

CALIFORNIA COASTAL COMMISSION

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October 17, 2025

TO: California Coastal Commissioners and Interested Public

FROM: Dr. Kate Huckelbridge, Executive Director
Eben Schwartz, Marine Debris Program Manager
Vanessa Metz, Senior Environmental Scientist

SUBJECT: **Final Draft of “Guidance for Addressing Plastic Pollution in Coastal Development Permits and Local Coastal Programs” Recommended for Adoption**

SUMMARY OF STAFF RECOMMENDATION

Staff is recommending **adoption** of new policy guidance titled “**Guidance for Addressing Plastic Pollution in Coastal Development Permits and Local Coastal Programs**” (hereafter abbreviated to “Plastic Pollution Guidance”). A draft of the guidance document was released on August 15, 2025, followed by a 30-day public review period. Three public comment letters were received, including comments from Surfrider and other interested parties. In addition, Commission staff coordinated with the Ocean Protection Council’s Plastic Pollution Steering Committee and received comments and suggested edits from the California Department of Public Health, Tobacco Control Program. Most comments were supportive of the guidance and provided suggestions designed to strengthen specific sections. A variety of edits were made to address these comments. Although various changes were made to clarify, correct, add context, and emphasize certain portions of the document, the proposed final draft of the Plastic Pollution Guidance was not fundamentally altered. The recommended final draft version of the Plastic Pollution Guidance is attached as **Exhibit 1**.

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EXHIBITS

Exhibit 1 – Final “Guidance for Addressing Plastic Pollution in Coastal Development Permits and Local Coastal Programs”

I. MOTION AND RESOLUTION

Motion:

I move that the Commission adopt the “Guidance for Addressing Plastic Pollution in Coastal Development Permits and Local Coastal Programs” pursuant to the staff recommendation.

Staff Recommendation of Approval:

Staff recommends a **YES** vote. Passage of this motion will result in the adoption of the “Guidance for Addressing Plastic Pollution in Coastal Development Permits and Local Coastal Programs” as interpretive guidelines. The motion passes only by affirmative vote of a majority of the Commissioners present.

Resolution to Approve the Guidance:

The Commission hereby adopts the “Guidance for Addressing Plastic Pollution in Coastal Development Permits and Local Coastal Programs” as interpretive guidelines pursuant to Public Resources Code section 30620.

II. BACKGROUND

As the prevalence of plastic increases in California and threatens its valuable resources, it is more important than ever to make land use policy and development decisions that minimize plastic pollution. Prevention of plastic pollution is crucial for protection of the coastal environment, as plastic materials and their chemical additives can adversely impact terrestrial, freshwater, estuarine, and marine ecosystems. The Plastic Pollution Guidance attached as **Exhibit 1** describes how plastic pollution prevention efforts interface with the Coastal Act and relate to the Coastal Commission's work on coastal resiliency, including guidance for both the Coastal Commission and local governments.

As interpretive guidelines that are recommended for adoption pursuant to Coastal Act Section 30620(a)(3), this guidance is intended to assist the Commission, local governments, and members of the public in preventing plastic pollution through planning and permitting actions. However, this document is not a regulatory document, and the principles in it are simply guidance for how Coastal Act policies can and will be carried out. The document also sets forth a suite of past actions previously taken by the Coastal Commission to provide templates for future permit conditions and LCP revisions in order to implement this guidance.

A. Plastic Pollution & the California Coastal Act

The Coastal Commission has a long history of addressing plastic pollution through organizing volunteer beach cleanups such as California Coastal Cleanup Day and the year-round Adopt-A-Beach Program. Through these efforts, more than 2 million Californians have helped remove over 26 million pounds of trash from ocean coastlines and river shorelines since 1985. However, substantially reducing plastic pollution in the ocean and other coastal environments will require additional, effective interventions. Reducing the release of plastic pollution into the coastal environment by being thoughtful about the use of plastics is more effective than removing plastic after it has entered the environment. To that end, reducing or eliminating unnecessary single-use plastics at the source is a key strategy in preventing plastic pollution. Plastics impact the coastal zone and the coastal environment in many ways, such as through harmful impacts to marine wildlife, the release of toxic chemicals associated with plastics, as well as economic and social impacts associated with the entire life cycle of plastics. These many manifestations of plastic pollution are already causing extensive impacts on California's coastal resources, residents, economy, and infrastructure, with disproportionate impacts placed on already overburdened communities.

Several policies in the Coastal Act address issues relevant to the environmental impacts of plastic pollution resulting from development, including:

- Section 30230, which provides a broad basis for protection and enhancement of marine resources. This policy requires that uses of the marine environment sustain the biological productivity of coastal waters and maintain healthy

populations of all marine species. Plastic pollution in the ocean may impair the health and biological productivity of marine life populations.

- Section 30231, which establishes the Commission's authority to protect the water quality of all coastal waters, including waterways, lakes, wetlands, estuaries, and marine waters. It requires that coastal water quality be maintained, and where feasible restored, to protect marine organisms and human health. The Commission (and local governments with certified LCPs) may protect water quality in a variety of ways, including by controlling wastewater discharges and stormwater runoff. Plastic pollution resulting from development degrades coastal water quality to the detriment of both aquatic life and human health.
- Section 30240, which mandates that Environmentally Sensitive Habitat Areas be protected from significant disruption of habitat values. Plastic pollution resulting from development can have adverse impacts on aquatic and terrestrial biota, which could potentially disrupt habitat values.
- Section 30251, which protects the scenic qualities of coastal areas that can be visually degraded by plastic pollution, particularly in waterways, along shorelines, and on the coastline.

Together, these Coastal Act sections provide the Commission with the authority and the duty to consider and address the prevention of plastic pollution in land use policy and development decisions. Preventing plastic pollution through sustainable land use planning and development practices is necessary for building cleaner and healthier coastal communities, mitigating for impacts of development, and protecting coastal resources over the long term. Such planning strategies are presented in and supported by the Plastic Pollution Guidance.

B. Project Background

The final draft Plastic Pollution Guidance document was developed using federal financial assistance provided by the Office for Coastal Management, National Oceanic and Atmospheric Administration under the Coastal Zone Enhancement Program (Coastal Zone Management Act Section 309). This project was prepared pursuant to Strategy 3, Marine Debris Reduction Measures Program in the Commission's approved 2021-2025 Assessment and Strategy. This strategy and its associated grant deliverables focus on developing guidance and informational products for the Commission, local governments, and the public on how to prevent plastic pollution throughout the coastal zone through planning and permitting actions.

The Plastic Pollution Guidance document aligns with and helps carry out the Commission's [2021 to 2025 Strategic Plan](#), particularly with respect to Objective 3.5, which calls for the Commission to provide guidance for coastal development permits, LCPs, and other relevant documents to incorporate marine debris reduction measures into permits and plans. It also calls for the Commission to develop educational materials and campaigns, implement outreach programs, and encourage management and

regulatory strategies that reduce reliance on single-use, disposable plastic products and packaging, which the guidance will encourage through permits and planning documents.

III. SUMMARY OF PLASTIC POLLUTION GUIDANCE

The Plastic Pollution Guidance (Exhibit 1) describes how prevention of plastic pollution relates to the Coastal Commission's work on protecting coastal resources and provides general strategies and examples of past actions taken on specific types of development by the Coastal Commission. No new actions or conditions are proposed in the guidance document; staff relied on past Commission actions to provide a blueprint for planners to use in the future. Where no past actions had been taken, suggestions for potential actions to consider were included. The general strategies are listed below, but more details and discussion can be found in the full document.

A. General Strategies

The Plastic Pollution Guidance document provides the following general strategies to consider to guide the Coastal Commission and local governments in their plastic pollution prevention work under the Coastal Act:

1. Use non-plastic materials when feasible
2. Select Low-Toxicity Plastics Resistant to Releasing Plastic Particles
3. Minimize Discharge of Plastics During Installation and Maintenance
4. Monitor Plastics in Structural Components
5. Contain Plastic Litter and Debris
6. Remove Plastic Debris from Runoff, Wastewater Discharges, and Waterways

Additional guidance is provided specific to both Coastal Development Permits and within other coastal planning documents.

IV. RESPONSE TO COMMENTS

Three public comment letters were received, including comments from Surfrider and other interested parties. In addition, Commission staff coordinated with the Ocean Protection Council's Plastic Pollution Steering Committee and received comments and suggested edits from the California Department of Public Health, Tobacco Control Program.

Most comments were supportive of the guidance and provided suggested edits designed to strengthen specific sections or expand the scope of plastic products to be

addressed. A variety of changes were made to incorporate these comments. Although various edits were made to clarify, correct, add context, and emphasize certain portions of the document, the proposed final draft of the Plastic Pollution Guidance was not fundamentally altered by the suggested changes.