

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT OFFICES
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**June 28, 2018**

Mr. Graham Stapelberg
ASP LLC dba World Surf League
147 Bay Street
Santa Monica, CA 90405

RE: Incomplete Filing Status of Coastal Development Permit (CDP) Application No. 2-18-0496 (ASP LLC dba World Surf League), Pillar Point Harbor, Princeton-by-the Sea, San Mateo County

Dear Mr. Stapelberg:

Thank you for the submittal of your revised application form (including your "event planner") received in our San Francisco office on September 1, 2017 and via e-mail on August 30, 2017. The CDP application is incomplete and cannot be filed in accordance with the Commission's Administrative Regulations (Title 14 CCR § 13056). Please submit the following information so that we can adequately analyze the project for conformity with the Coastal Act.

- 1. Request for CDP Consolidation.** The proposed project/event activities would be conducted within areas under both the Commission's and the County's permit jurisdictions. Please submit your and the County's written concurrence to a consolidated CDP permitting process.
- 2. Competitor Selection Process.** You state in the application (on page 9) that WSL monitors top performances that each surfer puts on at every break over the course of the full year. Best overall performances are ranked. It's not clear, as described; regarding the "pathway" to qualification that WSL says is now available to women. Please confirm the distinction between the past and what WSL currently proposes. Women now will be invited to participate in Mavericks based on final rankings and review of her entire documented big wave surfing performances; versus a best performance on any single day.
- 3. Inclusion of Women.** Condition #8 of CDP 2-17-0671 required that any subsequent application for a surf event at Mavericks include a detailed plan for the inclusion of women. While the 2017-2018 season allowed for one heat for women. The proposed plan will need to be similar/comparable to what is designated for men.
 - a) The Men's Division has four heats. Provide the number women's heats for this year's event.

- b) You indicate that the women's competition will take place during a break in the men's competition "when conditions are most suitable". Describe what suitable conditions are; including relative to conditions during the men's heats.
- c) You state that WSL is expanding the inclusion of female surfers and investigating this expansion pending further consultation with surfer representatives. Please confirm which surfer representatives are being consulted. Describe in more detail the consultation process you are undertaking, including the projected timeline.
- d) The application states that "Wildcard" surfers (male and female) are voted in by a panel of local big wave legends that advises the WSL Commissioner. Describe the selection process for the panel.

4. Proposed Development

- a) The Plan A and Plan B site plans are difficult to read, particularly the labeling for the structures. Submit a site plan that is legible. Please also provide an electronic copy of the submittal.
- b) The public has previously raised questions as to whether or not it is appropriate to give an applicant exclusive use rights for multiple months during a given year for a surf event. Describe how WSL proposes to deal with/conduct its event if another entity submits a complete application for a similar event during the same window as WSL.
- c) Provide an alternative to the Pillar Point Marsh lot (West Trail Lot) that will be available for public parking during the proposed event.
- d) The Event Management Plan includes monitoring and evaluation of the event. Provide a plan for the monitoring of wildlife and biological resources. The proposed plan should include the collection of data consistent with the requirements of the Monterey Bay National Marine Sanctuary (aka NOAA, Greater Farallones National Marine Sanctuary).
- e) The Event Plan mentions that WSL hopes to establish a more extensive "festival" type viewing experience in the Harbor Area with expanded amenities and significant capacity in the future once basic event permitting is completed and sufficient time is available for planning and community integration. Will this be for this coming event season, i.e., this year or further in to the future?

5. Monitoring Plan. The application state that you will be working with a private consultant to put in place a "monitoring team". Please submit

6. Required Attachments. Please submit the following materials.

- a) A completed Appendix B, Local Agency Review Form.
- b) Appendix D, the Declaration of Posting, indicates that a Notice of Pending Permit was posted at the Pillar Point Harbor Office. Please also post a notice closer to the Mavericks site, such as the West Trail lot, and provide evidence of posting at both locations.
- c) You indicate that other agency applications are pending and you expect to begin the respective process in August, at their direction. Provide verification of all other permits, permissions, or approvals applied for or granted by the public agencies as required and listed on page six of your application. Please also submit evidence that the Traffic Management Plan has been reviewed and signed-off (or approved) by CHP, San Mateo County Harbor District, Caltrans, and the County Sheriff's Office. You should coordinate with the State Lands Commission (SLC) staff regarding that agency's permit requirements. SLC has jurisdiction over all "sovereign lands," or lands held in trust by the State of California, including tidelands and submerged lands three miles off the coast. Included below is contact information for the SLC contact person.

Nicholas Lavoie
Public Land Manager
California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, CA 95825

Phone 916 574-0452
Fax 916 574-1324
nicholas.lavoie@slc.ca.gov

- 7. Appendix B of your submittal (on page 29) provides an event timeline, including "Pre-Build" which is for setting up the Production and Broadcast Area. Do you propose to close the West Trail Lot during the "Pre-build" if you use Plan B rather than Plan A? Plan A indicates use of the Pillar Point Air Force Station property on the bluff top. Please provide evidence that you are permitted or authorized to use the Air Force's property.

We will hold your application for six months from today's date (i.e., December 24, 2018) pending receipt of these materials. The application will again be reviewed after all of the above-listed materials have been received, and will be filed as complete if all is in order pursuant to Government Code Section 65943(a). There may be additional materials necessary for filing purposes depending upon the nature of the information you provide in response to our request.

All of the above-listed materials must be received within six months, if not, application number 2-18-0496 will be considered withdrawn and returned to you. This submittal deadline may be extended for good cause if you submit/make a request prior to December 24, 2018. Feel free to

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contact me at the address and phone number listed in the letterhead if you have any questions regarding this CDP application.

Sincerely,

A handwritten signature in cursive script that reads "Renée Ananda". The signature is fluid and elegant, with the first name and last name clearly distinguishable.

Renée Ananda, Coastal Program Analyst
California Coastal Commission
North Central Coast District

CC: Steve Monowitz, San Mateo County Planning and Building Dept.
Steve McGrath, San Mateo County Harbor District