

MMAC Testimony: Clean Air Mercury Rule

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I'd like to thank the Department of Natural Resources for their hard work and attention to the serious matter before us. I'd also like to compliment the department on its willingness to keep stakeholders in this rule so well informed and involved during the rulemaking process. Finally, I want to express my special appreciation for you traveling here to Milwaukee today to invite input on this important rule.

The Metropolitan Milwaukee Association of Commerce (MMAC) represents over 2000 member businesses employing over 350,000 individuals in Milwaukee, Waukesha, Ozaukee and Washington Counties. Every two years, our organization works with its board and its membership to identify public policy priorities we believe are critical to creating a strong economy in our region and in our state as a whole. This strategic planning process culminates in the biennial publication of our "*Blueprint for Economic Prosperity*."

One of the five basic goals articulated in the current *Blueprint* is creation of. "A tax and regulatory environment that positions Wisconsin competitively for growth." To meet that goal, our *Blueprint* further states, "It is imperative that state regulations are consistent with federal standards to avoid making Wisconsin a 'regulatory island.'"

Consistent with those priorities, we believe that Wisconsin should adopt the federal Clean Air Mercury Rule and resist any attempts to add additional state-specific regulations or mandates to this rule. We hold this position for two fundamental reasons:

First, adoption of the federal standard is more logically consistent with the nature of mercury in the environment. Mercury emissions do not recognize or respect state lines when polluting our environment. To pretend that placing different standards for Mercury emissions on Wisconsin utilities and businesses would have any significant effect on actual environmental quality is to ignore the very nature of the pollutant and its transmission and transport in the environment.

Second, given the global nature of mercury pollution noted above, the ultimate environmental impact of a Wisconsin regulatory standard that exceeds the federal standard would be higher utility rates and a less competitive economic environment, not a cleaner natural environment. In today's global marketplace, Wisconsin is forced to compete every day for jobs, workers, and economic development. Creating a regulatory burden in our state that exceeds the federal standard places us on the wrong side of an unlevel playing field in an increasingly competitive economic landscape.

Thank you again for your willingness to entertain our comments on this rule. We urge you to resist efforts that would make Wisconsin a regulatory island on this issue and instead the promptly approve state implementation of the federal Clean Air Mercury Rule.