



## CITY OF PACIFIC GROVE

### Public Works Department

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September 20, 2016

Ms. Gayleen Perreira, Municipal Storm Water Unit  
State Water Resources Control Board  
Municipal Storm Water Program  
P.O. Box 1977  
Sacramento, CA 95812-1977

**Electronic submittal: [Gayleen.Perreira@waterboards.ca.gov](mailto:Gayleen.Perreira@waterboards.ca.gov)**

RE: Submittal of 2016 Pacific Grove ASBS Compliance Plan

Dear Ms. Perreira,

The Cities of Monterey and Pacific Grove (Cities) are pleased to submit their Updated 2016 Pacific Grove Areas of Special Biological Significance (ASBS) Compliance Plan (Plan) for your review. As described in the Plan, the Cities have been implementing non-structural and structural best management practices (BMPs) consistently since adoption of the ASBS General Exception in March 2012.

Within this updated Plan, the Cities propose a three-phase implementation approach to achieve compliance with the Special Protections. BMPs proposed for implementation in Phase 1 have been identified strategically to improve storm water quality to the ASBS within high-priority sub watersheds. Accordingly, the Cities are pursuing grant funds through Proposition 1 Implementation/ASBS Grant Funding to assist with those BMP efforts. If Phase 1 of project implementation were funded and constructed, follow-up water quality monitoring would be conducted to evaluate compliance with the Special Protections. If pollutant exceedances were identified after implementation of Phase 1, the Cities will then evaluate the additional structural BMPs included in this Plan and prioritize for Phase 2 implementation, as needed and funding opportunities allow. Water quality sampling would again be conducted at the conclusion of Phase 2, and so on, until compliance is achieved or if physical impossibility and/or financial hardship were demonstrated as per I.A.3.f.(1) or (2) at any step along this strategy.

The water quality compliance analysis identified 203PAC080 (Forest/Lovers Point Outfall) as the only outfall not currently in compliance with the ASBS requirements; therefore, the currently proposed wet/dry-weather urban diversion at Lovers Point (BMP #6 in the Plan) and the LID Retrofit at the Lovers Point Parking Lot (BMP#8) may be the only structural BMP necessary to come into compliance during

Phase 1. Plan Table 11, Phased Implementation Schedule, demonstrates an estimated implementation date of September 2018 for BMPs #6 and #7, if grant funding opportunities were to be successful. It is important to note that September 2018 is beyond the March 2018 six-year compliance deadline in the Special Protections. Accordingly, the Cities have developed this detailed, updated Plan to demonstrate the steps planned to arrive at water quality compliance.

Thank you, in advance, for your time and efforts to review the Cities updated Plan. If you have any questions, or require additional information, please call or email us.

Sincerely,



Daniel Gho  
Public Works Director  
City of Pacific Grove  
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Tricia Wotan, CFM  
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Enclosure: Pacific Grove ASBS Compliance Plan

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