

CALIFORNIA COASTAL COMMISSION

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**Comments for oral testimony on 2nd Draft Stormwater Permit for Ventura County and Cities
- Los Angeles Regional Water Quality Control Board September 20, 2007 Workshop:**

I'm Tracy Duffey and I am here on behalf of the staff of the Water Quality Unit of the California Coastal Commission and as a partner in the California Water and Land Use Partnership, otherwise known as Cal WALUP, which is focused on educating land use decision makers about the relationship between land use and water quality.

As the State's land use agency charged with protecting and enhancing coastal resources, the Coastal Commission is deeply concerned with the impact of stormwater and dry-weather runoff on the water quality of our streams, wetlands, estuaries, and beaches.

Land use planning and development are inextricably linked with the health of our watersheds. The way we develop and manage land use activity in our watersheds directly affects the water quality and ecological integrity of our rivers, streams and other aquatic resources in the State. Land use planning efforts and water quality goals must be integrated – and we believe the concepts and measures set forth in the proposed Draft Permit recognize and embrace this important principle. We are particularly supportive of the Draft Permit sections that address the impacts of **hydromodification** and advance the use of **low impact development concepts and techniques**.

The Coastal Commission is one of the lead agencies carrying out California's Non-point Source Control Plan, and that plan recognizes the importance of maintaining the pre-disturbance hydrologic character of watersheds when developing land. The Commission, accordingly, has long emphasized the need for development to control not only pollutants in runoff, but also increases in volume, flow and duration of discharge caused by the creation of impervious surfaces.

In addition, Low Impact Development and the integrated approaches to stormwater management articulated in the Draft Permit are consistent with the policies and measures that the Coastal Commission has been approving in Local Coastal Plans and Permits in recent years. Further, the Commission, as a member of Cal WALUP, encourages and supports an LID training program as outlined in the Draft Permit, and hopes that this training program will be coordinated with Cal WALUP's efforts.

The Commission and Cal WALUP support the concept of Natural Resource Based Planning where natural areas in a region are preserved or set-aside to retain their beneficial uses, including infiltration, pollutant removal and habitat value. In addition, the footprint of development should be minimized as much as possible to reduce the spread of impervious surfaces and maintain the functions of natural drainage systems.