

May 9, 2016

VIA EMAIL ONLY

Secretariat Staff

Great Lakes-St. Lawrence River Water Resources Regional Body

Great Lakes-St. Lawrence River Basin Water Resources Council

20 N. Wacker Drive, Suite 2700

Chicago IL 60606

Re: Further information for the record concerning the City of Waukesha Diversion Application and the Regional Body's April 27 and May 4 Draft Proposed Declarations of Findings

Dear Distinguished Members of the Great Lakes–St. Lawrence River Basin Water Resources Regional Body and Compact Council:

Thank you for your deliberations on the precedent-setting diversion application from the City of Wisconsin by way of your (and our) colleagues at the Wisconsin Department of Natural Resources.

Our review of the May 4 iteration of the draft declaration of findings did not alter in any significant manner the points of concern documented in the letter dated April 29th from a broader group of organizations including the undersigned. Thus, we continue to urge the Regional Body and Compact Council to request that Wisconsin's Department of Natural Resources provide an updated evaluation of potential reasonable water supply alternatives before this process moves any further forward.

Our coalition reiterates that reasonable alternatives to a diversion exist for Waukesha, a position not only substantiated by the robust technical analysis completed by GZA GeoEnvironmental but reinforced by the reduction in the proposed diversion volume under consideration by the Regional Body. Only through a **new** updated needs/alternatives analysis can the Regional Body and Compact Council be assured that the scaled down diversion volume in question meets the Compact and Agreement's threshold requirements on need and lack of reasonable water supply alternatives.

Accordingly, we ask that the Regional Body and Compact Council make it a priority to secure an updated needs analysis, reliant on best available information, before proceeding any further with decision-making on the instant precedent-setting diversion request. In an effort to facilitate this evaluation, we attach hereto, and enter into the record accordingly, the May 9, 2016 memo prepared by GZA GeoEnvironmental, which answers 6 critical points germane to the Regional Body's April 27 and May 4 revised declaration of findings and upholds GZA's conclusion in support of a Non-Diversion Solution.

Furthermore, we have attached a second document, which conveys Coalition members' analysis of remaining concerns relating to the proposed return flow of Waukesha's treated wastewater into the Great Lakes basin watershed via the Root River and Lake Michigan.

Mindful of the overarching value of the Great Lakes Compact's Precautionary Principle, it is our hope that these two documents will inform the Regional Body and Compact Council's understanding of the ongoing uncertainties existing with respect to hydrological connections between groundwater in the vicinity of Waukesha and the waters of the Great Lakes Basin and, therefore, the heightened importance of establishing Compact precedent in a manner conducted without haste and in reliance upon information that is as up-to-date and comprehensive as possible.

Thank you for your consideration.

Very Truly Yours,

Wisconsin Compact Implementation Coalition

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

*Clean Wisconsin
Midwest Environmental Advocates
Milwaukee Riverkeeper
Waukesha County Environmental Action League
Wisconsin Wildlife Federation
Peter McAvoy*