



United States Department of the Interior

NATIONAL PARK SERVICE

Point Reyes National Seashore
Point Reyes, California 94956

IN REPLY REFER TO:

N3615

December 20, 2004

Ms. Celeste Cantu
State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95812-0100

RE: Point Reyes Headlands Reserve and Extension Waste Discharge

Dear Ms. Cantu:

Point Reyes National Seashore was established in 1962 to preserve and protect the diminishing coastal resources of the United States. The Seashore manages more than 90,000 acres of land as well as 80 miles of coastal and estuarine resources along coastal Marin County. Four state Areas of Biological Significance occur within the boundary of Point Reyes National Seashore, including Bird Rock, Point Reyes Headlands and Reserve, Double Point, and the northern portions of Duxbury Reef.

We have received notice from your staff concerning dry and wet weather stormwater runoff into the Point Reyes Headlands Reserve and Extension. In addition, we have discussed these discharges with Dominic Gregorio of your staff, and reviewed the information in the 2003 Final Report and associated database. The 2003 discharge report documents 20 outlets with 7 distinct discharges associated with the lighthouse and Reserve overlook. Two of the seven discharges are described as nonpoint, while five point sources are identified along the stairs and area around the historic lighthouse facility.

Based on our staff review of this documentation and field information, points and determined that there are no viable alternatives to divert discharge away from these areas to sites outside the ASBS. It should be noted that all discharges documented from this site are clean water runoff. Six of the seven points are associated with the Lighthouse stairs and lighthouse pad. It should be noted that since the SWRCB site review and documentation, structural improvements were completed in 2002 to the stair facilities. The discharge points identified in the survey are still present, but facilities such as faucets may no longer be located in the same places.

In 2002, the National Park Service completed a \$1.5 million project to develop and replace the potable water storage supply and distribution system, as well as to rehabilitate failing structural components of the stairway and electrical systems at the historic lighthouse structure. The Seashore is also planning on upgrading the septic system to meet existing code with funding in FY2005. In the long-term, the Seashore anticipates funding in the next 5-10 years to implement structural improvements on the historic lighthouse structure and surrounding areas through NPS maintenance funds.

The Seashore has reviewed each of the documented discharges and has determined that there are no viable structural alternatives to divert discharges away from the ASBS and will seek exceptions to for all seven documented discharges. The Seashore will pursue non-structural solutions to reduce potential accumulation of pollutants at these sites, however, it is not likely that structural changes are possible at this time. Because of the improvements and changes at the site since the SWRCB review, the Seashore would like to schedule a meeting to reassess the site and discuss potential non-structural treatments. Brannon Ketcham, the park hydrologist, will be your primary contact for this process and can be reached at 415-464-5192.

The Seashore is committed to working with the SWRCB and protecting state ASBS resources to the greatest extent possible. While we cannot make structural improvements, the Seashore is happy to work with your staff to determine solutions that will reduce potential impacts associated with these discharge locations.

Sincerely,



Don L. Neubacher
Superintendent

cc:
Dominic Gregorio
State Water Resources Control Board