood Rd.
Racine, WI 53402
chazj@ticon.net



This email has been checked for viruses by Avast antivirus software.
www.avast.com

Aug 25, 2015 / Tues
11:11 AM

Dear Ashley Hockett + to whom

I attended the recent hearings on the request of water diversion from Lake Michigan to Waubesa

I oppose the Diversion for but not limited^{to} the following reasons:

- Governors of The Great Lake Compact - Set guide lines to protect these waters - Waubesa's request does not meet these guide lines. Their request is beyond "NEED" - Consider this Compact w/in the guide lines of the State laws in the decision you/we will issue - regarding this Critical matter for present and future generations
- Waubesa does not meet "Critical Needs"
- Waubesa must be expected and held responsible to exhaust all other available options - including Conservation to its utmost highest extent - Conservation has ~~not~~ been maximized - ie human occupied space stations recycle urine/perspiration - reconsider conservation -
- Diversion only as a last ~~to~~ viable option - ~~to~~ this is not the case - watering^{ing} golf courses and filling swimming pools is not a responsible use
- Costs: Who pays for what and for how long and how much -

Turn the Page → "

- Sets a Dangerous Precedence-
- looking for New growth in the Waukesha area is not a valid reason for their request of water diversion - develop elsewhere
- Flooding of homes / barrier bank destruction along the Root River / water slab path
- expensive law suits over unenforced consequences of ^{granting} such a reckless request

This is not an exhausted list of Opposition. Please consider these reasons of opposition and may my comments resonate for those whose voices have not been heard - ~~for~~ the critical outcome your decision will impact for generations to follow -

The use of Water - Life sustaining water must be first and foremost for the survival of all living species - not to be taken lightly

I OPPOSE the Diversion of ANY Lake Michigan water to Waukesha

Please consider these comments and may you be guided w/ the utmost inner self in this critical controversial matter

Thank you for taking these comments

Ms Dorothy J. Koch
Ms Dorothy K. Koch



Dorothy Koch
515 Goold St
Racine WI 53402

MILWAUKEE WI 530
25 AUG 2015 PM 6 L



Wisconsin DNR - DG 15 RECEIVED-DNR

P.O. Box 7921

Madison WI 53707-7921 DRINKING WATER & GW

Attn: Ashley Hoekstra



Hoekstra, Ashley N - DNR

From: Charles Johnson <johnsonc@putzam.com>
Sent: Friday, August 28, 2015 2:00 PM
To: DNR Waukesha Diversion App
Subject: Opposition to Waukesha DNR Diversion Proposal with additional information

Importance: High

Re-Sent: Friday, August 28, 2015
Subject: Waukesha DNR Diversion Proposal opposition

Hello,

We are opposed to the proposal for Waukesha to dump waste water in to the Root River, for the following reasons; 1) Other options do exist, 2) the proposal isn't legal, 3) the proposed discharge water quality is currently questionable, 4) today, the technology exists for Waukesha to use a closed loop system to process and reuse the water and in that way it will be certain that the water quality will absolutely be maintained, 5) there is no certainty the water quality would be maintained if the waste is dumped into the river!, 6) all of the other opposition items noted by others at the Racine public hearing.

Several of us live along the River and were flooded out in June 2008 and this was the first time since in over 50 years. Our home was built in ca. 1948. and with the greatly increased water flow this will cause this to happen again. The flood damage and rebuilding costs exceeded \$300,00! Allowing this to proceed would place the direct legal responsibility for damage to property, shore erosion, etc. on Waukesha and the DNR for allowing this to proceed.

Sincerely,

Charles Johnson
7211 Linwood Rd.
Racine, WI 53402
chazj@ticon.net



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www.avast.com

Hoekstra, Ashley N - DNR

From: Dennis Idzikowski <idzidm@sbcglobal.net>
Sent: Tuesday, August 18, 2015 8:49 AM
To: DNR Waukesha Diversion App
Subject: Diversion NO

Approval of this first request for Great Lakes water would set a bad precedent. How many other such requests are waiting in the wings for this decision ? The best avenue is to err (if that's what it is) on the side of stingy. Because on its merits, this request is marginal, anyway. I can foresee future disapproved requests contested legally because of an ill-advised initial approval. Do we really want that ?

Please, please, please do NOT approve the diversion request from Waukesha County.

Hoekstra, Ashley N - DNR

From: Karin Kozie <kkozie@centurytel.net>
Sent: Wednesday, August 19, 2015 10:59 AM
To: DNR Waukesha Diversion App
Subject: comments

Thank you for the opportunity to comment on water removal from Lake Michigan for the City of Waukesha. I believe Waukesha should pursue treating it's groundwater for radon and other contaminants rather than sourcing its water from Lake Michigan. Taking water for Lake Michigan violates the Great Lakes Compact and sets a precedent for removing water from the Great Lakes. The recharge for Lake Michigan is nearly 90 years. It cannot withstand sustained removal with that long of a recharge. Additionally, Waukesha has not instituted any kind of mandatory or even voluntary water conservation efforts. These should all precede unsustainable removal of water from the Great Lakes. Thank you.

Karin Kozie
29580 County Highway C
Washburn, WI 54891

5/23/15

Dear Ms. Holstrom,

As a resident of Wisconsin and the Great Lakes Basin, I strongly urge you and the Dept. of Natural Resources to deny Waukegan's application for water diversion. I believe this sets a dangerous precedent. It is critical for the future of our state and region to preserve the integrity of this water resource. Thank you, Mary ~~xxxx~~

Nancy Kocuff
2306 Erin Kiddle
Madison, WI 53707
MILWAUKEE WI 530
24 2015 8:27 PM 2 L



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AUG 26 2015
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Debra Hoelstra
DNR Bureau of Drinking
Water & Groundwater
Box 7921
Madison, WI 53707-7921



Hoekstra, Ashley N - DNR

From: Tom Kolb <tekolb@charter.net>
Sent: Sunday, August 16, 2015 7:28 PM
To: DNR Waukesha Diversion App
Subject: Waukesha Diversion

I strongly oppose Waukesha's attempt to divert water from the Great Lakes. It is obvious from the Compact Implementation Coalition study that diversion is unnecessary and only justified by Waukesha's attempt to consolidate with other surrounding communities. It would appear from the information that I have read that the alternative plan created by the above coalition is more than sufficient for Waukesha and surrounding communities. Please reject this obvious attempt at diversion which is totally unnecessary

Thomas Kolb
412 1st St
Baraboo, WI 53913



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www.avast.com

Name	Susan Kieffer
Email Address	sbkieffer@gmail.com
Address	2114 E. Woodstock Place, # 10 Milwaukee, Wisconsin 53202 United States of America
Comment to the Wisconsin DNR	<p>To Whom It May Concern,</p> <p>We need to protect our Great Lakes fresh water supply for years to come as more areas/regions will want/need to request access to our fresh water supply. There are other solution options than to let outlying communities take access by offering a reciprocal offer of whatever in return. Please take a long-term view and various possible solutions of these requests to have access to our fresh water supply. Our life, environment, and delicate ecosystem depends on it. People need to learn to conserve what they have and to have some type of compensation for doing so. We know with climate change that the Great Lakes fresh water supply will be in high demand for many communities. The solution is complicated. People who have residence around the Great Lakes in the United States and Canada need to be considered as well as surveyed for possible solutions. We the people are voters and taxpayers of this beautiful Great Lakes region.</p> <p>Thank you.</p> <p>Sincerely, Susan E. Kieffer</p>

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AUG 28 2015
DRINKING WATER & GW

Hoekstra, Ashley N - DNR

From: James Kerler <jfkerler@charter.net>
Sent: Friday, August 28, 2015 5:57 PM
To: DNR Waukesha Diversion App
Subject: Public Comment: Waukesha Great Lakes Diversion Application should be denied

Ashley Hoekstra
DNR Bureau of Drinking Water and Groundwater
Box 7921
Madison, WI 53707-7921
DNRWaukeshaDiversionApp@wisconsin.gov

Dear Ms. Hoekstra,

Waukesha's Request for a diversion of Lake Michigan water should be denied.

The Great Lakes Compact is a ground-breaking agreement that protects our unique and globally important Great Lakes. The precedent set by the first application for diversion from a community in a straddling county is extremely important as it will affect all future applications for diversion. Unfortunately, under the Great Lakes Compact and the Clean Water Act, Waukesha's application for a diversion of Lake Michigan water *does not* meet requirements for approval and should be denied. A final recommendation for *approval* by the Wisconsin Department of Natural Resources will only be perceived as an attempt to weaken protections for the Great Lakes and other affected waterways.

Reasons for Denial:

- A request for diversion must meet the strict definition of a **Community in Need**. However, Waukesha uses communities outside of its city limits to justify the inflated amount of water it requests in its diversion application. In fact, Waukesha's water usage has been going down and the aquifer has been recovering. Communities in the proposed "expanded water service area" have not indicated a need or desire to obtain their water from the City of Waukesha or to combine governments with the city.
- The diversion request must also show there is **no reasonable alternative water supply** other than a Great Lakes Water Supply. But an alternative water supply was presented in the [report entitled "Non-Diversion Alternative Using Existing Water Supply With Treatment – City of Waukesha Water Supply" by GZA Environmental](#). This report shows Waukesha has a viable and sustainable alternative water supply for current *and future* needs. This local water supply alternative is estimated to cost half of the cost of diverting water from the Great Lakes. The GZA plan allows for growth and development within Waukesha city limits, satisfies expected demand from a growing population, and treats the water to remove contaminants.
- A community applying for a diversion must **reduce demand through conservation measures** before applying for a Great Lakes water diversion. But Waukesha has only implemented a fraction of the necessary conservation and efficiency measures required before applying for a Great Lakes diversion. Instead it proposes to implement the rest of the plan over 20 years. Communities in the expanded service area cannot meet conservation requirements because they have no central plan. Most of the homes are reported to be on well and septic systems, and are not implementing conservation or measuring use.
- Finally, the application for a diversion **must return all Great Lakes Water to the Great Lakes without doing harm to other rivers** and without mixing those waters with out-of-basin waters. Waukesha's current plan is to return Great Lakes water via the Root River, a Great Lakes tributary. But the Root River, which I paddled recently, is polluted with phosphorus, and is officially designated as an impaired river

because of this pollution. Waukesha's treated and returned water will add phosphorus pollution to the already impaired Root River, which violates the standards of the federal Clean Water Act. It may increase flooding during high flow periods and strong storms. Waukesha has *not* demonstrated that this problem will *not* be made worse by its discharge of treated water. Waukesha's current proposal for return flow would also result in mixing of Lake Michigan Basin water and Mississippi River Basin water and would significantly change the flow patterns of the Fox River, where the city currently discharges wastewater. The effects of this change on downstream aquatic ecosystems, residents and other users in Wisconsin and Illinois has apparently not even been studied. Yet these effects must be considered.

In the book "The Great Lakes Water Wars" (2006) by Peter Annin, chapter 13 documents Waukesha's past history as a premier tourist destination because of its natural springs, which were coveted by other communities. It states "most of Waukesha's historic springs have been obliterated or abandoned, covered by gas stations, apartment buildings and parking lots". On page 246 it also documents a somewhat cavalier attitude toward providing whatever water requirements residents felt they had. At the end of this chapter Doug Cherkauer, a University of Wisconsin-Milwaukee hydrogeologist is quoted as saying "We have the opportunity to move forward into the twenty-first century and look for sustainable options, or we have the alternative approach of continuing to do things the way we've always done them – and impacts be damned". **I hope that a rejection of Waukesha's application will lead the community toward a more sustainable and affordable approach to managing their water supply and protecting the Great Lakes for future generations.**

James F. Kerler

369 W. Prospect Street
Lake Mills, Wisconsin 53551

RECEIVED-DNR

AUG 27 2015

DRINKING WATER & GW

Wisconsin Department of Natural Resources
Public Hearing on the City of Waukesha's Application for Diversion of Great Lakes Water
Comment Form

Hearing Location: MKE
Date of Hearing: 8/18
Name: Alan Keltner
Address: 4110 N. Newhall
Who you represent: Myself

COMMENTS;

Has anyone from the Wisconsin governor's office or the legislature directly or indirectly (through lobbyists, third parties, etc.) contacted the WI DNR about the water diversification issue?

1. If so, what is the person's name (and who is their employer)?
2. Who did they represent in WI government (branch and/or official)?
3. What was their position on the issues?
4. Did they try to influence the DNR's research or conclusions?
5. Did they pressure the DNR in any way?
6. If so, how?

If you are unable to submit your comment today please email to opine on the issue

Ashley Hoekstra
DNR Bureau of Drinking Water and Groundwater
Box 7921
Madison, WI 53707-7921

All public comments must be submitted by August 28th, 2015.

Hoekstra, Ashley N - DNR

From: Patti Jastroch <pjastroch@firstweber.com>
Sent: Wednesday, August 19, 2015 7:06 PM
To: DNR Waukesha Diversion App
Subject: Lake Michigan water use by Waukesha

While I do have some reservations about adding the use of Lake Michigan water for Waukesha - I think the benefits far outway my concerns. Residence should have the ability to have safe fresh water available to them. Water is a basic need.

Property values are effected by many things - and safe water is certainly one of them. The residence of Waukesha are desperate for the help of their neighboring communities. Michigan draws water supplies to serve their residence - why would Wisconsin limit the supply to only a few?

Please approve the use for Lake Michigan water for Waukesha.

Patti Jastroch
First Weber Inc.
414-303-3299

Wisconsin Department of Natural Resources
Public Hearing on the City of Waukesha's Application for Diversion of Great Lakes Water
Comment Form

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AUG 31 2015

DRINKING WATER & GW

Hearing Location: _____

Date of Hearing: _____

Name: Kathy H Jahns

Address: 543 W. Oakwood Rd, Oak Creek, WI 53154

Who you represent: _____

Comments: Please vote "No" for the Waukesha
Diversion Application to the Great Lakes
Compact.

Kathy H Jahns

If you are unable to submit your comment today please send comments to:

Ashley Hoekstra
DNR Bureau of Drinking Water and Groundwater
Box 7921
Madison, WI 53707-7921

All public comments must be submitted by August 28th, 2015.

Wisconsin Department of Natural Resources
Public Hearing on the City of Waukesha's Application for Diversion of Great Lakes Water
Comment Form

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AUG 31 2015

DRINKING WATER & GW

Hearing Location: _____

Date of Hearing: _____

Name: Gary Johns

Address: 543 W. Oakwood RD Oak Creek W.

Who you represent: _____

Comments: Please vote "NO" for the Waukesha
Diversion Application to the Great Lakes
Compact.

Gary Johns

If you are unable to submit your comment today please send comments to:

Ashley Hoekstra
DNR Bureau of Drinking Water and Groundwater
Box 7921
Madison, WI 53707-7921

All public comments must be submitted by August 28th, 2015.

MR & MRS GARY JAHNS
543 W. Oakwood Road
Oak Creek, WI 53154

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AUG 31 2015

DRINKING WATER & GW

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27 AUG 2015 PM 7 L



Ashley Hoekstra
DNR. Bureau of Drinking Water & G
Box 7921
Madison, WI 53707-7921

53707792121



Hoekstra, Ashley N - DNR

From: Mary Ann Ihm <wellspring@hnet.net>
Sent: Tuesday, August 25, 2015 4:25 PM
To: DNR Waukesha Diversion App
Subject: lake diversion and Waukesha Co. water

Here is my written comment regarding water diversion from Lake Michigan:

1. Has Waukesha Co. looked into using reverse osmosis to clear the radium out of its drinking water?
2. Please keep projected needs current and within the city of Waukesha. Do not include township wells that have safe water.
3. In the DNR application, acknowledge that Waukesha's groundwater sources have been steadily rising.
4. Use a few new shallow wells and more water conservation to provide the city with a safe drinking supply from the Mississippi River Basin.
5. Divert industrial jobs to Milwaukee where there's lots of water, vacant factories, and many unemployed people seeking work.

Thank you for hearing my concerns.

Mary Ann Ihm

Hoekstra, Ashley N - DNR

From: Drew Lake <drew.w.lake@gmail.com>
Sent: Wednesday, August 26, 2015 10:32 PM
To: DNR Waukesha Diversion App
Subject: Leave it Alone

Ms. Hoekstra,

The world's greatest source of fresh water is more important than 60,000 people who have plenty of other options.

I was born and raised on a lake in Northern Wisconsin and the drought that we endured from 2005 - 2013 was terrifying. When in doubt, we should be grateful for the fresh water that we have and we should protect it at all costs. No questions.

Thank you,

Drew W. Lake

Drew Lake
W7820 Rainbow Dr
Spooner, WI 54801

Hoekstra, Ashley N - DNR

From: Nicole Lightwine <nicolelightwine@icloud.com>
Sent: Thursday, August 27, 2015 1:59 PM
To: DNR Waukesha Diversion App
Subject: Oppose Waukesha Applicaton

Thank you for the opportunity to comment on Waukesha's application review. I believe Waukesha's application does not adhere to the exemption standards outlined in the Compact for the following reasons:

- Waukesha's service area includes potential, hypothetical growth, which may align with state law but does not meet the requirements for diversion in the Compact
- The impact of Waukesha's wastewater on Lake Michigan has not been thoroughly researched. We are just beginning to understand the presence of pharmaceutical pollution in our drinking water. To allow additional wastewater to be pumped into Lake Michigan without data on cumulative risk is irresponsible.
- Independent analysis has been provided to the department which outlines non-diversion options for Waukesha. These options should be explored before submitting an application.
- This application will set a precedent for all future diversion requests. It is vitally important that all measures are taken to ensure only those, "applications of last resort" are considered by Great Lakes leaders.

For all the aforementioned reasons, Waukesha's application is not appropriate for diversion consideration.

Thank you,

Nicole Lightwine
Milwaukee, WI

Hoekstra, Ashley N - DNR

From: Jewel Liebrecht <jliebrecht@shorewest.com>
Sent: Wednesday, August 19, 2015 4:36 PM
To: DNR Waukesha Diversion App
Subject: Regarding the stealing of the water from Lake Michigan...

I highly protest the giving of the prized and should be protected water of Lake Michigan to any other source. We need to protect this great resource both for its beauty and natural water source for our city. thank you!

--



JL With Jewel, every home is a gem!

Jewel Liebrecht
cell: 262.309.8797
direct: 262.289.2851
email: jliebrecht@shorewest.com
web: jewel.shorewest.com

ShoreWEST REALTY

For Staging Tips: www.facebook.com/JewelsGemStaging 

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 DRINKING WATER & GW

Name	Mike Lessard
Email Address	mlessard@sbcglobal.net
Address	6905 Cedar Street Wauwatosa, Wisconsin 53213 United States of America
Comment to the Wisconsin DNR	<p>I am in opposition to Waukeshas's attempt to obtain access to Lake Michigan a source for the water supply. This would set a terrible precedent for the entire Great Lake region. Waukeshas has yet to implement all possible conservation measures and continues to allow there local water supply to leave via the Fox River rather than find a way to preserve it for their needs. The financial cost of diversion to it's citizens would be a great burden to bear, especially when cheaper solutions exist. The could also be unforeseen consequences to the Root River and areas that surround it due to excessive runoff or flooding not to mention the burden that would be imposed on an already challenged waterway. Waukeshas has chronically failed for years to plan for their future water needs. They should now find their own solutions to a problem they created and avoid impacting the entire region between them and Lake Michigan.</p>

Hoekstra, Ashley N - DNR

From: Charlene Lemoine <charlemoine@att.net>
Sent: Thursday, August 27, 2015 1:44 PM
To: DNR Waukesha Diversion App
Subject: Comments on City of Waukesha Water Diversion Application

Charlene Lemoine
1240 Highpoint Lane
Waukesha, WI 53189

August 27, 2015

Ashley Hoekstra
DNR Bureau of Drinking Water and Groundwater
Box 7921
Madison, WI 53707-7921

(Submitted via email)

RE: Comments on City of Waukesha Water Diversion Application

Dear Ms. Hoekstra:

I am a homeowner and Water Utility ratepayer in the City of Waukesha. I've been following the water diversion application process because it is in my best interest to have a safe, sustainable long-term water supply. I believe the present application does not comply with conditions required under the Great Lakes Compact and I cannot support this application moving forward.

If Waukesha is a "community in need" the conservation plan, consisting of a sprinkling ordinance and toilet rebates, is not consistent with a serious and urgent need required to warrant a water diversion. Additionally, it is difficult to understand how an expanded service area could possibly meet the "community in need" definition under the review required by the Great Lakes Compact.

My comments will focus on the conservation component of the application since I've raised questions regarding conservation and the continued sale of sprinkling credit meters in the past.

Sprinkling Ordinance

The Sprinkling Ordinance allows Waukesha Water Utility customers specific times two days a week to water lawns and gardens. The Ordinance also allows the use of a hose or hand-held watering cans any time of the day or night to water gardens, trees or shrubs. Offering unlimited use of a hose 24/7 does not demonstrate an urgent need to request a water diversion.

Residential Sprinkling Credit Meters (Sewer Credit Meters)

The sale of sprinkling credit meters allows residential customers to purchase a meter for \$130.00 in order to avoid sewer charges for water that does not enter the sewer system. Residential properties in the City are located on relatively small lots so when water appeared to be an abundant resource the practice of using this type of meter may not have been objectionable. However, when a diversion is being requested the use of credit meters does not promote conservation and this practice should not be continued.

Commercial Sprinkling Credit Meters (Sewer Credit Meters)

Commercial Water Utility customers can purchase credit meters for \$202.00. Since these customers may be located on multiple acre lots using credit meters can result in a significant use of water. Along with avoiding sewer charges, commercial customers also enjoy water rates that decline with greater use of water. The charges are essentially a volume based discount.

For example, a residential customer that uses 30,000 gallons of water in a quarter is charged \$4.89 per 1,000 gallons. A commercial customer using 1,500,000 gallons in a quarter is charged \$2.88 per 1,000 gallons. This disparity in water charges favors customers that use large amounts of water and is simply not consistent with a critical need for a diversion.

Water Utility Response to the use of Sprinkling Meters

The Water Utility responded to concerns I've raised regarding the continued sale and use of sprinkling credit meters in an 11/14/2013 e-mail with the following comments:

“This is a follow up to the question you had at our Community meeting pertaining to sprinkling credit meters.

As public servants we must balance the wishes of many constituencies. While some constituents are passionate about conservation (and we thank them for that), others are passionate about gardening. We believe that our ban on day time sprinkling and the 2 day limit on sprinkling balance the desires of these 2 constituencies. The decision to install sprinkling credit meters addresses the desires of another constituency that feels strongly that they should not be charged for sewer services that they are not using.”

If the Waukesha School District applied this philosophy property owners without children in the public schools could avoid paying taxes for education. Clearly, education is important but so is water conservation. Credit meters encourage using more water, particularly for commercial customers who also enjoy declining water rates.

Conservation Recommendations for the Waukesha Water Utility

1. Immediately stop selling sprinkling credit meters to residential and commercial customers
2. Design a program to phase out the use of existing sprinkling credit meters for residential and commercial customers through buy-back programs or billing credits.
3. Offer residential customers incentives to use rain barrels. With small lots residential customers can benefit from having access to water without paying water or sewer charges. Offering residential customers free rain barrels, or rebates for purchasing rain barrels would go a long way to demonstrate Waukesha is serious about conservation.
4. Eliminate volume based discounts for commercial customers.
5. Offer Commercial Customers incentives to install various types of water collection systems.

6. Require new construction of commercial properties, apartment complexes and condos to have water collection systems included in their design plans.

Summary

There are many issues associated with the Waukesha Water Diversion Application that are in need of revision. I don't see how the inclusion of an expanded service area and the lack of significant long-term water conservation plan can possibly pass the scrutiny of a more comprehensive review if the proposed Waukesha Water Diversion Application moves forward.

I ask the DNR to deny the Waukesha Water Diversion Application. The precedent setting nature of this application requires further evaluation of what the City actually needs versus what the City wants. With additional review of the latest scientific information on the state of the aquifer and innovative treatment opportunities to meet radium standards the City of Waukesha may be able to provide safe drinking water without the need for an expensive Great Lakes water diversion.

I appreciate this opportunity to submit comments and recommendations.

Sincerely,

Charlene Lemoine
1240 Highpoint Lane
Waukesha, WI 53189

Hoekstra, Ashley N - DNR

From: Land, Jean <jean.land@cbexchange.com>
Sent: Thursday, August 20, 2015 10:22 AM
To: DNR Waukesha Diversion App
Subject: Waukesha Water/Lake Michigan

Importance: High

DNR Waukesha Division App:

As a Realtor and resident of Waukesha, it is very important to our future that we act now.

Why does Waukesha need Lake Michigan water?

Waukesha's primary water source is depleted and has radium levels in excess of federal drinking standards.

Recharging of the aquifer currently serving Waukesha from rain and snowmelt is limited because of a layer of shale. Continuing to use groundwater in Waukesha is not sustainable. It makes no sense to exhaust current groundwater resources before switching to a sustainable alternative.

The aquifer is used by many communities in the densely populated region of southeastern Wisconsin and northeastern Illinois.

We agree with the DNR that the only reasonable solution is for Waukesha to switch to Lake Michigan water.

What will the impact on Lake Michigan be?

Waukesha will not affect lake levels. The daily withdrawal would be 1/1,000,000 of 1% of Great Lakes volume, and Waukesha will return approximately the same amount that it withdraws.

Waukesha is not a precedent for water to go beyond to California or other far-off places. That issue was resolved with the adoption of the Compact which states that water cannot be pumped beyond the boundaries of counties that straddle the Lake Michigan Basin divide (i.e. Waukesha County).

Impact on housing?

Clean water is a basic utility and governmental service that homeowners rely on for their quality of life.

Just as spotty electrical service, bad roads, or underperforming schools negatively impact a property's value, so too will a poor water supply to the homes and businesses in Waukesha.

The limited alternatives to diverting Lake Michigan water to Waukesha would be cost prohibitive and cause further economic hardship to property owners in Waukesha.

Other comments.

Waukesha's application helps improve the flow in the Root River, improving the fishery and the recreational fishing economy.

Waukesha's application lives up to the Great Lakes Compact – Waukesha has shown it does not have an alternative and will return the water to the lake.

The Compact was designed to ensure that decisions would be based on science, not politics.

Most of the opponents will oppose water for Waukesha under any circumstances, regardless of what the Compact actually says.

The DNR has a legacy of basing its decisions on sound environmental science, not on emotion, anecdotal evidence or NIMBY'ism. We would like the department to continue that legacy

Thank you so much for your help,

Jean

Jean T. Land
Broker/Associate
Coldwell Banker Residential Brokerage
Member of The Knurr Team
20350 Watertower Blvd.
Brookfield, WI 53045
(262) 780-9319 Direct
(781) 810-8455 E-Fax
(262) 780-5500 Office
(262) 798-8441 Fax
jean.land@cbexchange.com

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Wisconsin Department of Natural Resources
Public Hearing on the City of Waukesha's Application for Diversion of Great Lakes Water
Comment Form

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AUG 26 2015
DRINKING WATER & GW

Hearing Location: Racine

Date of Hearing: Aug. 18, 2015

Name: Elizabeth Kampark

Address: 5929 Three Mile Rd.

Who you represent: myself - as a citizen

Comments: I oppose the City of Waukesha's

application for diversion of Great Lakes water. I have concerns regarding issues of flooding, pollution, water quality, riparian changes and

harbor quality and maintenance as the

"treated" water is discharged into the Root River

@ Franklin, eventually flowing through

Racine County and the heart of the City of Racine.

Will Waukesha be responsible to remediate

problems arising from these concerns, both financially

and scientifically with long-term sustainable

solutions? Please reject the water diversion application.

If you are unable to submit your comment today please send comments to:

Ashley Hoekstra

DNR Bureau of Drinking Water and Groundwater

Box 7921

Madison, WI 53707-7921

All public comments must be submitted by August 28th, 2015.

Hoekstra, Ashley N - DNR

From: lindsay lochman <lindsay.lochman@gmail.com>
Sent: Thursday, August 27, 2015 1:36 PM
To: DNR Waukesha Diversion App
Subject: ATTN: ASHLEY HOEKSTRA, DNR

Please DENY Waukesha water request.
L.Lochman

7915 Warren Avenue
Wauwatosa WI 53213
h 414.453.4759
c 414 412 1468
www.ciurejlochmanphoto.com

Hoekstra, Ashley N - DNR

From: Marna Lindroth <mwllindroth@solarus.biz>
Sent: Wednesday, August 12, 2015 5:07 PM
To: DNR Waukesha Diversion App
Subject: Great Lakes Water Diversion for Waukesha County

To Whom It May Concern:

Please register my comments as opposed to the diversion of Great Lakes Water to Waukesha County. Based on the study done by the Wisconsin Wildlife Federation, there is no need for the water diversion at this time. Any diversion of water would set a dangerous precedent for other cities or states to tap into Great Lakes water. We need to keep the Great Lakes untapped unless within the water basin of the Great Lakes. At some future time, probably not too distant, the southwest and or California will be requesting to divert water and if there is a precedent, it will be easier to grant a second petition for water. It is far better if there are no diversions from the Great Lakes.

Marna Lindroth
1380 Rain Dance Trail
Nekoosa, WI 54457
715-254-4361

Hoekstra, Ashley N - DNR

From: Shannon Majewski <smajewski@wi.rr.com>
Sent: Tuesday, August 18, 2015 8:05 AM
To: DNR Waukesha Diversion App
Subject: A Letter in Opposition to the Great Lakes Water Diversion Application

Dear Wisconsin DNR DG/5,

Last night I spoke at the Public Hearing at Carroll University, in opposition to the Waukesha Great Lakes Water Diversion Application. Not having had much time to prepare, nor much time to be at the meeting due to squeezing it in between 2 other meetings, and not being a fan of public speaking, I nonetheless showed up and spoke in **OPPOSITION**.

I wanted to further my comments from last night, and still speaking in opposition.

Just because we CAN build a water diversion does not mean that we should. Just because some exceptions CAN be made to the Great Lakes Compact, in this case does not mean that they SHOULD. **As a citizen of Waukesha, being granted a water diversion despite the Great Lakes Water Compact is not what I'd like my city, my hometown, to be known for. It's an embarrassment, a representation of a city's greed, selfishness, irresponsibility, shortsightedness, and apathy for the rest of the country and planet's water issues. Shame on us.**

Waukesha and those working on this application seem to be looking at this issue as an isolated issue, a water "supply" issue, not interconnected to other issues, and somehow not a shared issue for the rest of the planet. Absolutely none of this is the case.

WATER, as we know is a globally shared resource. Outrageously, it was stated last night that if we want to prove that the Great Lakes Compact works like it was intended to work, then Waukesha should be the one to lead the way in showing exactly when exceptions should be made to request and get the water. Wow. It's no wonder we are in such deep trouble.

I challenge this reactive thinking, this supply issue thinking. **We have a water BEHAVIOR issue**, more than we have a water issue.

The behavior issue that I see in total disrespect for our most precious resource, and the perpetuation of this way of thinking will continue to further the global crisis of water – including our own. It will exacerbate the water issue, bringing it closer to home as we continue to abuse water, drying up resources for ourselves and others, as we lead the way in opening the proverbial floodgates for others to do the same – all while contaminating what is left. This is happening globally and we cannot continue to stick our heads in the sand or operate with blinders. We cannot pretend water is not interrelated, interconnected.

- The water crisis is a global issue. We have to open our eyes to this and address it as such, proceeding from that understanding and place.
- According to the World Economic Forum Global Risks Assessment 2015, "The water crisis is the #1 global risk based on impact to society...and the #8 global risk based on likelihood (...of occurring within 10 years)."
- Biodiversity loss and ecosystem collapse rate nearly a number 5 on the scale, scoring a greater risk to the people of the planet than terrorism
- Risks related to water and biodiversity and ecosystem loss are interconnected to each other, to food shortages, to unemployment, to climate change, to extreme weather events. Why are we turning blind eyes and pretending each issue exists independent of the others? We MUST take care of the water. We MUST take care of the planet or it will stop taking care of us. We must look deeply into this issue and its impact on everything that water

touches. Humanity is treating our resources like a cancer would. We are consuming and migrating, eating up and destroying as we go. We MUST change or we will kill our “host,” and in turn ourselves.

- Water is a systemic and global problem. In order to ensure safe water and wellbeing for the future, we must first begin with changing our behaviors toward water. We must stop overusing water. We must protect our groundwater and surface water. We must stop development in areas that are overdeveloped or cannot support future development. That must first begin with how to conserve, and how to treat what we have.

Waukesha needs to “man up.” We have historically created our own problems of water misuse, dating back at least to our springs era. We did not strictly inherit the problems we have – we created and exacerbated and ignored them. **We need REFORM. Not diversion. The diversion is exactly what it sounds like: we are stepping around the very problem that we have created and ignored until it could be ignored no more.** Granting a diversion would reward the bad behavior that got us where we are in the first place – and permits us to perpetuate bad behavior. We need to step up to the plate and fix the problem from within and not make this everyone else’s problem. We need to make this issue ours and deal with it proactively, immediately. What is the definition of insanity?: Doing the same thing and expecting different results. If Waukesha wants to lead the nation in progressive thinking, to be a LEADER in the nation and the world, let’s not engineer incredible solutions that also happen to further abuse and exacerbate a global water problem. Let’s lead the way **being** the change we want to see by creating behavior changes and combined solutions that do not harm the environment! Let’s ACTUALLY treat water like the precious resource that it is. By syphoning off others’ water supplies, and contaminating what is left we slap the rest of the world in the face and pretend that our water access is more important than theirs.

Where this application fails is in its thinking! There is no apparent interest now or in the future for conservation. We can treat what we have! And we can and MUST CONSERVE. What is lacking, and why the application should be rejected is that NO efforts have been made for conservation by Waukesha! And not enough has been done to combine efforts to create a sound solution. It’s deplorable.

Here’s a protocol that Waukesha SHOULD implement, and has apparently FAILED to organize and apply thus far, and until such time that these objectives are attained and evaluated for their COMBINED effectiveness, no water diversion should be granted:

:

- **Educate the public on water conservation and what the alternative is if we don’t conserve – both from a candid and transparent effects to the environment standpoint, and an itemized cost projection for households for a diversion standpoint**
- **Emphasize that water cannot be thought of as endlessly disposable and unlimited. Help change thinking. Put out materials, but don’t stop there. Hold workshops – ongoing workshops - for individuals and families that empower!**
- **Encourage and Enable water conservation through offering means to reduce water consumption: low flow showerheads, toilets, rain barrels, potentially recycled water for watering lawns, and how to choose native plantings that require very, very little water to sustain themselves**
- **Establish more well-thought-out and stricter ordinances for water use**
- **Enforce those ordinances! We have a supposed seasonal watering ban. I’ve never seen nor heard of that ban being enforced.**
- **Enlist new talent trained in accomplishing sustainability with environmental wellbeing at their hearts. Waukesha seems to be stuck in an old and either uninformed or obtuse mindset. Many universities are graduating people with degrees in sustainability. Tap into this talent resource! Until then we have a global disconnect in training and application. Let’s be the city that puts this valuable training into motion!**
- **Engineer solutions that involve a combination of approaches to make our water safe to drink without harming the environment, and without adding massive cost to our residents in an already strapped economy**

- **Envision the domino effect of the positive example that Waukesha can be for other parts of the country and world if it can succeed in CONSERVING and MANAGING our own water issue**
- **Exemplify change in behavior toward water before we are FORCED to change behavior. Start being proactive, Waukesha and DNR!**
- **Excel at spreading the story of our successes, of conserving and managing**

See the BIG picture. Use broader conscience on the far-reaching potential impacts of this diversion.

Please help Waukesha to be a national AND global leader in reform, responsibility and respect for our natural resources, including our most precious resource, WATER, by withdrawing this application and pursuing more sound options as listed above.

Sincerely,
Shannon Majewski, Resident, City of Waukesha

Name	Anthea Morgan
Email Address	antheam@yahoo.com
Address	9411 Ellen Dr Highland, Indiana 46322 United States of America
Comment to the Wisconsin DNR	<p>I'm writing to protest the request of Waukesha to divert Lake Michigan water. Although I'm from Indiana, my family & I stayed in Waukesha last summer, so we're somewhat familiar with this city.</p> <p>Waukesha officials need to pursue other options than Lake water diversion. Once one municipality seeks an exception to the Great Lakes Compact, what's to stop another city to also seek an exception? What's to stop states to from getting in line for our liquid gold?</p>

RECEIVED-DNR
AUG 28 2015
DRINKING WATER & GW

Hoekstra, Ashley N - DNR

From: Barbara Mikula <bmikulaaccountant@gmail.com>
Sent: Wednesday, August 12, 2015 1:45 PM
To: DNR Waukesha Diversion App
Subject: Waukesha water

I oppose the application by Waukesha for access to Lake Michigan water.

We have yet to work aggressively on water conservation in the City of Waukesha. Our existing water supply is far healthier than Lake Michigan water. Lake Michigan is polluted with numerous prescription drugs for which there is no method of removal.

While Waukesha water has radon, a home soft water system removes 80% of the radon. I move an additional 80% by reverse osmosis.

Wakesha should be required to conserve, and limit its growth in order to have an adequate supply of safe water.

Barbara Mikula
150 W Wabash Ave, Waukesha. 53186

Hoekstra, Ashley N - DNR

From: susan susan <sunlightrising@gmail.com>
Sent: Wednesday, August 19, 2015 4:04 PM
To: DNR Waukesha Diversion App
Subject: Waukesha Diversion Application Official Hearing Testimony WITH ATTACHMENT
Attachments: Waukesha water diversion application 2014.doc

To whom it may concern:

I apologize for accidently sending the previous email without the attachment containing my official testimony.

Attached please find my official testimony for the Waukesha Diversion Application.

Susan Michetti
605 sheila St.
Mt. Horeb, WI 53572
608 334 3515
sunlightrising@gmail.com

Official Comments to the WI DNR regarding the application for the Waukesha Diversion

To: DNRWaukeshaDiversionApp@Wisconsin.gov

August 14, 2015

From: Susan Michetti

605 Sheila St.

Mt Horeb, WI 53572

608 334 3515

sunlightrising@gmail.com

Organization of Comments:

1. The Great Lakes Compact and Stakeholders, pg 1
2. The City of Waukesha/Waukesha Water Utility asks for water diversion, pg 3
3. Eligibility criteria to file application for an exception to the ban on water diversions, pg 4
4. Non-sustainable application becomes more unsustainable proposing an irrational water service extension into neighboring communities, pg 4
5. The people of Wisconsin oppose this water diversion from Lake Michigan, pg 6
6. Inappropriate premature application filed prior to meeting eligibility standards, pg 6
7. Rigorous thorough and complete EIS for local plan required prior to approval, pg 7
8. Water Conservation Insufficiently Addressed, pg 7
9. Alternative Technologies and Treatments Insufficiently Addressed, pg 8
10. Insufficiently Addressed Return Water Sewage Plan, pg 9
11. Unacceptable, inappropriate claim of increased “need,” pg 10

1. The Great Lakes Compact and Stakeholders:

Governors of States bordering the Great Lakes signed the Great Lakes-St. Lawrence River Basin Water Resources Compact and the companion Agreement with the Premiers of Ontario and Quebec, Canada. All 8 States bordering the Great Lakes ratified this Great Lakes Compact, including Wisconsin.

The Compact’s founders had broad bipartisan recognition of the threat that the priceless world-class resource of the Great Lakes could be destroyed bit by bit, piece by piece, gradually over time without sufficient regulation, requiring high standards of protection including best practices---if diverted, pumped, or made into a commodity and sold. It was recognized that various pressures stemming from global climate change would aggravate the threat of destruction and/or degradation from the loss of the area’s water. This threat was recognized prior to that of the wide-scale reckless destruction of a substantial portion of the drinking water across the United States by the fossil fuel industries in the last decade. The loss of such a massive volume of drinking water places undeserved pressure on the remaining drinking water resources. The signers of the Great Lakes Compact planned ahead into the future with extreme wisdom to protect the elixir of life’s vitality—clean drinking water.

The Compact’s signers recognized that this priceless rare natural treasure, specifically the individual Great Lakes and their many ecosystems within the Great Lakes basin, must be protected and managed in a unified way to retain their international and global preciousness and their uniqueness and priceless values for future generations of humanity and wildlife.

A primary objective is to prevent loss of original basin water as much as possible from human activities in general, including governmental actions and commodity bottling of water.

In general, water diversions are banned. An area within a “*straddling county*” of the Great Lakes watershed is potentially eligible to apply for an exception, but only under very limited circumstances of extreme need, without any reasonable alternatives, and only if strong water conservation measures are first adopted and implemented to meet rigorous and high protection standards. The approval of an application for water diversion is expected to be rare and only to be seriously considered under the direst circumstances--after all other available options using best practices are insufficient.

The US Senate passed the Compact upon the recommendation of the Council of Great Lakes’ Governors in 2008. Senator Carl Levin (D-MI) and Senator George Voinovich (R-OH) introduced the Compact which was cosponsored with the broad bipartisan support of all Senators from the Great Lakes region.

The US House Compact bill was sponsored and passed in 2008 by Representative James Oberstar (D-MN) with a large number of regional cosponsors.

President George W. Bush signed the Compact into law in 2008. Previously, he had called the Great Lakes a “*national treasure*” and urged rapid approval from Congress, showing his success in the political arena.

President Obama, then a US Senator from Illinois in 2008, stated the Compact was “*perhaps the most significant legal action to protect the lakes in the last 100 years since the Boundary Waters Treaty between the US and Canada.*”

Beyond the Great Lakes Compact, other entities, such as any indigenous tribes and First Nations as well as cities and other communities, within the Great Lakes Basin would have to agree. Treaties and other government agreements give them legal standing that potentially would be activated by a water diversion, due to potential negative impacts to the Great Lakes that, in turn, would adversely impact them.

The Great Lakes and St. Lawrence Cities Initiative continues to have a voice about potential impacts upon their local collective and individual communities from adverse impacts caused to the Great Lakes Basin. Other local governmental units may not necessarily be part of this initiative and yet retain a voice about potential adverse impacts.

The Great Lakes form a unique global treasure. They comprise the largest body of fresh drinking water in the world. The varied ecosystems of the Great Lakes and the St. Lawrence Seaway comprise unique and priceless resources that supply recreation, food, drinking water, commercial fisheries, shipping transportation, and unparalleled aesthetic enjoyment for over 40 million international residents in various governmental units comprising the United States, Canada, and numerous indigenous First Nations.

The impact of cumulative water diversions away from the Great Lakes predictably would adversely impact these multiple nations and their peoples with needless and irreversible harm from unnecessary unnatural alterations.

An application for a water diversion should be rare. At the very least, it must meet the exception standards for eligibility. Approval would not be easily “rubber-stamped,” because meeting all the high standards must be required first. Approval is expected to be rare and to possibly come only after extensive rigorous deliberation that proves no other alternatives are available.

As standard procedure, a rigorous and complete environmental impact statement (EIS) with public hearings would be required before the process is completed. For example, in Wisconsin, the WI DNR would issue the final Environmental Impact statement (EIS) and final decision, after deliberative hearings and rigorous scientific assessments with the

burden of eligible proof falling on the applicant, such as Waukesha's application for a Lake Michigan water diversion. If Wisconsin might approve Waukesha's application, then the Compact next would require approval from all 8 states and both Canadian border provinces. Beyond that, other potentially impacted entities become involved.

The Waukesha case will set a precedent for future water diversions for the entire Great Lakes Region. It the first test case of the Great Lakes Compact. Other states are holding back opportunists and likewise Wisconsin must do the same.

Waukesha knows, or should know, that if every demand for Lake Michigan water were to be granted, that predictable degradation would have irreversible multi-faceted harmful impacts throughout the Lake Michigan watershed, but it continues to push anyway.

The Great Lakes Compact certainly did not agree to accommodate nor approve opportunism and commodity losses of its water. The Great Lakes Compact essentially banned greedy white-collar theft of the drinking water commons in the Great Lakes basin.

It is critical for the integrity of the Great Lakes Compact that any consideration of an application for water diversion must meet all the high standards, including best practices for water conservation and alternative treatments and options. The next step requires proving that these combined wholehearted efforts are insufficient to provide safe drinking water.

2. The City of Waukesha/Waukesha Water Utility asks for water diversion—Proposed drinking water solution wants *to take the drinking water that belongs to others in application filed October 2014:*

Repeatedly over the last decades, the City of Waukesha has applied to *take* Lake Michigan water to replace its groundwater, due to the fact that its deep aquifer contains high unsafe drinking levels of radium. By mixing water from shallow and deep aquifers, Waukesha met the federal safe drinking water standards for radium 11 months per year, according to a 2013 Milwaukee Riverkeepers report. Waukesha is under a court order to address the radium safety issue by 2018.

Past applications by Waukesha were denied by the WI DNR and the State of Wisconsin repeatedly in order to protect the outstanding resource value of unique and priceless Great Lakes' ecosystems from unnecessary water diversions that would take on cumulative adverse effects over time and set a destructive precedent. Waukesha's inappropriately proposed expansion of its water service into neighboring communities displays that Waukesha seeks to benefit itself. Waukesha is trying to take more and more drinking water that belongs to others, without sufficient regard and respect for the priceless and irreplaceable nature of the source of that water.

Apparently reports from two engineering third-party firms confirmed that Waukesha has access to ample safe drinking water supplies within the Mississippi River Basin to meet their current and future drinking water needs, per a recent Milwaukee Riverkeeper report. I assume that these engineering reports will be submitted in the formal comments pertaining to the Waukesha application for water diversion and will become part of the official record. *ask the WI DNR to thoroughly consider and evaluate the alternative(s) proposed by these engineering firms,* particularly in terms of the information supplied that likely may disqualify the Waukesha application for a water diversion.

The application filed by the City of Waukesha in October 2014 requires the highest scrutiny regarding preservation of the integrity of the Great Lakes Compact and its primary purpose to preserve the integrity of the hydrological ecosystems comprising the Great Lakes.

The all-important integrity purpose requires immediate rejection of this application as disqualified per eligibility standards.

3. Eligibility criteria to file application for an exception to the ban on water diversions:

1) Physical location of being within a straddling county, not extending into other more distant counties and locations;

2) No other water safe drinking water supplies available; and

3) implementation of a best practices water conservation program as well as best practices water treatment and alternative options (for radium, in this case).

The Waukesha application's lack of sufficient details makes it deficient in all of these standards for eligibility criteria. Such deficiency fails this application. Such deficiency is cause for immediate DNR rejection. Such deficiency does not show sufficient respect required for the protective standards and requirements and integrity of the Great Lakes Compact which contains a virtual ban on diverting water outside of the Great Lakes Basin. Such deficiency can be viewed as coming from a *taker* of what belongs to others, specifically from apparent aggressive and gross disregard of the integrity of the commons and their very high resource value to double-digit millions of inhabitants and tourists and others.

The deficient facts prove that Waukesha has not yet met the high standards required of it, such as best practices, that should have been first implemented, before making such an application prematurely. Waukesha has a duty to prove it first has done everything possible to conserve water as well as to prove that it has committed to and adopted best practices technology and alternative treatments for radium, but it hasn't completed these activities. This deficiency disqualifies the application.

When the City of Waukesha asks to divert water from the Great Lakes, it is required to take the protective standards of the Great Lakes Compact seriously. These standards involve providing substantial documentation that proves it has already wholeheartedly provided funding and implementation of best practices in water conservation and alternative treatments as its first step. Waukesha has failed to provide sufficient effort and details proving beyond any doubt that its actual need exceeds already implemented best practices for both conservation and alternative technology and treatments.

It is not enough to file an application in order to make a claim to *take* the water belonging to others when such a claim is unsupported by sufficient facts. The incomplete application documentation is unprofessional for a governmental entity and should be automatically rejected on that basis, specifically due to the fact that such unprofessional and incomplete application information wastes everyone else's time, energy, and financial resources with a distraction-application by not first doing all Waukesha can do first, which includes creating sufficient details by fully implementing actual best practices. Waukesha filed a distraction-application before it should be filed due to the fact that it currently does not meet the eligibility criteria in order to file this application. Essentially, this is another aspect of viewing the same deficiencies in the eligibility standard that compel this application to be rejected.

4. Non-sustainable application becomes more unsustainable proposing an irrational water service extension into neighboring communities:

The claim to expand water service is irrational, since Waukesha simultaneously claims it can't autonomously service its own current users without *taking* water from others. (I note that Waukesha's plans also will increase urban sprawl.)

The local financial burden falls on Waukesha's officials and water ratepayers, not on the Great Lakes Compact. Cost-outs, particularly within relatively close ranges that predictably change, are not specifically relevant to the initial eligibility of application for an exception to a ban. Cost-outs in the millions provide interesting details that can be considered only after the eligibility to apply for an exception to a ban has been met.

The Great Lakes Compact contains a much larger international burden of protecting the integrity of the rare and priceless and irreplaceable Great Lakes in order to avoid adverse international impacts.

The potential cost-outs of insufficient uniform management could extend beyond trillions or quadrillions of dollars. One only needs to point, for example, at the failing watersheds of California, which could be very slowly restored at tremendous cost; but it would require uniform cooperative-type management that does not exist there; unfortunately, the political will does not exist there to do all that can be done to restore health to the earth so that humanity there can survive into the future. Protection of resources always requires the highest and best sustainability practices to prevent this bad management over decades.

It is irrational to claim one can't service one's own users but that this might magically change if one will expand into other communities. It is irrational to try to expand water services, while acknowledging that the same expanding water utility does not have any clean water with which to provide such expanded water services that it claims it wants to deliver and sell.

Such irrationality is compounded by simultaneously asking others, in other locations belonging to a different watershed, if Waukesha can *take* more and more of their precious limited water. To examine this ridiculousness closer, let us envision a possible scenario in terms of how this might be viewed after the fact, if approved, when drinking water becomes scarce in the near future: Waukesha apparently schemed to *take* water that doesn't belong to them from others who needed their water. Waukesha used pen-and-paper to steal and to lock-in precious dwindling water, in order to expand sale of it to its neighbors, with the unstated idea of gradually filing application revisions to take more and more of that water belonging to others. After all, this is the classic pattern of major *takers*, particularly those I observe stealing and/or destroying natural resources, often as they transfer the resources from the many to the wealthy few. The *takers* obtain valuable natural resources without trading sufficient energy and value for those very resources---a theft that is magically justified by their arrogant hubris of being "better," "more privileged," and/or "financially smarter" than other people. Yet, it is these "dumb" other people who understand the "big picture" with healthy connected ecosystems as the ultimate highest and best values, far above and beyond quick money and greed that brings the inevitable consequences of suffering adverse impacts on future generations. It is the *takers* who quickly strip away the valuable natural resources that they plan to sell for greedy financial returns, while they recklessly destroy the other surrounding valuable natural resources in their haste. The *takers* rarely appear willing to understand, or perhaps just to admit, the inevitable consequences of their degradation and destruction upon future generations, upon perhaps their own descendants. The extreme greed and selfishness of the *takers* narrows their thinking to false justifications and denial of their unnecessary harm. Future generations will hate the *takers*.

As a futurist, in my viewpoint, this proposed expansion contains similar echoes of the same type of irrational buildup of an unstable business foundation, in this case by selling water to its neighbors, that is doomed to unsustainably collapse at great damage to too many innocent people---much like the irrational theft by Enron who thought they were the "smartest," greediest, "most privileged" people who could get away with victimizing others and stealing their money. Allowing Waukesha to move forward with its plan is unsustainable and irrational, just as unsustainable as was not stopping Enron from continuing until it self-destructed by the accountants and the rating firms as well as the regulatory agencies that ignored clear warnings. We must stop foolishly permitting and "rubber-stamping"

predictable unsustainability. I believe that it will harm people in all directions that this unwise plan reaches, if approved.

Resources that can be damaged belong in Compacts, such as the Great Lakes Compact, in order to be managed uniformly as sustainable commons with the best practices applied to the highest standards to the maximum ability that guarantees the best protection into future generations and descendants of both humanity and wildlife. Most of the natural resources in the USA are insufficiently managed and regulated in order for the survivability of future generations.

If such a Compact's integrity was corrupted with that start point occurring with filing an application that does not meet the eligibility requirements, I predict that priceless finite water source, such as the Great Lakes, would begin to degrade and decrease in volume, as it is abused, until it begins to behave like the failed watersheds of California, where unnecessary drought has taken over, aggravated by adverse climate changes. This is an ancient, but classic, ecological pattern when the very prized treasure on a very limited earth has been abused over time by the decisions of a few who manage to corrupt the power structure into unfair *takings* of what belongs to others or of what belongs to the commons.

Such a failed watershed scenario in the Great Lakes becomes possible, because Waukesha has filed an application with dreams of business expansions on the backs of others to *take* resources that Waukesha does not have. I view this as outside scheming that is attempting to not play by the rules of the Great Lakes Compact.

Waukesha has not incorporated the best practices, required for eligibility of application, making its plan unsustainable. *Waukesha is improperly asking for a Lake Michigan water diversion when it already knows, or should know, that it did not wholeheartedly work hard to put in place all the eligibility requirements that should have been in place before it filed such an application.*

It also fails to prove that its plans and processes would conform to law, specifically regarding the return of original basin water to the basin without exchanging it for Mississippi River basin water. This failure makes it deficient in the very sustainable criteria that would be required for acceptance of this application for a rare water diversion.

Even more important, *it has not proven that basic required fact that a water diversion remains the only and last option available to Waukesha, but this proof is required for eligibility of application. Therefore, Waukesha certainly beyond any doubt does not meet the exception standard to the ban on water diversions and should be immediately rejected for this overwhelming deficiency.*

5. The people of Wisconsin oppose this water diversion from Lake Michigan:

Clean Wisconsin reported “nearly 3,700 filed comments on Waukesha’s application with the WI DNR and that almost all arrived at same conclusion that Waukesha’s application does not meet the protective standards of the Great Lakes Compact and cannot be approved as drafted.”

The Great Lakes Compact is a democratic, autonomous agreement among those who reside in its watershed and depend upon it for drinking water and its many other priceless values.

Waukesha does not have a legitimate right to the water that does not belong to it, particularly when it disregards the eligibility standards.

6. Inappropriate premature application filed prior to meeting eligibility standards:

Last winter in 2014, Mark Redsten, Executive Director of Clean Wisconsin, conveyed that his organization had tried to work with local Waukesha officials to find sustainable

solutions since 2003, but Waukesha, in effect, was unchangingly focused on getting Great Lakes water.

From my viewpoint, this is an indicator that Waukesha actually knew what it should have known regarding the necessity of first wholeheartedly implementing the eligibility standards. Obviously, Waukesha did not do this requirement before applying for an exception to the ban for a water diversion. This conduct showed it applied without meeting the requirements to be eligible to apply.

Such facts appear to indicate to me that Waukesha has not been sufficiently interested in meeting the high standards and requirements of the Great Lakes Compact before filing its application asking to divert water from Lake Michigan.

This failure renders this application ineligible for consideration until 1) it has fully implemented best practices in water conservation and in alternative technologies and treatments and 2) until it has permanently limited and rejected any expansion plans that disqualify it from eligibility to be considered for the rare and unusual exception to the ban on water diversions.

It is inappropriate of Waukesha to file an application for a Lake Michigan water diversion when it does not meet the stringent high standards required to file an application for a rare and very unusual water diversion. Worse yet, Waukesha obviously knew that it was not qualified for a water diversion but filed the application anyway.

Why does Waukesha think it might get special treatment without meeting the requirements to be eligible to apply? Is this an attempt to attack the integrity of the Great Lakes Compact and its autonomy?

7. Rigorous thorough and complete EIS for local plan required prior to approval:

- 1) Maximum water conservation with best practices fully implemented, but continuing to provide insufficient safe drinking water;
- 2) Objective assessment of all alternatives and treatments with detailed analyzing and evaluating of best practices available to try to meet Waukesha's water needs, and after implementation with the collection of data showing peer-reviewed, replicable measured safe drinking water insufficiency using vigorous methodology;
- 3) City's proposed return path of sewage water that maximizes sufficient original basin water return (without mixing Mississippi River basin water into the return).
- 4) The permanent removal of increase in water supply "need" from Waukesha's proposal to extend unneeded water service into neighboring communities (which is unsustainable, lacking in integrity, and ineligible).
- 5) The permanent removal of proposed expansion and extension into areas yet further from the Great Lakes basin that do not meet all or most of the eligibility standards required before the application is filed.

8. Water Conservation Insufficiently Addressed:

Waukesha has not sufficiently and fully implemented water conservation measures available to reduce its water need.

Waukesha has not done all it can and must do to conserve water in order to be eligible to file an application under the Compact and under Wisconsin law; this failure places Waukesha's application inappropriately outside of the rules and regulations.

This constitutes a major deficiency that does not meet the exception standard that applies to the ban on water diversions by the Compact.

Waukesha is located outside of the Great Lakes Basin and is part of the Mississippi River watershed. The Great Lakes Compact has clear requirements pertaining to water conservation. These requirements determine basic application eligibility.

Wisconsin rules require conservation measures must be fully implemented before a water diversion application is submitted, but the Waukesha application is deficient in this matter.

Waukesha has neglected and failed to do all it can do to help itself by funding and implementing best water conservation and alternative treatment practices.

The Waukesha application does not meet the eligibility criterion at this time pertaining to water conservation. This deficiency makes the application ineligible to qualify as an exception to the ban on water diversions.

Waukesha has not proven that its water needs are unable to be met through local water sources combined with a genuinely vigorous conservation effort. This application should be rejected as well as any claimed “need” for Great Lakes water---until Waukesha has committed to a clear, measurable water conservation plan with sufficient details and has funded implementation. Then, measurable results should be further refined into maximizing best practices. Full utilization of rigorous and thorough scientific methodology is required.

The conversation must properly distinguish the all-important first consideration of eligibility to be the application acceptance criteria. Cost-outs remain irrelevant to eligibility criteria that do not require cost-outs but instead eligibility criteria require the highest and best practices for alternatives and conservation to be in place---before eligibility criteria for application is met. It is not acceptable for any entity to try to apply for any Great Lakes’ water diversion, using any reasoning that it may be the lowest cost. Costs do not trump integrity and its eligibility requirements. Costs do not come on par with integrity. Costs are properly relegated to lesser consideration at a later stage. At that stage, cost-estimates frequently change unevenly and rapidly for various reasons.

The financial burden for issues within Waukesha’s drinking water belongs to Waukesha, not the Great Lakes Compact.

In late 2013 the Milwaukee Riverkeeper reported that *“an alternative solution that would use some of the city’s existing shallow groundwater wells”* along with *“aggressive water conservation and riverbank inducement from the Fox River were estimated at \$217 million.”*

The Milwaukee Riverkeeper further reported: *“Riverbank inducement is a sustainable “closed loop” type system, which uses shallow groundwater filtered naturally by the riverbed and returns this water back to the river after use and treatment. This has been used successfully by other cities such as Louisville, KY, and shows a lot of promise. Water is used, treated, and returned upstream from where it’s taken in order to minimize flow impacts to the river and associated habitats. Impacts to local wetland areas like the Vernon Marsh would have to be closely monitored and mitigated to ensure that these resources would not be negatively impacted.”*

The integrity of the Great Lakes Compact depends on rigorous and strict eligibility criteria enforcement. I ask the Wisconsin DNR to ensure that without the highest standards in place for all rigorous eligibility that it reject and deny the Waukesha application for water diversion from Lake Michigan.

9. Alternative Technologies and Treatments Insufficiently Addressed:

There must be no other reasonable way to supply its users with adequate clean water in order to apply for such a water diversion. This is the major unmet eligibility

requirement both of the Compact and of Wisconsin law that has not been sufficiently proven by City of Waukesha/Waukesha Water Utility.

Waukesha's sandstone aquifer has experienced a major drawdown over the decades, but that appears to be rebounding, or at least leveling out, per Clean Wisconsin.

Waukesha is blending shallow aquifer water and deep aquifer water to reduce radium concentration to sufficiently safe drinking water standards.

Technology exists to remove radium from drinking water safely and economically, but Waukesha hasn't sufficiently addressed using this treatment technology.

This Waukesha application should be rejected, including any claimed "need" for Great Lakes water---until Waukesha has thoroughly researched and funded implementation of alternative technologies and treatments, which it has not sufficiently done.

Since other communities in Wisconsin and the United States safely and economically remove radium from drinking water, Waukesha should be committed to do this with a clear, measurable treatment plan to sufficiently help itself, before asking recklessly to divert water from a global natural resource that is priceless and irreplaceable—the Great Lakes basin. It is unacceptable for Waukesha to ask for a diversion that would begin a precedent in diverting Great Lakes waters that will gradually degrade and destroy the integrity of this priceless resource, particularly when Waukesha has not already done all that it can do to help itself and particularly when Waukesha does not meet the eligibility criteria, including its burden of proof.

10. Insufficiently Addressed Return Water Sewage Plan:

The Compact requires that the water originating within the basin be maximally returned to the basin and that return water from outside the basin be minimized. This requirement aims to minimize any approved diversion's impact on Great Lakes' water levels. Predictably, some adverse impacts will occur, and the source of mitigation funding needs to be identified up front. This requirement aims to help reduce predictable negative impacts on water resources outside of the Great Lakes' basin, such as the Fox River by Waukesha. A major goal of this requirement is to limit as much as possible the potential for outside contaminants to enter the Great Lakes basin.

The Milwaukee Riverkeeper reports that Waukesha "proposes to discharge treated wastewater into a waterway that is already impaired by pollution and does not demonstrate how this would comply with the requirements of the Clean Water Act, which states there can be no 'new' or 'increased' discharge to impaired waterways." If these outstanding issues are not resolved, this application should not be approved.

The Waukesha application plan sends back too much water from the Mississippi River basin. More than one-third of the return water to Lake Michigan is planned to come from the Mississippi River basin. This extremely high volume of non-original basin water does not meet the intent of the rules and is unacceptable. The Great Lakes Compact needs an objectively planned guarantee of the maximal return of original waters to the proper basins.

This application must be not being approved until Waukesha sufficiently plans to return virtually as much as possible of all original water back to the Great Lakes basin. This application falls far short of a wholehearted effort to do this. Waukesha should be sufficiently funding the removal of radium and fully implementing best practices technology for this alternative, but this prerequisite to filing this very application has not been done.

Waukesha should not have filed an application for a radium problem to be solved using Great Lakes' drinking water without having first maximized best practices in water conservation methods and in alternative treatments. The discussion of return waters completely depends on first meeting eligibility requirements.

This application should be rejected. It should not be approved.

11. Unacceptable, inappropriate claim of increased “need”

The Waukesha application shows average daily supply need of drinking water as 10.1 million gallons. The current need is 6.5 to 7 million gallons a day. Waukesha application makes an unacceptable claim of increased daily supply “need” of 3.1 to 3.6 million gallons a day.

The City of Waukesha claims it cannot serve its own community, but yet it is inappropriately reaching out to serve the unincorporated towns of Waukesha County. When Waukesha can’t take appropriate care of itself and fully conserve its water resources, it is irrational to reach out to serve communities that don’t need safe drinking water.

Milwaukee Riverkeeper reports that the “greatly expanded service area includes communities or portions of communities that have their own adequate supplies of potable water, and they have not been implementing any conservation programs.”

Both Delafield and Pewaukee are part of this proposed Waukesha water service extension. Both have adequate supplies of clean, safe well water; both also have not implemented water conservation programs. These communities do not qualify in any application for an exception to a ban on a water diversion. These facts alone render the Waukesha application ineligible for a water diversion exception, specifically due to not meeting the all important exception standard, which requires proof that no other safe drinking water sources or alternative options are available and that asking for a water diversion is a last resort. This exception standard is the most important and basic rule that supersedes everything else.

Waukesha renders its application for water diversion ineligible by reaching out to serve communities that do not actually in fact need to be served drinking water, that already have their own supplies of sufficient safe drinking water, and that are not conserving water—all deficiencies of basic eligibility to file the application for a water diversion.

From my viewpoint, Waukesha is asking for a water diversion before it has done all it can to help itself. Waukesha is asking to *take* the waters of others, not only for itself, but to sell water to other communities that are obviously growing that do not need water and are not bothering to conserve water as the precious resource that it actually is.

Waukesha appears to be opportunistically attempting to grab the water resources of a finite Great Lakes and sell them to its neighbors. Water has been predicted to skyrocket in value as precious water becomes expensive due to the extensive permanent contamination that is rapidly destroying multitudes of existing clean water resources throughout the United States by the fossil fuel oil and fracking industries that are insufficiently regulated, after former US Vice-President Dick Cheney took destructive action.

Waukesha should not have filed an application for a water diversion in order to opportunistically propose to extend its service area into other communities that already have sufficient clean and safe drinking water.

The eligibility criteria to file an application for a water diversion under the Great Lakes Compact does not include opportunism and other unnecessary schemes to steal water and value from a priceless resource.

This application must be rejected by the Wisconsin DNR.

Ashley Hoekstra
DNR Bureau Drinking Water

Dear Ms. Hoekstra:

The continuing research work to advance our capabilities in water purification, can solve a water shortage in Waukesha. New technology will save our diminishing ground-water supply in The United States, and around the world.

This research is an investment for all.

The preservation of the water of the Great Lakes is necessary for a healthy eco-system, a sustainable fishing source for industry and the public.

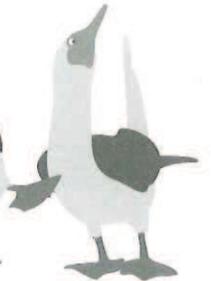
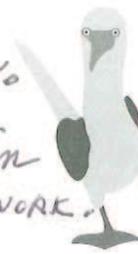
Diversion of water is not the solution. Conservation and technology is.

The Great Lakes region can remain
a great place to live. John Menger



John Menger
3222 S 53rd St
Milwaukee, WI 53219-4522

August 2, 2015



THANK YOU FOR YOUR WORK.



John Menger
3222 S 53rd St
Milwaukee, WI 53219-4522



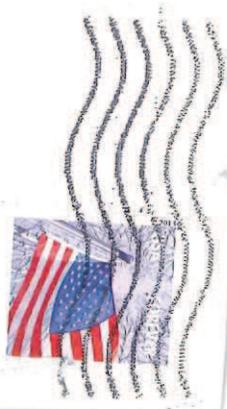
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DRINKING WATER & GW

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Ashley Hebert
DNR Bureau of Drinking Water and Wastewater
P.O. 7921
Madison, WI 53767-7921

53707752121



Dear DNR,

As a resident of the Great Lakes region, I support the protection of the Great Lakes as a vital natural resource and a national treasure. The Great Lakes provide the foundation of our identity as a region. The City of Waukesha's request for Great Lakes water threatens that identity. I urge the DNR to deny Waukesha's application to divert Great Lakes water for the following reasons:

- Waukesha's application does not pass legal muster under the federally ratified Great Lakes Compact.
- Waukesha has a safe, sustainable and treatable water supply available to its residents that does not require using water from the Great Lakes.
- Investing in existing infrastructure is the cheapest, fastest and safest option for Waukesha to meet radium and public health standards by 2018.

Sincerely,

PRINT NAME PAMELA MEYER SIGNATURE *Pamela Meyer*
ADDRESS 5101 W 34849TH RD CITY EDGEWATER
ZIP 53119 PHONE 262-594-3119 EMAIL pdw-meyer@yahoo.com

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DRINKING WATER & GW

ADDITIONAL COMMENTS: I am concerned
that Utah has ^{real} basic needs.
They have not met the water con-
servation standards and requirements.
Their 2006 conservation plan is not
yet fully implemented. Many
I am concerned also about the return
flow problems which have not been
resolved. Cost may be prohibitive to
its rate payers.

Hoekstra, Ashley N - DNR

From: Curt <curtmeine@gmail.com>
Sent: Tuesday, August 18, 2015 9:16 AM
To: DNR Waukesha Diversion App
Subject: Lake Michigan Water Diversion
Attachments: Curt.vcf

I write in regard to the Wisconsin DNR's draft environmental impact study and preliminary decision on Waukesha's diversion application.

I urge that the application for this diversion be withdrawn and reconsidered.

I am especially concerned that (1) City of Waukesha's application ignores other reasonable alternatives to their proposed Great Lakes diversion; and that (2) the City of Waukesha is proposing to double the size of its water service area. This runs counter to the standards of the Great Lakes Compact. By including this expanded service area in its application, the City of Waukesha greatly inflates the amount of water it needs and thereby tries to justify using Great Lakes water rather than local groundwater, and to enact effective water conservation measures. The expanded service area further indicates an unwillingness to consider alternative land use planning that minimizes the pattern of development that has led a once water-rich community to now be in this situation.

The request to divert Great Lakes basin water beyond the basin boundaries is an important moment in the history of our shared stewardship of Great Lakes waters. The Great Lakes Compact provides for the careful consideration and implementation of such diversions. But such a precedent for diversion should be approved only to meet the most dire needs, in a manner that demonstrates a serious commitment to water conservation and land stewardship. This application does not meet that standard.

Dr. Curt Meine
Sauk City, Wisconsin

TESTIMONY IN SUPPORT OF CITY OF WAUKESHA WATER UTILITY
REQUEST TO ACCESS LAKE MICHIGAN WATER

By Richard A. Meeusen

August 11, 2015

My name is Richard A. Meeusen of W224 N3414 Lost Creek Ct., Pewaukee, WI, 53072. I am the Chairman, President and CEO of Badger Meter, Inc., headquartered at 4545 W. Brown Deer Rd., Milwaukee, WI 53223. My company is the largest maker of water meters in North America, with a proud 110 year history of being a major employer in Milwaukee. We are publicly traded, with 1,450 employees worldwide.

I am also the co-founder and co-chair of the Water Council, an industry group representing over 120 water technology companies and organizations in Southeastern Wisconsin. In addition, I am one of the two State of Wisconsin trustees appointed by Governor Walker to represent our State on the Great Lakes Protection Fund.

I am submitting this testimony in support of the City of Waukesha Water Utility and its request to access Lake Michigan water under the terms allowed by the Great Lakes Compact. Other people with better education and experience will certainly address many of the environmental and legal aspects of this request. I will focus my comments only on the potential economic impacts of this request.

Let me start by noting that, through my work at Badger Meter, the Water Council and the Great Lakes Protection Fund, I have become increasingly familiar with the seriousness of our nation's water issues and the significant potential for the Great Lakes to be a source of economic growth for this region.

The Great Lakes represent an economic advantage for its eight bordering states both today and, increasingly, in the future. Agriculture, industry and residences all require water for growth and prosperity. After too many decades of watching our economic future dwindle as companies and people moved to dryer, warmer climates, we now see a future where that trend will most certainly change.

Thanks to the foresight of the drafters of the Great Lakes Compact, our nation's two hundred year history of moving water to people is about to change. Now, people will have to move back to water. And the regions with water will benefit from this change.

The Great Lakes Compact benefits all communities located within the Great Lakes Water Basin, creating an exclusive economic advantage over those communities located outside of the basin. For some states, like Michigan, this advantage extends to essentially all communities within the state. For others, like Wisconsin, the economic advantage of Great Lakes water access is limited to only those select communities within the basin.

However, the Great Lakes Compact does allow each state, under certain conditions, to extend this economic advantage outward by one county, through the "straddling county" rules. States that take advantage of this opportunity will see more of their communities able to benefit from Great Lakes water. States that fail to take advantage of this opportunity will be purposely by-passing a potential benefit for their citizens. Certainly the other seven states will not hesitate to take advantage of this benefit; Wisconsin should not be left behind.

One Milwaukee representative recently explained to me the reasons behind the city's opposition to Waukesha's request. He explained: "Milwaukee has brown fields and water. Waukesha has green fields and no water. If Waukesha gets more water, businesses will choose to locate there instead of Milwaukee." My response was simple: "If you give a businessman a choice between Milwaukee's brown fields with water, or Waukesha's green fields without water, do you know what most businessmen will choose? Iowa."

I encourage people to look beyond the local municipal boundaries and parochial infighting. We need to do what is best for the State of Wisconsin and the region. We need to approve this request.

Hoekstra, Ashley N - DNR

From: Sandra L McLellan <mclellan@uwm.edu>
Sent: Thursday, August 27, 2015 9:57 PM
To: DNR Waukesha Diversion App
Subject: Public comments
Attachments: Comments on EIS McLellan 8-12-15.pdf

Ashley, please find attached my comments on the EIS for the Waukasha diversion. Please feel free to contact me if you need more information.

Sandra McLellan
Professor
School of Freshwater Sciences
University of Wisconsin-Milwaukee
600 E. Greenfield Avenue
Milwaukee, WI 53204

phone 414-382-1700

fax 414-382-1705

email mclellan@uwm.edu

<http://home.freshwater.uwm.edu/mclellanlab/>

August 12, 2015

Ashley Hoekstra
DNR Bureau of Drinking Water and Groundwater
Box 7921
Madison, WI 53707-7921

Dear Ms. Hoekstra,

Please find below my comments on the EIS for the Waukesha Diversion. My comments relate to the level of degradation of the Root River when high proportions of treated wastewater is added or the discharge of treated wastewater directly to Lake Michigan, which can create a health risk at nearby beaches. It is well documented in the scientific literature that treated wastewater has residual pathogens and low or absent fecal indicators, which are the organisms that are used for water quality assessments. In several places in the document, the environmental impacts are not stated; rather the text simply states that the return waters would meet permitting requirements. The return of water diverted from Lake Michigan as wastewater is not of equal quality and many of the contaminants that are in this water (pathogens, pharmaceuticals) are not regulated under the WPDES permitting process. There will be a net increase in treated wastewater entering Lake Michigan, which is considered in practicality a closed system with a residence time of nearly 100 years. In addition, the amounts of the diversion are much higher than current usage and expected population growth without an adequate explanation (specific examples are given below). This is important because increased returned wastewater will magnify the environmental impacts and human health risk.

Degradation of the Root River by pathogens:

Page 54 The section heading is water quality of the Root River, yet no fecal coliform levels or other bacterial water quality metrics are provided in this section. There is ample data from MMSD and other monitoring programs. One of the most important questions in terms of acute environmental degradations and subsequent human health risk is levels of fecal indicators and pathogen presence. Information about the baseline state of the Root River should be included in this section.

Page 154 The statement “Consequently, there would be no opportunities for invasive species or VHS from the Mississippi Basin to be introduced to the Lake Michigan basin from the return flow discharge” is inaccurate. VHS may not be completely removed from the waste stream before discharge. Points of potential entry into the sanitary sewage waste stream should be identified if possible, or at minimum, acknowledged that VHS entering the system may not be removed.

Page 156 Fecal coliforms have been regulated as part of the WPDES permits. The section stating Waukesha effluent values in comparison to MMSD does not address fecal coliforms.

Beginning at Page 163 section 4.2.4.3. Estimates from this EIS cite as much as 80-90% of the Root River flow during low flow periods could be treated wastewater (page 165). Section 4.3.2.3.1.5 highlights that wastewater contains residual pathogens and can impact human health. However, the very high concentration of wastewater under low flow conditions and during times of the year where there is the greatest potential for human exposure is not included in this section and should be explicitly stated. Adding such a high proportion of wastewater creates a serious health risk. Treated wastewater has residual pathogens but virtually no indicators. Treated wastewater is reported as the most potent source of pathogens for a given amount of fecal indicator concentration, and acceptable risk can be exceeded when indicators are at recommended limits (Soller et al. 2010, Water Research 44:4674-4671; Schoen et al. 2011, Water Research 45: 2670-2680). The language should reflect the current literature and include the above information. Importantly, because fecal indicator bacteria are not present, it should be noted that this risk could go unrecognized. WPDES permitting criteria does not protect against or prevent the aforementioned environmental impacts. Section 4.3.2.3.1.5 does highlight the potential degradation of water quality due to pathogens, and acknowledges that the human health risk that is created would not be regulated.

Page 176 Section 4.3.2.3.7 Do any of these recreational areas have water access for kayaking or canoeing? Recreational opportunities would be impacted by increased pathogens in wastewater flows.

Page 163 4.3.2.3.1.1. Overall comment on this section: Additional treated wastewater discharge is being added to Lake Michigan. Many constituents of wastewater are not regulated, including pharmaceuticals, pathogens, and numerous chemicals. Page 165 states that pharmaceutical concentrations will increase. It should be noted that there will also be increases in these other constituents in Lake Michigan in addition to pharmaceuticals.

4.3.2.4.1 The water quality information is absent. Other sections reiterated the impacts, even though they were redundant. See comment above for health risk cause by treated wastewater. "Treated wastewater is reported as the most potent source of pathogens for a given amount of fecal indicator concentration, and acceptable risk can be exceeded when indicators are at recommended limits (Soller et al. 2010, Water Research 44:4674-4671; Schoen et al. 2011, Water Research 45: 2670-2680)." Localized discharges of treated wastewater can be expected to impact beaches in close proximity. Along shore currents can move water several km without much dilution. More information should be included in this section about the impact to beaches, specifically, the potential for increased human health risk that can go unrecognized. Importantly, beach monitoring programs would not protect public health in this case since fecal indicators are absent.

Diversion amounts:

Page 2: The amount of water given for the maximum diversion is an 80% increase over current usage. Isn't one strategy to address the clean water shortage in Waukesha to conserve water? These numbers do not coincide with the water conservation plan that is stated to have reduced water demand. The 2050 projections also do not add up; the expected amount of maximum diversion is a 250% increase when the population will only increase 37%. The EIS should be a self-standing document, so the rationale for these numbers should be explained since the magnitude of the return flow will affect environmental conditions. Page 88 alludes to the possibility that more water might be needed in dry years, but this does not justify an 80% increase in the base amount. Graph 3-19 shows maximum demand at 16 mgd, but provides no details on how this number was derived. The document also eludes to increasing the service area but does not offer adequate detail on this. A short synopsis should be included and the technical memo prepared by consultants referenced.

Other comments

Page 31 Figure 3-2 has no legend

Page 34 should list the Kinickinick River also as one of the discharges

Page 32 Comma is needed between shoreline and algae accumulation

Page 34 3.2.4.1 Michigan has a lower case m and capital I

Page 94 should the reference be to figure 3-19? The reasons listed here appear inadequate to explain the 80% increase from current usage patterns.

Please feel free to contact me if you have any questions or need clarifications for any of these comments. I can be reached best by email at mclellan@uwm.edu or by phone at 414-382-1710.

Sincerely,

A handwritten signature in black ink, appearing to read "Sandra McLellan". The signature is written in a cursive style with some loops and flourishes.

Sandra McLellan, PhD

Hoekstra, Ashley N - DNR

From: Mark McClellan <mark.mcclellan98@gmail.com>
Sent: Monday, August 24, 2015 3:25 PM
To: DNR Waukesha Diversion App
Subject: Water Rights

I encourage all parties involved not to pursue water for Waukesha. The fact that it will be used for "future development" for urban sprawl and industry doesn't show immediate problems for the city. Through conservation efforts, efficiency and recent ground water levels rising, this should be adequate for their needs. This will open a can of worms for communities around the great lakes to pursue their own water agendas without thinking of the impact of the Great Lakes in general. Please, don't start a domino effect that will come back to hurt all communities that are located around this fragile ecosystem.

Thanks

Mark McClellan

Wisconsin Department of Natural Resources
Public Hearing on the City of Waukesha's Application for Diversion of Great Lakes Water
Comment Form

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Hearing Location: Racine

AUG 28 2015

Date of Hearing: Tues. Aug 18, 2015

DRINKING WATER & GW

Name: Wendy McCalvy

Address: 4825 Richmond Dr., Racine, WI, 53406

Who you represent: myself, also on board of Caledonia Conservancy

Comments: It seems to me that the area to be served by the proposed diversion is way too large - unnecessarily so. I was told that it is state law that the entire sewer and water service area must be included in a service. But this is such ~~an~~ a historic decision, I think it would be easier to ask an exception to the state service area law, than ask for the exception from 8 states for such a large diversion. I also object to Racine having virtually no say in the diversion down the Root River.

Wendy McCalvy

If you are unable to submit your comment today please send comments to:

Ashley Hoekstra
DNR Bureau of Drinking Water and Groundwater
Box 7921
Madison, WI 53707-7921

All public comments must be submitted by August 28th, 2015.



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AUG 28 2015
DRINKING WATER & GW

Ashley Noekstein
DNR Bureau of Drinking Water and Groundwater
~~Box 7921~~ 101 S. Webster St.
Madison, WI. 53707-7921

Version Comment

Calvy
Dr
36

Hoekstra, Ashley N - DNR

From: Mary McIlvaine <marysew@yahoo.com>
Sent: Sunday, August 23, 2015 11:57 AM
To: DNR Waukesha Diversion App
Subject: oppose Waukesha diversion

August 23, 2015

I oppose the diversion of Lake Michigan water, or any Great Lakes water, to the City of Waukesha.

I don't believe it is right for us to rearrange watersheds. We get in trouble when we tamper too much with nature.

The numbers presented by Waukesha belie the fact that water use is in fact declining. While the WDNR may require Waukesha to project future build-out use by adjacent communities actually not engaged in nor committed to the diversion approach to Waukesha's water woes, this interpretation of state regulations seems truly distorted, especially when a non-diversion option could cost far less.

Wisconsin allowed the Oak Creek Power Plant for WE Energies in the face of similarly declining power usage. I don't think we looked enough at conservation options during that process, either.

Conservation is one of the most effective, and at the same time, most overlooked alternatives. California communities drink treated wastewater because they have no other options. So they have in fact shown us extreme conservation.

While Waukesha has a conservation plan, and is apparently further ahead than most Wisconsin communities in this regard, I believe much more could be done with implementation, especially if it goes beyond what WDNR requires.

Let me give an example. Toilet flushing represents one of the largest portions of water consumption in any household. Our household finally replaced two toilets for the second time in our more than 3 decades-long residency here. We replaced very old, large tank toilets from our 1908-built home in 1990 with then state-of-the-art 3 gallon tank toilets. The new toilets installed in May 2015 are dual flush with either 1.6 or 1.1 gallons per flush. The lower flush option suffices over 90% of the time. Our most recent water bill shows a decline in usage of 12% compared with an 8-year average of the same time period, and the new toilets were in service only half of that most recent billing cycle. I look forward to future lower water bills. To be sure, it took us time to decide that spending the money on new dual-flush toilets was worthwhile. If thousands of households in Waukesha were to install such dual flush toilets, collective water use would decline even further.

Creative thinking could result in rebates or incentives for households to consume less water. The large amount of money planned for diverting Great Lakes water could be redirected in part to these greater conservation efforts by the City of Waukesha, and less money would be spent overall, through a non-diversion alternative. I support the non-diversion option proposed by the Compact Implementation Coalition.

Mary McIlvaine
marysew@yahoo.com

262.902.5606

Hoekstra, Ashley N - DNR

From: Kathy Muntner <kmuntner@gmail.com>
Sent: Friday, August 28, 2015 12:04 PM
To: DNR Waukesha Diversion App
Subject: Water diversion

I am opposed to this plan. It is vitally important to protect our Great Lakes watershed. We are facing this issue now in the Northwoods. Do not set a precedent to weaken the protection of what should be our greatest and most protected resource.

Thank you.

Kathy Muntner

Rhineland WI

Sent from my iPhone

Hoekstra, Ashley N - DNR

From: Jade Mueller <jademueller1@gmail.com>
Sent: Sunday, August 23, 2015 1:07 PM
To: DNR Waukesha Diversion App
Cc: Staral, Janice M; Nate Hamilton
Subject: It is Unjust to Divert Water from Milwaukee's Supply to Waukesha

Dear Ashley Hoekstra:

It is unjust to divert any Milwaukee water resource to Waukesha. Just as any extraction of resources from an area of poverty, people of color and underemployment to one of whiteness and financial advantage, so is water diversion a colonialist and racism-tinged exploitation. As a white lifelong Milwaukee resident I strongly oppose diversion as it is one more way the rich exploit the poor.

Secondly, Waukesha can get adequate water from the Mississippi River Basin at half the cost with a few new shallow wells and more water conservation. Furthermore, Waukesha is asking for twice as much water than it's using now which just fuels more urban sprawl. Diversion should be a last resort rather than this situation that could be remediated in a more conservative manner.

For these reasons, I urge you in the strongest terms to not approve the diversion of Great Lakes water to Waukesha.

Sincerely,
Jade Mueller

Hoekstra, Ashley N - DNR

From: Gerard McMullen <gerard.mcmullen@me.com>
Sent: Friday, August 28, 2015 6:12 PM
To: DNR Waukesha Diversion App
Subject: Waukesha Diversion Request

Dear Ms. Hoekstra,

I am writing as a resident of the City of Milwaukee to comment on the City of Waukesha's proposed Water Diversion Application under the Great Lakes–St. Lawrence River Basin Water Resources Compact. I strongly believe that Waukesha's application should be rejected as it does not meet the standards of the Compact, and is non-compliant with the requirements of the the Water Diversion Application.

I am not persuaded that they have exhausted all other alternatives to meet their present and projected future water needs. Furthermore, Waukesha gives no reasonable explanation of why it is requesting a substantially greater volume of diverted water than its current and projected needs. But what is most troubling to me is that Waukesha's application includes additional non-Basin areas that are not in their current service area. These areas (Pewaukee, Towns of Delafield and Waukesha, among others) have no demonstrated need for Great Lakes water and are glaringly non-compliant with the conservation requirements of the Compact. Thus I urge the State of Wisconsin to reject Waukesha's Water Diversion Application as woefully inadequate of the requirements of the application process, and clearly far below the standards of the Compact.

Thank you for consideration of my comments and concerns. And thank you for your work to conserve our Great Lakes water.

Gerard J. Mc Mullen
4917 W. Sunnyside Drive
Milwaukee, WI 53208

Hoekstra, Ashley N - DNR

From: GowMc@aol.com
Sent: Wednesday, August 19, 2015 11:28 PM
To: DNR Waukesha Diversion App
Subject: Comment on meeting held on 8/18/2015

My name is Todd McMahon,

I am a resident in Kenosha at 5213 nth Place and a student at Gateway Technical College. I attended the meeting the on the Waukesha Great Lakes Water Application held in Racine on 8/18/15.

The main observation that I have from the meeting is two concerns. One is getting more information to the people in the Waukesha and Racine area information on the Waukesha Great lakes Water Application and how it can affect these areas. I know there are pros and cons to each side. Should the City of Racine residents receive financial benefits from this plan?

The other observation I had was a concern of the Great Lakes Compact Agreement. How will this decision affect the longevity of this agreement. If Waukesha is allowed to get water from Lake Michigan how many other communities will be looking to get water from the Great Lakes?

Thanks for your time

Todd McMahon
mcmahont8@mail.gtc.edu

or
gowmc@aol.com

Hoekstra, Ashley N - DNR

From: Jill <jillstephany@hotmail.com>
Sent: Tuesday, August 25, 2015 8:53 AM
To: DNR Waukesha Diversion App
Cc: Jill; Mark McClellan
Subject: great lakes water

Hello, DNR. Thanks for taking care of this beautiful state. I think the great lakes are a priceless resource that we need to be forward thinking about. I also believe innovation needs to catch up to alleviate some of the demands the humans place on our resources, instead of us working ever harder to deplete our finite supplies. Piping is not so innovative. It is a simple-minded solution which would set a devastating precedent. Cleaning, conserving, and building where the resources already exist are better solutions in my opinion; and ideas we had better get accustomed to if we are to keep exploiting resources at our current pace. Waukesha should not divert water from the Lake Michigan watershed, as I believe it could cause large scale problems for the great lakes, and water quantity, quality, and policy. We have hit a limit. Here is where we need to start innovating. Let us help them, but not by piping water to where it doesn't belong. Please make a good long-term decision and refuse to divert water from the lake Michigan watershed to anybody.

Thank you.

Jill McClellan
2361 N 68th Street
Wauwatosa, WI

Wisconsin Department of Natural Resources
Public Hearing on the City of Waukesha's Application for Diversion of Great Lakes Water
Comment Form

Hearing Location: Milwaukee

Date of Hearing: Aug. 18

Name: Daryl Matter

Address: 2807 N. 7th St. Milwaukee 53210

Who you represent: _____

Comments: I attended the meeting concerning Waukesha's request to receive H₂O from Lake Michigan. Was very disappointed with the DNR seemed to OK everything that Waukesha submitted.

After listening to presenters concerns my feelings changed.

Milwaukee presented many points that I had not heard before.

Expanding water to other communities; is the need really there?; seems like other avenues have not been exhausted.

Environmental concerns are ~~not~~ so important!

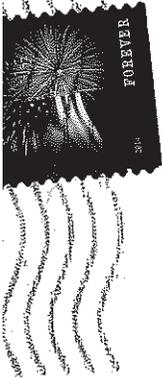
If you are unable to submit your comment today please send comments to:

Ashley Hoekstra
DNR Bureau of Drinking Water and Groundwater
Box 78
Madison, WI 53707-7921

All public comments must be submitted by August 28th, 2015.

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Paul Matter
2807 N. 7th St
Madison, WI.
53210



MILWAUKEE WI 530
26 AUG 2015 PM 3:2

Ashley Hockstetter
DNR Bureau of Drinking Water
& Groundwater

Madison, WI. 7921



Hoekstra, Ashley N - DNR

From: Mariette Nowak <mmnowak@wi.rr.com>
Sent: Friday, August 21, 2015 9:02 AM
To: DNR Waukesha Diversion App
Subject: Deny City of Waukesha's application for a Great Lakes water diversion

Importance: High

Dear Ashley Hoekstra,

I urge the denial of the city of Waukesha's application for a Great Lakes water diversion. This diversion will set a very dangerous precedent, encouraging many other communities just outside the Great Lakes watershed to try to get diversions.

The Great Lakes Compact requires that water should not be requested if the need for this water can be avoided through conservation measures. Yet, Waukesha has not implemented its own water conservation plan. Moreover, its conservation plan is deficient and lacks meaningful measures. The only mandatory measures have been a sprinkling ordinance and a residential inclined water rates, which have helped reduce water usage. But no mandatory measures have been taken to reduce water usage by commercial and business interests.

Other data suggests the Waukesha has sufficient water for its projected needs through 2050. Instead of water diversion from the Great Lakes, Waukesha should be expected to treat the radium in its water like over 40 other communities in Wisconsin have successfully done.

Although I presently live outside the Lake Michigan watershed, I lived in the Milwaukee area for over 60 years and I hope the watershed will be fully protected now and in the future.

Thank you for this opportunity to comment on the application.

Mariette Nowak
mmnowak@wi.rr.com
N9053 Swift Lake Dr
East Troy, WI. 53120
262-642-2352

From: Gregory Majersky [<mailto:gmajersky@outlook.com>]
Sent: Thursday, August 27, 2015 3:58 PM
To: Ratarasarn, Thanintr T - DNR
Subject: A solution to provide Waukesha with sufficient water and protect the Great Lakes Compact

Hello Mr. Ratarasarn,

I have been reading about Waukesha's water woes, and as a former Great Lakes resident am also supportive of the Great Lakes compact, but am very sympathetic to the effects of groundwater reduction and pollution.

A few years ago, I designed a rain/snow melt collection solution using the city's own paved surfaces and existing urban storm drainage network. I applied for a copyright of this design, the application number is 1-1415957581.

The basic idea is that cities themselves act as rain/snow collection basins, and all of that runoff is a wasted resource. Consider the size of Waukesha, ~ 23 sq. miles, and multiply that times the annual precipitation. You should come up with a number that typically exceeds Waukesha's yearly water needs.

The overall construction costs of the system should be less than the cost of piping and treating water from Lake Michigan. Past projects have estimated costs at \$0.02 / person. Then there is the job creation and being on the cutting edge of water resource management.

I would be willing to lease the rights to the design for a very small yearly fee to help out Waukesha and protect the integrity of the Great Lakes Compact.

Sincerely,
Gregory Majersky
303-618-4145

Hoekstra, Ashley N - DNR

From: Joan Maas <maasjoan@gmail.com>
Sent: Wednesday, August 26, 2015 10:46 AM
To: DNR Waukesha Diversion App
Subject: Water Diversion Application

We are opposed to Waukesha's proposed diversion of water from Lake Michigan. Waukesha is the poster child for runaway sprawl. Many of its citizens fled Milwaukee, have little to do with it & look down on it with disdain. Waukesha has promoted continual development without regard to water needs. It thumbs its nose at regulations & regional cooperation ... that is, until it wants Great Lakes water. Then it's all about cooperation.

Interesting that Waukesha County calls itself "Lake Country" because of its tremendous water resources, many lakes surrounded by very expensive homes, 31 sq mi of water. Not enough? Just build a pipeline running through Milwaukee County to divert water from Lake Michigan to slake its unquenchable thirst, a precedent-setting action that will spur other requests for diversion & continue never-ending sprawl. When is enough enough? Save the precious, irreplaceable Great Lakes from all future water grabs. Just say NO!

Thank you for the opportunity to comment on this very important issue.

Don Devona & Joan Maas
Milwaukee

Dear DNR,

As a resident of the Great Lakes region, I support the protection of the Great Lakes as a vital natural resource and a national treasure. The Great Lakes provide the foundation of our identity as a region. The City of Waukesha's request for Great Lakes water threatens that identity. I urge the DNR to deny Waukesha's application to divert Great Lakes water for the following reasons:

- Waukesha's application does not pass legal muster under the federally ratified Great Lakes Compact.
- Waukesha has a safe, sustainable and treatable water supply available to its residents that does not require using water from the Great Lakes.
- Investing in existing infrastructure is the cheapest, fastest and safest option for Waukesha to meet radium and public health standards by 2018.

Sincerely,

PRINT NAME

Karen Nimz

SIGNATURE

Karen Nimz

ADDRESS

4704 West Wisconsin

CITY

WAUNATOSA

ZIP

53213

PHONE

414-259-1639

EMAIL

ADDITIONAL COMMENTS:

Decisions, hopefully, will
be made on scientific
facts and not on politics.

RECEIVED-DNR

AUG 28 2015

DRINKING WATER & GW

Hoekstra, Ashley N - DNR

From: mailagent@thesoftedge.com on behalf of Catherine Parker
<mailagent@thesoftedge.com>
Sent: Wednesday, August 12, 2015 1:51 PM
To: DNR Waukesha Diversion App
Subject: Reject Waukesha's Diversion Application

Dear Ms. Hoekstra:

Waukesha's attempt to use the expanded service area to demonstrate need for Lake Michigan water is not legal under the Great Lakes Compact, the historic regional agreement enacted into federal law in 2008 that overrides state law. The portions of neighboring communities included in the expansion do not meet two key compact requirements: they fail to demonstrate water conservation efforts to date and fail to show an inadequate existing supply of drinking water.

There are alternative solutions. The city of Waukesha can add treatment technology to three existing deep groundwater wells and continue to use existing shallow and deep wells to meet all of the current and future water needs of its current water supply service area. Over 40 other communities in Wisconsin use this common and safe method of treatment to meet radium standards. This can all be done with no additional drawdown of the deep sandstone aquifer, no impact to local wetlands or surface waters, and with over \$150 million in savings for current Waukesha ratepayers. It is Waukesha's best option.

The Department of Natural Resources (DNR) should not approve Waukesha's request for Great Lakes water.

Thank you.

Sincerely,

Catherine Parker
PO Box 96
Lake Tomahawk, WI 54539-0096

RECEIVED-DNR
AUG 28 2015
DRINKING WATER & GW

Dear Ashley Holkstra,
I was present at the Public
Meeting on Aug 15. Excellent
meeting! I am concerned
about water leaving our lake!
There are many reasons, here
are a couple.
Concerned about the effect
it will have on Kootenai
also, this year and the next

up by 5 ft a few years
ago down by 2 ft and this
had an effect on shipping
and there needed to be dredging.
I hope no water will be
allowed to leave our lake!

Thank you very much,
Sincerely,
Emily Paparo

Emily



Emily Papetti
 MILWAUKEE WI 530
 1842 Carlisle Ave.
 Racine, Wisconsin

26 AUG 2015 PM 7 L



USA
 ANGELINA

It's not about singing
 because it has an
 answer, it sings because
 it has a story.

Harmonies DNR DG/5
 PO Box 7981

Milwaukee, WI 53407-7981

Att: Whitney Holstrom



53407798121

Hoekstra, Ashley N - DNR

From: Keith Pamperin <kjpamperin@aol.com>
Sent: Monday, August 17, 2015 10:27 PM
To: DNRWaukeshaDiversionApp@wisconsin.gov.
Subject: Waukesha Application to divert Water from Lake Michigan in violation of the Great Lakes Compact

I am opposed to the WDNR approval of the City of Waukesha's application to divert water from Lake Michigan. I urge the WDNR to deny this application and to assist Waukesha in utilizing a solution that will not violate the Great Lakes Compact. Approving this application invites many lengthy law suits, and if successful sets a precedence that would be very damaging to the Great lakes and Wisconsin.

There are solutions that would meet the needs of the City of Waukesha at a lower cost to rate payers, and help curtail the growing urban sprawl and all the problems that creates.

Please show Wisconsin is a good faith partner with our Great Lakes neighbors and hold to the commitment of the great Lakes Compact.

Keith A. Pamperin
1499 Rockdale Street
Green Bay, WI 54304
920-494-3990
kjpamperin@aol.com

Hoekstra, Ashley N - DNR

From: dorothy bosley <bosozz@sbcglobal.net>
Sent: Friday, August 28, 2015 1:37 PM
To: DNR Waukesha Diversion App
Subject: Comments on Waukesha application

To: Ashley Hoekstra

My husband and I were in attendance at the Racine hearing last week. We were disappointed in the answers we heard from your representatives.

Because we have kids living in Arizona we have been quite aware of the increasing need throughout the West and Southwest for water. As my son told us last month - "We have to learn to live with the smaller amount of water available to us." The dramatic news this week of the enormous drop of water use in the State of California intensifies the changing attitude of Americans as they recognize their water tap is turning off.

We were upset with the answer to the amount of water requested by Waukesha and approved by you. I checked with the conservation policies of Waukesha, and, although important, they seemed far from impressive. They don't seem to be what California has been able to achieve.. Isn't the Department allowed to negotiate for the State rather than rubber stamp this request?

More important - you gave a vague answer to information on the states and provinces in the compact regarding any other potential requests from the states and provinces akin to the Waukesha one that could appear if this application were approved. The answer given was you did not know of any other in the works. Obviously, this could have impact. I am sure you made a thorough study of each of these entities, but this report was not provided to us.

Because of this nation's growing thirst for water it is ridiculous for Mr. Duchniak, water utility manager of Waukesha to make a statement that by giving them water it doesn't open the door for California (and others). Is he God? Once we put a crack in our dam the push for our waters will escalate. Community eligibility of our sister states and provinces may increase dramatically as lands once lush with water dry up. *Your Department cannot speak of climate changing, but you cannot hold it back.* Serving Waukesha by a myriad of small providers cannot open the can of worms that approving this request would.

None of us, laymen and professional alike, know what the near future will bring in national water availability. We are fortunate that the compact was enacted when it was. We are emphatically opposed to allowing this to be sent out to the other compact participants for possible approval.

Dorothy Bosley Ozzello
James Ozzello
5020 Valley Trail
Racine, WI 53402
262 639 3103

2020 E. Park Pl., #307
Milwaukee WI 53211
August 24, 2015

RECEIVED-DNR

AUG 24 2015

DRINKING WATER & GW

Ashley Hoekstra
DNR Bureau of Drinking Water and Groundwater
Box 7921
Madison WI 53707-7921

Dear Ms. Hoekstra:

I am writing to comment on the Waukesha water diversion proposal.

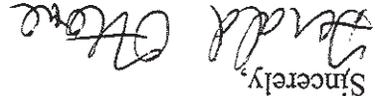
The proposal has received preliminary approval based on data showing an expansion of the service area for the City of Waukesha to include various surrounding communities. There is no ostensible reason for this artificially projected expansion of area served, other than to buttress the case by showing a greater demand for the water in the future, and there is no provision in the Great Lakes Compact for consideration of such an expansion.

The approval also relies on a questionable assumption of increasing demand for sprawl housing in these surrounding areas outside the City of Waukesha. Numerous studies suggest sprawl is decelerating, and in any case, sprawl economics is environmentally unsustainable. Strictly and properly considering only the City, it is difficult to make the case for the demand for this water. The City of Waukesha has other opportunities, including conservation measures, which have been insufficiently explored.

In addition, the impacts of the proposed return of water to the Great Lakes watershed have not been sufficiently studied.

If ultimately approved, this proposal will set a strong precedent for future actions under the Compact. The DNR ought to use only the highest standards for approval. A weaker case will appropriately face strong scrutiny and criticism from the other parties to the Compact. This is too important a resource to be traded away based on incomplete research.

Sincerely,



Gerald Ottone

Hoekstra, Ashley N - DNR

From: Karen Ostrov <karen.ostrov@konectconsult.com>
Sent: Thursday, August 27, 2015 6:42 PM
To: DNR Waukesha Diversion App
Subject: Great Lakes water diversion

Hello DNR, I strongly oppose diverting water from the Great Lakes to the City of Waukesha.

Please oppose changing the law.

Karen Ostrov
Madison, WI

Sent from my iPhone

Hoekstra, Ashley N - DNR

From: Lynn Orlando <lmoh@yahoo.com>
Sent: Thursday, August 27, 2015 3:56 PM
To: DNR Waukesha Diversion App
Subject: Opposing water diversion

To the DNR:

I oppose the diversion of water to the City of Waukesha and its surrounding area. The amount of water they are asking for exceeds their current use. In addition Lake Michigan water is being sought out for surrounding areas that already have an adequate water supply.

Please seek other ways to filter the water Waukesha already has and to find nearer, more appropriate, sources from which to get water.

Thank you,

Lynn Orlando

715-630-7035

3821 Graceland Blvd.

Racine, WI

53405

lmoh@yahoo.com

Katharine H, Odell
1415 Vilas Ave.
Madison WI 53711

25 August 2015

Ashley Hoskstra
DNr Bureau of Drinking water and groundwater
Boc 8921
Madison WU 37707-7921

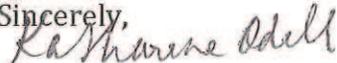
RECEIVED-DNR
AUG 28 2015
DRINKING WATER & GW

As a resident of the Great Lakes Basin, I strongly urge the Department of Natural Resources to examine the very carefully the city of Waukesha's application to divert water out of the Great Lakes basin for its personal use. Because they are located in a county that straddles the Great Lakes basin, Waukesha can legally request water, but only in extraordinary circumstances and as a last resort. As I understand from newspaper and water experts in WI, there are no extraordinary circumstances in Waukesha, warranting such a diversion of Great lakes water to the city. Such a diversion will set a set an unfortunate precedent for the entire Great Lakes region and weaken the 7/8 Sates Great Lakes Compact.

There are no extraordinary circumstances, for the following reasons:

- Waukesha has not demonstrated adequate water conservation efforts within its own boundaries.
- Waukesha has not shown an inadequate water supply for its residents. Existing deep groundwater wells have a sufficient and safe water supply for Waukesha.
- Waukesha had unnecessarily "added" an enlarged service area, i.e. neighboring communities not in Waukesha, as evidence for the need for a Great Lakes diversion. Residents in these communities use well water and not Waukesha municipal water.
- Treat groundwater radium pollution in deep wells, as other Wisconsin communities have done.

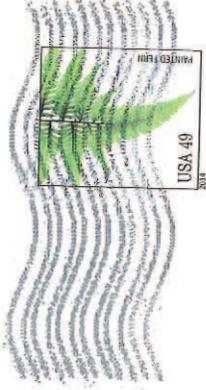
I understand that a diversion would be welcomed by city residents, as the easiest way to ease their water problems. However, Waukesha's reliance on state planning laws to justify a request that has neither the best interest of its residents nor the Great Lakes region at heart is irresponsible at best. The Department of Natural Resources has no other option than to deny Waukesha's request.

Sincerely,

Katharine Odell

o lve

MILWAUKEE WI 531

SEP 20 10 30 AM '11



Ashley Hockstra
 DNR Bureau of Drinking Water and
 Groundwater
 Box 7921
 Madison WI 53707-7921

53707792121



Hoekstra, Ashley N - DNR

From: Pfeiffer, Shaili M - DNR
Sent: Wednesday, August 26, 2015 2:58 PM
To: DNR Waukesha Diversion App
Subject: FW: Waukesha - lake Michigan water

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Shaili Pfeiffer

Phone: [(608) 267-7630

Shaili.pfeiffer@wisconsin.gov

From: Anthony J Noll [<mailto:AJNoll@wi.rr.com>]
Sent: Sunday, August 23, 2015 8:34 AM
To: Pfeiffer, Shaili M - DNR
Subject: Waukesha - lake Michigan water

Shaili,

We current reside in Mount Pleasant, WI. Formerly we lived in Lake county, Mentor OH for 20+ years.

We happen to have a small creek that ran through our property. The creek was normally a trickle during non-rainy periods. It would fill the to the brim after a rain storm and return to a trickle within 24 - 36 hours. For the first 10 years we lived there the creek erosion could be measured in inches.

Then about 1/2 mile upstream from our property, a through street had flooding issues during medium to heavy rains. The city installed a larger drain under the road which elevated the flooding. The result downstream however was that for the next 10 years the creek erosion was measured in feet!!

Obviously, only in hindsight did the city realize the long term results of the seemingly small water flow change. There was no plan to mitigate the problem(s) long term. Increasing the water flow by millions of gallons of water could have a similar and catastrophic impact river and adjoining cities. If additional erosion occurs on root river, how will the cities along the entire water return route minimize the erosion, at what cost and more importantly, who will pay? Waukesha?

If the Waukesha application is to approved, perhaps an escrow account should be created to provide future funds to correct unforeseen issues. The fund would be a fee added to the water Waukesha residents and business pay for the water usage.

Currently Racine county requires very large upfront fees for businesses that build in the area. Is Waukesha paying a proportionally similar fee for the water expansion?

Our Greats are a precious resource that should used judiciously to guarantee its longevity.

Regards,

Anthony J Noll

8119 Daub Ct.
Mt. Pleasant, WI 53406-2149
Ph: 440.478.1493



This email has been checked for viruses by Avast antivirus software.
www.avast.com

Hoekstra, Ashley N - DNR

From: Mary Nelson <mary2605@centurytel.net>
Sent: Thursday, August 27, 2015 8:22 AM
To: DNR Waukesha Diversion App
Subject: opposition to Waukesha Water Diversion proposal

Dear Ms Hoekstra:

I am in opposition to Waukesha's plan to divert water from Lake Michigan to supply their and their neighbors water needs.

Water is a precious and finite resource. Water usage needs to be protected and conservation measures such as those being applied in California need to be instituted.

I support the Great Lakes Compact that sets rules for the withdrawal of water from the lakes, and gives bordering communities a say in any decisions to divert water to areas outside the Great Lakes basin.

Mary Nelson
2605 Baumgartner Dr
La Crosse, WI 54603

Hoekstra, Ashley N - DNR

From: James Nelson <nelsonj161@mail.gtc.edu>
Sent: Monday, August 17, 2015 4:55 PM
To: DNR Waukesha Diversion App
Subject: Stormwater Regulations and Excessive Use

Hello Ashley Hoekstra,

In regards to the city of Waukesha's plans to divert water from Lake Michigan, I am curious about a few things. As stated in the proposal and by the Great Lakes Compact all diverted water(or equivalent amounts?) must be returned to the Great Lakes.

How will 100% be accounted for?

Will there be regulations set in place to prevent businesses from exporting water as bottled water?

Will there be guidelines set in place to control excessive use of water by property owners in the use of sprinklers, pools, outdoor fountains, etc..?

Will use of water for farming and other agriculture be monitored?

The plans call for the treated waste water to be returned, will any of the stormwater system be diverted as well?

I am very curious about this project and am hoping this can be a feasible and an effective way to solve multiple solutions using proper guidelines in accordance to the Great Lakes Compact for future issues that will arise.

Sincerely,

James Nelson