

Proposed Framework for Community Access Partner Permitting (CAPP) by Mira Manickam (Brown Girl Surf) and Johnny Irwin (City Surf Project)

I. Creating a CAPP system vs overhauling the whole permitting structure. We strongly urge the PBRC to first focus on creating a CAPP permit system rather than overhauling the whole permit system all at once. Focusing on nailing down the details of the CAPP system before attempting an entire system overhaul will have the following benefits:

- Immediately address the issue of equitable access for underrepresented groups served by CAPP-eligible orgs and lay out a clear framework for equitable access going forward;
- Create a contained program in which the PBRC can test-drive new systems for a permitting process (including accepting applications, evaluating applications, sharing space between permittees);
- Lessons learned from the CAPP program can inform a larger permit policy change later on, if PBRC wants to pursue this;
- Avoid exposing commercial surf schools to a major change in their permit process during a year that has been particularly devastating economically.

II. Setting the guardrails for a CAPP Permit System. We suggest 3 measures to keep in mind when looking at creating a CAPP Permitted Spot structure:

1. **Permit sizes.** Right now there's a 12-person, 25-person permit and (technically) a 5-person surf shop permit. We suggest adding a 15-person permit size, since this is a typical group size for CAPP weekday school programs. We also suggest viewing permit size as a less important measure of beach usage, than "load" described below.
2. **The "load" of surf school participants on the beach.** The load is the amount of participants a permittee brings on the beach, how often, and when. Each permittee creates a particular "load" of participants that varies across time. For example:
 - The load of University of Surf is concentrated in the summer, but the load of Brown Girl Surf would be concentrated on off-season weekends.
 - While University of Surf and Nor Cal Surf shop have similar permit sizes, the load they place on the beach over the course of the year is different, because one group operates mainly in the summer, and the other group operates year-round.
 - While Brown Girl Surf and City Surf project have similar size permits, the load they place on the beach over the course of the year will also be different, since Brown Girl Surf offers far fewer program days (focused mainly on off-season Saturdays) than City Surf Project, which does programs on most weekdays during the school year.

When we look at the total load of the current permittee usage across the entire year, we find that there is actually a lot of time when the beach is not experiencing the total

possible load of all the existing permitted spots.
Percentage of 74 existing spots being used:

- Summer Weekends (Memorial Day to Labor Day): 75-100%
- Summer Weekdays: 50-75%
- Offseason Weekends: 10%-50%
- Offseason Weekdays: 0-50%

We believe it is critical to take load into account when assessing how many permits the beach can accommodate. City Surf Project and Brown Girl Surf can work within the times of lesser load in the first few years of the CAPP program – this will minimize impact on the commercial surf schools.

We also recommend relaxing the noon-sunset 10-person limit currently in the policy. This would allow CAPP schools to operate on weekday afternoons, which are a less desirable time for commercial schools and a key time for CAPP schools.

3. **Maximum number of permitted spots on the beach *at one time*.** Right now we are assuming this number is 74, since that is the current amount of permitted spots. It is critical to note that there could be more than 74 permit spots allotted *and* we can still maintain a max of 74 (or less) people on the beach *at one time* provided there is some degree of coordination among the surf schools.

We therefore propose creating a Maximum CAPP participant limit each year for each of the different parts of the year (Summer/Offseason, Weekend/Weekday) as noted in the chart below.

Staying within this limit will require coordination and calendaring among the CAPP permit holders only. We recognize that existing permitted commercial surf schools are not enthusiastic about calendaring, and we believe that this is not necessary to stay within the maximum number of permitted spots allowed *at one time* during the initial implementation of the CAPP program.

CAPP organizations would coordinate among themselves to ensure that they do not exceed the CAPP participant max on the beach at one time. This maximum will need to be negotiated each year, based on a variety of factors outlined in greater detail below.

III. Proposal for Key Elements of CAPP system:

- An application deadline will be set every 2 years;
- To ensure grant-funded programs can succeed, application deadline and notification period will be well in advance of the permit start date. We recommend April 1 deadline,

July 1 notification for permit commencing the following year on June 1. This will allow for planning of programming around the summer and school year.

- Applications will be reviewed by a CAPP Application Review Body (CARB), which could be a subcommittee of PBRC comprised of members with strong knowledge of equity issues in outdoor programming, or a separately appointed or contracted body (see further below for details on CARB's role, criteria for membership, and proposed method for evaluating applications);
- When eligible organizations apply for a CAPP permit, they must state the intended "load" that they plan to bring to Pacifica beach.
- The CARB will evaluate applications, looking both at the applicants' quality of programs, AND the load they plan to bring to Pacifica beach.
- The CARB will make a recommendation for specific applicants to receive permits, and make a suggestion to the PBRC for the total CAPP participant max for the coming permit year (the year for which applications are being submitted) based on vetted CAPP applicants' need.
- Every two years during this time of application review, the max CAPP-permitted spots on beach at one time will be reevaluated and determined by PBRC taking into consideration:
 - Need by CAPP-eligible organizations vetted by CARB, understood in terms of proposed load across the year;
 - Need by Commercial Surf Schools, understood in terms of proposed load across the year;
 - Equitable sharing of space between CAPP orgs and commercial surf schools, based on their relative needs;
 - The maximum number of total permitted spots on the beach at one time (currently assumed to be 74);
- Based what PBRC ultimately decides will be the max for CAPP-permitted spots on beach at one time for the coming permit year, the CARB will instruct PBR to issue permits of varying sizes to the groups selected. We recommend that the CARB set the permit size based on the need of the applicant rather than a one or two size fits all category. The permit would specify the following: max group size for that group (6 person permit, 12 person permit, 15 person permit, etc), limits around LOAD for different times of the year, and the expectation that future calendaring of dates must be coordinated with other CAPP permittees.
- CARB will convene a CAPP permittee "draft day" during which CAPP permittees will agree upon sharing of tricky dates (ex// summer weekdays, offseason Saturdays), within the "Total Max CAPP-permitted spots on beach at one time ." This will take place in early July of the year prior to the permit start date to allow for program planning by CAPP permittees.
- Pricing for CAPP permits should be set according to the load. We recommend, a price of 50 cents per participant spots. For example, a CAPP organization that plans to bring a load of 500 participant spots in one year would pay \$250 and a CAPP organization that

plans to have 2,000 participants spots in one year would pay \$1,000.

- Permits will last two years and then CAPP organizations must reapply. Priority in the “draft day” date sharing process among CAPP permittees may be given to existing CAPP permittees in good standing.
- Once permitted, CAPP organizations will be expected to coordinate with each other to calendar at least one month in advance to ensure that they do not exceed the max CAPP permitted spots on the beach *at one time*;
- This calendar will be shared with commercial schools who can use any unutilized CAPP spots;
- If, at some point in the future, the need for CAPP permits becomes equal (in terms of proposed load) to the needs of commercial surf school permittees (in terms of proposed load), then the maximum CAPP-permitted spots will equal half the total permitted spots on the beach at one time;

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| Max Total CAPP-permitted spots on beach at one time, assuming that total permitted spots on the beach at any one time is 74. | | | | |
| | Year 1 (2021) | Year 2 -3 (June 2022-May 2024) | Year 4-5 (June 2024 to May 2026) | Max CAPP permitted spots (assuming CAPP demand requires it - which may not occur for many many years) |
| Summer Weekends | 0 | This would be negotiated | This would be negotiated | Half of total permitted spots on beach. |
| Summer Weekdays | 24 | This would be negotiated | This would be negotiated | Half of total permitted spots on beach. |
| Off season weekends | 15 | This would be negotiated demand | This would be negotiated | Half of total permitted spots on beach. |
| Off season weekdays | 30 | This would be negotiated | This would be negotiated | Half of total permitted spots on beach. |

IV. System for evaluating CAPP permit applications.

- Applicants must meet CAPP criteria, which also incorporates existing Pacifica surf school criteria (re: group size, certifications, insurance, etc.);

- Applicants must demonstrate proven record, high quality of programming, and need for Pacifica permit. Some examples of application questions:
 - How long have you operated?
 - Who have you served in the past year?
 - Demonstrate that you are serving groups under-represented in surfing. How does your group contribute to equitable access to surfing in the Bay Area?
 - Why is access to Pacifica State Beach crucial for your program?
 - How do you ensure cultural responsiveness in your programming? What cultural responsiveness training does your staff receive?
 - Please demonstrate the impact of your programming.

V. Criteria for (CAPP application review board) CARB membership, and definition of CARB role

- Members have a strong understanding of Diversity, Equity, and Inclusion in the outdoors ● Members are committed to the principle of increasing access to surfing for underrepresented groups
- There is no conflict of interest, i.e. members and their family members do not stand to personally gain from admittance of particular applicants over others.
- There should not direct personal connections (i.e. former employee, etc) between the members of the board and the applicants.
- Members have a high degree of comfort with complex scheduling tasks. Their job will be a little bit like sudoku

CARB roles:

- Review CAPP applications
- Vet CAPP applicants and determine which applicants to recommend for permits ● Make a recommendation to PBRC of max CAPP permitted spots on the beach at one time for the upcoming permit year based on needs of vetted applicants
- Present this recommendation and its justification to PBRC, acting as an advocate for vetted CAPP groups.
- Based on PBRC's decision on max CAPP permitted spots on the beach at one time for the upcoming permit year, determine reasonable permit types for vetted CAPP applicants (including permit size, guidance around loads at different times of year). PBRC will then issue permits according to CARB's recommendations
- Host "Draft Day" to set calendar for high demand dates
- Possibly host a second calendaring day closer to the start of the program, to negotiate additional adjustments to dates
- Share this calendar (google calendar is probably a good choice) with CAPP permittees who are responsible for reporting their intended program dates a month in advance. (high demand dates will have been set up earlier via draft days)

Summary:

- Relax 10-permitted-spots-per-school limit for weekday afternoons;
- Agree to the idea of different permit sizes for CAPP orgs (6 person, 15 person, etc), and begin to think of “load” (how many participants, how often, when) as a more important determinant of space-sharing feasibility than permit size. Agree to CAPP permit pricing based on load rather than permit size.
- Confirm that for 2021, maximum number of permitted spots allowed on the beach *at one time* is 74;
- Approve max CAPP-permitted spots (see chart above) for year 1; ● Confirm that all groups are comfortable with principles for negotiating max CAPP spots each year;
- Determine method for designating CARB members
- Designate CARB members to review applications
- Create Application, Criteria for Evaluation, and Rubric for assessing applications according to this criteria. Brown Girl Surf and City Surf Project are happy to help with this.
- Set up periodic reviews of the system.