

**CALIFORNIA COASTAL COMMISSION**

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SENT BY FAX AND REGULAR MAIL

January 4, 2012

Marietta Harris  
Pillar Point Harbor District  
400 Oyster Point Blvd. Suite 300  
So. San Francisco, Ca 94080

RE: Request for Assistance in Resolving Complaints pertaining to the Surfer's Beach RV and Public Parking Lot located at 4000 Cabrillo Highway, Half Moon Bay, APN 047-263-010

Dear Ms. Harris:

I am writing to request the Pillar Point Harbor District's ("District") assistance in resolving multiple complaints received by the Coastal Commission alleging unpermitted activities at the Surfer's Beach RV and public parking lot ("Lot"). More specifically, we have received reports from the public regarding unpermitted development at the Lot, including but not limited to: 1) the construction of restrooms; 2) construction of the sewer system connected to the restrooms; 3) paving and striping of the parking lot; 4) increasing the fees charged for day-use parking; and 5) prohibiting public use of the Lot's restroom. The public has alleged that the Pillar Point Harbor District as lessor and the current lessee, Keet Nerhan, have failed to obtain required coastal development permits (CDPs) from the Coastal Commission and/or the City of Half Moon Bay for these cited development activities.

In order to respond to these complaints Commission staff has been researching the Lot's CDP and local government permit history. While we have encountered significant evidence of local projects contemplated for and possibly initially permitted by local government to take place on the RV and public parking lot, we have been unable to find any record of a valid, issued CDP for the Lot's creation, the paving and striping, the decision to charge fees and the construction of the restroom facility and related sewer system, and request your assistance in locating them. If you have any CDPs, building permits or use permits pertaining to the cited development activities that have taken place on the subject property, I would appreciate your providing them to the Commission. As of right now, Commission staff has been unable to find any issued CDP that authorizes the cited activities.

On November 29, 2011, we contacted the current lessee of the RV and public parking lot, Mr. Keet Nerhan, in a letter similar to this one. By a letter dated December 30, 2011, Mr. Nerhan's attorney, Fred Lyons, informed the Commission that he does not have any copies of the Coastal Development Permits, and he suggested that the Harbor District may be in possession of such permits. I have enclosed a copy of Mr. Lyon's letter with this letter for your convenience. We would appreciate a response to this letter as soon as is practicably possible. Recognizing that the RV and public parking lot has a complex permitting and use history, I would like to thank you for your time and assistance in advance. If you have any further information or concerns please do not hesitate to contact me at 415-597-5886 or my Supervisor, Nancy Cave, at 415-904-5290.

Sincerely,

A handwritten signature in cursive script that reads "Leandra Mosca".

Leandra Mosca  
Enforcement Program  
California Coastal Commission

Attachment: Letter from Fred Lyons to Nancy Cave dated December 30, 2011

Cc: Nancy Cave, Supervisor, Statewide Enforcement Program

Telephone: 650-288-8304

FREDERICK LYON  
ATTORNEY AT LAW  
P.O. BOX 159  
BELMONT, CA 94002

Facsimile: 650-726-3615

December 30, 2011

Ms. Nancy Cave  
Northern California Supervisor  
Statewide Enforcement  
California Coastal Commission  
45 Fremont St. Suite 2000  
San Francisco, CA 94105-2219

Dear Ms. Cave:

This letter is in response to your letter of November 29, 2011 to Keet Nerhan regarding Coastal Development Permits for 4000 Cabrillo Highway in Half Moon Bay. I represent Mr. Nerhan and he has asked me to respond on his behalf.

While Mr. Nerhan does not have copies of the Coastal Development Permit, he suggests that the San Mateo County Harbor District might be in possession of such permits. At the time that the RV Park was modernized, the San Mateo County Harbor District had obtained plans and approvals for the project and had sent out Requests for Proposals for the construction and operation of the park. The plans that were used were plans that had been developed by the Harbor District and approved by the city of Half Moon Bay. While the plans were not strictly followed, in that fewer RV parkings were installed than had been designed, the plans were generally adhered to and the changes were approved by the City.

If we may be helpful in any further way, please let us know.

Yours truly,



Frederick Lyon

cc: Peter Grenell  
SMCHD