



Linda S. Adams
Secretary for
Environmental Protection

State Water Resources Control Board

Division of Water Quality

1001 I Street • Sacramento, California 95814 • (916) 341-5455
Mailing Address: P.O. Box 100 • Sacramento, California • 95812-0100
FAX (916) 341-5463 • <http://www.waterboards.ca.gov>



Arnold Schwarzenegger
Governor

January 19, 2007

Ms. Joelle Buffa, Refuge Manager
Farallon National Wildlife Refuge
U.S. Fish and Wildlife Service
P.O. Box 524
Newark, CA 94560

Dear Ms. Buffa:

STATUS OF DISCHARGES INTO THE FARALLON ISLANDS AREA OF SPECIAL BIOLOGICAL SIGNIFICANCE

Thank you for your response to our earlier notification letter regarding the prohibition of waste discharges into the Farallon Islands Areas Of Special Biological Significance (ASBS). Your status report dated October 3, 2006 addresses the six potential sources of waste discharges identified for the Farallon Islands ASBS in the 2003 Southern California Coastal Water Research Project (SCCWRP) report on discharges into State Water Quality Protection Areas. We have the following responses regarding the six discharges:

1 - The discharge of untreated sanitary waste from the houses to the inter-tidal area (FAR001). Your report states, with the as-built drawing as supporting documentation, that this discharge has been eliminated.

2 - The discharges from the water catchment pad on the east side of the island, driven by electrical pumps (FAR006). Your report states that these discharges from the water collection system into the inter-tidal zone have been eliminated by catching and using the water for consumption. Please provide us with photographic documentation to support this statement, showing that the discharge line has been abandoned.

3 – Water storage cistern roof (FAR005). This configuration remains unchanged. Your letter states the cistern is located about 15 meters from the inter-tidal zone with a natural buffer zone of porous rock substrate. Your report further states that no chemicals are used or are present in this area. Based on the concept that only natural precipitation runs off and there is no potential for pollution to enter the ASBS, we are not requesting further documentation at this time.

California Environmental Protection Agency

4 – The abandoned water collection pad on the south side of the island (FAR005).

You stated that no changes have been made to this configuration and that this pad now serves as an occasional helicopter-landing surface for personnel and supplies when boat landings are not possible. You also stated that there is no potential for contamination to enter the ASBS, since the runoff from the pad is designed to flow into the cisterns, with no surface outlets. From the information in your letter, it appears that you believe that all surface runoff is percolated into the soil and that there is no surface water runoff from the pad or cisterns. It appears that you do not believe it is likely that rainwater runoff from this pad would reach the ASBS. However, since pad is used for helicopter service, we consider that there is some small potential for anthropogenic pollutants in the runoff from the pad. Please visually survey and photograph this area during a rainfall event near the end of the rainy season to confirm both that the cisterns do not result in surface runoff and that there is no surface runoff from the pad into the inter-tidal zone. Please submit the results of your visual observations and supporting photographs to us by May 1, 2007.

5 – East Landing concrete pad and derrick (FAR008). You stated that no changes have been made to this configuration. Although this pad is located just above the inter-tidal zone, your assessment of the potential for contamination from mechanical oils to enter the ASBS is very low because the derrick is electrically driven and only 12 liters of lubricating oil are used, contained in heavy steel casings. We concur, and no further documentation is necessary at this time.

6 – North Landing concrete pad and derrick (FAR004). You stated that no changes have been made to this configuration. Your assessment of the potential for waste to be discharged into the ASBS from this site is very low, as there are no chemicals or automated machinery used at this site. Based on your statement, we no longer consider this drainage a waste discharge unless and until chemicals or other machinery are introduced at a later date.

Regarding the potential for any other anthropogenic non-point source pollution on Southeast Farallon Island, please:

- a. Report the use of any pesticides (including but not limited to insecticides, herbicides, or rodenticides) or other chemicals used on the island and the practices employed to prevent pollution from entering the ASBS. If there is any use of pesticides, you must collect and analyze (for acute toxicity, according to California Ocean Plan specifications) a sample of surface water runoff from the island and report the analytical results to us.
- b. Report any spills of fuel, oil, or other pollutants and the methods employed to clean up such spills.

- b. Report any future spills of fuel, oil, or other pollutants and the methods employed to clean up such spills.

Please send the requested or any future correspondence to the attention of Ms. Constance Anderson at the State Water Resources Control Board, Division of Water Quality, Ocean Unit, 1001 I Street, 15th Floor, Sacramento, CA 95814 with a copy to Mr. Bruce H. Wolfe, Executive Officer, at the San Francisco Bay Regional Water Quality Control Board, 1515 Clay Street, Suite 1400 Oakland, CA 94612.

We thank and commend the U.S. Fish and Wildlife Service for its stewardship of the Refuge and the efforts it has made to date to eliminate impacts to the Farallon's ASBS. Should you have any questions, please free to contact me at (916) 341-5458 (dpolhemus@waterboards.ca.gov) or Dominic Gregorio, Senior Environmental Scientist, Ocean Unit, at (916) 341-5488 (dgregorio@waterboards.ca.gov).

Sincerely,



Darrin Polhemus, Deputy Director
Division of Water Quality

cc: Mr. Bruce H. Wolfe, Executive Officer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

bcc: Board Members, EXEC
Tom Howard, EXEC
Susan Gladstone, San Francisco Bay RWQCB
Sheila Vassey, OCC
Constance S. Anderson, DWQ