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June 11, 2007

Secretary of the Department of Natural Resources, and  
The Natural Resources Board  
P.O. Box 7921  
Madison, Wisconsin 53707

Dear Secretary Hassett & members of the NR Board,

Thank you for giving the public the opportunity to testify and submit public comments regarding the state's mercury rules.

The Wisconsin DNR can be applauded for much of the work it has done regarding mercury pollution. As we increasingly understand the danger of mercury pollution in our environment and food supply, it is critical the DNR move forward with rules that utilize the best available technology to reduce mercury from coal-fired power plants.

Mercury is a potent neurotoxin that can affect the kidneys, heart, and nervous system. Exposure is especially dangerous for children, and women of childbearing age, although it can also be dangerous for adults. Exposure to mercury can cause attention and language deficits, impaired memory, and impaired visual and motor function in children. In adults, mercury exposure can adversely affect fertility and blood pressure regulation and contribute to heart-rate changes and cardiovascular disease. The main avenue of exposure to mercury is through eating fish. Mercury is released into the air from power plants or other industries, and it mixes with rain and snow to enter our lakes and rivers. Once there, much of this mercury is converted to an easily absorbable form by bacteria in the soil and sediment. Then, it works its way up the food chain, becoming more and more concentrated as it progresses, until it is ingested by humans in the form of recreationally or commercially caught fish. The largest source of mercury pollution in Wisconsin is coal-fired power plants, accounting for approximately 65 percent of mercury emissions in the state.

As you know, the Department of Natural Resources has issued a fish consumption advisory for every body of water in the state. This means that children and women of childbearing age are advised to limit their consumption of species like bass and

walleye to no more than one meal per month. They are advised to avoid some species, like muskies, altogether because of high levels of mercury contamination.

Wisconsinites should not have to worry about health risks when eating fish caught in our lakes and rivers. In 2005, the Department of Health and Family Services conducted a study of mercury levels in Wisconsin residents. They found that 13 percent of women had unsafe levels of mercury in their bloodstreams, enough to put a developing child at risk of learning disabilities and developmental disorders. We have to act now.

Technology already exists that would reduce mercury emissions from power plants by 90 percent or more. Wisconsin Environment is asking that you establish rules that will reduce mercury emissions from coal-fired power plants by 90 percent by 2012. Any rule that acts less quickly or requires a less stringent reduction will unnecessarily sacrifice the public health of Wisconsinites and our environment. Help us make sure that we get the best possible rule to ensure the safety and health of our children and to preserve Wisconsin's heritage of enjoying our lakes and rivers.

Best,

Dan Kohler

Director, Wisconsin Environment

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