



**LAKEHEAD REGION**  
CONSERVATION AUTHORITY

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March 1, 2016

VIA EMAIL: [comments@waukeshadiversion.org](mailto:comments@waukeshadiversion.org)

Waukesha Diversion Comments

c/o Conference of Great Lakes and St. Lawrence Governors and Premiers  
20 N. Wacker Drive  
Suite 2700  
Chicago, Illinois  
60606

Re: City of Waukesha Diversion Application

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The Lakehead Region Conservation Authority (LRCA) is one of 36 Conservation Authorities located in Ontario, and one of two located on Lake Superior. Conservation Authorities in Ontario are mandated to ensure the conservation, restoration and responsible management of Ontario's water, land and natural habitats through programs that balance human, environmental and economic needs. Conservation Authorities also administer the Drinking Water Source Protection program on behalf of the Ontario Ministry of Environment and Climate Change, and therefore have a vested interest in the protection (i.e. quality and quantity) of drinking water at its source.

It is understood that the Great Lakes-St. Lawrence River Water Resources Regional Body and Great Lakes-St. Lawrence River Basin Water Resources Council are conducting Regional Review of a proposal from the City of Waukesha, Wisconsin, which would divert water outside the Great Lakes Basin to a county that straddles the Basin. The City of Waukesha, has applied for an exception to the Agreement, as out of Basin diversions are prohibited, without approval of an exception. The proposal would allow the diversion of 38.2 million litres per day of water from Lake Michigan, via the City of Oak Creek Water Utility to the City of Waukesha, which is located outside the Great Lakes Basin. The City is seeking an alternative source of drinking water as their current municipal groundwater supply contains levels of radium above drinking water standards.

As a Conservation Authority located on one of the Great Lakes, the Waukesha Diversion proposal, if approved, presents a great concern to the Board of the LRCA as a potentially precedent setting water diversion from the Great Lakes Basin.

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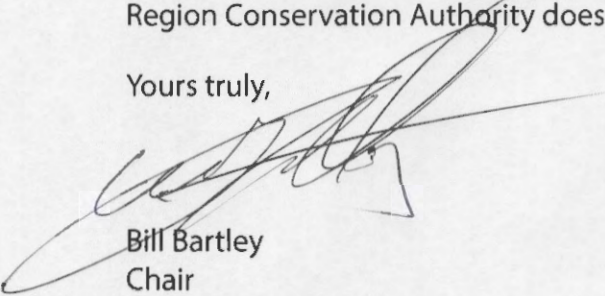
[www.lakeheadca.com](http://www.lakeheadca.com)

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Careful consideration must be given to the potential impact to the integrity of the Great Lakes Basin ecosystem, and the cumulative impacts if this sets a precedent that results in the approval of future additional diversions outside the Basin. Due to the uncertainty associated with climate change, and potential significant changes to levels and flows on the Great Lakes, the impacts associated with this type of proposal cannot be quantified. The Straddling County Exception – Article 201(3) should be examined extensively to ensure that the proposal in fact meets all conditions. In particular, confirming that a reasonable water supply alternative within the basin in which the community is located does not exist, as a water supply within the same basin is the preferred option.

Due to the potential significant negative impacts to Great Lakes Basin, the Lakehead Region Conservation Authority does not support this application.

Yours truly,



Bill Bartley  
Chair

c.c.: LRCA Member Municipalities  
Conservation Ontario  
All Conservation Authorities