

# GREAT LAKES UNITED

May 17, 1996

An international coalition to conserve and protect the  
Great Lakes/St. Lawrence River ecosystem

Mr. Bill Tans  
Wisconsin Department of Natural Resources  
Mining Project Manager  
Box 7921  
101 South Webster Street,  
Madison, Wisconsin  
53707

Dear Mr. Tans,

## Wastewater Pipeline from the Exxon and Rio Algom Proposed Crandon Mine


Great Lakes United (GLU) is an international coalition formed in 1982 to conserve and protect the Great Lakes-St. Lawrence River Ecosystem. Our diverse membership includes individuals as well as conservation, environmental, native and tribal, municipal, sports and recreational, and educational groups. One of our coalition's goals is to have a sustainable water conservation program implemented in the Great Lakes to prevent damaging withdrawals and diversions which threaten the integrity of the ecosystem and its viability for generations to come. We feel that the pipeline proposal before you tonight has long term impacts, not only locally, but for the Great Lakes ecosystem, and potentially for North America. We hope that you will act on our recommendations. Please circulate this letter at your hearing, May 20, 1996.

The sustainability of the Great Lakes ecosystem depends on the protection of all of its waters making up its watershed, including its groundwater aquifers, and tributaries. Great Lakes United is very concerned about the numerous ways in which the Exxon and Rio Algom mining proposal could degrade the quality of the waters near and downstream from the Crandon site. We share the concerns voiced by the Sokaogen Chippewa Council about the water quality impacts of the proposed operation and its socio-economic and cultural impacts on nearby local communities. However, we are limiting our comments to the water quantity implications of this proposal.

For the past year, Great Lakes United's Sustainable Water Resources Taskforce has been researching water use problems brewing in the Great Lakes and North America for a report which we will be releasing soon. Our research has found that, contrary to popular beliefs and behavior, the water resources of the Great Lakes are not unlimited. 99% of the waters of the Great Lakes watershed were created by glacial melt and are not renewable. This means that future proposals for both large and small withdrawals, have the potential to cumulate to seriously affect the health and well-being of all creatures and economies dependent on stability of the system. Our research found that diverse and increasing pressures are going to result in increasing conflicts among users within and from outside the Basin. Climate change, global trade, continental groundwater depletion, continuing water pollution, population growth, and economic pressures are beginning to seriously threaten our ability to manage our water resources sustainability.

In the spirit of ecosystem management, protective measures have been put in place to prevent damaging withdrawals and diversions from the Great Lakes watershed and to encourage involvement of all governments that share the waters to scrutinize these proposals. It is our opinion that this pipeline should be considered a diversion and should be subject to the provisions of The Water Resources Development Act of 1986 and to the Great Lakes Charter. The pipeline will be transporting large volumes of ground water pumped at the mining site within the Great Lakes Basin to be discharged into the Wisconsin River within the Mississippi watershed for a period up to thirty years.

The Water Resources Development Act of 1986 prohibits "any diversion of Great Lakes water by any State, Federal agency or private entity for use outside the Great Lakes basin unless such diversion is approved by the Governor of each of the Great Lakes States". We ask that your Department of Natural Resources and



Governor Tommy Thompson act in good faith and bring this pipeline proposal to the attention of the Council of Great Lakes Governors at their next meeting scheduled for early summer. We also ask that the approval process for this pipeline diversion not proceed until written responses are received from each Great Lakes governor.

The Canadian Premiers should also be consulted about this proposal. As signatories with the Great Lakes States of the 1985 Great Lakes Charter they have the expectation of prior notice and consultation for any withdrawal application or consumptive use of volumes that exceed 5,000,000 gallons per day average in any 30-day period. While estimates for this project are now being sited as 1,000,000 a day, its duration will likely be of concern. Increasingly, jurisdictions are recognizing that the cumulative impacts of many medium sized withdrawals could have a cumulative impact similar to larger proposals and concern has been widely voiced in Canada and the US that the rules need revision. A recent editorial in the Ann Arbor News (03/08/96) entitled "Region's governors must keep diversion to a minimum" states that the Council of Great Lakes Governors is in the process of revising rules for allocation of water. Recently close neighbours of the Great Lakes are looking for new supplies of water from the Basin in order to supply suburban sprawl just outside the boundaries of the watershed.

One of the greatest concerns about this pipeline proposal is its linking of the Great Lakes watershed with the Mississippi watershed. The precedent of creating another linkage similar to the continually controversial Chicago Diversion between watersheds will be highly contentious. It is widely accepted that the US and Mexico are facing future water crises in the future. The Worldwatch Institute's State of the World 1996 reports that serious groundwater overdrafts are occurring now in the US High Plains, Southwest and California as well as in Mexico. Any new infrastructure that could facilitate water transfers out of the Great Lakes into the Mississippi River to these arid areas is politically controversial to Great Lakes jurisdictions. Because of this precedent we ask that you and Governor Thompson refer this proposal to the Water Resources Management Committee set up by the Great Lakes Charter as well as by the International Joint Commission.

We object in principle to the notion inherent in this proposal that the Great Lakes Region export its wastewaters to another watershed. If this mine is considered to be too polluting to discharge into the Wolf River and the Great Lakes watershed, then it should not proceed. This pipeline discharge has the potential to degrade the Mississippi River and is not a sustainable or viable option for any ecosystem.

For these reasons we urge you and Governor Thompson to not grant approvals for the Exxon and Rio Algom Crandon Mine.

Yours truly,  
Great Lakes United

*Sarah Miller*

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Great Lakes Water Resources Management Committee