

Wisconsin Wildlife Federation

May 15, 2007

Good afternoon:

My name is Jerry Knuth, Past President and current Board member of the Wisconsin Wildlife Federation. I am from Plover, Wisconsin. Thank you very much for the opportunity to testify today on behalf of the Federation in favor of stronger DNR mercury emission regulations. The Federation is the largest conservation organization in the state representing 155 hunting, fishing, trapping and forestry-related groups who have a membership in excess of 100,000 citizens conservationists.

Mercury emission reductions are critically important to our members. Our members are the hunters, anglers and trappers that consume the fish and wildlife that contain the mercury that is emitted and then returns to our lakes, streams and land and becomes embedded in the food chain of fish and wildlife. Every lake and stream in this state contains a mercury contaminant advisory recommending that we stringently limit the amount of fish that we should eat from our lakes and streams. The limits are especially restrictive for children and women of reproductive age. We are greatly concerned about the health of our families and believe that it should be beyond debate in this state that stringent mercury emission reductions standards be adopted.

Wisconsin hunters, anglers and trappers pay well in excess of \$70 million dollars a year in hunting, fishing and trapping license fees and stamps to manage and protect fish and wildlife and their habitat. The State of Wisconsin and Wisconsin's utilities need to take aggressive measures to reduce mercury that is being emitted into the air and then falls into our lakes and streams and is then eaten by our fish and our children.

In 2000, the Federation was one of the initial groups that petitioned for strong mercury emission regulations for utility coal-fired boilers. At that time concerns were raised by state utilities and some legislators that the mercury reductions that we requested were not technically and economically feasible. In 2003, DNR adopted slightly less stringent regulations and therefore Wisconsin became the first Midwest state to adopt mercury emission reduction rules.

In 2003, the National and Wisconsin Wildlife Federation did a poll of Wisconsin hunters, anglers and trappers about proposals to reduce mercury emissions in the state. Seventy-two percent of those polled agreed that very stringent standards should be adopted by the end of the decade even if the cost of making such reductions would be expensive.

Last year, the Wisconsin Wildlife Federation joined several other conservation groups to file a second petition asking the DNR to strengthen the previously adopted mercury

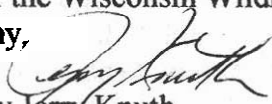
emission regulations. Since the DNR adopted the initial mercury rules in 2003, any remaining questions on technical and economic feasibility for stringent mercury regulations have been answered. The technology that would achieve the standards initially petitioned for has been installed and is operating on several utility coal-fired power plants.

We are specifically requesting that the current regulations be modified to request a 90% to 95% reduction of mercury emissions from coal-fired boilers by the year 2012. Illinois has adopted a rule requiring a 90% reduction across all of their utility coal-fired power plants by June 30, 2009 and a 90% reduction at each plant by December 31, 2012. Minnesota has passed a law requiring a 90% reduction by either 2009 or 2014, depending on the current technology on individual power plants. Michigan is currently developing regulations requiring a 90% reduction for all plants by 2015. The fact that these states and the many New England states that have adopted more stringent regulations is concrete proof that the standards that we are requesting are both technically and economically feasible.

The Wisconsin Wildlife Federation also asks that the State of Wisconsin join with the many other states that are not participating in the national interstate mercury emission trading program. While such emission trading programs make sense for certain pollutants such as SO₂ and carbon dioxide, they should not be used for the emissions of heavy metals such as mercury that has been shown to cause hotspot deposition areas. Wisconsin joining the interstate trading program would substantially delay the deadlines for reducing mercury emissions in this state.

In conclusion, it is of paramount importance to Wisconsin hunters, anglers and trappers to reduce mercury in our waters, fish and families. Please adopt the emission reductions and deadlines contained in the petition that has been submitted. Candidly, it is embarrassing to Wisconsin citizens to have the State of Illinois having stronger mercury reduction standards than the State of Wisconsin. We know that tens of thousands of Illinois citizens greatly appreciate Wisconsin's beautiful lakes and streams but in the end millions of Wisconsin citizens love Wisconsin's lakes and streams and want mercury contamination reduced.

On behalf of the Wisconsin Wildlife Federation, thank you for the opportunity to share this testimony,


Submitted by Jerry Knuth
Past President and Board Member
Wisconsin Wildlife Federation

May 17, 2007