



Proposed TMDL for Mercury in the Sacramento San Joaquin River Delta

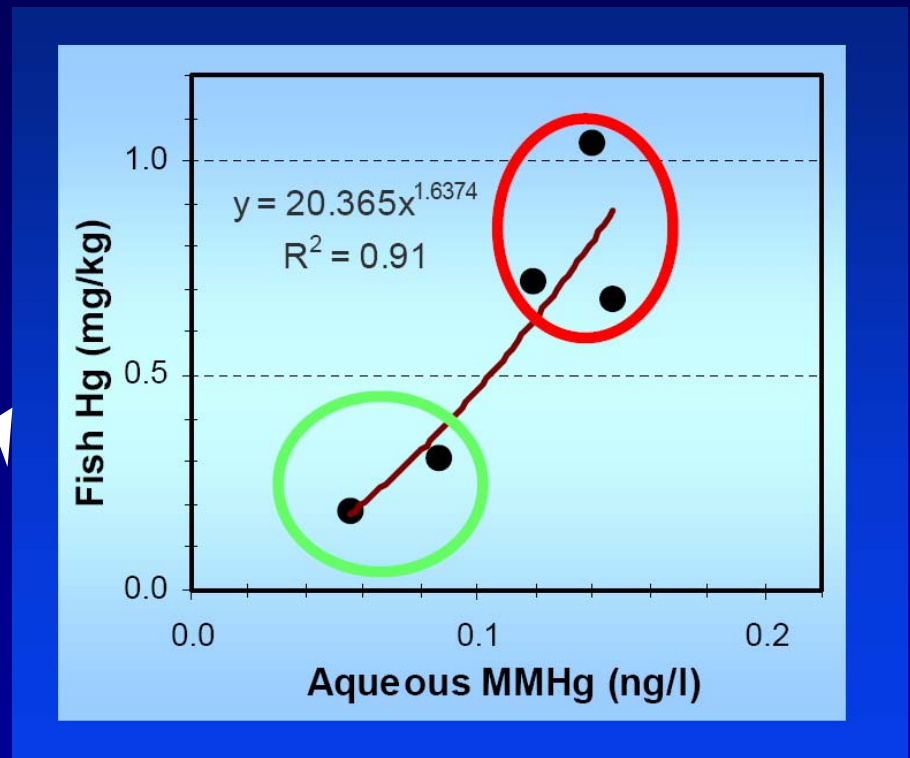
Technical Issues - Policy Consequences

Summary of technical issues

- The report has fatal flaws:
 - Confuses correlation with causation
 - Ignores significant watershed mercury sources
- Consequences of fatal flaws
 - Misleads people about expected outcomes
 - Diverts attention from urgently needed action

Fatal flaw #1: Report confuses correlation with causation

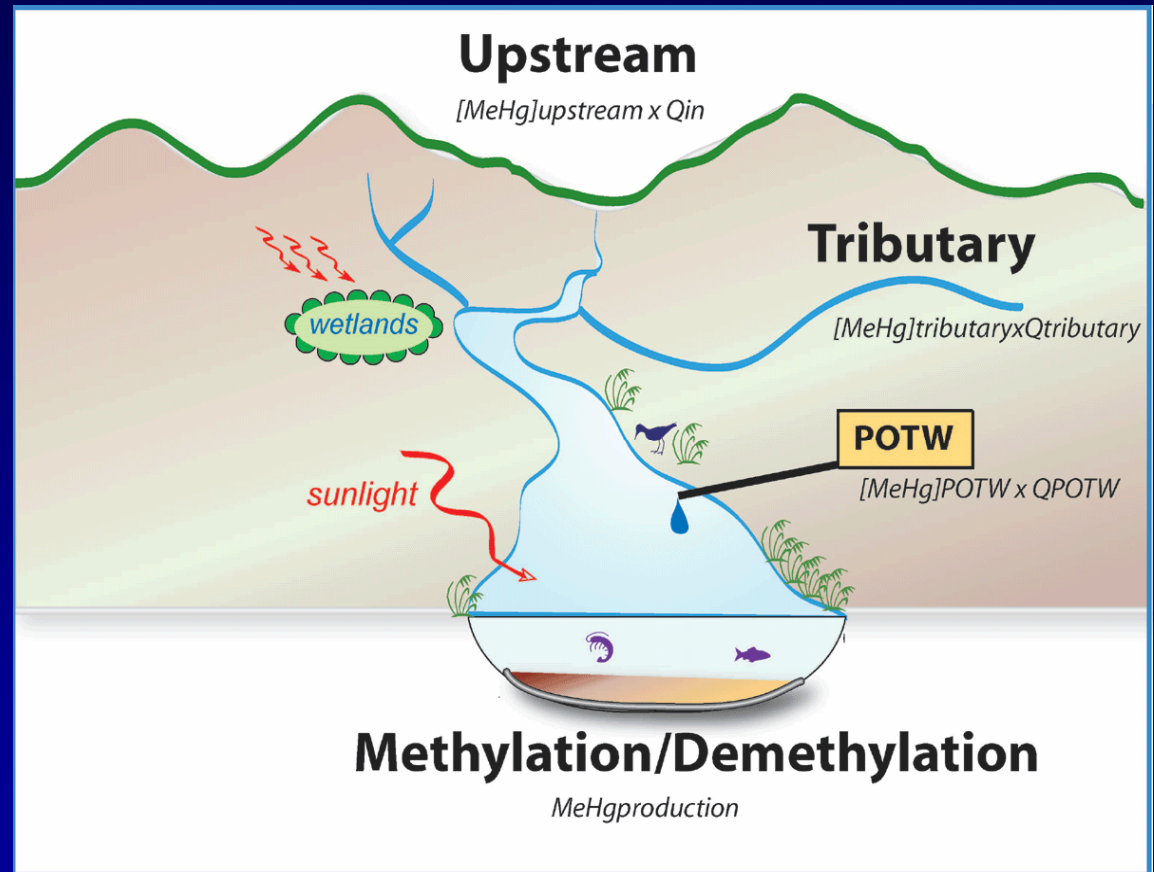
Report asserts high methylmercury in the water column causes high methylmercury in fish



Is this caused by this?

Fatal flaw #1: Correlation is not causation

Reality is that both are caused by high rates of localized methylmercury production.



No, both are caused by THIS

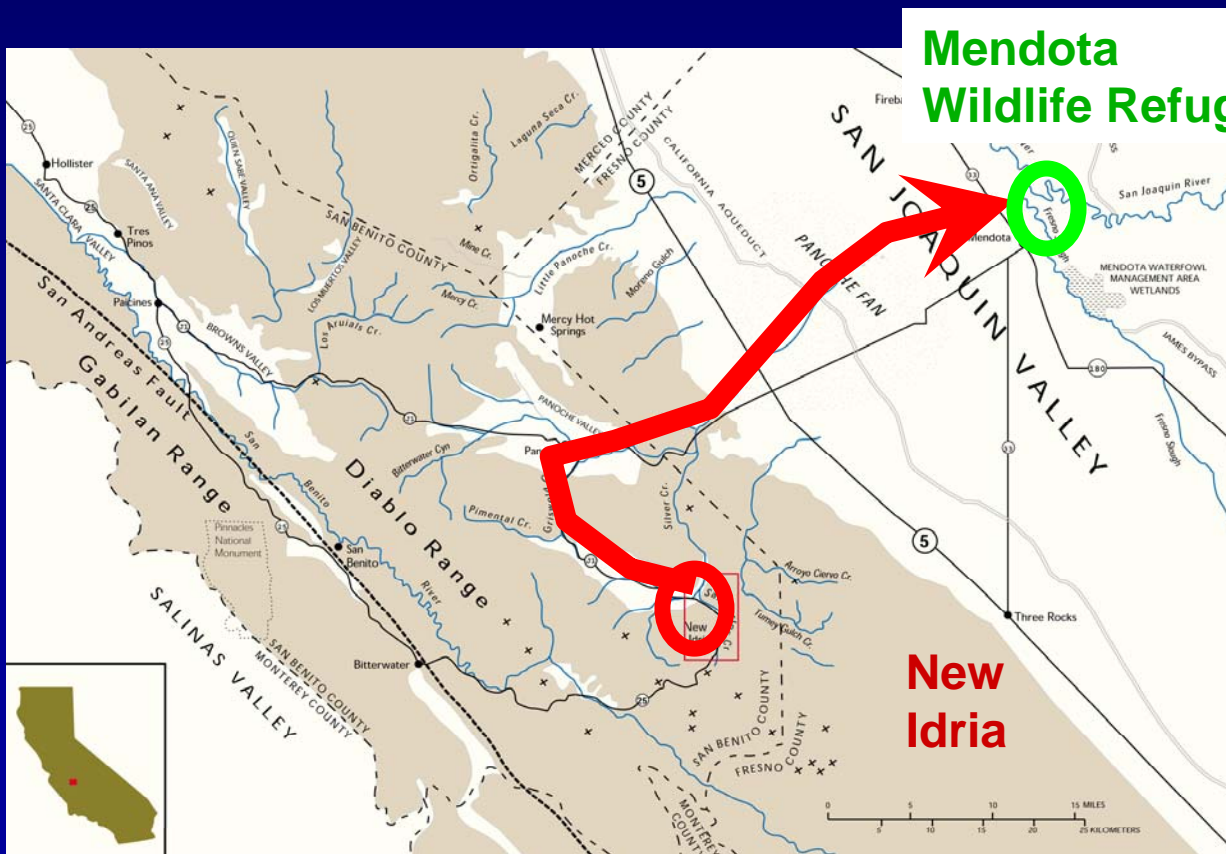


Fatal Flaw #2: Report ignores significant watershed sources

- POTWs 2-3% of methylmercury load
 - Not 9% cited in San Joaquin River example
- San Joaquin example ignores significant mercury discharges into wetland habitat

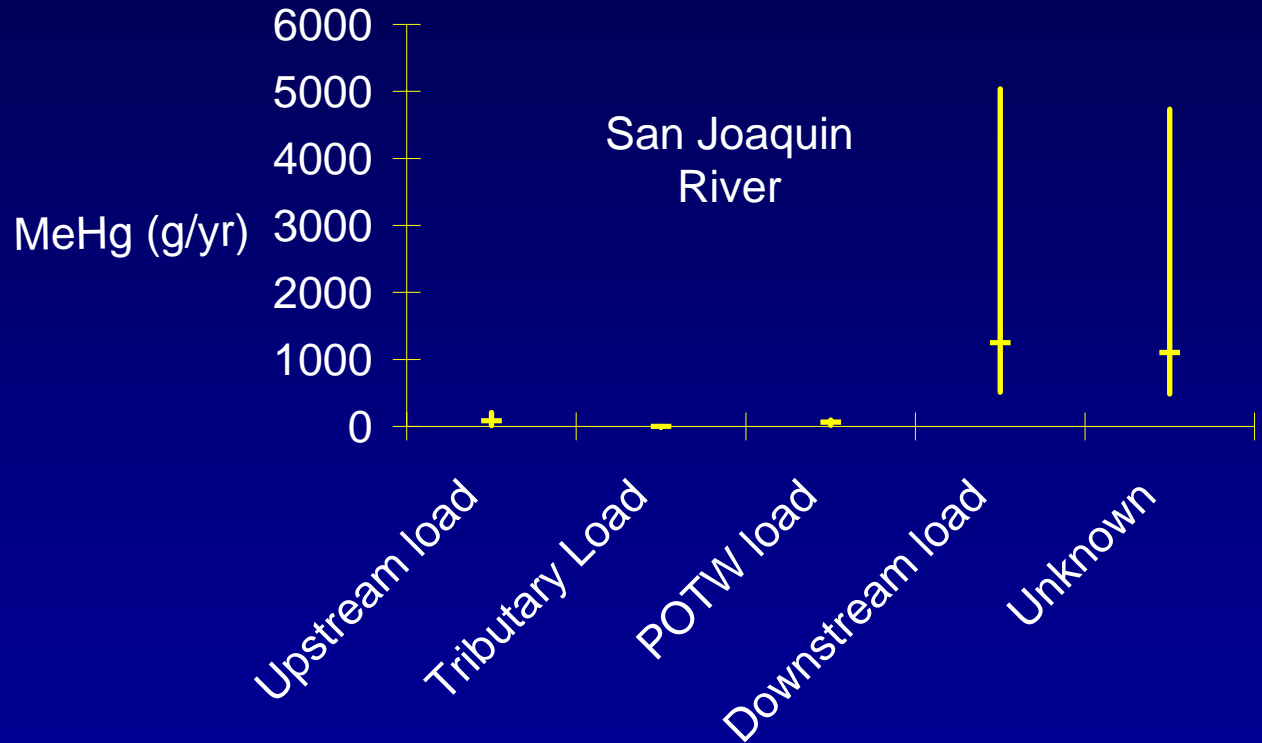
What will be done about this?

- New Idria was second largest mercury producer in N. America
- New Idria Mercury Mine drains to Mendota wetlands
- New Idria known to have > 1 ng/L methylmercury downstream



General point relevant to the Delta:

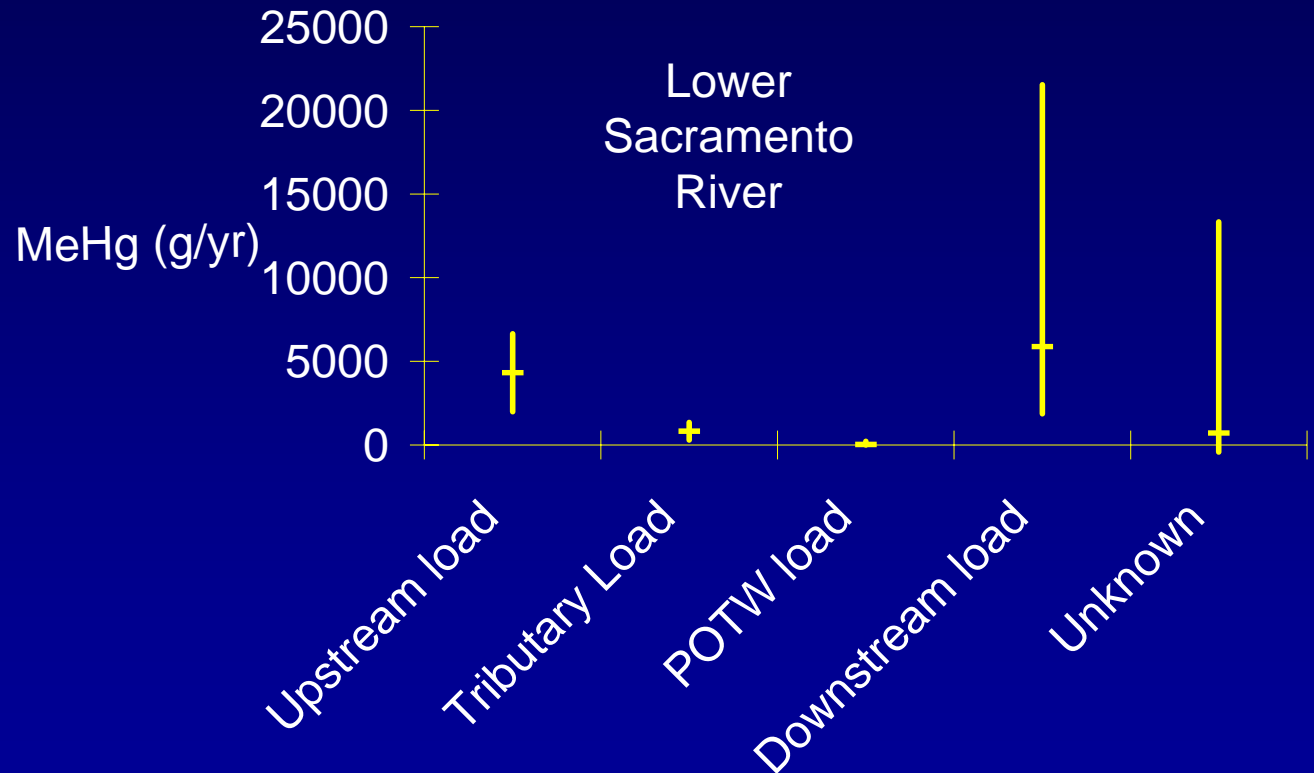
- Tributary loads, *in-situ* production cause too much methylmercury
- Not POTWs



Loads summary as presented to WEFTEC 2005, November 2, Washington D.C.

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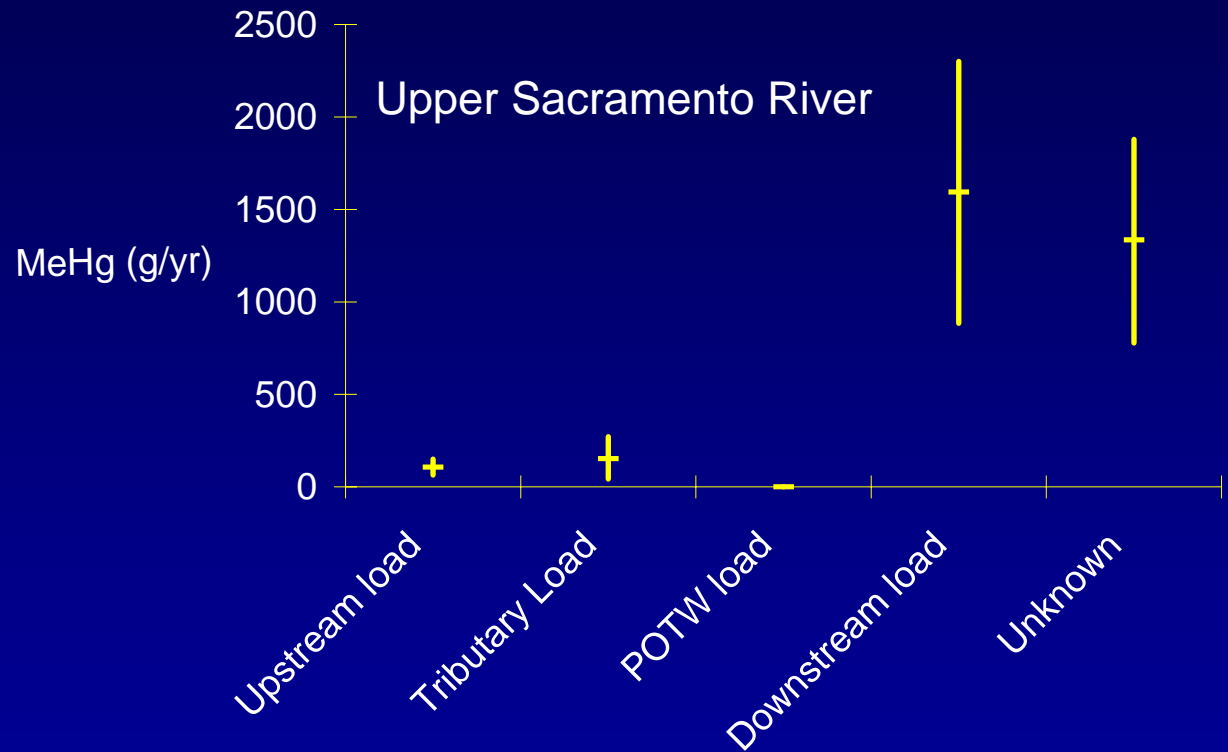
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Public Policy Consequences

- Report and presentation misleading about methylmercury sources
- Potential consequence is misplaced priorities
- The real issue is how to fund watershed projects
- The real answer requires
 - Peer reviewed science
 - Policy that follows 13241 and 13242 of the State water code