



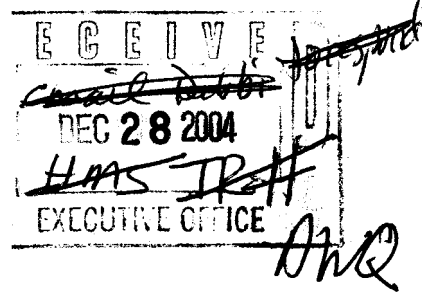
United States Department of the Interior

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FISH AND WILDLIFE SERVICE
San Francisco Bay National Wildlife Refuge Complex
P.O. Box 524
Newark, California 94560-0524
(510) 792-0222

December 27, 2004

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



Dear Ms. Cantu,

This is in response to your letter dated October 18, 2004 regarding discharges into the Farallon Islands Area of Special Biological Significance (ASBS). We have a small field station located on Southeast Farallon Island that houses 4-8 biologists who protect and monitor the large and significant seabird nesting colony and marine mammal breeding/haul-out population harbored on the Refuge. Having personnel stationed on the island year-round is essential to protect the biological diversity supported within the Farallon Islands ASBS. Our station operates under very stringent water and other resource use/disposal practices. We compost all solid waste and discharge a small amount of gray water. This is the only discharge generated from our facility. Because there are no fresh water sources on the island, we collect and treat rainwater to meet all our water needs, therefore there is no non-point source discharge. Our strict water conservation measures insure that that only a very small amount of water is discharged at all.

We are in the process of developing and installing a system that will eliminate our discharge, however we are not certain that a solution is available that will completely stop all wastewater from going into the ocean. There are practical constraints to implementing traditional or alternative wastewater treatment systems. Most of the island is exposed granite, and the soil "layer" in the few places where it does exist is only a few inches thick and rocky, challenging the use of leach fields. The Island's offshore location and lack of boat docking facilities precludes the installation of holding tanks that can be pumped.

While eliminating any discharge remains our goal, we want to pursue the exception process referred to in your letter in case we cannot come up with a solution and funding within a reasonable timeframe. I am interested in attending a workshop, and have received notice of the Stakeholder Meeting on January 13 in La Jolla, but I would be interested in attending one closer to the Bay Area. Please let me know if you plan to have a workshop in northern California.

Sincerely,

Joelle Buffa
Manager, Farallon National Wildlife Refuge