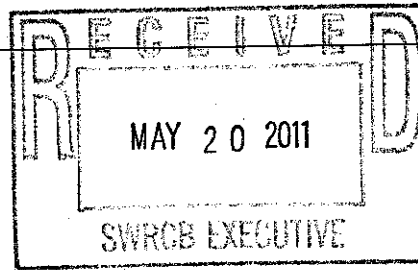




# Southeast Asian Assistance Center

May 20, 2011

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA 95812-2000



Dear Ms Townsend and Members of the Water Resources Control Board:

Thank you for the opportunity to submit comments on the proposed approval of amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Basin Plan) to include a program for the control of methylmercury and total mercury in the Sacramento-San Joaquin Delta Estuary.

Regarding the Chapter IV – Implementation amendment: In April 2008 our agency submitted comments both at the Public Hearing and in writing, regarding two issues: 1) that our research with the Sacramento area Southeast Asian communities, conducted in collaboration with UC Davis Environmental Science and Policy Department, demonstrated that many households are consuming fish once per day rather than once per week. This research has been done and has been published (by Dr. Fraser Shilling), and 2) it is disappointing to find that the Delta Mercury Control plan will only modify its protective standards after another 8 year research period, the duration of Phase 1 Implementation. We feel that this is overly cautious and conservative, and is based more on the concerns of cost and difficulty of implementation, rather than public health priorities. In the next 8 years, how many pregnant women and young children will be exposed to toxic levels of mercury by eating contaminated fish, and what is an acceptable number? As the economy continues to decline - and as you know the local area suffers the highest rate of unemployment statewide - more families will participate in subsistence fishing, not fewer.

It is amazing to me that under the Basin Plan, dischargers will be able to design and implement their own mercury reduction plans, and will have 4 years to evaluate their impact. The communities that our agency represents would prefer that the Delta Mercury Control Plan would adopt an a more regulated approach that would combine research with reduction methods that will result in measurable decrease in levels of all forms of mercury in water as well as fish tissue, within the Phase I implementation period. The inclusion of upstream mitigation is also welcome, especially with increased runoff in recent years that is draining the legacy mining areas. Public reporting of these actions and their results will continue to inform and engage affected communities in this process.

Sincerely,

Laura Leonelli  
Executive Director