



August 5, 2025

The Honorable Shawn Reilly
201 Delafield Street
Waukesha WI 53188

Subject: 2025 Documentation of Reporting Requirements for City of Waukesha Diversion Approval

Dear Mayor Reilly:

On February 28, 2025, the Department of Natural Resources (DNR) received the City of Waukesha's (City) annual report (Report) related to the City's approval for a diversion of Great Lakes water. The DNR's June 2021 diversion approval requires the City to submit annual reporting information to the DNR by March 1 of the following year. The following is a summary table of the information provided in the City's diversion report for reporting year 2024.

Lake Michigan Diversion	1,844,782,000 gallons
Treated Wastewater Discharge to Root River	1,943,510,000 gallons
Water volume returned to Lake Michigan compared to diversion	105.4% (98,728,000 gallons more water returned than diverted)
Residential per capita water use per day	44 gallons per person per day
Ratio of maximum day water demand to average day water demand	1.54
Non-revenue water	11%
Consumptive Use (domestic, distribution system losses, incorporation into products)	16%

Below, the DNR approval reporting requirements are in *italics*, followed with a summary of our review of the City's annual report.

- The City shall summarize that the diversion was implemented consistent with the requirements of the Council Decision. The total amount of water purchased daily, monthly, and annually from the City of Milwaukee, including the location(s) of the water meter used to determine the amount of water purchased.*
See section A and B of the Report. The City purchased a total of 1,844,782,000 gallons from the City of Milwaukee in 2024 (5.05 million gallons per day).
- The total amount of water sold monthly to each category of customer within the approved diversion area.*
The City sold a total of 1,648,585,700 gallons of water in 2024 (4.52 million gallons per day). See section C of the Report.
- The daily, monthly, and annual volume of treated wastewater discharge returned to the Root River and the daily, monthly, and annual volume of treated wastewater discharge returned to the Fox River.* In 2024, the City discharged 1,943,510,000 gallons of treated wastewater to the Root River and the City discharged 1,455,627,000 gallons of treated wastewater to the Fox River. See section D of the Report for details on treated wastewater discharge.

4. *The total consumptive use as defined in Wis. Stat. §281.346(1)(e).*
The City reports returning 105.4% of the volume of water diverted from Lake Michigan in 2024. The City returned 98,728,000 more gallons of water to Lake Michigan than they purchased and diverted from the City of Milwaukee. The City's wastewater treatment plant has additional water from infiltration and inflow (from the Mississippi River Basin) into the sewer system that provides the source for additional water available to discharge to the Root River. The City's total 2024 consumptive use was 286,897,001 gallons or 15.6% of the water purchased from the City of Milwaukee, using the Winter Base-Rate Method, plus system water loss and reported consumptive use from industry. See section E of the Report for details on consumptive use.
5. *Water use intensity metrics.*
See summary table and section F of the Report for calculations for residential per capita water use, average day water use per residential equivalent units, and maximum day demand.
6. *A summary of the impacts of the implementation of conservation and efficiency measures.* The City provided a summary of the impact of water conservation and efficiency measures, see section F of the Report.
7. *A description of any additional conservation and efficiency measures implemented.*
See section G of the Report. The City's program for water softener removal started in January 2025.
8. *A statement verifying that no customers outside of the diversion area were sold Lake Michigan water.*
See section H of the Report.
9. *A spatially explicit description of the properties served by the City's water utility, in the manner prescribed by the DNR.* See Appendix D, the City provided a map of the properties served by the City's water utility, in 2025. The City provided a GIS data layer of the properties served by the City's water utility on April 3, 2025. The DNR reviewed the GIS data layer against the approved diversion area, all properties included in the GIS layer are located within the diversion area.
10. *A report of any City wells filled and sealed or changed to emergency use status in the past year. A description of deep aquifer groundwater wells maintained for emergency use, as allowed under Wis. Admin. Code § NR 810.22, and use of these wells in the previous year.*
Appendix E includes a letter from WDNR with conditions that all wells be placed in emergency well status and operated only with in accordance with NR 810.22.
11. *A summary of the implementation of the pharmaceutical and personal care products recycling and reduction program in the past year.*
Appendix F provide a report on the implementation of the City's pharmaceutical and personal care products reduction program in 2024.
12. *For at least 10 years after the date the diversion begins, the City shall annually report the results of Root River monitoring to DNR. The report shall include a summary of the monitoring results and a summary of any impacts to the Root River from the City's wastewater discharge.*
Appendix G provides a report on the City's monitoring program comparing October 2023 – September 2024 data to the pre-diversion monitoring including information on stream flow, water quality, fish, habitat and macroinvertebrates. The City has uploaded water quality data for the reporting period to SWIMS.
13. *A statement of compliance with all applicable federal and state permits and approvals.*

The City provided a statement that it has complied with all applicable federal and state approvals.

Thank you for submitting the required diversion reporting in compliance with your diversion approval. In addition to the reporting requirements above, the City has also submitted documentation demonstrating compliance with Tier 3 water conservation as required by section 6 of the Approval and ch. NR 852, Wis. Admin. Code. The information provided in the Report appears to meet the annual reporting requirements. The City's 2025 Annual Report is to be submitted to the DNR by March 1, 2026.

Please contact Shaili Pfeiffer, Shaili.pfeiffer@wisconsin.gov, (608) 219-2216, with any questions regarding your annual reporting.

Sincerely,

A handwritten signature in cursive script, appearing to read "Adam Freihoefer".

Adam Freihoefer
Manager, Water Use Section
Bureau of Drinking Water and Groundwater

cc.

Kelly Zylstra, Interim Acting General Manager and Operations Manager, Waukesha Water Utility, (email only)
Dan Duchniak, Waukesha Water Utility, (email only)
Laura Fay, PSC (email only)
Shaili Pfeiffer, Natural Resources Specialist, DNR (email only)
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