



June 13, 2013

Mary Shallenberger, Chair and Members of the Commission  
California Coastal Commission  
45 Fremont Street Suite 2000  
San Francisco, CA 94105

**RE: Concerns Regarding State Park Automated Payment Machines: Applications 5-13-0349, 5-13-0350, 5-13-0351**

Dear Chair Shallenberger and Honorable Commissioners,

The Surfrider Foundation HQ (Surfrider) writes to express our concerns about the three applications put forth by California State Parks (CSP) to install automated payment machines (APMs). Surfrider is sensitive about the fact that both the State and CSP are enduring hard economic times. We are also aware that recent legislation requires CSP to increase revenue. However, Surfrider is concerned the CSP is not being methodical about their revenue building plans.

For these three permits, we are specifically concerned about the following:

- The applications, and the conditions put forth by CCC Staff, do not articulate a specific pay structure. Surfrider is not quite sure how CCC can vote on the matter if you do not specifically know how much the public will be charged—and how that will impact “change in use” as required under the Coastal Act.
- Surfrider is also concerned that there is no baseline information about current uses and revenues. Upon reading the Staff report, it appears this baseline data will be forthcoming, but again, I’m not sure how CCC can vote on an item with major data gaps.
- The monitoring program and the possibility of “reprogramming” AMPs, as described in the applications, are equally vague and open-ended—which naturally leads Surfrider to be concerned about how CSP will communicate to the public (and the CCC) if/when rates are increased and/or new fees are instituted.
- The concept of “hourly fees” seems like an “after thought” and based on some of the CSP correspondence I have read, it seems as if CSP would rather not have hourly fees. Surfrider is adamant that hourly fees be carefully considered and evaluated. Many of our constituents only go to the beach for an hour or two to surf. It would be unfair to charge someone \$15-20 to surf for an hour.
- Surfrider believes the permit application should be for one or two years. Not three years as suggested by CCC Staff, nor five years as suggested by CSP.
- Finally, Surfrider believes CCC should require CSP to create a strategic plan and a robust marketing plan before these permits are granted.

**General Concerns about CSP Park Fees and Lack of Public Outreach**

Surfrider wants to ensure that all impacts associated with installing pay stations are thoroughly evaluated, including, but not limited to: environmental impacts, signage, traffic

analysis, socioeconomic implications, maximum public access, and other community concerns that are raised during a public process. At this point we are concerned that the CSP has not conducted thorough community outreach nor do they have a strategic plan that ensures any fee increases are equitable and maintain maximum public access to the coast.

While we are supportive of fees to keep parks open and well maintained, we are concerned about **how** the process has been handled thus far—especially in Sonoma County to collect **new** fees. For example, in Sonoma, CSP did a poor job of engaging the public—and tried to get a CDP exemption. Surfrider and our local Chapter fought hard to make sure that process was open and transparent and included a CDP. In addition to lack of public involvement, CSP’s plans to install numerous iron rangers in Sonoma is lopsided. CSP has aspirations to install 15 iron rangers that could cover nearly 80% of state beaches in Sonoma. That means only 20% of parking at State Beach would be free when it is currently universal and free access.

CSP has an obligation to ensure they are providing timely project information and encouraging public awareness. Lack of timely communication only leads the local community to think the process has been obfuscated and conducted without public awareness.

Before CCC grants permits in Orange County and before CSP pursues fees in Sonoma, Surfrider calls on CSP to:

- Implement a thorough statewide strategic plan that is transparent, equitable, and includes community input. The plan must articulate how CSP will raise revenue and explain *what* new revenues will be utilized for.
- CSP must work with CCC and the public to **maintain the maximum amount of public access** in order to comply with the Coastal Act and ensure that new/increased fees do not overburden seniors, low-income individuals, students and others from enjoying the coast.
- We would like to see a thorough marketing plan for how CSP will communicate new fee structures to all Californians.

In conclusion, Surfrider Foundation HQ urges CCC to postpone making a decision until the above conditions are considered and implemented. As mentioned, the Surfrider Foundation is not opposed to fees to help maintain parks—but we feel it is imperative to ensure it’s done methodically, with public input, and based on sound data and revenue analysis. We care deeply about our coastal parks.

Respectfully,



Stefanie Sekich-Quinn  
California Policy Manager  
Surfrider Foundation, HQ