



June 5, 2026

Delivered via email

To: Meagan Harmon, Chair, California Coastal Commission  
CC: Kate Huckelbridge, Executive Director, California Coastal Commission,  
South Coast Deputy Director Hudson

**Re: Th19A Application 5-26-0188 (Goldenvoice LLC and City of Santa Monica, Santa Monica)**

Dear Chair Harmon, Commissioners, and South Coast Staff,

Thank you for the opportunity to comment on this proposed two-day ticketed music festival at Santa Monica State Beach. We write not to oppose this event, but to offer perspective on its coastal access and environmental implications, to commend Commission staff for several important conditions of approval, and to flag an area where we believe the permit could be strengthened. We also write with a broader legislative context in mind that makes this application, and how the Commission handles it, particularly timely and important.

### **AB 1740 and the Importance of Independent Commission Review**

AB 1740 (Zbur) is a bill currently moving through the legislature that Surfrider, the Commission, and a large coalition of coastal advocates have opposed due to its insistence on Coastal Act exemptions for various types of development in the coastal zone. While the temporary events exemption has since been removed via amendments, the bill as originally intended would have allowed the City to self-certify an event like this one without Commission oversight. This application is a case study in why that approach is a mistake.

Commission staff secured mitigation for the event's acknowledged impacts to public beach access, along with environmental conditions protective of water quality, biological resources including nesting birds, and a prohibition on single-use plastics. Each of these made the event meaningfully better from both an access and an environmental standpoint, and several are conditions the applicants might well have preferred to avoid had local approval been sufficient. Just as importantly, the Community Benefits Program, with its environmental justice focus, free ticket distribution, ocean safety programming, and cultural activations, was built through a months-long collaboration between Commission staff and the applicants. These conditions are the product of independent Coastal Act review, not the low-bar local permitting exemption that AB 1740 originally intended to set. The temporary events exemption would have only required

the City to self-certify that this event wouldn't "unduly obstruct" public access to, or prevent "traversing of the shoreline." That would have been the entire standard.

Surfrider has real respect for Santa Monica's city staff and confidence in the intentions of its elected officials. But the Coastal Act does not rest on any one city being competent or well-intentioned at any given moment, and the more important question is what happens when a city is not. The pressures are visible even here: under the exemption, the City, a co-applicant that negotiated the license fee and profits from the event, could have self-certified it with no independent check. California's coastal resources, including the public's right to reach them, are protected statewide resources precisely because they are consistently threatened by these kinds of local financial and political pressures. Independent Commission review exists so those resources do not depend on local goodwill. This event is the proof: the review worked, and it left the public better off.

### **General Concerns Regarding Beach Access**

Surfrider does not oppose concerts or community events, and we recognize the City's interest in activating its coastal assets in ways that generate community benefit and revenue. However, a private, for-profit event that encloses roughly 900,000 square feet of Santa Monica State Beach, with varying access restrictions across a 15-day period, is not an ideal use of public beach space under the Coastal Act. Santa Monica State Beach is among the most accessible and heavily used stretches of public coastline in California.

We appreciate that the applicants selected a non-holiday September weekend, intentionally avoiding the peak summer season so as to not compound impacts to access. We also appreciate the serious attention given to environmental justice in the staff report and the Community Benefits Program. The Commission's recognition that the temporary closure of this transit-accessible beach disproportionately impacts lower-income and transit-dependent communities is exactly the kind of analysis that independent review enables. Please ensure that the community benefits are meaningfully delivered to the intended recipients, and documented in the post-event compliance report with enough demographic detail to confirm it.

### **Environmental Conditions**

Surfrider commends Commission staff for securing meaningful environmental conditions, particularly those protective of biological resources, water quality, and nesting birds. We are especially pleased to see the prohibition on single-use plastic foodware, serviceware, and packaging in Special Condition 6D. Source reduction is the most effective approach to the plastic pollution that ravages California's beaches, and embedding that standard in a high-profile commercial event sends an important signal.

Goldenvoice implemented impressive sustainability practices at its Cali Vibes festival in Long Beach, including a reusable cup program through r.World and a requirement that all food and beverage vendors use bioplastic-free compostable serviceware. Both r.World and BYOBottle are confirmed Coastal Education Zone partners for this event (Exhibit 3), so the means to deliver both are already present. We offer two recommendations that build on both Goldenvoice's record, as well as the City of Santa Monica's impressive Zero Waste Plan protocols.

First, we ask that the Commission ensure any compostable materials used on-site are actually accepted for commercial composting by the City's or the event's waste hauler. Many products marketed as "compostable" or as bioplastics are not accepted at commercial composting facilities and effectively function as single-use plastics in the waste stream. If the prohibition does not close this loophole, it risks falling short of its purpose. Our research indicates that Santa Monica's Zero Waste Plan protocols specifically call out bioplastics,<sup>1</sup> but integrating the prohibition into the special conditions adds additional certainty and sets the expectation for similar conditions for beachfront events statewide.

Second, although Special Condition 6D does not specifically address single-use beverage cups, they are a disproportionately large contributor to festival waste streams. We encourage Goldenvoice and the City to implement a reusable cup program for beverage service, consistent with the Cali Vibes model. Paired with the City's Zero Waste Plan protocols, these measures would reflect a genuinely ambitious commitment to plastic pollution prevention.

### **Transportation and Coastal Access**

We appreciate the transportation management approach, particularly the active promotion of the Metro E Line, Big Blue Bus, rideshare, and bicycle access, and the decision not to advertise coastal zone parking to attendees. The provision of approximately 3,600 off-site parking spaces with complimentary shuttle service is a meaningful step. However, that supply rests on the assumption that only about a third of attendees will arrive by personal vehicle. We look forward to reviewing the post-event data to see whether the off-site parking and transit options actually absorbed demand, or whether the festival ended up overwhelming an already-congested coastal zone with additional traffic and parking pressure.

### **Looking Ahead**

There is genuine community benefit in the programming that has been negotiated. The post-event compliance report required by Special Condition 7 is an important tool that we intend to review closely. Should Goldenvoice and the City return for a 2027 permit, that record should

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<sup>1</sup> [Zero Waste Santa Monica Event Guide to Reduce Waste](#), pg 5, "Compostable plastic products (bioplastics) are NOT accepted."

be the starting point for evaluating whether conditions were met, whether the transportation plan performed as modeled, whether the community benefits reached their intended recipients, and where the conditions of approval should be strengthened. This event is a chance to further establish best practices for large-scale temporary events on California's public beaches, particularly in a City whose leadership has signaled strong interest in hosting more events like this one. We are hopeful the applicants will make good on every commitment they have made here.

Thank you for the opportunity to comment.

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