

CCMP Crosswalk and Model Language Guidelines for Integrating Environmental Planning Best Management Practices into Comprehensive Plans

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Executive Summary

Effective planning for the Tampa Bay region calls for a whole-systems approach to estuary management; a process that incorporates estuary management considerations into the broader structure of community-based land use planning. By integrating policies which support estuary protection within elements of a community's comprehensive plan, local governments can provide a basis for development decisions regionally. This integration is fundamental in achieving widespread awareness of the ecological services provided by the Tampa Bay estuary, and its connection to achieving broader community goals.

This project provides a point of reference in the development of comprehensive plan language that furthers the protection and restoration of the Tampa Bay estuary. The outputs of this project provide tools for elected officials, planners, scientists, resource managers, and community stakeholders to reference during the comprehensive plan amendment process.

The model language in this document is suggested and not required. We hope that this guide enables your community to more easily incorporate estuary management considerations into the broader structure of comprehensive land use planning.

TBRPC coordinated meetings and workshops, integrated comments, and is actively supporting additional updates and dissemination to local government elected officials, planners, and resource managers. The statements, findings, conclusions, and recommendations expressed herein are those of the organizations, and do not necessarily reflect the views of the TBEP members or the TBRPC.

Purpose

The regulatory framework supporting local government land use decisions has changed dramatically since the Tampa Bay Estuary Program (TBEP) was founded in the early 1990s. In 2011, the Florida Legislature passed the Community Planning Act which called for sweeping changes to the comprehensive plan review process, limited state oversight, and narrowly prescribed topics upon which state and regional entities may provide guidance. The Act also eliminated many of the rules promulgated to establish minimum compliance criteria for local comprehensive plans, further placing the burden of these planning decisions and required technical expertise on local government staff.

TBEP and its partners have pledged, through a binding Interlocal Agreement, to achieve the science-based goals of *Charting the Course: The Comprehensive Conservation and Management Plan (CCMP)* for Tampa Bay. During the effort to update the CCMP in 2017, the TBEP Management and Policy Boards expressed an interest in improving the extent in which actions and goals articulated in the CCMP are translated into the vision and planning documents of local governments. This project supports the local land use decisions of local governments and provides technical assistance regarding the best practices for appropriately applying the CCMP into established regulatory frameworks that fall under local government jurisdiction; specifically, a local government's comprehensive plan.

Project Background

The CCMP uses scientific research to identify Tampa Bay’s most pressing issues and set corresponding actions to further the protection and restoration of the estuary over a 10-year horizon. The CCMP intended to be a living document that reflects the evolving knowledge and understanding of bay processes and community needs. Major revisions of *Charting the Course* occur every 10 years; minor updates occur every 3-5 years. There are 39 Action Plans within the 2017 CCMP Update. Each Action Plan presents specific strategies to meet agreed-upon objectives. Responsible parties, implementation timetables, and results and deliverables are a component of every Action Plan.

As provided under Chapter 163 of the Florida Statutes, all cities and counties are required to maintain a comprehensive plan. Comprehensive plans are legally binding documents that guide and coordinate growth and development in a community through at least a 10-year planning horizon. A widespread community engagement process is undertaken to ensure that the comprehensive plan’s policies address their community’s vision for the future, its specific needs, and all local considerations.

Local governments share a common interest in the health of the bay; not only for environmental considerations, but as a basis for maintaining a thriving economy. The economic, environmental, social, and cultural linkages between coastal communities and estuaries are fundamental drivers of quality of life and community character. There is a responsibility to protect the critical habitat diversity and ecosystem services of the Tampa Bay estuary and its associated wetlands.

Given that local government land use decisions are required to maintain consistency with the objectives and policies of the community’s comprehensive plan, the process of incorporating policies that support estuary protection within comprehensive plans can provide a basis for development decisions regionally. This integration is fundamental in achieving widespread awareness of the ecological services provided by the Tampa Bay estuary, and its connection to achieving broader community goals.

Stakeholder Engagement

The project employed a collaborative approach, convening a variety of experts to establish consensus on the most appropriate actions and goals to be addressed effectively in local government comprehensive plans.

The following jurisdictions were included in the local government comprehensive plan review and CCMP crosswalk:

- Pasco County
- Pinellas County
- Hillsborough County
- Manatee County
- City of Clearwater
- City of St. Petersburg
- City of Tampa

Table 1 includes all members of the project team, throughout the entirety of the process.

Table 1 – Project Team

Project Management Team	
Maya Burke Senior Environmental Scientist Tampa Bay Estuary Program	Heather Young Environmental Planner Tampa Bay Regional Planning Council
Sarah Vitale, AICP Senior Planner Tampa Bay Regional Planning Council	CJ Reynolds Director of Resiliency and Engagement Tampa Bay Regional Planning Council
Cara Woods Serra Comprehensive Resiliency Planner Tampa Bay Regional Planning Council	Siobhan O’Kane Director Urban Land Institute (ULI)
Local Government Stakeholders	
Shawn College (City of Tampa/Hillsborough County), Director, Strategic Planning, Environmental & Research Hillsborough City-County Planning Commission	Mary Helen Duke (Pasco County) Senior Planner – Project Management Pasco County Planning Department

Kyle Brotherton (City of Clearwater) Senior Planner – Long Range Planning City of Clearwater	Amy E. Hylar (Pasco County) Planner II (Long Range) Pasco County Government
Ryan Riordan (Hillsborough County) Environmental Specialist Hillsborough County	David Glicksberg (Hillsborough County) Manager, Sustainable Water Resources Section Hillsborough County
Sarah Kessler, CFM (City of Clearwater) Environmental Specialist City of Clearwater	Sheridan Boyle (City of Clearwater) Sustainability Coordinator City of Clearwater
Caroline Lanford (Pinellas County) Principal Planner Pinellas County Government	Robert Knable, PWS (Manatee County) Manager, Environmental Planning Section Manatee County Building & Development Services
Sharon Wright (City of St. Petersburg) Sustainability Manager City of St. Petersburg	Carlos J. Frey, P.E., ENV SP (City of St. Petersburg) Design Manager Stormwater and Environmental Division Engineering and Capital Improvements
Robert Brown (Manatee County) Division Manager Manatee County Parks and Recreation	Shelby Knobel (Pasco County) Resiliency Intern Pasco County Government
Lauren Matzke (City of Clearwater) Long Range Planning Manager City of Clearwater	Matt Armstrong (Pasco County) Executive Planner Pasco County Government
Derek Kilborn (City of St. Petersburg) Manager, Urban Planning & Historic Preservation City of St. Petersburg	

The project was conducted in two phases:

Phase 1 emphasized identifying and prioritizing actions and creating a crosswalk that translates the most appropriate elements of the comprehensive plan to create model language for. The project managers conducted several stakeholder meetings during this phase and, once priority actions and goals were identified they were presented to the appropriate Tampa Bay Estuary Program boards/committees for conceptual approval.

Phase 2 of the project focused on the development of actual model language. The project management team conducted a virtual stakeholder meeting to review the draft model language and will present final recommendations to the Management and Policy boards for approval.

CCMP Crosswalk / Phase 1

In Phase 1 of this project, TBRPC conducted a review of the comprehensive plans of Hillsborough, Pasco, Pinellas, and Manatee counties, and the cities of Clearwater, St. Petersburg, and Tampa (using 2017 documents). This was done in order to establish a baseline understanding of the extent in which CCMP goals and actions are already addressed within existing policy language, and how they might be better incorporated moving forward.

TBRPC created a Crosswalk that relates CCMP goals and actions to appropriate comprehensive plan elements across all 7 of the local government’s comprehensive plans. A review was conducted to determine first, whether the CCMP Action Plans are addressed within the Comprehensive Plan, and second, to what degree. Each of the 39 CCMP Action Plans received a color-category to illustrate the methodology (see Figure 1). There was also a determination made by the Stakeholder Committee as to whether the CCMP Action Plan was applicable at the local level; and if it was not applicable it received an X.

Figure 1. Crosswalk Matrix Category Descriptions

- 
Activity is specifically addressed.
 Language specifically refers to and enables the practice or measure of said activity. If conditional, states criteria considered acceptable for approval, so questions are limited.
- 
Activity is generally addressed.
 Language generally supports the CCMP action plan.
- 
Activity intent is vaguely referenced.
 Not specifically mentioned or has ambiguous application or intent. Not prohibited or in conflict with other specific actions in planning documents. Not disallowed or encouraged.
- 
Activity is prohibited or prevented by conflicting code or state statute.
 Language of statute, code, or other planning documents either specifically discourage the practice, or makes the practice impractical without providing a path for approval.
- 
Activity is not applicable.
 Not applicable at the local level of government.
- 
Activity is not addressed.
 Not addressed in the comprehensive plan.
- X** **Determined not applicable at the local level by Steering Committee**

TBRPC solicited feedback from a variety of practitioners with expertise in the planning and environmental resource management fields.

Table 2 - Phase 1 Stakeholder Meeting Summary

Meeting Date	Meeting Type	Meeting Summary
August 9, 2019	TBEP Management Board	Project management staff presented an update on the project's current status.
August 16, 2019	TBEP Policy Board	Project management staff presented an update on the project's current status
September 27, 2019	Local Government Stakeholder Meeting	Updated stakeholders on project status, and discussed the comp plan/crosswalk scoring process
October 25, 2019	Local Government Stakeholder Meeting	Continued discussion of the crosswalk scores and prioritization of CCMP priority actions for model language development

The Stakeholder Committee received all draft documents and were given the opportunity to submit their own recommendations for the color-categorization of their comprehensive plans. TBRPC staff reviewed the recommendations submitted and amended the Crosswalk to incorporate appropriate changes (see Table 3).

<p>Crosswalk Matrix</p> <p>This matrix crosswalks the Tampa Bay Estuary Program’s CCMP Goals and Actions with local government comprehensive plans.</p>	Manatee	Tampa	Hillsborough	Clearwater	St. Petersburg	Pasco	Pinellas	Not Applicable
Water and Sediment Quality Goals								
WQ-1 Implement the Tampa Bay nutrient management strategy	Blue	Green	Blue	Blue	Green	Green	Blue	
WQ-3 Reduce frequency and duration of harmful algal blooms	Brown	Brown	Brown	Brown	Brown	Brown	Brown	X
SW-1 Reduce nitrogen runoff from urban landscapes	Purple	Green	Green	Purple	Purple	Purple	Blue	
SW-8 Expand adoption and implementation of best management plans for commercial and urban agriculture	Purple	Green	Green	Orange	Orange	Green	Orange	
SW-10 Expand use of Green Infrastructure practices	Purple	Green	Green	Blue	Purple	Green	Blue	
AD-1 Continue to reduce nitrogen loading from atmospheric deposition	Blue	Green	Green	Purple	Green	Green	Blue	
WW-1 Expand the beneficial use of reclaimed water	Blue	Green	Green	Green	Green	Green	Green	
WW-2 Extend central sewer service to priority areas now served by septic systems	Purple	Blue	Green	Green	Green	Green	Green	
WW-3 Require standardized monitoring and reporting of wastewater discharges	Orange	Green	Green	Purple	Purple	Green	Orange	
WW-5 Reduce the occurrence of sanitary sewer overflows to the bay	Purple	Green	Green	Green	Green	Green	Green	
COC-1 Address hot spots of contamination in the bay	Brown	Brown	Brown	Brown	Brown	Brown	Brown	X
COC-4 Identify and understand emerging contaminants	Brown	Brown	Brown	Brown	Brown	Brown	Purple	X

<p>Crosswalk Matrix</p> <p>This matrix crosswalks the Tampa Bay Estuary Program’s CCMP Goals and Actions with local government comprehensive plans.</p>	Manatee	Tampa	Hillsborough	Clearwater	St. Petersburg	Pasco	Pinellas	Not Applicable
PH-2 Continue source and risk assessments of human and ecosystem health indicators suitable for Tampa Bay beaches and other recreational waters	■	■	■	■	■	■	■	X
PH-4 Reduce fecal contamination from humans and pets in Tampa Bay Area waters	■	■	■	■	■	■	■	
PH-5 Reduce pollution from recreational boaters	■	■	■	■	■	■	■	
Bay Habitats								
BH-1 Implement the Tampa Bay Habitat Master Plan	■	■	■	■	■	■	■	
BH-2 Establish and implement mitigation criteria for Tampa Bay, and identify priority sites for mitigation	■	■	■	■	■	■	■	
BH-3 Reduce propeller scarring of seagrass and pursue seagrass transplanting opportunities at select sites	■	■	■	■	■	■	■	
BH-4 Identify and protect hard bottom communities and avoid impacts	■	■	■	■	■	■	■	
BH-6 Encourage habitat enhancement along altered, waterfront properties	■	■	■	■	■	■	■	
BH-8 Expand habitat mapping and monitoring programs	■	■	■	■	■	■	■	X
BH-9 Enhance ecosystem values of tidal tributaries	■	■	■	■	■	■	■	
BH-10 Implement the Tampa Bay Freshwater Wetland Habitat Master Plan	■	■	■	■	■	■	■	
FI-1 Maintain Seasonal Freshwater Flows in Rivers	■	■	■	■	■	■	■	

<p>Crosswalk Matrix</p> <p>This matrix crosswalks the Tampa Bay Estuary Program’s CCMP Goals and Actions with local government comprehensive plans.</p>	Manatee	Tampa	Hillsborough	Clearwater	St. Petersburg	Pasco	Pinellas	Not Applicable
Dredging and Dredged Material Management								
DR-1 Develop a plan for beneficial uses of dredged material in Tampa Bay	Purple	Green	Green	Purple	Green	Green	Yellow	
DR-2 Continue to minimize impacts to wildlife and their habitats from dredging activities	Purple	Green	Blue	Purple	Purple	Blue	Purple	
Fish and Wildlife								
FW-1 Increase on-water enforcement of environmental regulations on the bay	Brown	Green	Brown	Brown	Green	Brown	Green	X
FW-3 Support bay scallop restoration	Purple	Brown	Brown	Brown	Purple	Brown	Brown	X
FW-5 Continue and expand the Critical Fisheries Monitoring Program	Brown	Brown	Brown	Brown	Brown	Green	Brown	X
FW-6 Preserve the diversity and abundance of bay wildlife	Purple	Blue	Blue	Purple	Purple	Blue	Green	
Spill Prevention and Response								
SP-1 Continue implementation of advanced technology to improve coordination of ship movements in Tampa Bay	Brown	Brown	Brown	Brown	Purple	Brown	Brown	X
SP-2 Evaluate and update spill response plans for priority areas	Green	Green	Blue	Purple	Purple	Green	Purple	
Invasive Species								
IS-2 Support prevention, eradication or management of invasive species in Tampa Bay and its watershed	Purple	Green	Green	Purple	Purple	Green	Green	

<p>Crosswalk Matrix</p> <p>This matrix crosswalks the Tampa Bay Estuary Program’s CCMP Goals and Actions with local government comprehensive plans.</p>	Manatee	Tampa	Hillsborough	Clearwater	St. Petersburg	Pasco	Pinellas	Not Applicable
Public Access								
PA-1 Provide for and manage recreational uses of the bay	■	■	■	■	■	■	■	
Public Education								
PE-1 Promote public involvement in bay restoration and protection	■	■	■	■	■	■	■	
PE-2 Promote public education about key issues affecting Tampa Bay	■	■	■	■	■	■	■	
Local Implementation								
LI-1 Incorporate CCMP goals and actions in local government comprehensive plans, land development regulations or ordinances	■	■	■	■	■	■	■	
Climate Change								
CC-1 Improve ability of bay habitats to adapt to a changing climate	■	■	■	■	■	■	■	
CC-2 Understand and address the effects of ocean acidification	■	■	■	■	■	■	■	X

Phase 1 Outcomes:

The outputs of the first project phase include a stakeholder-approved Crosswalk document that compares comprehensive plans across municipalities within the region, and seven supplemental documents, one per municipality, that list all comprehensive plan policies relating to a CCMP Priority Action. A Priority Matrix is included to highlight the eight CCMP Priority Actions and identify which comprehensive plan elements include relevant plan language. Additionally, a review of the municipalities' Code of Ordinances is also included but is not color-categorized within a matrix. These documents were provided to TBEP and will be housed on TBEP's online technical portal (www.tbep.tech.org).

The benefits of the first project phase are reported in terms of the number of local governments/professional planners who received technical assistance and knowledge of how the municipality's comprehensive plan policies relate to CCMP goals and actions (captured primarily using meeting sign-in sheets and draft comments). The first phase of the project engaged 15 stakeholders representing 7 local governments.

The Crosswalk identifies variability among local governments throughout the region; identifying estuary-supportive planning initiatives within comprehensive plans and revealing unique approaches taken by municipalities to address CCMP goals and actions within existing plans. This information is beneficial because it provides a baseline understanding of existing policy language from throughout the region and identifies existing strengths and opportunities for policy revisions. The Crosswalk development and collaboration with stakeholders informed Phase 2 of the project, the development of model comprehensive plan language.

Model Language Guidelines / Phase 2

In Phase 2 of this project, TBRPC reviewed comprehensive plans from multiple cities, counties throughout the country to identify leading practices and policies (see resources document). TBRPC prioritized the review to include community plans of local governments that abut water features, including coastal areas, estuaries, lakes, rivers, and other contiguous waters characterized by the presence of marine life, vegetation, and critical habitat.

From those resources, model comprehensive planning language was developed for local governments to use in long range planning. The draft model plan language incorporated Priority CCMP Goals and Actions into a standard, “goals, objectives, and policies” comprehensive planning framework.

The Stakeholder Committee prioritized eight of the 39 total actions for the development of model language; stating that the eight selected could have the largest and most immediate impact on the estuary and are also the easiest to implement at the local level. All local governments agreed that Action Priorities Climate Change 1 (CC-1), Sediment and Water Quality 10 (SW-10), and Bay Habitats 6 (BH-6) would be most useful because the related plan policies greatly impact the estuary and are also policies that TBEP would not be able to implement on its own.

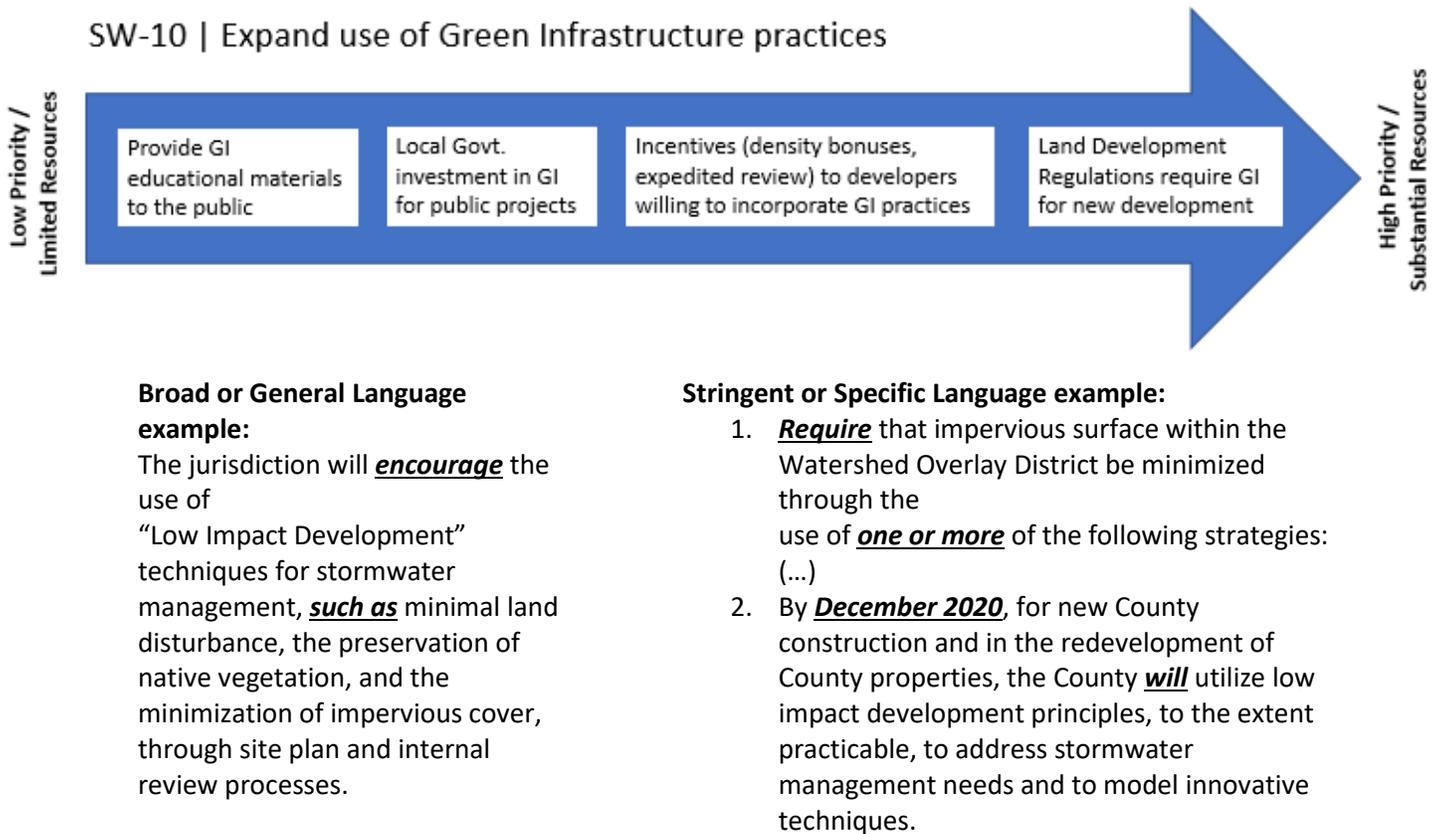
Model language is provided that corresponds with and supports the targeted CCMP Priority Actions. Due to the broad spectrum of objectives addressed in the CCMP, we do not provide model ordinances to cover every possible approach to implementing a CCMP Priority Action. Rather, the model language is meant to provide samples of approaches that have been adopted by other communities and that align the comprehensive plan more closely with CCMP goals and actions.

At a local government stakeholder meeting in October of 2019, the stakeholders were asked to consider which CCMP priority actions would be best suited for model language development. This consideration took into account areas where their jurisdiction could use better language or where their jurisdiction might not have language that addresses that priority action at all. Then, TBRPC staff reworked the model language portion of CCMP project and would like some feedback so that it can be sent out to the stakeholder group. Based on the stakeholder group feedback, the model language has been paired down to the three priority objectives the group felt would be most useful: CC-1, SW-10 and BH-6.

Based on the stakeholder feedback, a streamlined version of the model language document was developed. The initial version of the document included recommended model language to be incorporated into all stakeholders plans similar to a model ordinance. The intent was to have stakeholders edit the model language to get a consensus on language that could be adopted by all jurisdictions. Another important goal for the streamlined language was to ensure that it is comprehensive in addressing the three CCMP objectives as possible.

In addition to the proposed model ordinance the streamlined model language document included a mix and match option. The intent of this option was to give the stakeholders additional options if they wanted to incorporate some more stringent/specific language (See Figure 2). The first column shows the language that was already recommended above. The second column shows language examples for more specific model language that could be added in addition to the language recommended above. For the most part the language in the second column would require implementation in other regulatory mechanisms.

Figure 2 – Choosing Model Language



Goal 1: (Insert local government) shall support regional efforts to integrate climate change, stormwater management and bay habitats into planning efforts in alignment with the applicable goals of the Tampa Bay Estuary Program’s Comprehensive Conservation and Management Plan (CCMP)

Climate Change 1 (CC-1)	
Objective 1: Support adaptation strategies that promote the long-term resiliency and diversity of critical coastal habitats for a changing climate.	
Broad or General	Stringent or Specific
<p>1.1.1 (Insert local government) shall support the integration of resilience measures into local plans and continue to develop and advance policies and programs which conserve natural resources, mitigate greenhouse gas pollution, and advance sustainability and climate resiliency.</p> <p>1.1.2 Assess the vulnerability of specific species, habitats, landscapes, and ecosystem functions that may be sensitive to climate change and develop coping strategies and contingency plans for their adaptation, such as identifying habitats that may be viable during climate disturbances and could potentially serve to give refuge to and sustain at-risk species.</p> <p>1.1.3 Continue to support local environmental restoration, mitigation, and adaptive management initiatives, and coordinate with other state, regional, and national strategic planning efforts to improve the resiliency of natural lands and systems to climate change. Support local and regional mapping, modeling, monitoring programs to assure the most current and locally-specific data on climate change vulnerability is available.</p> <p>1.1.4 Seek the support of agencies, such as the National Oceanic and Atmospheric Administration (NOAA), U.S. Geological Survey (USGS), Federal Emergency Management Agency (FEMA), U.S. Army Corps of Engineers (USACE), as well as universities and not-for-profit organizations to coordinate support for updating,</p>	<p>1.1.7 Create/amend a zoning ordinance to address possible sea level changes and develop appropriate use regulations and development standards.</p> <p>1.1.8 Revise land acquisition and preservation policies to consider the values of natural areas for sequestering carbon and providing climate adaptation and mitigation benefits such as the resource's strategic capacity to absorb floodwaters and address coastal ecosystem migration.</p> <p>1.1.9 Evaluate the minimum shoreline and wetland setbacks currently in use and identify the potential for updates to protect vulnerable structures from the effects of long-term sea level rise.</p> <p>1.1.10 Where appropriate, implement wetland design changes, such as the use of living shorelines and wetland mitigation that allow for the landward migration of wetlands, for resiliency to sea level rise.</p> <p>1.1.11 Establish riparian buffers that reflect projected rates of sea level rise for all tidally-influenced waterbodies to allow the conversion of adjacent uplands to wetlands while retaining transitional ecotones.</p> <p>1.1.12 Develop priority areas of land protection efforts based on their strategic capacity to support coastal ecosystem migration.</p> <p>1.1.13 Incorporate habitat vulnerability to climate change into land use planning, land acquisition, and for deed of conservation easement consideration.</p> <p>1.1.14 Evaluate the use of rolling easement zoning to designate areas of future abandonment, future waterway locations, and future lands for</p>

<p>exchanging and analyzing data regarding potential changes in climate change vulnerability.</p> <p>1.1.5 (Insert Local government) shall enhance climate change mitigation through conservation, restoration and sustainable use of blue carbon ecosystems (mangroves, salt marshes and seagrasses).</p> <p>1.1.6 Enhance public understanding of the potential impacts of changing climate on marine and estuarine habitats through educational community outreach activities and interactive demonstration projects.</p>	<p>conservation, recreation, drainage, and floodplains.</p>
<p>Sediment and Water Quality 10 (SW-10)</p>	
<p>Objective 2: Encourage the reduction of pollution from stormwater runoff by supporting the expanded use of green infrastructure practices.</p>	
<p>Broad or General</p>	<p>Stringent or Specific</p>
<p>2.1.1 (Insert local government) shall conserve, appropriately use, and protect the quality of groundwater and surface/estuarine waters during all phases of construction, land alteration, and in post-construction.</p> <p>2.1.2 (Insert local government) (Insert local government) shall seek to improve the stormwater management system through the implementation of water retention/capture/reuse BMPs.</p> <p>2.1.3 (Insert local government) shall support and/or facilitate innovative pilot projects and practices, public education, and outreach efforts which prioritize low impact development and green infrastructure.</p> <p>2.1.4 (Insert local government) shall encourage the use of green infrastructure as a method of stormwater management to include but not be limited to the integration of rain barrels, green roofs, and rain gardens.</p>	<p>2.1.5 (Insert local government) shall promote low impact landscaping alternatives, expand landscaping Best Management Practices BMPs, and showcase innovative strategies in landscape alternatives, fertilizer reductions, and water conservation.</p> <p>2.1.6 (Insert local government) shall incorporate “passive” green infrastructure and/or low-impact development alternatives that maximize land preservation over impervious or "active" infrastructure.</p> <p>2.1.7 Ensure that green infrastructure (GI) and low impact development (LID) measures are incorporated into site design before conventional on-site detention and infiltration methods are considered.</p> <p>2.1.8 (Insert local government) shall create and maintain streets that are designed to contribute to water conservation and stormwater management efforts.</p>

Bay Habitats 6 (BH-6)	
Objective 3: Increase and preserve the number and diversity of healthy bay habitats by encouraging habitat enhancement along altered waterfront properties	
Broad or General	Stringent or Specific
<p>3.1.1 (Insert local government) shall expand the use of wetland setbacks, and living or enhanced shorelines as an alternative to traditional seawalls, along waterfront properties as the preferred method of shoreline stabilization.</p> <p>3.1.2 (Insert local government) shall promote demonstration projects, community involvement, and K-12 education related to shoreline management.</p> <p>3.1.3 (Insert local government) shall encourage the enhancement of existing hardened shorelines (e.g. seawalls). These enhancements may include but shall not be limited to the addition of oyster reefs, native coastal plants, rip-rap and gradual slopes where appropriate.</p>	<p>3.1.4 Evaluate the minimum shoreline and wetland setbacks currently in use, and in coordination with DEO, FDEP and FWC, redefine setbacks to accomplish the following: protect natural shoreline vegetation; protect marine turtle nesting beaches; protect water quality; and protect beaches and shorelines from erosion.</p> <p>3.1.5 Adopt land development regulations that promote maintaining shorelines in their natural state and where that is not practicable, support the use of living shoreline practices, where appropriate, as the preferred method of shoreline management. Implementing land development regulations should:</p> <ol style="list-style-type: none"> 1. Promote practices that minimize or eliminate the use of vertical hard materials as typically used in bulkhead and seawall construction; 2. Maximize the use of soft alternatives such as native vegetation plantings and local, naturally occurring materials; <p>3.1.6 Require that any new shoreline hardening structures, or replacement of any existing bulkheads, shall consist of or include sloping structures of riprap or permeable materials combined with native vegetation.</p> <p>3.1.7 Inventory the linear extent of all private residential and commercial shoreline parcels and publicly owned shoreline parcels whose biophysical characteristics make them suitable for living shorelines.</p> <p>3.1.8 For those parcels that exhibit features suitable for living shorelines, develop an outreach/stakeholder engagement program, and permitting/regulatory strategy to maximize their use.</p> <p>3.1.9 Develop a living shoreline monitoring program that tracks the success of living shorelines over time.</p> <p>3.1.10 Integrate beach dunes and other living shoreline features, as appropriate, as part of all beach nourishment projects.</p>

Bay Habitats 6 (BH-6)	
Objective 3: Increase and preserve the number and diversity of healthy bay habitats by encouraging habitat enhancement along altered waterfront properties	
Broad or General	Stringent or Specific
	<p>3.1.11 Prohibit further hardening of shorelines unless as a last resort to protect public property due to erosion.</p> <p>3.1.12 Establish living shoreline, oyster garden, and living seawall demonstration projects to promote education about the ecological benefits and cost effectiveness of shoreline-friendly techniques.</p> <p>3.1.13 Provide incentives and technical assistance to waterfront home and business owners to install living shorelines, oyster gardens, living seawalls, and other shoreline-friendly practices.</p> <p>3.1.14 Explore opportunities to create a small grants program that gives home and business owners access to raw materials needed to install living shorelines, oyster gardens, living seawalls, and other shoreline-friendly practices.</p> <p>3.1.15 Explore opportunities to create a small grant program for curriculum development and field-based education, including marsh grass nurseries and oyster gardens.</p> <p>3.1.16 Develop a community outreach and education program to promote living shorelines by:</p> <ol style="list-style-type: none"> 1. Providing education and support to local community groups and neighborhoods who want to monitor and care for their local park or natural area. 2. Giving all members of (insert local government) opportunities to experience, appreciate, and participate in volunteer stewardship of the natural environment. 3. Encourage curriculum programs such as “Grasses in Classes” in public and private schools.

Phase 2 Outcomes:

Phase 2 of the project resulted in the development of model language for three of the CCMP Action Priorities. The model language was formatted to allow local governments to choose for broad or general language and/or specific or stringent language depending on the needs of their community. The project team developed 1 goal, three objectives, and over 40 policies for local government consideration.

There was a consensus among stakeholder that the direction of comprehensive plans is to be less detailed, revised to remove repetitive language (“streamlined”), and that most regulatory information should be moved to/reference other plans that can be more easily updated and are generally updated more frequently.

At a stakeholder meeting in February, TBRPC facilitated a discussion about the CCMP Action Priorities selected for the development of model comprehensive plan language. Stakeholders were given the opportunity to review an updated model language draft in advance of the meeting. The model language was developed by TBRPC for CCMP Action Priorities CC-1, SW-10, and BH-6.

Attendees provided feedback on the specific phrasing of the objective and policy statements, providing examples of how the language can be rewritten to become more applicable and actionable within their comprehensive plans (ex. to include a standard definition of green infrastructure and low impact development).

Stakeholders agreed that the way that the more effective way to present the model language is in a table format, in place of model goal, objective, and policy statements. The table should include suggested objectives and policies in one column, and beside it, options for more stringent policies that address the same objective.

There was a general consensus that the comprehensive plan language should be written in the most politically agreeable phrasing (ex. “speaks to a changing climate” vs. “climate change”), should address all bay habitats (not only those directly affected by sea level rise), and that shoreline management policies should be revised to include a stronger emphasis on preserving and/or enhancing natural shorelines.

After the meeting all jurisdictions had the opportunity to review and suggest changes that would be incorporated into the final draft of the model language document.

How to Apply the Model Language

The model language herein should not be adopted as-is into planning documents. Rather, these ordinances should serve as a template for communities seeking to implement estuary-supportive planning initiatives. The policy recommendations are intentionally broad and amenable. This format increases the likelihood and efficiency in which these policies can be customized and refined throughout a community engagement process and ultimately integrated within local comprehensive plans.

One approach when updating a comprehensive plan is to add a new element to the plan that focuses on a specific topic area; ex. Resiliency, Climate Change, or Sustainable Development. Another approach is to edit existing GOPs and/or insert new GOPs, where applicable, throughout existing plan elements.

Regardless of which approach is chosen, a comprehensive plan's goals should be supported by other elements of the comprehensive plan. For example, if a priority to decrease impervious surfaces is added to the Recreation and Open Space Element, the Transportation Element should be closely examined to ensure that policies for the design of parking lots are consistent and avoid conflict with the new priority.

Another consideration is that comprehensive plan policies should not be unaccommodating and overly specific. The comprehensive plan identifies a community's overarching priorities, but the plan itself is implemented through land development regulations. If language that is more appropriately stated within a zoning ordinance, land development code, or small area plan appears within a comprehensive plan, implementation of the plan can become problematic and inefficient across varying geographies.

A highly prescriptive comprehensive plan policy limits a community's ability to adopt flexible land development regulations that can more ably respond to changing environmental conditions and site characteristics. For example, a comprehensive plan policy should not include an exact width for strips of vegetative buffers. That determination should be made on a site-by-site basis, informed by the site's unique purpose for the buffer and any surrounding habitat area.