

March 23, 2010
Mike Thornton
The Sierra Fund

Hi All:

While I understand that it has already (and I think prematurely) been decided that abandoned mines and mercury are NOT going to be addressed as part of the process I am a bit disturbed by this statement from the meeting notes;

"Mercury and abandoned mines: Mine discharges are considered 'point source' so will not be dealt with as part of the plan. There is a separate program that deals with abandoned mines".

After talking with The Sierra Fund Science Director, Carrie Monohan Ph.D she helped me to draft the following explanation.

Mercury that was used during hydraulic mining is not solely a "mine discharge" issue, in fact the majority of ongoing mercury contamination is from mining debris entrained in river gravels. Furthermore mercury should not be considered a "point source" of pollution for two additional reasons.

First and foremost is that the deposition of hydraulic mining debris is spread over entire watersheds and continues to erode and be washed downstream with storm events and through other erosional processes.

Second, the fate and transport of mercury from hydraulic mining deposits to downstream reaches is a pervasive problem that contaminates the entire aquatic foodchain and can't be traced back to a single source.

A recent investigation at the Humbug Creek confluence by USGS and BLM is an example of an area where BLM land contained hydraulic mining debris deposits which are contaminating many miles of downstream habitat in the South Yuba River with mercury. This area will likely be the focal point of BLM led remediation efforts to reduce mercury contamination to downstream reaches. The remediation will likely include bank stability and set backs to reduce erosion based on evolving best management practices.

The US Forest Service as the largest public landowner in California has a unique opportunity and responsibility to address this important and pervasive source of water quality impairment, thereby becoming a leader in addressing California's longest running environmental problem "Mining's Toxic Legacy"

Sincerely:

Mike Thornton
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