



JEFFERSON COUNTY
WISCONSIN

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JEFFERSON COUNTY
HEALTH DEPARTMENT

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www.jeffersoncountywi.gov health@jeffersoncountywi.gov

Members of the Wisconsin State Legislature

Re: Policy Support Needed to Strengthen Avian Influenza Response, Protect Groundwater, and Reduce Public Health Risk

Dear Members of the Wisconsin Legislature,

On behalf of the Jefferson County Health Department and the Jefferson County Board of Health, I am requesting your urgent attention and support for targeted policy and regulatory changes to strengthen Wisconsin's response to Highly Pathogenic Avian Influenza (HPAI) and reduce agricultural, environmental, and public-health impacts for our residents.

In Jefferson County, the 2025 HPAI events required an immediate, large-scale local response that was costly for producers and counties and disruptive to nearby residents. The response involved the euthanizing of **3,572,032 birds** and the transport and management of extraordinary volumes of material: approximately **60,000 cubic yards** of carbon material were delivered to the compost site, and **1,042 truckloads** of mortality and manure were hauled for composting, supplemented by additional material that had already been staged on-site from a prior response. Operationally, the incident required the construction and management of windrows spanning approximately **19 acres** on a compost site of approximately **44 acres**. It also demanded at least **303 hours** of Health Department staff time alone, which does not account for the additional dozens of hours spent by County Administration, Sheriff's Office, Emergency Management, Land and Water Conservation, and other staff who monitored the situation under the coordination of the Health Department

As local health officials responsible for environmental health, communicable disease response, and emergency preparedness, we urge the Legislature to consider the following priorities to better protect communities across Wisconsin:



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1. Enable and Expand Access to Poultry Vaccination Programs (Commercial and Small-Flock)

Commercial and backyard poultry producers lack the ability and accessible ways for obtaining and administering avian influenza vaccine. Vaccination has the potential to reduce outbreak severity, decrease mass depopulation needs, and limit the scale of disposal activities. We encourage the Legislature to work with Department of Agriculture, Trade, and Consumer Protection (DATCP), U.S. Department of Agriculture (USDA), and local partners to:

- Request that USDA allow vaccines to be administered to commercial and small-flock poultry.
- Explore state-supported procurement or subsidized purchasing of poultry vaccines.
- Establish guidance for safe, effective vaccination for commercial and small-flock owners.
- Create statewide education/outreach resources to support effective vaccine implementation.

2. Review and Modernize Composting Regulations to Allow Safe Transport of Waste to Approved Disposal Sites

During recent HPAI events in Jefferson County, carcass-disposal options were limited to land adjacent to multiple private property owners, creating significant operational and environmental challenges as well as quality-of-life and health impacts. Current regulatory barriers restrict the transportation of infected poultry material to licensed landfills or other controlled disposal facilities, even in situations when these sites may be capable of handling the waste under proper biosecurity protocols.

To fully prepare for future outbreaks, the State should evaluate whether certain disposal options can be conducted under rigorous, monitored, and evidence-based standards.

We respectfully request that the Legislature:



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- Direct DATCP and Department of Natural Resources (DNR) to conduct a comprehensive review of regulations and response guidance related to carcass disposal and transport to approved landfill/disposal facilities.
- Develop clear criteria and thresholds for when off-site disposal is appropriate, including capacity, safeguards, and transport biosecurity.
- Provide flexibility for HPAI response authorities to select the lowest-risk disposal method available based on site conditions and evidence.

3. Evaluate Incineration Options as an Alternative to Whole-Flock Depopulation and On-Site Composting

Wisconsin currently lacks accessible, scalable, and permissible incineration options for large-scale animal disposal during outbreaks. If incineration is pursued as an option, it must include appropriate protections related to air quality, including particulate matter emissions (PM2.5).

We encourage the Legislature to:

- Assess feasibility and permitting for stationary or mobile incineration, including best-available emissions controls and technology options that minimize particulate emissions.
- Support pilot projects on regionalized disposal capacity, paired with transparent air monitoring, to evaluate environmental and public-health impacts.
- Identify state-level funding or cost-sharing opportunities so local governments are not left with unfunded response infrastructure.



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4. Strengthen Protections for Groundwater and Drinking Water Wells

Jefferson County and many rural Wisconsin communities rely heavily on private wells and groundwater systems. Large-scale composting and disposal activities can pose increased risk in areas with shallow aquifers, permeable soils, or specific geologic vulnerabilities such as fractured bedrock.

To better protect residents statewide, we recommend the Legislature:

- Support expanded groundwater monitoring and sampling near composting or disposal sites, including guidance on constituents and wells to be included in sampling, and contingency funding for DATCP, DNR, Department of Health Services (DHS), etc.
- Require that Confined Animal Feeding Operations submit emergency response plans to the DNR and that they include pre-identified disposal/compost locations and a site risk assessment completed in advance, with the assessment on file with DNR (and, if feasible, county emergency management) so suitability can be confirmed quickly based on current conditions (e.g., frozen ground, heavy precipitation). Risk assessments should include at a minimum soil assessment, depth to groundwater, regional groundwater flow direction, distance to surface water, distance to drinking water wells, distance from facility, and other considerations.
- Provide funding to assist counties with water testing, environmental surveillance, law enforcement involvement, and public communication during outbreaks.

Wisconsin families should not bear any long-term environmental consequences of emergency disposal decisions made under outbreak conditions, especially when planning requirements can help prevent higher-risk site selection.

The Jefferson County Health Department is committed to protecting the health of our residents and supporting Wisconsin's agricultural sector. However, counties cannot adequately address these challenges alone. A modernized, flexible, and science-based statewide approach is



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essential to ensuring that Wisconsin is prepared for future avian influenza events. We respectfully request your consideration of these priorities.

I would welcome the opportunity to provide additional information, share local observations, or discuss policy solutions in greater detail. Thank you for your attention to this urgent public-health and environmental concern.

Sincerely,

Elizabeth M. McGeary, RN, MSN, CBE-MC
Health Officer/Director, Jefferson County Health Department
On behalf of the Jefferson County Board of Health