

WEAL's President, Steve Schmuki's Guest Opinion: "Waukesha's Water Wager Worrisome"

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Waukesha's water wager worrisome

Too many questions unanswered in Great Lakes proposal

By Steve Schmuki

If any lessons are to be taken from Peter Annin's book, "The Great Lakes Water Wars," it is that seemingly vast, inexhaustible water resources can indeed be depleted, the Great Lakes and precious groundwater resources among them. It is from this overarching shared natural resource framework that the Waukesha County Environmental Action League (WEAL) is unable to support the city of Waukesha's application for a Lake Michigan diversion. Sadly, here is why:

-- The draft application does not meet the Great Lakes Compact's diversion exception standard to exhaust all "reasonable water supply alternatives within [its own] basin ... including conservation of existing water supplies" as a condition of making application for an exemption to the Compact's ban on diversions;

-- Many of the 14 original alternatives were dismissed as "too expensive," "too political," or "not implementable" with little detail to support the conclusion. The application will have to do better to describe how costs were estimated, what assumptions were made, how each was analyzed, and how conclusions were reached. Furthermore, in eliminating 12 alternatives, the city relied on a water supply plan nearly a decade old. Much has changed in a decade. How is it possible to know that a Lake Michigan diversion is the least costly option without full cost breakdowns of each option? WEAL continues to ask the city to show its work in making projections and cost estimates (itemized, not totaled sums) in a side-by-side comparison of all options and combinations thereof.

-- The draft application does not adequately justify the need for the 18.5 million gallons per day that is being requested, an amount that is nearly three times the average daily amount now being used – 6.9 mgpd average daily use (page 2-1 of draft application).

-- The application fails to establish a need for the 18.5 mgpd. It's a long way between 10.9 mgpd maximum daily demand for the projected service area and 18.5 mgpd.

Due to many economic factors, projected population growth may never materialize.

According to the Southeastern Wisconsin Regional Planning Commission, "only 15 percent of the service area land is available for future new development." There are no guarantees that these lands will be developed at all, or that they won't remain in the townships with private wells and septic systems.

-- Water conservation lacks a future plan and details about implementation:

The application lists "Water Conservation and Protection Plan Goals." We would expect that while making a case to the Great Lakes governors of the exceptional nature of this plan, the plan would include a description of each plan component and how it accomplishes or progresses toward each goal, a prioritization of plan components with start dates and target dates for completion, quantifiable and measurable standards of success, an analysis of already implemented components, a conservation impact for each, an annual conservation plan budget including actual funds expended for years 2006 to 2009 and projections for 2010 and beyond for implementation.

Enumerating percentage decreases without supporting detail raises more questions about how these amounts were derived and what actual impact conservation contributed.

-- Transparency remains opaque:

WEAL was appreciative that the city committed to a transparent, "high-bar" application under the Great Lakes Compact. However, we're disappointed in the resulting process.

On March 18, the Waukesha Water Utility Commission voted to recommend a diversion application to the Common Council, eight days before the public comment period ended on March 26.

How could the public's comments be fairly considered, much less incorporated into the application? How can the Common Council vote on the WWU Commission recommendation without public comments incorporated into the application?

-- No urgent need:

Despite insistence that the Waukesha Common Council must decide immediately whether to submit an application to the Wisconsin Department of Natural Resources, there is no urgency to submitting an application right this minute. In fact, there is good reason to wait.

Douglas Cherkauer, Ph.D., hydrogeology, is in the process of completing research and analysis of a riverbank infiltration study on the Fox River to investigate whether a significant part of Waukesha's daily need could be provided via the river and recycling of water. He expects to have results in two to three months.

There is plenty of radium-compliant water to meet Waukesha's current need.

Full, detailed costs have not been released. Full vetting of all alternatives is not complete.

Throughout, the diversion application describes Lake Michigan as the most "sustainable" water source. WEAL challenges the city and county of Waukesha to seek true sustainability: to live within its existing natural resource base. The city and county are not without water resources, as are many other U.S. communities. Both the city and county can demonstrate true leadership by researching and using best practices of other communities, utilizing new technologies and innovative planning and operating from the principle that all resources are finite.

(Steve Schmuki is president of the Waukesha County Environmental Action League. WEAL is a 30-plus-year-old grassroots environmental organization whose mission it is to protect and preserve the natural

resources of Waukesha County.)