

August 17, 2026

Shawn Skeries, Principal Regional Planner
Coastal Development Services

**SUBJECT: REQUEST FOR INFORMATION FOR PROJECT NUMBER PRJ2024-002546-(2),
CONDITIONAL USE PERMIT RPPL2024003831, COASTAL DEVELOPMENT PERMIT RPPL2024003824,
AND PARKING PERMIT RPPL2024003833**

Dear Mr. Skeries:

Project Number PRJ2024-002546-(2) is scheduled for public hearing on August 25, 2026. After reviewing the Hearing Officer package for the item, I have the following comments. Please be prepared to address these comments at the hearing. I ask that you forward this memo to the applicant/owner and ensure this memo is posted on the public website for the item. Additional questions may follow depending on responses at the hearing.

- **CEQA Class 1 Categorical Exemption.** The staff report recommends a Class 1 Categorical Exemption pursuant to State CEQA Guidelines Section 15301. The Project would continue an existing charter yacht business with no proposed physical modifications to the dock or other facilities; however, the requested CDP would authorize an increase in the permitted passenger occupancy from 298 to 435 passengers, which the draft findings characterize as an “intensification of use.” State CEQA Guidelines Section 15301 applies to existing facilities involving negligible or no expansion of existing or former use, and identifies the degree of expansion of use as the key consideration. Please provide additional analysis explaining how the proposed increase from 298 to 435 passengers qualifies as negligible or no expansion of the existing or former use for purposes of Section 15301, and revise the environmental analysis and Finding #42 as appropriate.
- **Alternative Transportation and Peak Parking Demand.** The staff report and Parking Study rely in part on buses, ride-sharing services, and other transportation alternatives to support the conclusion that 92 parking spaces will adequately serve the proposed increase in passenger capacity. Draft Condition #19 states that the Permittee “will require the use of buses and ride-sharing services for larger groups when parking demands will be maximized.” Please clarify how this condition is intended to operate, including what constitutes a “larger group,” when parking demand is considered to be maximized, and how the Permittee will determine when buses, ride-sharing, or other alternative transportation must be used. Please revise the condition as appropriate so that it provides a clear and enforceable requirement consistent with the assumptions relied upon in the Parking Study and findings.

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- **Sheriff's Department Recommendation.** The staff report and Finding #17 reference the May 12, 2026 Sheriff's Department recommendation to install and/or maintain surveillance cameras. Please confirm whether this recommendation was intentionally not included in the draft conditions of approval and revise the draft conditions as appropriate.
- **Corrections and Internal Consistency.** Please review and correct the following apparent errors in the operative findings and conditions:
 - The correct CUP number is **RPPL2024003831**. The first page of Exhibit C and Recital #1 identify the CUP as RPPL202403831.
 - The correct CDP number is **RPPL2024003824**. The cover page of Exhibit D identifies the CDP as RPPL202403824.
 - Finding #7 identifies the prior CUP approval date as March 9, 2025, while the staff report identifies the approval date as March 9, 2005. Please verify and correct the date.
 - Please review and revise Finding #19 as appropriate to ensure that the description of the vessel substitution, Coast Guard passenger-weight changes, and resulting increase in passenger capacity is clear and internally consistent with the project history described elsewhere in the hearing package.

Please ensure that any revisions made in response to these comments are carried through consistently in the staff analysis, findings, and conditions of approval.

Sincerely,



Tina Fung
Hearing Officer