



Linda S. Adams  
Acting Secretary for  
Environmental Protection

# California Regional Water Quality Control Board

## San Francisco Bay Region

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Edmund G. Brown, Jr.  
Governor

March 9, 2011  
File No. 256502

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RE: Approval of Mercury and Methyl-Mercury Monitoring Plan for the South Bay Salt Pond Restoration Project under Water Board Order No. R2-2008-0078

Dear Mr. Bourgeois and Ms. Valoppi:

Thank you for attending the June 21, 2010, meeting at the Water Board on mercury monitoring for the South Bay Salt Pond Restoration Project (SBSRP) and for submitting a draft mercury monitoring plan dated September 2, 2010, showing how beneficial uses of water will be monitored to ensure their protection as the SBSRP restores former salt ponds to tidal marsh and improves other ponds for water birds. We have reviewed and hereby approve the plan that is summarized below.<sup>1</sup>

The SBSRP mercury monitoring plan you submitted states that:

1. The mercury biosentinels selected for monitoring, which includes two fish and three bird species in addition to sediment and water, will provide enough information to determine if opening Pond A8 poses any threat to the environment from mercury.
2. The peer reviewers requested that sediment methyl-mercury and isotope information be added to the study. As a trade-off, the fringe tidal marsh and its associated species, such as song sparrows, will not be a priority in this initial study, but can be monitored in the future if necessary.

<sup>1</sup> Figures, tables, and attachments are available at the FTP site:

[Note: when the document is finalized, it should be put on the South Bay Salt Pond Restoration Project website and kept there permanently where it can be accessed without a password.]

3. There will be very little vegetated marsh affected for a few years, so monitoring tidal marsh species is not urgent and should not hold up the monitoring program.

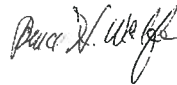
4. The plan follows the provision in Order No. R2-2008-0078 that the South Bay Salt Pond mercury study data from 2007-2009 be analyzed and used as a basis to make recommendations for monitoring mercury in the South Bay. Your plan states that you did follow the recommendations in the SBSP mercury study found in Grenier et al. (2010).<sup>2</sup>

5. No additional mercury monitoring is necessary in the Eden Landing or Ravenswood salt pond complexes, other than what has been proposed adjacent to Pond SF-2 in the Ravenswood complex, because mercury levels in these pond complexes are lower than the Alviso ponds, especially lower than those in the mercury-enriched Pond A8. The Water Board believes that this conclusion may be reasonable. However, before a final decision is made on monitoring the other restored pond complexes, the Water Board suggests waiting for the results of the Pond A8 studies and any available information from Pond SF-2, to ensure that high levels of mercury in water and sediment are not found in biosentinels associated with Pond A8. If Pond A8 does not find high mercury levels in species from those areas with elevated sediment or water after the mercury is buried or dissipated, then mercury monitoring need not be required in the other pond complexes. If the SBSPRP team finds that additional mercury studies need not occur in the Eden Landing or Ravenswood pond complexes based on the results of the Pond A8 mercury studies, it should present those results to the SBSPRP Technical Advisory Committee and the Water Board for concurrence.

6. The mercury monitoring plan is expensive, and, as you point out, the Water Board asked only for sediment, water, and/or biosentinel monitoring. We have been working with the SBSPRP team to minimize monitoring. The decision to add scientific research to monitoring was made by the SBSPRP team and was not a requirement of the Order's monitoring program.

With the caveats on future monitoring mentioned in item 5 above, we approve the mercury and methyl-mercury monitoring plan for the SBSPRP. Thank you for working with us to develop a mercury monitoring plan that will protect waters of the State. If you have questions, please contact Andree Greenberg at [agreenberg@waterboards.ca.gov](mailto:agreenberg@waterboards.ca.gov), Shin-Roei Lee at [SRLee@waterboards.ca.gov](mailto:SRLee@waterboards.ca.gov), or Robert Schlipf at [RSchlipf@waterboards.ca.gov](mailto:RSchlipf@waterboards.ca.gov).

Sincerely,



Bruce H. Wolfe  
Executive Officer

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<sup>2</sup> Grenier, L., M. Marvin-DiPasquale, D. Drury, J. Hunt, A. Robinson, S. Bezalel, A. Melwani, J. Agee, E. Kakouros, L. Kieu, L. Windham-Myers, and J. Collins. February 2010. *South Bay Mercury Report* [Final]. San Francisco Estuary Institute, U.S. Geological Survey, Santa Clara Valley Water District.