

CALIFORNIA COASTAL COMMISSION

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ADDENDUM

October 29, 2020

To: Commissioners and Interested Persons

From: California Coastal Commission
San Diego Staff

Subject: Addendum to **Item 14a**, Coastal Commission Permit Application **#LCP-6-SDC-20-0031-1 (Implementation Plan)**, for the Commission Meeting of November 5, 2020.

The purpose of this addendum is to revise suggested modification #19 shown in Exhibit #2 to the staff report. These revisions will exempt certain improvements (e.g. sidewalks and bicycle lanes) from having to comply with the Priority Development Project requirements in Section 9306 (Water Requirements and Watershed Protection) of the IP. These revisions do not exempt any development from obtaining a coastal permit, if necessary, or from complying with other provisions under IP Section 9306. A redundant section will also be removed. These revisions were reviewed and accepted by Commission water quality staff.

The double underlined sections represent **new** language that the Commission suggests be added to the proposed IP. The ~~double strikethrough~~ sections represent language that the Commission now suggests be deleted from the language of the proposed IP as originally submitted. Staff recommends the following revisions to suggested modification #19 as shown in Exhibit #2:

19. Section 9306.i shall be revised as follows:

~~i. Additional Plan Requirements for Priority Development Projects.~~

h. ADDITIONAL PLAN REQUIREMENTS FOR PRIORITY DEVELOPMENT PROJECTS.

i. Specified categories of development that have a greater potential for adverse water quality and hydrologic impacts due to the development size, type of land use, and/or proximity to coastal waters. The WQHP or PDP SWQMP shall be prepared for Priority Development Projects, as

identified below. The WQHP/PDP SWQMP shall include all the information required in a PDP SWQMP and, in addition, the WQHP/PDP SWQMP shall include a polluted runoff and hydrologic site characterization, a design storm standard for sizing BMPs, use of a Low Impact Development (LID) approach to retain runoff on-site, and documentation of the expected effectiveness of proposed BMPs. Additional WQHP/PDP SWQMP components include an alternatives analysis, and a description of the Treatment Control and/or Hydromodification BMPs.

ii. a) Priority Development Projects include:

[. . .]

13. The following projects are exempt from the PDP requirements if they meet the following criteria:

aa) New or retrofit paved sidewalks, bicycle lanes, or trails that meet the following criteria:

i. Designed and constructed to direct storm water runoff to adjacent vegetated areas, or other non-erodible permeable areas; OR

ii. Designed and constructed to be hydraulically disconnected from paved streets or roads; OR

iii. Designed and constructed with permeable pavements or surfaces in accordance with the County of San Diego Guidance on Green Infrastructure.

bb) Retrofitting or redevelopment of existing paved alleys, streets or roads that are designed and constructed in accordance with the County of San Diego Green Street Guidance.

cc) PDP exempt projects are required to submit a Green Street SWQMP that shall provide a description of existing and proposed drainage patterns, site conditions, changes to impervious area, runoff management Site Design strategies, pollutant Source Control BMPs and Green Street BMPs. The Green Street SWQMP shall include a site plan consistent with the requirements listed in section g.

[. . .]

- iv. Infeasibility of 85th percentile 24-hour design. . . . Biofiltration BMPs must be designed to have an appropriate hydraulic loading rate to maximize stormwater retention and pollutant removal, as well as to prevent erosion, scour, and channeling within the BMP, and must be sized to:

[. . .]

- iii. If bioretention BMPs are not technically feasible, then the PDP can propose to use ~~shall utilize~~ flow-through thru treatment control BMPs to treat runoff leaving the site if the project will also mitigate the design capture volume not reliably retained through the use of off-site alternative BMPs. . . . Flow-through thru treatment control BMPs with a low removal efficiency ranking will only be approved by the County if a feasibility analysis has been conducted which exhibits that implementation of flow-through thru treatment control BMPs with high or medium removal efficiency rankings are infeasible for the applicable portion of a PDP.
- ~~v. If bioretention BMPs are not technically feasible, then the PDP shall utilize flow thru treatment control BMPs to treat runoff leaving the site. Flow through treatment control BMPs must be sized and designed to filter or treat either: 1) the runoff produced from a rainfall intensity of 0.2 inch of rainfall per hour, for each hour of a storm event, or 2) the maximum flow rate of runoff produced by the 85th percentile hourly rainfall intensity (for each hour of a storm event), as determined from the local historical rainfall record, multiplied by a factor of two; and be ranked with high or medium pollutant removal efficiency for the PDP's most significant pollutants of concern. Flow thru treatment control BMPs with a low removal efficiency ranking will only be approved by the County if a feasibility analysis has been conducted, which exhibits that implementation of flow thru treatment control BMPs with high or medium removal efficiency rankings are infeasible for the applicable portion of a PDP.~~

[. . .]