

Template: Comparison of Water Quality Policies in Proposed Land Use Plan vs. Coastal Commission’s Model LCP Water Quality Guidance

[Name of Local Government]
[Name & Date of Proposed LUP Draft]
[Sections Reviewed]
[Reviewed by CCC Staff: Name & Date]

Green shows points of agreement. **Yellow** shows points to discuss/improve.

➤ **“Key Point:”** in Notes column indicates key point that needs improvement

CCC Model Land Use Plan (LUP) Policies from Model LCP Guidance	Section(s) of Proposed LUP Addressing this Model Policy <i>[Name of sections of proposal reviewed] Land Use Plan (dated xx-xx-xx)</i>	Notes by <i>[Reviewer’s Name]</i>
PRINCIPLES		
1. Protect and Restore Water Quality Protect and, where feasible, restore the quality of coastal waters to implement Coastal Act policies (in particular Sections 30230 and 30231). Coastal waters include the ocean, rivers, streams, wetlands, estuaries, lakes, and groundwater.		
2. Minimize Pollutants in Runoff from the Development Plan, site, and design development to minimize the transport of pollutants in runoff from the development into coastal waters.		
3. Minimize Changes in the Site’s Runoff Flow Regime Plan, site, and design development to minimize post-development changes in the site’s runoff flow regime (i.e., volume, flow rate, timing, and duration), to preserve the pre-development hydrologic balance and prevent adverse changes in the hydrology of coastal waters (i.e., hydromodification).		

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POLICIES FOR ALL DEVELOPMENT		
<p>4. Address Runoff Management Early in Site Design Planning</p> <p>Address runoff management early in site design planning and alternatives analysis for all development, integrating existing site characteristics that affect runoff (such as topography, drainage patterns, vegetation, soil conditions, natural hydrologic features, and infiltration conditions) in the design of strategies that minimize post-development changes in the runoff flow regime, control pollutant sources, and, where necessary, remove pollutants.</p>		
<p>5. Give Precedence to a Low Impact Development Approach to Stormwater Management</p> <p>Give precedence to a Low Impact Development (LID) approach to stormwater management in all development. LID integrates preventive Site Design strategies with small-scale, distributed Best Management Practices (BMPs) to replicate the site's pre-development hydrologic balance through infiltration, evapotranspiration, harvesting for later on-site use, detention, or retention of stormwater close to the source.</p>		
<p>6. Protect and Restore Hydrologic Features</p> <p>Plan, site, and design development to protect and, where feasible, restore hydrologic features such as stream corridors, drainage swales, topographical depressions, groundwater recharge areas, floodplains, and wetlands.</p>		

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<p>7. Preserve or Enhance Vegetation Plan, site, and design development to preserve or enhance non-invasive vegetation, to achieve water quality benefits such as transpiration, interception of rainfall, pollutant uptake, shading of waterways to maintain water temperature, and erosion control.</p>		
<p>8. Maintain or Enhance On-Site Infiltration Plan, site, and design development to maintain or enhance on-site infiltration of runoff, where appropriate and feasible, to reduce runoff and recharge groundwater.</p>		
<p>9. Minimize Impervious Surfaces Plan, site, and design development to minimize the installation of impervious surfaces, especially impervious areas directly connected to the storm drain system, and, where feasible, increase the area of pervious surfaces in re-development, to reduce runoff.</p>		
<p>10. Use Source Control BMPs in All Development Use Source Control BMPs, which can be structural features or operational actions, in all development to minimize the transport of pollutants in runoff from the development.</p>		
<p>11. Prevent Adverse Impacts to Environmentally Sensitive Habitat Areas from Runoff In areas in or adjacent to an Environmentally Sensitive Habitat Area (ESHA), plan, site, and design development to protect the ESHA from any significant disruption of habitat values resulting from the discharge of stormwater</p>		

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or dry weather runoff flows.		
<p>12. Minimize Adverse Impacts from Stormwater Outfall Discharges</p> <p>Avoid construction of new stormwater outfalls, and direct stormwater to existing facilities with appropriate treatment and filtration, where feasible. Where new outfalls cannot be avoided, plan, site, and design outfalls to minimize adverse impacts to coastal resources from outfall discharges, including consolidation of existing and new outfalls where appropriate.</p>		
<p>13. Manage BMPs for the Life of the Development</p> <p>Implement appropriate protocols to manage BMPs (including ongoing operation, maintenance, inspection, and training) in all development, to protect coastal water resources for the life of the development.</p>		
<p>14. Minimize Water Quality Impacts During Construction</p> <p>Minimize water quality impacts during construction by minimizing erosion and sedimentation, minimizing the discharge of other pollutants resulting from construction activities, and minimizing land disturbance and soil compaction.</p>		
<p>POLICIES FOR DEVELOPMENTS OF WATER QUALITY CONCERN</p> <p>Certain categories of development have a greater potential for adverse impacts to water quality and hydrology due to the extent of impervious surface area, type of land use, and/or proximity to coastal waters. These categories of <i>Developments of Water Quality Concern</i> should be identified in the LCP. Additional BMPs may be required for a <i>Development of Water Quality Concern</i>, such as the use of LID BMPs to retain the design storm runoff on-site; Treatment Control BMPs to remove pollutants; and Runoff Control BMPs to minimize adverse changes in the runoff flow regime. The LCP should specify an appropriate design storm standard for sizing LID, Treatment Control, and Runoff Control BMPs (at a minimum, the 85th percentile design storm). The LCP should also specify the amount of added impervious surface area that will trigger the requirement for Runoff Control BMPs.</p> <p>All applications for a Coastal Development Permit for a <i>Development of Water Quality Concern</i> should be required to comply with the following additional policies:</p>		

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<i>POLICIES FOR DEVELOPMENTS OF WATER QUALITY CONCERN</i>		
<p>15. Conduct a Site Characterization and Document Expected BMP Effectiveness</p> <p>Conduct a polluted runoff and hydrologic site characterization by a qualified licensed professional, early in the development planning and design stage, and document the expected effectiveness of the proposed BMPs.</p>		
<p>16. Size LID, Runoff Control, and Treatment Control BMPs Using the 85th Percentile Design Storm Standard</p> <p>Size LID, Runoff Control, and Treatment Control BMPs to infiltrate, retain, or treat, at a minimum, the runoff produced by the 85th percentile 24-hour storm event for volume-based BMPs, or two times the 85th percentile 1-hour storm event for flow-based BMPs.</p>		
<p>17. Use an LID Approach to Retain the Design Storm Runoff On-Site</p> <p>Use an LID approach that gives priority to preventive Site Design strategies to minimize post-development changes in the site's stormwater flow regime, supplemented by structural BMPs to retain on-site (by means of infiltration, evapotranspiration, or harvesting for later on-site use), at a minimum, the runoff produced by the 85th percentile 24-hour design storm, to the extent appropriate and feasible.</p>		

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<p>18. Conduct an Alternatives Analysis if the Design Storm Runoff is Not Retained On-Site Using LID</p> <p>Conduct an alternatives analysis to demonstrate that there are no appropriate and feasible alternative project designs that would substantially improve on-site runoff retention, if a proposed development will not retain on-site the runoff produced by the 85th percentile 24-hour design storm using an LID approach.</p>		
<p>19. Use Treatment Control BMPs if Necessary</p> <p>Use a Treatment Control BMP (or suite of BMPs) to remove pollutants of concern from any portion of the runoff produced by the 85th percentile 24-hour design storm that will not be retained on-site, or if additional pollutant removal is necessary to protect coastal waters.</p>		
<p>20. Use Runoff Control BMPs if Adding More than 15,000 ft² Net Impervious Surface Area</p> <p>If a proposed development will add a net total of more than 15,000 ft² of impervious surface area, and any portion of the runoff produced by the 85th percentile 24-hour design storm will not be retained on-site, use a structural Runoff Control BMP to minimize adverse post-development changes in the runoff flow regime.</p>		
<p><i>(Do not correspond to any Model Policies)...</i></p>		