



July 20, 2026

The Honorable Alicia Halvensleben
201 Delafield Street
Waukesha WI 53188

Subject: 2026 Documentation of Reporting Requirements for City of Waukesha Diversion Approval

Dear Mayor Halvensleben:

On February 26, 2026, 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 2025.

Lake Michigan Diversion	2,007,522,980 gallons
Treated Wastewater Discharge to Root River	1,858,005,000 gallons
Water volume returned to Lake Michigan compared to diversion	92.6%*
Residential per capita water use per day	42 gallons per person per day
Ratio of maximum day water demand to average day water demand	1.42
Water loss	11%
Consumptive Use (domestic, distribution system losses, incorporation into products)	16.9%

* The volume returned is less than volume diverted because the daily return flow volume is based on the previous year's annual average diversion. The annual average diversion in 2024 was 5.04 MGD and the City returned 100.9% of this volume in 2025. The City is meeting approval conditions related to return flow volume. In comparison the City diverted an annual average of 5.50 MGD in 2025. The 2026 daily return flow volume is based on the 2025 diversion volume.

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 2,007,522,980 gallons from the City of Milwaukee in 2025 (5.50 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 1,621,155,900 gallons of water in 2025 (4.44 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 2025, the City discharged 1,858,005,000 gallons of treated wastewater to the Root River and the City discharged 1,102,781,000 gallons of treated wastewater to the Fox River. The City returned less than the daily required

volume on three days in 2025 due to a pump programming issue, investigating a potential leak, and equipment removal at the reaeration building. 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 92.6% of the volume of water diverted from Lake Michigan in 2025. 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 2025 consumptive use was 339,956,617 gallons or 16.9% 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. In 2025 1,902 water softener removal rebates were issued. The City is considering offering rebates for washing machine and ice makers.
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 C, the City provided a map of the properties served by the City's water utility and a GIS data layer of the properties served by the City's water utility in 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 D includes a letter from WDNR with conditions that all wells be placed in emergency well status and operated only within 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 E provides a report on the implementation of the City's pharmaceutical and personal care products reduction program in 2025.
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 F provides a report on the City's monitoring program comparing October 2024 – September 2025 data to the post-diversion period and the pre-diversion period 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 2026 Annual Report is to be submitted to the DNR by March 1, 2027.

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, Operations Manager, Waukesha Water Utility, (email only)
Angela James, PSC (email only)
Shaili Pfeiffer, Natural Resources Specialist, DNR (email only)
Steve Elmore, Drinking Water and Groundwater Bureau Director, DNR (email only)
Joe van Rossum, Deputy Division Administrator, DNR (email only)