



United States Department of the Interior

Redwood National Park

1111 Second Street
Crescent City, California 95531

N3617

November 14, 2012

Mr. Dominic Gregorio
Manager, Watershed, Ocean and Wetlands Section
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812-0100

Dear Mr. Gregorio,

I wish to thank you and Dr. Maria de la Paz Carpio-Obeso for your participation at the North Coast Regional Monitoring meeting for Area of Special Biological Significance (ASBS) at Woodley Island Marina in Eureka, CA on September 21, 2012. It was valuable to have your input as the group worked through study design details for core monitoring for runoff and ambient seawater monitoring for receiving water and reference sites under the exception to the California Ocean Plan for the ASBS Waste Discharge Prohibition for Storm Water and Nonpoint Source Discharges, with Special Protections for beneficial uses (General Exception).

At the meeting, David Roemer, Chief of Resource Management and Science at Redwood National Park, had an opportunity to briefly review with you the conditions of discharge sites for which the National Park Service (NPS) has jurisdiction¹ that relate to the Redwood National Park ASBS, and also discussed the final disposition of the former wastewater treatment facility at Requa. In subsequent phone conversations Mr. Roemer has committed to following up with: 1) a written update of the status on the Requa facility, 2) a summary of discharge sites for which the NPS has jurisdiction, and 3) questions regarding additional sites that discharge into the Redwood National Park ASBS.

1. Requa Wastewater Treatment Facilities

The Requa wastewater treatment facilities in Del Norte County (WDID No. 1A83145ODN, Order No. 91-023) operated by the National Park Service are no longer in service. The residential complex served by the wastewater facilities was officially closed on September 30, 2009, the wastewater treatment facilities were decommissioned, and the buildings that it served were dismantled. A follow-up inspection by the Regional Water Board staff on September 25, 2009 confirmed the closure of the facility, that discharge of waste has ceased, and that the requirements of Waste Discharge Requirement (WDR) Order No. 91-023 are no longer needed for the protection of water quality. According to January 19, 2012 minutes of the Regional Water Quality Control Board, North Coast Region (Regional Water Board) a Mass Rescission Order No. R1-2012-007 including the Requa Wastewater Treatment Facilities was passed by the Board, rescinding Waste Discharge Requirement (WDR) Order No. 91-023. After removal of the complex, the landscape where the buildings and facilities stood was recontoured in 2011 to restore the original site drainage. Our future plans for the site are to treat exotic plants and promote native vegetation.

¹ This correspondence primarily addresses federal lands within Redwood National Park for which the NPS has jurisdiction. Redwood National and State Parks is managed in partnership by the National Park Service (NPS) and the California Department of Parks and Recreation (CDPR). The NPS has jurisdiction for federal lands inside the congressionally authorized boundary for Redwood National Park, and CDPR has jurisdiction in three adjoining state parks; Jedediah Smith Redwoods State Park, Del Norte Coast Redwoods State Park, and Prairie Creek Redwoods State Park.

The decommissioned wastewater treatment facility at Requa is site RED025 in the data collected by the Southern California Coastal Water Research Project (SCCWRP) for the State Water Resources Control Board (SWRCB).² It should no longer be considered an ASBS discharge site and we request that it therefore be excluded from the requirements of core monitoring under the General Exception.

2. NPS Discharges along Coastal Drive to the Redwood National Park ASBS

There are 11 additional discharges above 18" diameter for which the NPS has jurisdiction and is listed as a responsible party by the SWRCB; these are RED038-047 inclusive, and RED076 (SCCWRP 2003). All of these discharges are culverts situated along a 2.9 mile section of Coastal Drive that is permanently closed to vehicle traffic.

Coastal Drive is a narrow, oftentimes single-lane road, traversing coastline slopes for approximately six miles between Newton B. Drury Scenic Parkway in Humboldt County on the south end, and Klamath Beach Road in Del Norte County on the north end. Coastal Drive is generally between 560 to 640 feet above sea level along coastal bluffs and runs parallel to the coastline, approximately 0.25 miles from the ocean. The beach and ocean below is generally inaccessible due to the steep topography of the cliffs and coastal bluffs.

Coastal Drive has long been prone to slumping and landslides during the rainy season, causing unsafe conditions for motorists and high annual maintenance costs. In 2000 the NPS completed a General Management Plan (GMP) that stated the intent to close Coastal Drive to vehicles and convert it to a trail in the event of major road failure. Since then, the road condition has worsened and the NPS has taken logical progressive steps to curtail use and protect public safety:

- In 2001, the NPS enacted a regulation closing the northern 2.1 miles of Coastal Drive from the intersection with Klamath Beach Road to Alder Camp Road to recreational vehicles and vehicles pulling trailers;
- In 2006, the closure to large vehicles was extended to all of Coastal Drive;
- In December 2010, the NPS temporarily closed and installed barriers for a 3.3-mile-long segment of Coastal Drive north of the Carruthers Cove trailhead due to a landslide;
- In February 2011, the NPS announced that the 3.3-mile segment would be closed during the rainy season on a permanent basis because of the unpredictability of the location and size of landslides; and
- In June 2011, geotechnical engineering staff from the Federal Highway Administration (FHWA) inspected Coastal Drive and estimated the cost of repairs at more than \$700,000 exclusive of preliminary design and construction engineering costs, resulting in the NPS decision to implement the permanent closure that was planned for in the 2000 GMP.

On December 9, 2011 the California Coastal Commission concurred (CD-45-11) with the NPS determination that closure to motor vehicles and conversion to a recreational trail was consistent with the California Coastal Management Program. In August 2012 the NPS completed the installation of locked metal gates on both ends of a 2.9 mile section; the southern end is 0.3 miles north of the Carruthers Cove trailhead and the northern end is 0.1 miles south of the intersection with Alder Camp Road (see attached map). This section of Coastal Drive, encompassing the locations of culverts RED038-047 and RED076, is permanently closed to vehicle traffic and will be re-designated as a section of the California Coastal Trail: Tey-wo-lew section. "Tey-wo-lew" is a Yurok term signifying "along the coast."

NPS discharges RED038-047 inclusive, and RED076, may be considered to employ best management practices (BMPs) for the protection of ocean water quality. Road closure, in effect on a provisional temporary basis since 2010 and now permanently since 2012, completely eliminates vehicle use which

² SCCWRP. 2003. Final Report: Discharges into State Water Quality Protection Areas. Final Report to the State Water Resources Control Board (Contract 01-187-250). 25pp plus data and appendices.

was counted at slightly more than 24,000 vehicles in 2010, the last year the road was open. The culverts are all approximately 0.25 miles or greater from the ocean, and drain onto vegetated hillslopes greater than 500 feet above mean sea level. Storm water runoff from these culverts discharge into thick vegetation and infiltrate into the earth before reaching the ocean.

As funding becomes available, the NPS plans to remove unstable portions of the old road and restore the original landform to the maximum extent possible. Stable sections of the road would be converted to trail and less stable sections would involve rerouting the trail to more stable locations along the current alignment. Culverts currently in place may potentially be removed and replaced with rolling dips. The conversion to trail would lessen the overall footprint and make the former road “hydrologically transparent” to enhance long-term stability and reduce future maintenance costs. The NPS has employed similar landform restoration techniques at the Requa facility and for more than 200 miles of former logging roads in the Redwood Creek watershed.

The NPS requests that the SWRCB exclude discharge sites RED038-047 inclusive, and RED076 from core monitoring requirements under the General Exception. Apart from the safety issues for accessing the beach during the winter storm season and the logistical difficulty of identifying a corresponding receiving water site to monitor for storm drains that are 0.25 miles distant, the culverts employ robust BMPs for protection of ocean water quality. These sites, plus the decommissioned wastewater treatment facility at Requa (RED025) described above, encompass all of the discharge sites to the Redwood National Park ASBS that the NPS has jurisdiction and responsibility for which would be required for core monitoring through the General Exception.

3. Other Discharges to the Redwood National Park ASBS

In follow-up phone conversations with David Roemer, the SWRCB has inquired about the status of other discharge sites along the coast:

- **Crescent Beach Parking Lot.** The NPS has a parking lot at Crescent Beach, located south of Crescent City off Enderts Beach Road. This parking lot is outside the Redwood National Park ASBS; the parking area is in the northern quarter of Section 2, Township 15N, Range 1W, while the Redwood National Park ASBS is bounded at the northern extent by the southern boundary of Section 2. The parking lot is approximately one kilometer outside the ASBS boundary.
- **False Klamath Cove, Highway 101 Sites.** There are several pullouts, parking areas, and storm drains that are associated with Highway 101 near False Klamath Cove (RED024, RED027-RED031 inclusive, and RED034) which are identified as CalTrans in the data from the SWRCB (SCCWRP 2003). The NPS does not have jurisdiction for these sites, although we perform rocky intertidal biological monitoring twice per year at the point at False Klamath Cove, just south of these discharges.
- **Freshwater Spit, Highway 101 Sites.** There is a parking area along Highway 101 at the north end of Freshwater Spit (RED065) and a culvert beneath Highway 101 from Freshwater Lagoon (RED066) which are identified as CalTrans in the data from the SWRCB (SCCWRP 2003). The NPS leases a portion of the Freshwater Spit from CalTrans to facilitate management of recreational uses and to protect resource values within the national park boundaries. Although the NPS does not have jurisdiction for these sites, park staff have in the past searched for the RED066 outlet (buried in sand) and evaluated the surface runoff from RED065. Any potential runoff from the parking area flows to a vegetated bluff, approximately 5-15 feet in height, before the sand beach. There is no distinct point from which to collect a water sample or a receiving water sample for RED065.

We look forward to working with the State Water Resources Control Board and other partners in Northern California for monitoring and protection of ocean water quality, including assisting with permitting and logistics for reference water sampling sites, communication and coordination with CalTrans and other parties that have discharges to the Redwood National Park ASBS, and continued biannual rocky intertidal biological monitoring at three sites in Redwood National Park. If you have any

questions, please contact David Roemer, Chief of Resource Management and Science, at (707) 465-7700 or email Dave_Roemer@nps.gov.

Sincerely,



Barney Riley
National Park Acting Superintendent

cc: David Roemer – REDW
Dr. Maria de la Paz Carpio-Obeso – California State Water Board
Ken Schiff – Southern California Coastal Water Research Project

