

## **Rangi, Aparjeet@Waterboards**

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**From:** Lynne Harkins <L.Harkins@charter.net>  
**Sent:** Tuesday, June 30, 2015 4:58 PM  
**To:** gwquality.funding  
**Subject:** Comments on scoping questions

To All Whom It May Concern:

Thank you for this opportunity to comment on the scoping questions for the application for funds from SB 445 Site Clean-Up Subaccount.

Simply stated, there's abundant evidence that the clean-up of mercury in all its forms needs to be given the highest priority in addressing remediation of contamination of the State's waters. That's especially true if, as this application requires, a site has already been subject to some Waterboard evaluation and has an Order which has not been acted upon; leaving mercury to continue to degrade water quality in a watershed. The potential for bioavailability of mercury; its capacity for biomagnification and bioaccumulation make it a threat to all living things. We ignore the threat of this potent neurotoxin at our peril.

Additional factors which would give weight to a mercury clean-up project application:

Beneficial uses?

Drinking water? Recreational? Thru any State Park property? ESHA? Federally designated habitat for special status species?

Any remediation? How long has addressing this situation been deferred?

Is there evidence of mercury contamination beyond the area of original focus?

Has there been disturbance of legacy deposits?

Does watershed terminate in area of the coast where State Waterboard testing of sportfish tissue sampling (2009/2010) has shown the highest levels of methylmercury?

What research since the time of original WB Order supports or adds urgency to need for clean-up?

Can a present day site characterization be conducted and folded into planning/execution of clean-up by isolating or removal of source of mercury contamination.

Applicants for SCAP funding should not be hamstrung by requirements to investigate the financial status of landowners...most especially

not when dealing with moving toward remedying a longtime situation involving mercury toxicity.

After basic written requests by SCAP applicants to owners of areas that have needed clean-up about whether or not they/the owners have resources to contribute to the clean-up, the written response or lack thereof by owners should suffice to meet this requirement in the application process. With what we have learned/are learning about the toxicity of mercury, the great short and long term benefits of removing any source of mercury pollution from a watershed that supplies drinking water to a community and valuable habitat is a fully justifiable use of public funds in the light of any other considerations.

Thank you for your attention.

Lynne Harkins