

Hotline Report of Boat Storage Permits

NOVEMBER 2024 | OCA-25-05

Conclusion 1

Over 100 boat storage permits could have been issued, but were not, due to clerical errors that could have been avoided by using the existing online payment system. In addition, permitholders are currently allowed to renew their permits year after year without giving others a chance to purchase a permit. As a result, over 400 people are on waitlists for these permits, and some have been waiting for over 20 years.

Conclusion 2

The City charges lower fees for its boat storage program compared to other jurisdictions, and these fees only recover part of the estimated staff costs. If the fees were set based on the use of City property or set in comparison to what other cities charge, they could be higher. However, because the fees are lower than they could be, the City might not receive sufficient revenue to administer the program efficiently and effectively.

Conclusion 3

Other jurisdictions offer more efficient boat storage options and vary permit rates by boat type. Additional boat storage locations and repairs to existing structures could improve access to this resource.

Conclusion 4

Compliance inspections and enforcement activities would likely be improved if boat storage permit monitoring procedures were in place. Program compliance would also be improved if the existing rules were updated and clarified.

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CITY OF SAN DIEGO



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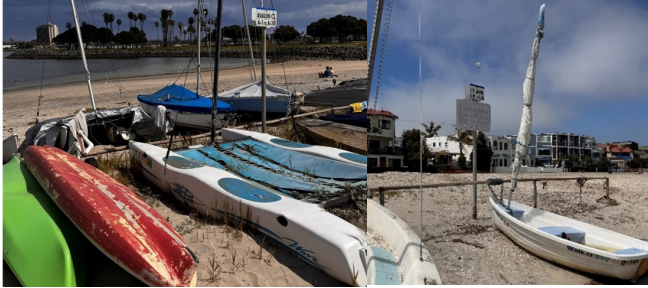
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Hotline Report of Boat Storage Permits

Fraud Allegation

OCA received a Fraud Hotline allegation regarding the mismanagement of permits issued by the City for the long-term storage of small boats on the sand at Mission Bay.



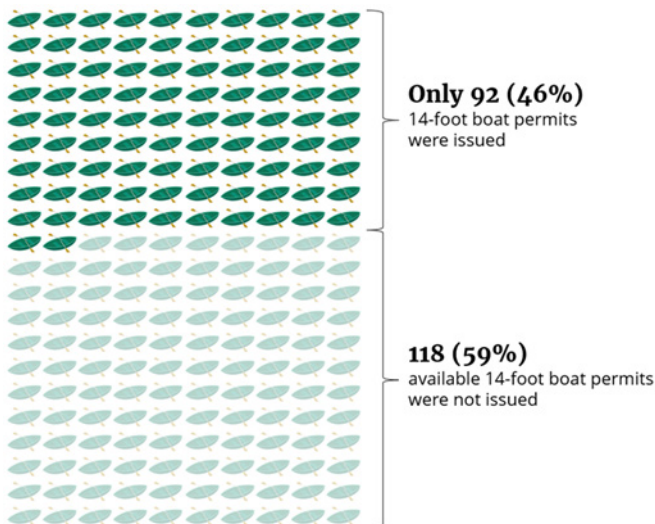
Investigative Conclusions

Our investigation determined that the allegations of waste and mismanagement were substantiated.

Conclusion 1:

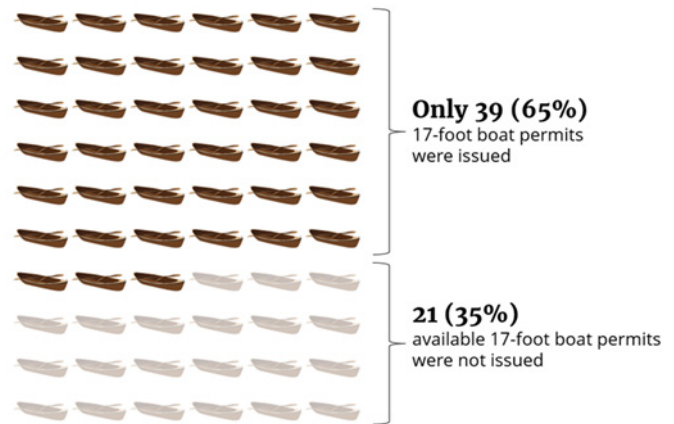
- Over 100 boat storage permits could have been issued, but were not, due to clerical errors.
- Clerical errors could be avoided if Parks and Rec used the existing online system to handle boat storage permits.
- Over 400 people are on waitlists for boat storage permits, with some waiting for over 20 years.
- Boat storage permits are able to be renewed perpetually, which limits the supply of permits available to be sold to other small boat owners.

Exhibit 4: More Than Half of Available 14-Foot Boat Permits Were Not Issued



Source: OCA generated based on permit data from April 2024.

Exhibit 5: Over One-Third of Available 17-Foot Boat Permits Were Not Issued



Source: OCA generated based on permit data from April 2024.

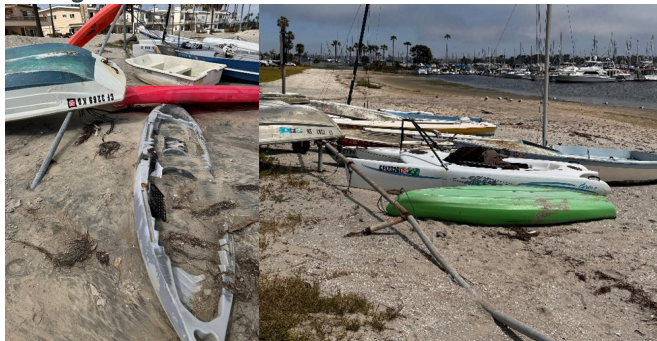
Conclusion 2:

- The City's boat storage program charges lower fees than other jurisdictions.
- These fees only recover part of the estimated staff costs.
- The fees for the City's boat storage permits were based on the estimated staffing costs to administer the program.
- Because the fees are lower than they could be, the City might not receive sufficient revenue to administer the program efficiently and effectively.
- The City's fee consultant concluded that boat storage permit fees could be calculated based on the use of City property and a comparison with fees of other jurisdictions rather than staff cost estimates.

Conclusion 3:

- Other jurisdictions offer more efficient small boat storage solutions.
- Parks and Rec management determined that the more efficient small boat storage solutions used elsewhere were infeasible in San Diego.
- Due to the limited space available for small boat storage, the City should evaluate the impact of wider boats and consider charging more for catamarans.
- One or more additional boat storage locations could be added to improve access to this resource.
- Some boat storage racks are in need of repair.

Exhibit 10: Some Boat Storage Racks are Heavily Damaged



Source: OCA images captured on March 18, 2024 and April 3, 2024.

- The Parks and Recreation Department considered using money from the Mission Bay Park Improvement Fund to construct new boat storage racks but declined to pursue using the proposed funding source.

Conclusion 4:

- Lifeguards recently removed 29 abandoned boats and took compliance actions against 44 others, but this appears to be the first enforcement effort in approximately 15 years.

Exhibit 12: Lifeguards Removed 29 Abandoned Boats and Identified 44 Other That Violated Program Rules in May 2024



Source: Lifeguards images captured in May 2024, obtained by OCA.

- Parks and Rec and Lifeguards would likely be better able to coordinate routine inspections and enforcement activities if written procedures were in place.
- Program compliance would be improved if the existing program rules were updated and clarified.

What OCA Recommends

We make 10 recommendations to improve the City's boat storage permit administration, facilities, fee recovery, and compliance operations.

Key recommendation elements include:

- Implementing reconciliation procedures to ensure all available permits are offered for sale;
- Transitioning to online registration software;
- Revising the permitting process to mitigate current problems of extensive waitlists and permits being renewed in perpetuity;
- Basing permit fees on benchmarking of what other jurisdictions charge;
- Considering more efficient storage options;
- Considering charging more for catamarans or limiting the number of permits available for catamarans;
- Considering replacing damaged racks and/or adding one or more racks;
- Identifying racks that need repairs and prioritizing repairs;
- Developing written policies and procedures for compliance activities; and
- Updating and posting current boat storage applications and permit "Specifications, Rules, and Regulations" sheets online, and ensuring consistency with DMV guidance.

Management agreed with all 10 recommendations.

For more information, contact Andy Hanau, City Auditor, at (619) 533-3165 or cityauditor@sandiego.gov.

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Over 100 boat storage permits could have been issued, but were not, due to clerical errors that could have been avoided by using the existing online payment system. In addition, permitholders are currently allowed to renew their permits year after year without giving others a chance to purchase a permit. As a result, over 400 people are on waitlists for these permits, and some have been waiting for over 20 years. 5

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Investigative Conclusion 2

The City charges lower fees for its boat storage program compared to other jurisdictions, and these fees only recover part of the estimated staff costs. If the fees were set based on the use of City property or set in comparison to what other cities charge, they could be higher. However, because the fees are lower than they could be, the City might not receive sufficient revenue to administer the program efficiently and effectively.....13

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Summary

We received a Fraud Hotline allegation regarding the mismanagement of permits issued by the City for the long-term storage of small boats on the sand at Mission Bay. Our investigation's scope did not include boat mooring permits that allow permit holders to secure boats in the water.

Our investigation determined that the allegations of waste and mismanagement were substantiated. In general, the City's boat storage permit program is not benefitting as many people as it could, fees are much lower than they could be, storage is not efficient, some structures need to be repaired or replaced, and the boat storage areas look unappealing to beach visitors due to poor program management and enforcement.

The City's Parks and Recreation Department (Parks and Rec) reviewed a draft version of this report, acknowledged the validity of our investigation and our report's conclusions, and agreed to implement all of our proposed recommendations. As part of the department's research into the issues identified in our report, the department cited the Mission Bay Master Plan,¹ which generally recommends against dry boat storage. As a result, Parks and Rec "continues to evaluate the placement of boat racks and bars and may recommend removing some racks and bars rather than replacing or adding new racks and bars." See **Appendix C** for the department's formal response memorandum, which includes additional details regarding the operations, maintenance, and capital improvement project priorities for Mission Bay.

¹ See page 75 of the [Mission Bay Master Plan](#).

Background

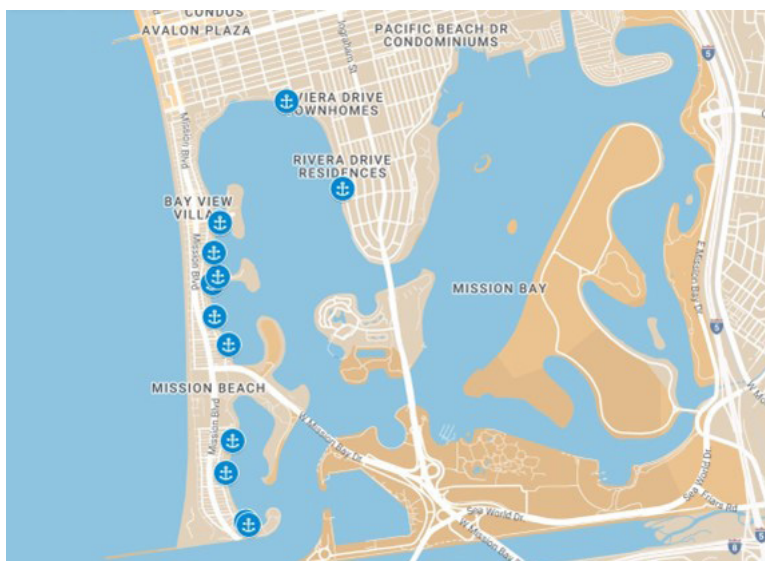
Parks and Rec oversees several areas around Mission Bay where people can store small boats on a long-term basis. The annual permits cost \$171, plus a \$6.09 service charge. For the period ending on February 29, 2024, the City generated revenues of about \$30,000 from this program, based on sales of 167 permits.

Parks and Rec refers to these storage racks² for boats of lengths 14-feet or less and up to 17-feet as “beach bars.” Two City departments are responsible for the program. The Parks and Rec’s Permit Center issues the permits, and the Boating and Safety Unit of the Fire-Rescue Department’s Lifeguards Division (Lifeguards), is responsible for monitoring and enforcing compliance.

There are currently 12 storage areas: 10 racks are east of Mission Boulevard, 1 is near Fanuel Street, and 1 is at Moorland Drive. Each metal rack consists of a roughly 50-foot-long horizontal bar, about 2 to 3 feet high, anchored to the sand. Individual permits are assigned to a designated bar, but there is no specific space assigned to any particular boat or permit number. A map depicting the locations of the boat storage racks is shown in **Exhibit 1**. (See **Appendix B** for Parks and Rec’s map).

Exhibit 1

Mission Bay Has 12 Boat Storage Locations for 14-Foot and 17-Foot Long Boats



Source: OCA generated using Google My Maps, based on data provided by Parks and Rec and field observations.

² Other jurisdictions refer to these facilities as dry boat storage, dry dock storage, dinghy storage, sandstakes, or rings, and they may include shelf systems. We will refer to them as boat storage racks in this report since there appears to be no universally-accepted term.

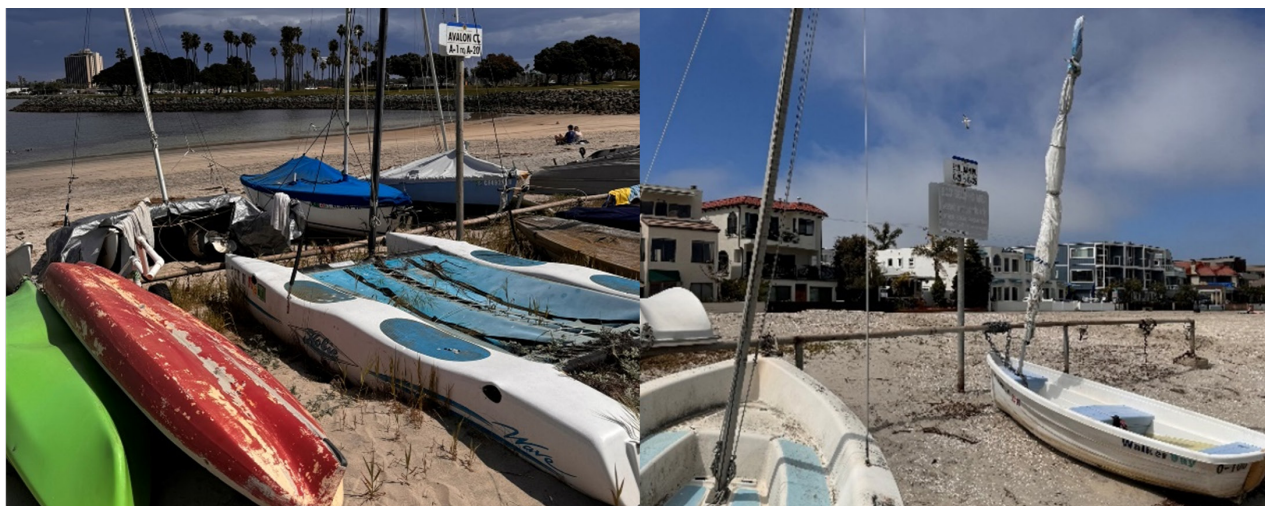
San Diego Municipal Code (SDMC) section 63.25.14(c), incorporated in 1952, establishes boat beaching areas³ around Mission Bay where the 12 boat storage locations are set up with space for up to 270 potential boat permits, these areas are:

1. Mariner's Basin, located on the southwest side of Mission Bay (4 locations, 80 potential permits);
2. Santa Barbara Cove, located on the west side of Mission Bay (3 locations, 75 potential permits);
3. San Juan Cove, located on the west side of Mission Bay (3 locations, 55 potential permits);
4. Sail Bay, located at the point that Fanuel Street ends at Sail Bay (1 location, 20 potential permits); and
5. Riviera Shores, located at the point that Moorland Drive ends at Riviera Shores (1 location, 40 potential permits).

The 14-foot and 17-foot boats include various types of vessels. The types of boats listed on the boat storage permit form include catamarans, sailboats, sabots, sloops, kayaks, canoes, rowboats, and dinghies. **Exhibit 2** below shows the condition of two of the racks as of March 18, 2024 and April 3, 2024, prior to a cleanup effort in May.

Exhibit 2

Boat Storage Racks at Mission Bay



Source: OCA images captured on March 18, 2024 and April 3, 2024.

³ SDMC section 63.25.14(c) designates Santa Clara Cove as one of the six potential locations for long-term small boat storage, but the City does not currently use that area of Mission Bay for boat storage.

Our investigation concluded that:

Investigative Conclusion 1: Over 100 boat storage permits could have been issued, but were not, due to clerical errors that could have been avoided by using the existing online payment system. In addition, permitholders are currently allowed to renew their permits year after year without giving others a chance to purchase a permit. As a result, over 400 people are on waitlists for these permits, and some have been waiting for over 20 years.

Investigative Conclusion 2: The City charges lower fees for its boat storage program compared to other jurisdictions, and these fees only recover part of the estimated staff costs. If the fees were set based on the use of City property or set in comparison to what other cities charge, they could be higher. However, because the fees are lower than they could be, the City might not receive sufficient revenue to administer the program efficiently and effectively.

Investigative Conclusion 3: Other jurisdictions offer more efficient boat storage options and vary permit rates by boat type. Additional boat storage locations and repairs to existing structures could improve access to this resource.

Investigative Conclusion 4: Compliance inspections and enforcement activities would likely be improved if boat storage permit monitoring procedures were in place. Program compliance would also be improved if the existing rules were updated and clarified.

We make 10 recommendations to improve the City's boat storage permit administration, facilities, fee recovery, and compliance operations. City Management agreed to implement all 10 recommendations. See **Appendix C** for the complete memorandum from Parks and Rec.

Investigative Conclusion 1

Over 100 boat storage permits could have been issued, but were not, due to clerical errors that could have been avoided by using the existing online payment system. In addition, permitholders are currently allowed to renew their permits year after year without giving others a chance to purchase a permit. As a result, over 400 people are on waitlists for these permits, and some have been waiting for over 20 years.

Our investigation determined that a large number of boat storage permits could have been issued, but were not, due to clerical errors. These errors may have been avoided if City staff had configured the online permitting system to process all available permits. The fact that available permits were not issued is unfair to the people seeking permits. Specifically, we identified hundreds of people who are on waitlists for these permits, with some waiting for over 20 years. The City's policy has been to allow current permitholders to renew their permits perpetually, year after year, without giving others a chance to purchase a permit.

Over 100 boat storage permits could have been issued, but were not, due to clerical errors.

Our investigation found that Parks and Rec staff manually record permit information. As a result, some available permits were accidentally overlooked. Specifically, more than 100 permits that could have been issued were not, because they were not recognized as being available for sale. The employees who currently staff the Permit Center⁴ update a Microsoft Excel spreadsheet by hand to keep track of issued permits, remove expired ones, and identify available permits for waitlisted boat owners. The spreadsheet is continuously updated from year to year and is not archived annually for historical comparison or evaluation purposes.

As illustrated in **Exhibit 3**, we identified 139 out of 270 total available permits as missing from the sequential list of permits issued as of April 2024. This data was captured near the start of the permit year, which begins on the first day in March. Out of the 139 missing permits, 118 were for 14-foot boats and 21 were for 17-foot boats.⁵

⁴ The Parks and Rec Permit Center is closed to the public, except by appointment, which is different from other jurisdictions we reviewed, and the four staff members are responsible for issuing several other permit types and ensuring compliance with internal financial controls.

⁵ Similarly, the records we reviewed as of January 2024, near the end of the prior year's permit term, revealed a total of 103 missing permits. We found 93 missing permits were for 14-foot boats and 10 missing permits were for 17-foot boats. Likewise, there were 101 missing permits from a 2022 list we found.

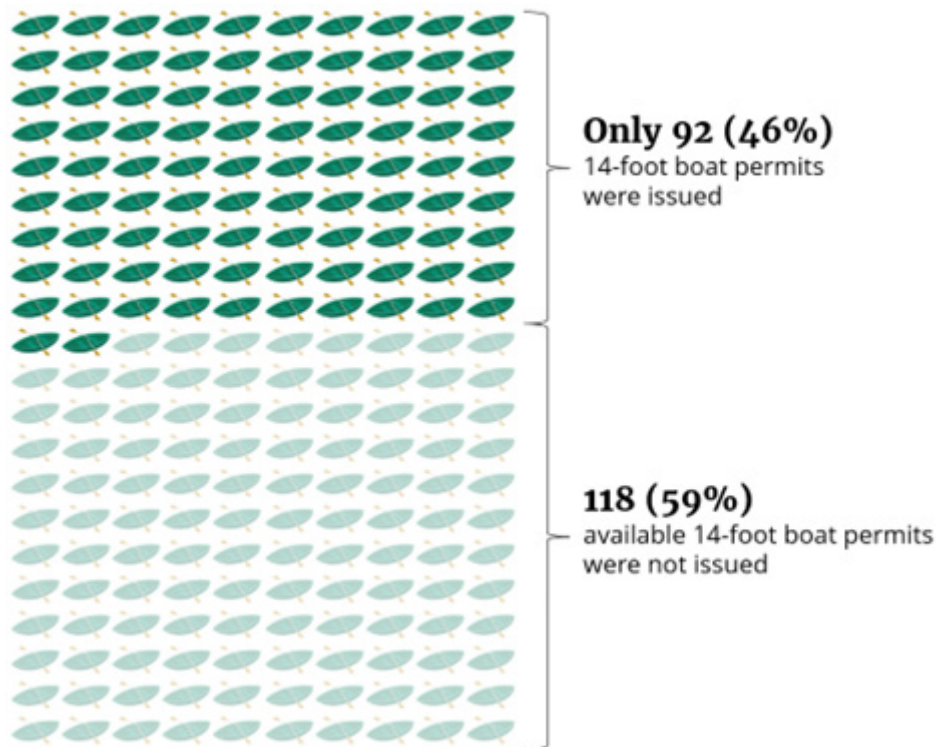
*Exhibit 3***We Found 139 Deleted Rows on Parks And Rec's Permit Tracking Spreadsheet**

Beach Bar A21	
Beach Bar A22	
Beach Bar A23	
Beach Bar A25	Missing A24
Beach Bar A27	Missing A26
Beach Bar A28	
Beach Bar A30	Missing A29
Beach Bar A33	Missing A31 & A32
Beach Bar A35	Missing A34
Beach Bar A37	Missing A36
Beach Bar A38	

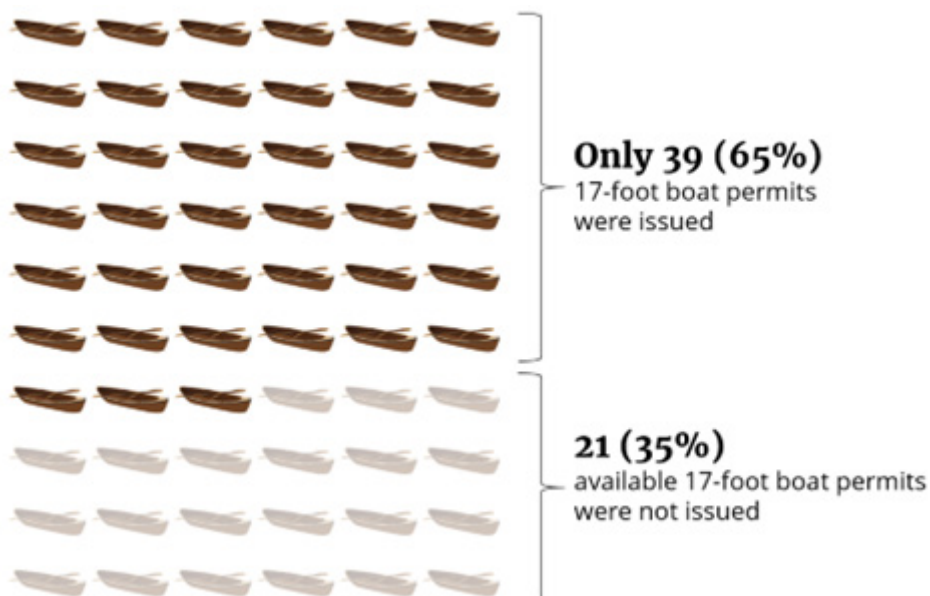
Source: OCA generated based on permit data from April 2024.

While there were over 100 permits that could have been issued if Parks and Rec staff used a more accurate method of tracking issued and available permits, the omissions seemed to increase shortly after the annual permits were renewed on March 1, 2024. This could be due to staff deleting rows from the spreadsheet when existing permitholders elected not to renew their permits. Unfortunately, this practice deleted both the permitholder's data and the record of the permit as being available to be issued in the future (unless the error was identified and corrected).

The breakdown of the 139 missing permit records by boat size is relevant to both groups of boat owners who would like to purchase a permit. As shown in **Exhibit 4**, 118 additional permits could have been issued for 14-foot boats as of April of 2024. Similarly, **Exhibit 5** illustrates that 21 additional permits could have been issued to 17-foot boat owners based on the data from April of 2024.

*Exhibit 4***More Than Half of Available 14-Foot Boat Permits Were Not Issued**

Source: OCA generated based on permit data from April 2024.

*Exhibit 5***Over One-Third of Available 17-Foot Boat Permits Were Not Issued**

Source: OCA generated based on permit data from April 2024.

Clerical errors could be avoided if Parks and Rec used the existing online system to handle boat storage permits.

Currently, Parks and Rec accepts payments for boat storage permits by mailed check or by using an online activity registration portal⁶ called ActiveNet. Permits may become available through a revocation of the permit due to a program violation or when an existing permitholder opts not to renew their permit. Parks and Rec staff export the payment information from ActiveNet and use it to update the spreadsheet list of current permitholders. Payments received by check are manually recorded as revenue in the ActiveNet system.

We determined that the ActiveNet system could be used to offer online registration for boat storage permits. For example, the current ActiveNet system also has the ability for members of the public to register for recreational activities and reserve one of 47 spaces at the Kumeyaay Lake campground at the Mission Trails Regional Park. Notably, there is an interactive campsite map feature for reservations, allowing patrons to view the availability of each location by date, with dynamic icons indicating whether a site is available, partially available, or unavailable. Information about check in and check out rules also appears for the individual sites as a pop-up window.

When asked about the possibility of offering online registration for boat storage permits, Parks and Rec staff noted that they could discuss the option with their IT staff and representatives from the vendor, but funding and staff availability would need to be considered. It appears that the ActiveNet system can be configured to include supplemental documents to be attached as part of the registration process, according to the company's website.

Given that implementing a software solution may take several months, as an interim measure, reconciliation procedures should be implemented to ensure that all available permits are offered for sale.

⁶ Parks and Rec staff send a link to the online payment system for individual approved permit applicants, but the general public does not have access to reserve boat storage permits or make payments.

Recommendation 1.1

(Priority 2)

As an interim measure, the Parks and Recreation Department should implement reconciliation procedures to ensure that all available boat storage permits are offered for sale.

Management Response: Agree. Permit Center staff will develop a process and written procedures in collaboration with Lifeguard. [See full response beginning on page 36.]

Target Implementation Date: Fiscal Year 2026 – Quarter 1

Recommendation 1.2

(Priority 3)

The Parks and Recreation Department should transition from mailed checks and manual recordkeeping to using online registration software to create permit data records for all available boat storage permits, issue permits using the online system, and make permits available to the public via the online system as they become available through revocations or cancelations.

Management Response: Agree. However, implementation of this recommendation is contingent on funding. [See full response beginning on page 37.]

Target Implementation Date: Fiscal Year 2027 – Quarter 4

Over 400 people are on waitlists for boat storage permits, with some waiting for over 20 years.

Our investigation determined that Parks and Rec staff's management of the waitlists for 14-foot and 17-foot boat storage permits has been inconsistent and poorly documented. Specifically, staff use a manual process of maintaining continuous waitlist spreadsheets listing individuals who express an interest in a permit, including the date and time they expressed an interest and their contact information.

As of April 2024, the waitlist for 17-foot boats contained 351 names; the first 17 individuals on the list were added in 2002. As a result of the length of the list and lack of movement, the waitlist for 17-foot boats was apparently closed sometime after July 28, 2017. There are no apparent records specifically indicating when the waitlist was closed because the spreadsheet data may change from day to day and no routinely-maintained archives exist.

The corresponding waitlist for 14-foot boats is currently active with 72 interested permit candidates; the first 3 individuals on the list were added in 2016. As summarized in **Exhibit 6** below, our analysis indicates that the waitlist for 14-foot boat storage permits could have been cleared if the permit administrators did not rely on infrequent, inaccurate, manual updates to a spreadsheet. We determined the number of available boat storage permits based on Parks and Rec's documents, interview information, and signs at each boat storage location showing which boats are allowed to be stored there. We determined the number of permits not issued by identifying gaps in the sequential numbers of the permits issued.

Exhibit 6

The 7-year Waitlist for 14-foot Boat Storage Permits Could Have Been Cleared

Boat Size	Available	Issued	Not Issued	Waitlisted	Duration
14' and under	210	92	118	72	7 years 10 months
17' and >14'	60	39	21	351	22 years 5 months
Total	270	131	139	423	

Source: OCA generated based on our investigation and data provided by Parks and Rec staff.

Boat storage permits are able to be renewed perpetually, which limits the supply of permits available to be sold to other small boat owners.

Currently, SDMC section 63.25.73(d) states that boat storage permits will be issued for a one-year period, “on a renewable basis,” and are not transferable. This language explaining the permitting process and regulations was added to the SDMC in 1994 as part of a “house cleaning” effort to repeal unnecessary codes and amend existing sections to match the current practice. As shown in **Exhibit 7** below, most of the boats we saw in March and April of 2024 (that had either current or expired permits) had several City-issued permit stickers on their hulls, which suggests that most permitholders renew their permits perpetually, year after year.

Parks and Rec staff do not track how long any individual has held a boat storage permit with the City. When asked about the longest-held permits, staff noted that the permitting software they use has changed over the years and they only maintain their records for five years, per the City’s document retention policy. Nevertheless, given the long and largely frozen waitlists, it is apparent that these annual renewals serve to limit the supply of permits available to other potential patrons.

Exhibit 7

Boat Storage Permits Can Be Renewed Perpetually, Which Limits Access



Source: Image captured by OCA August 7, 2024.

In future legislative update proposals,⁷ the department may want to revisit the language in SDMC section 63.25.73(d) and consider offering boat storage permits to all potential patrons on a first-come, first-served basis due to the limited supply of storage locations and very high demand. Depending on the legal interpretation of the phrase “on a renewable basis,” a revision to SDMC section 63.25.73(d) may or may not be necessary.

As the rules and regulations are currently interpreted, existing permitholders seem to have a perpetual “right of first refusal,” or option to renew “their” permit before anyone else has the opportunity. Renewing boat storage permits perpetually every year is unfair to the over 400 people who have been waiting for as long as 20 years to get a permit. Other jurisdictions, such as Los Angeles County, limit renewals to existing permitholders to one additional year, or they offer permits to the general public on a first-come, first-served basis, such as Santa Barbara. Furthermore, in San Diego, SDMC section 510.0106 requires certain short-term vacation rental licenses to be issued on a lottery basis “if sufficient demand exists.” Given the demand for boat storage permits, Parks and Rec may want to consider a lottery system.

Recommendation 1.3

(Priority 3)

The Parks and Recreation Department (Parks and Rec) should revise the boat storage permitting process to mitigate the current problems of extensive waitlists and permits that can be renewed in perpetuity. For example, Parks and Rec could make all permits available to the general public annually on a first-come, first-served basis, use a lottery system, and/or establish a maximum number of years boat storage permits can be renewed. Parks and Rec should propose revisions to SDMC section 63.25.73(d), if necessary, to allow this change in practice.

Management Response: Agree. Parks and Rec can explore implementing a lottery system and reducing the renewals to a maximum of two years. [See full response beginning on page 37.]

Target Implementation Date: Fiscal Year 2026 – Quarter 4

⁷ In January of 2023, the City revised SDMC Chapter 6, Article 3, Division 00, which includes the boat storage permit provisions, to (among other things) update the name of the department from “Park and Recreation” to “Parks and Recreation” in accordance with SDMC section 22.1801(b).

Investigative Conclusion 2

The City charges lower fees for its boat storage program compared to other jurisdictions, and these fees only recover part of the estimated staff costs. If the fees were set based on the use of City property or set in comparison to what other cities charge, they could be higher. However, because the fees are lower than they could be, the City might not receive sufficient revenue to administer the program efficiently and effectively.

We compared the City's boat storage permit fees with other jurisdictions that offer similar services. We determined that the fees the City charges are much lower than what other areas charge and could be higher. As a result, the City may lack the resources to effectively manage the program and to enhance the appearance and function of the boat storage areas.

The City's fees were based on a consultant's estimate of the costs to administer the program. Those costs were determined based on the estimated cost per hour and number of staff hours spent issuing permits and enforcing program requirements. We determined that the staff-hour estimates may not have been accurate. However, instead of being based on staff costs, the permit costs could have been tied to the use of the City's property, a comparison with prices charged in other jurisdictions, and the demand for boat storage in Mission Bay.

The City's boat storage program charges lower fees than other jurisdictions.

As summarized in **Exhibit 8**, other jurisdictions charge up to \$830 per year for similar small boat storage permits. Some aspects of the programs offered in other jurisdictions were comparable to the City of San Diego's. For example, most other programs charge the same rate to local residents and visitors. Waitlists for permits varied from around three months to much longer, in some cases years. One program required an annual \$20 fee to be placed on a waitlist, while others did not offer a waitlist at all.

In contrast to the City's program, the City of Naples, Florida requires permit holders to use their boats at least once per quarter. Also, the City of Long Beach requires boat owners to remove their boats from the beach for one month per year to allow crews to perform sand grooming and replenishment.

Two jurisdictions (Naples, Florida and Los Angeles County) require local or within-state residence. A 2008 version of the City's program requirements noted that both residents and non-residents of the City were eligible for a permit, but fees were higher for non-residents. The different rate for non-residents under the City's program is no longer in effect. We identified permits issued to residents of Nevada, Utah, and Texas in the City's January 2024 list (the Utah resident's permit was not on the April 2024 list).

Exhibit 8

City of San Diego Charges Less for Boat Storage Permits Than Other Jurisdictions

Jurisdiction	Program Name	Type of Storage	Fee
San Diego	Beach Bars	14' and 17' boats; racks	\$171
Los Angeles County	Dry Docks	+/- 20' boats	\$180-195
Long Beach	Sandstakes	16' boats; sand and racks	\$305 (11 mo.)
Delray Beach, FL	Boat Storage	20' sailboats; sand	\$341
Santa Barbara	West Beach	outriggers, 16' sailboats; sand and racks	\$375
Naples, FL	Boats on the Beach Program	16' boats; sand and racks	\$500
Santa Cruz	Dry Storage	catamarans; sand	\$830

Source: OCA generated based on data provided by the jurisdictions indicated.

The fees for the City's boat storage permits were based on the estimated staffing costs to administer the program.

In 2015 and 2020, a consultant set boat storage permit fees⁸ based on City staff's estimates of how many hours Parks and Rec and Lifeguard employees spend administering boat storage permits and enforcing compliance. Between the first and second estimates, Parks and Rec reduced the number of annual staff hours from 235 to 184 (a decrease of 22 percent). This estimate is equivalent to 29 and 23 8-hour workdays per year processing boat storage permits, respectively.

Lifeguards estimated that they spent exactly the same number of hours on compliance enforcement in 2015 and 2020. The estimated 280 hours per year is equivalent to 35 workdays per year, assuming an 8-hour day. This estimate conflicts with the figure provided by a Lifeguards supervisor we interviewed. According to the Lifeguards supervisor, on average, staff spends one hour every two weeks on boat storage rack inspections and enforcements, or 26 hours per year. This accounts for both busy weeks when more time is spent on enforcement operations and less busy periods in between. The Lifeguards supervisor's estimate is equivalent to a little more than 3 8-hour workdays per year, which is far less than the 35 workdays used in both the 2015 and 2020 estimates.

Based on the consultant's estimate of the number of combined hours spent on boat storage permit administration and enforcement, the annual permit fee increased from \$136 to \$154 in 2015, and the fee was raised again in 2022 to \$171 (not including a \$6.09 service charge). According to the consultant's estimate, the \$154 annual fee recovered only 75 percent of the costs incurred. The \$171 fee is closer to 84 percent assuming that the total staff costs were \$204 per permit.

Council Policy 100-05 and Administrative Regulation (AR) 95.25 set the framework⁹ for establishing and updating Parks and Rec's fees. According to Council Policy 100-05, fees that recover less than 100 percent of the costs are allowable when:

- a. The collection of fees is not cost-effective;
- b. The collection of fees would not comply with regulatory requirements or statutes; or
- c. The purpose of the fee is not to fully recover related costs but rather to provide benefits to the recipients or achieve a policy objective (e.g., provide access to recreational activities).

No explanation was provided in either the 2015 or 2022 fee study as to why the boat storage fees were lower than 100 percent cost recovery. Council Policy 100-05 states that "a sensitivity analysis

⁸ Parks and Rec charges fees to recover all or part of the costs to provide programs and services offered to the public, including the fees for boat storage permits. These fees are published in comprehensive Fee Schedules and approved by the City Council. The most recent version of the Parks and Rec Fee Schedule was published in 2022. Minor updates to the Fee Schedule were added in September of 2022 and March of 2024. The prior version of the Fee Schedule was published in 2015. See our October 2021 [Performance Audit of the City's General Fund User Fees](#) for more details.

⁹ Both policies also allow for annual adjustments based on the Consumer Price Index.

of consumer demand shall be considered when setting fees.” Based on the extensive waitlists for boat storage permits, it is apparent that the demand far exceeds the supply of available permits. The policy goes on to state, “a benchmarking analysis of like fees across a region may be conducted to determine demand.”

There may be some question about the number of hours Parks and Rec and Lifeguards staff actually devote to boat storage permit administration and enforcement each year. Neither department separately tracks and records time spent on either activity with the level of granular detail that would allow a definitive conclusion either way. However, the actual number of staff hours may be moot, as discussed in the next section.

The City’s fee consultant concluded that boat storage permit fees could be calculated based on the use of City property and a comparison with fees of other jurisdictions rather than staff cost estimates.

Rather than basing the boat storage permit fees on staff time, the consultant determined that an exception¹⁰ to State Proposition 26 applied because the permits were primarily related to the use of City property. As such, the use or “rental” of City property meant that the City could rely on a “comparative survey” of boat storage permit fees at other agencies to determine amount charged, rather than using an analysis aimed at recovering staff costs.

The consultant provided a survey of four other jurisdictions with dry boat storage permits in its 2015 report, but it did not include a comparable analysis in its 2020 report. We were unable to verify some of the benchmarked permit fees listed in the 2015 report and determined that two of the fees cited were inaccurate.

On the low end of the fees cited, the consultant’s report listed a dry boat permit fee offered by “San Diego County” at “Mission Bay” for \$131 per year. However, SDMC section 63.20 grants the City’s Parks and Rec Director “jurisdiction and control” over the beaches and waters in Mission Bay. We could find no San Diego County operated boat storage program on the beaches of Mission Bay. The closest alternative we could find was the private San Diego Mission Bay Boat and Ski Club’s dry boat storage at \$150 per month (\$1,800 per year, membership required).

The highest fee mentioned in the 2015 consultant’s report was in Santa Barbara at “\$8.26 per foot, per month (\$1,387 per year).” The consultant’s report cited the “Mission Bay” fee at the low end and Santa Barbara’s at the high end of the spectrum. The report noted that its survey data “shows a large variability in the fees charged by other agencies, thus making the comparison of fees difficult.” However, according to the City of Santa Barbara’s current website, and a follow-up interview we conducted with the program administrators, permits for dry boat storage at West Beach are \$375 per year and do not vary based on the size of the boat. Therefore, the consultant may have been referring to an unrelated set of fees.

¹⁰ Proposition 26, a 2010 amendment to the California Constitution, restricts the City’s ability to impose fees for services unless there is a recognized exception to the law.

It should be noted that the City of Santa Barbara conducts an annual comparative survey of 16 other public and private marinas throughout the State (not including San Diego) to assess fees, policies, and demand for the services they offer, including boat storage permits. The City of San Diego has identified annual surveys as a best practice. Specifically, AR 95.25, section 4.1.6 states, "It is the policy of the City for Administering Departments to conduct a comparison of fee levels for similar services provided in other jurisdictions (i.e., benchmarking)." Likewise, Council Policy 100-05, requirement D notes:

Benchmarking efforts should entail listing the jurisdictions analyzed, as well as comparing user fee rates and operational services to determine whether fees should be adjusted or eliminated, whether new user fee services should be established, and whether operational efficiencies can be identified and adopted for current services.

In its most recent 2020 report, the Parks and Rec fee consultant noted, "Setting individual fee amounts for use of beach bar and mooring facilities can rely primarily on a comparative survey of available options for similar facilities or services." Unfortunately, no comparative study of fees was provided in the consultant's 2020 report even though benchmarking data was provided in its 2015 report.

Recommendation 2.1

(Priority 2)

In order to ensure that the boat storage program is funded at a level that allows for efficient and effective management of the program, the Parks and Recreation Department should base boat storage permit fees on a comparison of what other jurisdictions charge for similar permits, rather than relying on the existing estimates of staff time costs.

Management Response: Agree. Parks and Rec can perform benchmarking research with other jurisdictions that operate a boat storage program and gather permit data to compare against. Parks and Rec intends to engage a consultant to perform a cost-of-service study as part of the planned update to the Department's Fee Schedule scheduled to begin in Fiscal Year 2026 pending identification of funding for the consultant work. All fees associated with watercraft can be evaluated as part of this effort. [See full response beginning on page 38.]

Target Implementation Date: Fiscal Year 2028

Investigative Conclusion 3

Other jurisdictions offer more efficient boat storage options and vary permit rates by boat type. Additional boat storage locations and repairs to existing structures could improve access to this resource.

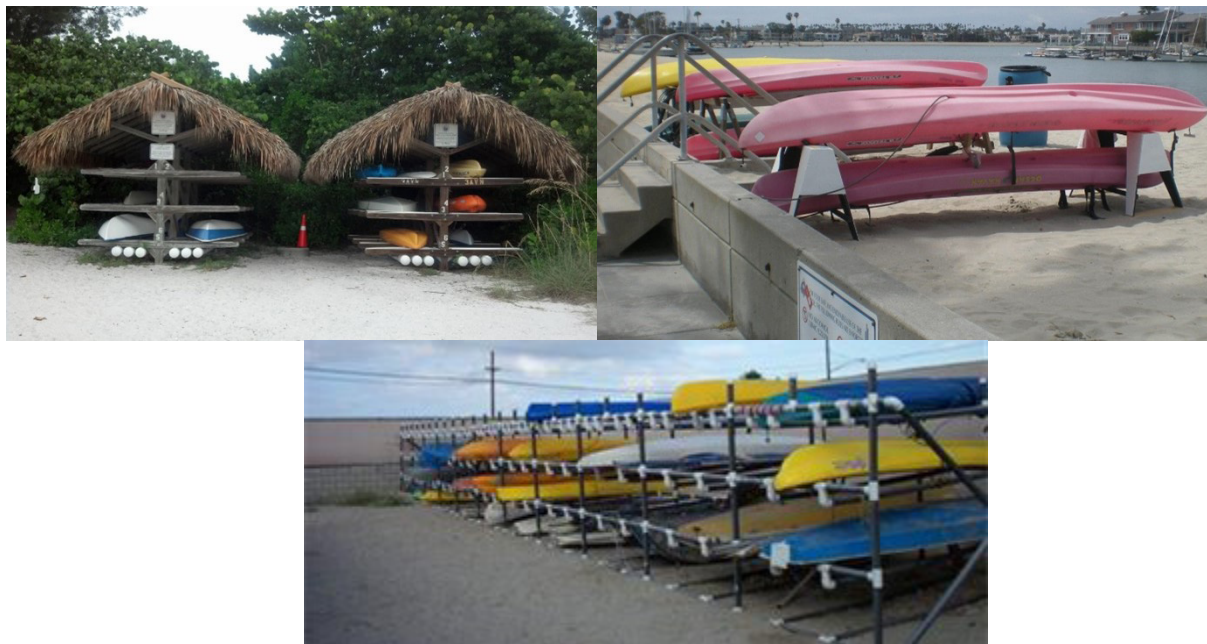
We compared boat storage options from other jurisdictions to the City's program. Other jurisdictions offer more efficient storage options, but Parks and Rec determined that implementing similar storage systems would not work in San Diego. Nevertheless, we recommend that Parks and Rec consider charging different rates for larger and wider boats. We also identified boat storage bars that the City should consider adding, repairing, or replacing.

Other jurisdictions offer more efficient small boat storage solutions.

While other jurisdictions provide more efficient and aesthetically appealing boat storage racks, Parks and Rec determined that changing the City's rack design would not be feasible. As shown in **Exhibit 9**, the boat storage racks in other jurisdictions including Naples, Florida and Long Beach, California include a shelf system that allows multiple lightweight canoes and kayaks to be stacked vertically on elevated PVC plastic or metal sawhorse-type racks. A roof structure provides shade and protection from the elements for small boats in Naples, Florida.

Exhibit 9

Other Jurisdictions Offer More Efficient Boat Storage Racks



Source: Images obtained from websites for (clockwise from top left) Naples, Florida and Long Beach, California (two images).

Parks and Rec management determined that the more efficient small boat storage solutions used elsewhere were infeasible in San Diego.

Although there are more efficient storage options, Parks and Rec stated that safety concerns, added costs, and regulatory requirements precluded the City from implementing similar structures in San Diego. Specifically, in response to a draft version of our report that included a recommendation to consider installing more efficient small boat storage solutions similar to those offered in other jurisdictions, Parks and Rec management stated that they “considered using more efficient storage options, such as shelf systems. However, due to existing Council Policies, Mission Bay Master Plan, and regulations supporting the preservation of beach areas for public use and access, it is infeasible to implement shelf systems on sandy beach areas.”

Recommendation 3.1

(Priority 2)

The Parks and Recreation Department should consider using more efficient storage options for smaller boats, such as shelf systems.

Management Response: Agree. Staff considered the recommendation and found it infeasible to implement. [See full response beginning on page 38.]

Target Implementation Date: Implemented

Due to the limited space available for small boat storage, the City should evaluate the impact of wider boats and consider charging more for catamarans.

While other jurisdictions charge different rates based on boat type, the City charges the same rates for all boat types and only limits the maximum length and width of the permitted boat. This is significant because the boats are stored side-by-side so the boat width has the greater impact on the total space available. As the permit fees are currently set up, a much wider boat is charged the same amount as a narrow boat because the fees are tied to estimated staff costs, not the use of the City's property.

Other cities take the type of boat and relative width into consideration as part of their small boat permitting programs. For example, Santa Cruz offers storage for both catamarans (two-hulled sailboats) and smaller kayaks. The rate for catamarans is about \$830 per year and the rate for kayaks (stored in racks) is approximately \$780 per year. Similarly, Santa Barbara charges \$350 per season (about 7 months) for catamarans and \$375 per year for other small boats.

As described earlier, each small boat storage location¹¹ at the City is equipped with a horizontal metal bar. Each bar measures approximately 50 feet in length.¹² In total, there are 18 bars available: 12 are designated for 14-foot boats and 6 are designated for 17-foot boats.

For 14-foot boats, based on our observations of whether both sides of each bar are used,¹³ approximately 988 feet are useable for boat storage. There are 210 permits available for these smaller boats, so the average boat width that could be accommodated per permit is about 4 feet 8 inches (988 feet / 210 permits).

We note that the number of permits assigned to each location are not uniform, which allows for more room on some bars and less on others (see **Appendix B** for Parks and Rec's map). For example, the San Juan Place location is assigned only 15 permits. Since both sides of the bar are useable, each permitholder has access to 6 feet 8 inches of horizontal space (100 feet / 15 permits). In contrast, due to inconsistent numbering, the El Carmel Place South location was assigned 26 permits (B-50 to B-75). It appears that both sides of the bar are useable, but that leaves only 3 feet 10 inches of space per permit (100 feet / 26 permits). Five of the 12 bars dedicated to securing 14-foot boats allowed for 5 feet of storage space per permit, three provided around 4 feet of room.

Although the length is limited to 14 feet, the widths of these boats vary and are the constraining dimension since the boats are attached to the bars in a side-by-side configuration. For reference,

11 Some locations have more than one horizontal metal bar, placed in a line side-by-side to accommodate the number of boats assigned to that area.

12 The two bars at Santa Clara Place appear to be slightly shorter than 50 feet (estimated to be 43 feet and 45 feet), but the other 16 bars are all about 50 feet long based on measurements using aerial images from Google Earth.

13 Steep terrain apparently makes it difficult to use both sides of bars at El Carmel Place North and Santa Clara Place.

a sea kayak¹⁴ is around 2 feet wide and a typical dinghy¹⁵ measures 4 feet 7 inches wide, both of which are within the average calculated width per permit. In contrast, a 13-foot-long catamaran¹⁶ (two-hulled sailboat) is 7 feet wide, which takes up more than three times the width of a kayak.

For 17-foot boats, both sides of each bar are used, so the total linear feet available is 600 feet (6 bars x 2 sides per bar x 50 feet per bar). Since there are 60 permits available for these larger boats, the average boat width that could be accommodated per permit is 10 feet (600 feet / 60 permits).

A typical 17-foot catamaran¹⁷ (two-hulled sailboat) is about 8 feet wide, which is well within the width that can be accommodated based on the number of permits available for boats of this size and consistent with the maximum width allowed by Parks and Rec. However, given that there are over 350 people on the permit waitlist for these larger boats, and some have been waiting over 22 years, Parks and Rec may want to consider adding storage dedicated to 17-foot boats.

Currently, all permits sell for the same price but catamarans (even those under 14-feet long) consume a disproportionate amount of space relative to single-hulled boats. Parks and Rec does not track permits issued by boat type. It may be worth reconsidering the permit fees for catamarans based on their width, limiting the number of permits issued to catamarans, and distributing permits to storage bars based on boat type and available space.

Recommendation 3.2

(Priority 2)

The Parks and Recreation Department should consider: (1) raising permit fees for catamarans based on their width, (2) limiting the number of boat permits available to catamarans, and/or (3) distributing permits to storage bars based on boat type and available space.

Management Response: Agree. Parks and Rec intends to engage a consultant to perform a cost-of-service study as part of the planned update to the Department's Fee Schedule scheduled to begin in Fiscal Year 2026 if funding is identified for this effort. All fees associated with watercraft can be evaluated as part of this effort. [See full response beginning on page 40.]

Target Implementation Date: Fiscal Year 2028

¹⁴ We used the Delta 14 sea kayak for reference based on the manufacturer's website.

¹⁵ Dimensions are for a 9 feet 9 inches West Marine Classic Dinghy, per the company's website.

¹⁶ The Hobie Club Wave is 13 feet long and 7 feet wide, according to the Hobie website.

¹⁷ According to the Hobie website, the 17-foot long Hobie Getaway is 7 feet 8 inches wide. The Hobie 16 is 16 feet 7 inches long, with a beam (width) of 7 feet 11 inches.

One or more additional boat storage locations could be added to improve access to this resource.

An undated map (see **Appendix B**) of boat storage locations provided by Parks and Rec staff includes 13 racks around Mission Bay. Each boat storage rack is identified by a letter from A to F and a sequential number within that series, such as A-21 through A-40. However, both the spreadsheet of issued permits and our review of existing boat storage racks on the beach indicates that at some point one of the storage locations was removed, leaving only 12 racks.

The map provided by Parks and Rec shows a boat storage rack identified by the letter D with 25 associated permits near Santa Clara Place. However, that storage rack no longer exists. We reviewed archival images of the area from as far back as 1994 and did not see any additional boat storage racks in the area indicated by the map. There appears to be space available for an additional boat storage rack on the north side of Santa Clara Place and there is an existing rack series C-36 to C-55 on the south side of the road.

According to the institutional memory of a Lifeguards employee, the boat storage rack identified by the letter D was eliminated approximately 17 years ago from an area near Rockaway Court. Apparently, “beach erosion made it impossible to have both a beach bar and room for trash compactors to get by,” so the boat storage location was removed and the boats assigned to area D were redistributed to the storage area on the south side of Santa Clara Place.

As noted previously, SDMC section 63.25.14(c) identifies an additional potential boat storage location at Santa Clara Cove, on the northwest side of Mission Bay. However, there are no boat storage locations in that area. It appears that there is space available on the beach in that area.

Some boat storage racks are in need of repair.

As shown in **Exhibit 10**, the condition of some of the boat storage racks is poor. In some cases, the exposed, rusted ends of the metal racks could pose a tripping or laceration hazard that should be addressed as a safety issue. We were unable to identify past liability claims due to exposed boat racks, but more effective monitoring would allow City staff to identify and address these repair or replacement issues in a timely manner.

*Exhibit 10***Some Boat Storage Racks are Heavily Damaged**

Source: OCA images captured on March 18, 2024 and April 3, 2024.

Since 2016, nine reports (not including duplicate reports) to the City's Get It Done app noted concerns about boat storage racks. For example, several reports noted erosion at rack A-61 through A-80 near Ensenada Court causing boats to be submerged, allegedly damaging both the boats and metal rack at that location. An image from a 2019 Get It Done report regarding that area is shown in **Exhibit 11**. The report noted that the rack was "in total disrepair, boats are damaged now daily. Many requests have been made no effort is being made to correct the problem." As of August of 2024, it appears that beach erosion continues to be a minor problem at that location, but the sign has been repositioned. Other Get It Done reports noted the poor condition of some of the boats attached to various racks and complained about weeds and debris accumulation near the boat storage areas. According to Lifeguards, Parks and Rec staff may be reluctant to remove weeds around boat storage areas, citing concerns about damaging the boats.

*Exhibit 11***Beach Erosion at a Boat Storage Rack Was Reported in 2019**

Source: Image obtained from Get It Done report 02478605, submitted January 6, 2019.

Of course, the budgetary impact of any repairs or replacements of existing boat storage racks would need to be considered in light of limited financial resources and the City's significant General Fund budget deficit. However, as noted in our fiscal year 2023 [Performance Audit of the Mission Bay and San Diego Regional Parks Improvement Funds](#), there is a pool of lease revenue collected from tenants in Mission Bay Park that could be used for certain allowable capital improvement projects. One such project could include constructing boat storage racks, if requested by Parks and Rec, approved by the Mission Bay Park Improvement Fund Oversight Committee, and ultimately appropriated by the City Council. As noted in the audit, the Mission Bay Improvement Fund ending balance increased by \$5.1 million to \$41.2 million in fiscal year 2023.

The Parks and Recreation Department considered using money from the Mission Bay Park Improvement Fund to construct new boat storage racks but declined to pursue using the proposed funding source.

In response to a draft version of this report, Parks and Rec management determined that it was infeasible to construct additional boat storage racks using money from the Mission Bay Park Improvement Fund. Specifically, they noted, "there are other funding needs for Mission Bay Improvement Fund that have higher priority for limited funding availability." Instead, Parks and Rec plans to use money from the department's portion of the General Fund operating budget to pay for the repair and replacement of boat storage racks. Alternatively, if sufficient funds are not available, Parks and Rec management stated, "any unrepairable boat storage racks would be removed."

Recommendation 3.3

(Priority 3)

The Parks and Recreation Department should consider recommending funding approval from the Mission Bay Park Improvement Fund Oversight Committee to reinstall the beach bar boat storage rack identified as rack D, replace heavily damaged racks, and/or consider adding one or more storage racks near Santa Clara Cove, or elsewhere.

Management Response: Agree. Parks and Rec considered the recommendation and found it infeasible to implement. [See full response beginning on page 40.]

Target Implementation Date: Implemented

Recommendation 3.4

(Priority 3)

The Parks and Recreation Department should identify beach bar boat storage racks that need repairs, estimate the costs for improvements, determine the relative priority for each identified location, and make repairs as indicated.

Management Response: Agree. Repair and replacement of boat storage racks would be accomplished through Park and Rec's General Fund operating budget. If funds are not available, any unrepairable boat storage racks would be removed. [See full response beginning on page 41.]

Target Implementation Date: Fiscal Years 2026–2027

Investigative Conclusion 4

Compliance inspections and enforcement activities would likely be improved if boat storage permit monitoring procedures were in place. Program compliance would also be improved if the existing rules were updated and clarified.

Currently, Lifeguards and Parks and Rec staff share responsibility for the enforcement and administration aspects of the boat storage racks. Lifeguards are responsible for routine compliance inspections and enforcement based on program rules and permit holder information maintained by Parks and Rec. Although Lifeguards recently took enforcement action to remove abandoned boats with help from Parks and Rec staff, this was the first cleanup effort in many years. Program compliance would likely be improved if Lifeguards and Parks and Rec staff establish procedures to ensure consistent inspections, coordinate enforcement, and update the boat storage permit rules.

Lifeguards recently removed 29 abandoned boats and took compliance actions against 44 others, but this appears to be the first enforcement effort in approximately 15 years.

During the course of our investigation, the Lifeguards initiated a boat impound and disposal project that began in May of 2024. Images from the project are shown in **Exhibit 12**, and involved coordination with Parks and Rec permitting staff, Park Rangers, and the Parks and Rec Mechanized Beach Equipment Team to identify and remove boats that did not comply with the program's rules.

*Exhibit 12***Lifeguards Removed 29 Abandoned Boats and Identified 44 Others That Violated Program Rules in May 2024**

Source: Lifeguards images captured in May 2024, obtained by OCA.

According to SDMC section 63.20.22(d), any abandoned boat found in Mission Bay Park may be removed under the Parks and Recreation Department Director's authority "without any liability to the City for any damage to any property of the owner." Lifeguards are currently called upon to post violation notices on noncompliant boats and impound (remove) boats to a secure location if an owner can be identified and notified of the violation. Lifeguards also dispose of abandoned boats and owner-identified boats if a title-holder fails to respond within a 30-day timeframe.

According to the Lifeguards staff who led the effort, this was the first cleanup effort in many years. Historically, the permit and enforcement process has gone through several periods of action and inaction over the past 30 years, according to a Lifeguards employee's memory of being involved with the program.

When asked, a Lifeguards supervisor estimated that staff spends approximately one hour every two weeks on boat storage rack inspections and enforcements, including responding to complaints from the City's Get It Done app. We identified a total of nine Get It Done complaints related to boat storage permits (not including duplicate reports) received in the eight years between May of 2016 and July of 2024.

Initially, Lifeguards removed 29 boats that were identified as lacking both DMV registration and City permit stickers. These boats appeared to have been abandoned. During our fieldwork, we heard from a frustrated Mission Bay resident that an inflatable raft that was left near a boat storage rack was left behind by vacationers over a year prior to our survey.

In the second phase of the cleanup effort, Lifeguards identified 44 boats that had expired permits, or current permits but lacked DMV registration (or were otherwise non-compliant with permit rules). Lifeguards created a compliance checklist that was sent to boat owners. Eight violations identified by Lifeguards were:

1. No current DMV registration (if required);
2. No current City-issued boat storage permit;
3. Improper boat storage permit sticker placement;
4. Boat is at the wrong storage location;
5. Boat is the wrong length for that storage location;
6. Standing water in the boat;
7. Extra items attached to the boat, such as gear boxes or roller dollies; and
8. Boat is not seaworthy (holes in the hull, no mast on sailboats).

Parks and Rec and Lifeguards would likely be better able to coordinate routine inspections and enforcement activities if written procedures were in place.

According to SDMC section 63.20(a), the Parks and Rec Director “shall have jurisdiction and control over all beaches owned or controlled by the City of San Diego.” Further, SDMC section 63.20.1, states that Parks and Rec staff are charged with “maintaining peace, order, and safety in beach areas.” Taken together, these SDMC sections suggest that Parks and Rec is primarily responsible for maintaining order and ensuring compliance with the rules and regulations related to the activities on Mission Bay’s beaches, which would include the administration and enforcement of boat storage rack permits.

Given the Parks and Rec authority under the SDMC, it may be more efficient and effective for the department’s staff to develop procedures to coordinate the enforcement aspects of the boat storage process in Mission Bay. According to our interviews with Parks and Rec staff—with the exception of the recent enforcement effort coordinated by Lifeguards—Parks and Rec staff do not routinely coordinate boat storage compliance and enforcement efforts.

Historically, Parks and Rec has delegated the responsibility for inspecting boat storage racks and enforcing program compliance to Lifeguards. Apparently, according to a Lifeguards employee, at one point roughly 20 years ago, the entire boat storage program was handled by Lifeguards. The current rationale for involving Lifeguards in the inspection process, according to Parks and Rec staff, is that Lifeguards are needed to make determinations about whether a boat is seaworthy.

However, we note that only one of the eight items on the Lifeguards' boat storage permit compliance checklist related to a seaworthiness determination. Seven of the eight items identified by Lifeguards as violations of program rules had to do with boat registration and permit stickers, how the boat was attached to the rack, and other plainly observable conditions. The one item on the checklist that related to seaworthiness included items such as holes in the hull and no mast attached to sailboats. Neither violation requires a Lifeguards employee's expertise to identify.

One of the compliance checklists completed by Lifeguards in May of 2024 referred to a canoe that had an expired boat storage permit from 2021 that was labeled either "E 01 or F 01." The inspection report noted that the permit was illegible. Based on the violation checklist provide by Lifeguards, Parks and Rec sent a notice to the owner of a boat that was issued permit E-01. The boat owner responded, "I do NOT have a canoe," and added "the inspection report your service delivered is AGAIN in error. This happened 15 yrs ago and caused damage to my boat and my loss of confidence in your service." The boat owner recommended that pictures of the alleged violations be included with their reports. A supervisor from Lifeguards responded, confirming that a current, valid permit was in place and the boat was otherwise in compliance, but added (underlining in the original):

The only violation I saw was storage of launching devices under your vessel. We are currently not enforcing that regulation as we have other higher priorities. We will not be addressing launching devices within the next 4 months.

It seems likely that the violation notice that was sent to the wrong boat owner could have been avoided if Parks and Rec staff had provided Lifeguards with a current list of permitholders (including boat type, DMV registration information, and permit number). Other cities require boat owners to include an image of their boat as part of the permitting process, which could also resolve questions related to illegible permit numbers.

Coordinating inspection and enforcement activities, holding employees and permitholders accountable, and communicating information with permit staff would likely be much more efficient and effective if these aspects of the boat storage program were led by Parks and Rec staff. Lifeguards could still handle impound (removal) operations, but the day-to-day inspections would likely be better handled in coordination with Parks and Rec staff.

Recommendation 4.1

(Priority 3)

The Parks and Recreation Department should develop written policies and procedures for boat storage permit compliance activities, including scheduled inspections, permit data collection and sharing, and compliance operations in coordination with Lifeguards.

Management Response: Agree. Parks and Rec, in coordination with Lifeguards, will develop written interdepartmental policies and procedures documenting compliance activities, annual inspections, permit data collection and sharing, and compliance operations. [See full response beginning on page 41.]

Target Implementation Date: Fiscal Year 2027 – Quarter 4

Program compliance would be improved if the existing program rules were updated and clarified.

During our investigation, we found multiple conflicting versions of the Parks and Rec boat storage permit “Specifications, Rules, and Regulations” guidelines for both 14-foot and 17-foot boats.

When we asked for the most current version of the 14-foot boat permit rules, Parks and Rec provided a version which was revised on July 27, 2022. However, a Parks and Rec manager sent us an earlier version of the rules, dated January 17, 2008, two days later. We also found the 2008 version of the rules via a Google search. The 2008 versions both mentioned that “fees are higher for non-residents,” but that language was removed from the newer version of the rules.

Lifeguards noted that the instructions for placing permit stickers were incorrect on the version of the 14-foot boat rules it used during a recent enforcement action. However, Lifeguards said that instructions were correct on the 17-foot boat rules. According to Lifeguards, the instructions to place the City’s permit sticker on the front (bow) of the boat conflicted with State boat registration requirements that only the DMV-issued vessel registration number and sticker appear on that part of the boat. We found instructions on the DMV’s website that states, “Please do not place any numbers, letters, or devices near the registration sticker (other than your vessel registration number and Mussel Fee sticker (if required)).” All of the boat storage permit instructions we reviewed said to place the City-issued permit on the “starboard bow side (right front) of the vessel,” where the DMV advises against placing other stickers.

When asked, Parks and Rec staff only provided a 2008 version of the rules for 17-foot boats. The document did not mention higher fees for non-residents and showed a May 31st expiration date for permits. In contrast, the 2008 version of the 14-foot boat rules had an expiration date of March 1st. The non-resident fee and expiration date information were inconsistent between the 17-foot and the 14-foot boat rules, even though both were revised in 2008.

In addition, as of this report’s publication, the Lifeguard’s web page states, “Beach Bars and/ or Mooring Permits are available at the Park & Recreation’s General Park Use Permits and Applications web page.” However, no applications are available on that page. When asked, Parks and Rec staff said they removed the application because there had been little movement on the waitlists for several years.

Recommendation 4.2

(Priority 3)

The Parks and Recreation Department should update and post current boat storage applications and permit “Specifications, Rules, and Regulations” sheets for both 14-foot and 17-foot boats online, include an updated revision date, and ensure consistency with DMV guidance.

Management Response: Agree. Parks and Rec will update the webpage to incorporate this information. [See full response beginning on page 42.]

Target Implementation Date: Fiscal Year 2025 – Quarter 2

Conclusion

Our investigation into a hotline allegation regarding mismanagement of the Parks and Rec's boat storage program determined that the allegation was substantiated. We identified over 100 permits that could have been issued, but were not, due to clerical errors related to the manual process used to issue permits. As a result of these errors, fewer small boat owners were given the opportunity to securely store their vessel on the beach at Mission Bay.

Also, we found that over 400 people are on waitlists for 14-foot and 17-foot boat storage permits, with some left waiting for decades. The long waitlists were caused not only by the clerical errors we found that limited the number of permits issued, but also by the existing program rules and City regulations that allow existing permitholders to renew their permits year after year—effectively blocking access to the boat owners on the waitlists.

Fee structure issues also emerged as a concern. In comparison to other cities, San Diego charges lower fees for on-beach storage of small boats. We found that a consultant set boat storage permit fees based on City staff's estimates of how many hours they spend administering boat storage permits and enforcing compliance. However, the fees could have been based on the use of City property and benchmarking with other jurisdictions. We found that other cities charge between two to nearly five times more per permit than San Diego does.

We also found that additional funds could be put toward repairs to existing boat storage bars and construction of additional sites. Higher permit fees are one source of additional funds, but they may not be the only source of revenue. In fact, Parks and Rec may be able to tap into the over \$41 million in funds available in the Mission Bay Park Improvement Fund for capital improvements generated from lease revenue collected from area businesses, but that option was deemed infeasible.

Finally, we determined that compliance inspections could be more frequent and effective if they were coordinated by Parks and Rec and if the program rules were clarified. Although the Lifeguards conducted a boat storage cleanup effort during the course of our investigation, it appears that the last comprehensive enforcement action took place about 15 years ago. Clearly, boat storage permit enforcement should not be the highest priority for City Lifeguards. However, the permit fees are currently set based on the assumption that Lifeguards spend approximately 280 hours per year on these inspections and enforcement activities. Also, the boat storage permit rules published by Parks and Rec are inconsistent and may conflict with State regulations.

To address these concerns, our report makes 10 recommendations to improve the City's boat storage permit administration, facilities, fee recovery, and compliance operations. City Management agreed to implement all 10 recommendations.

Appendix A

Definition of Fraud Hotline Recommendation Priorities

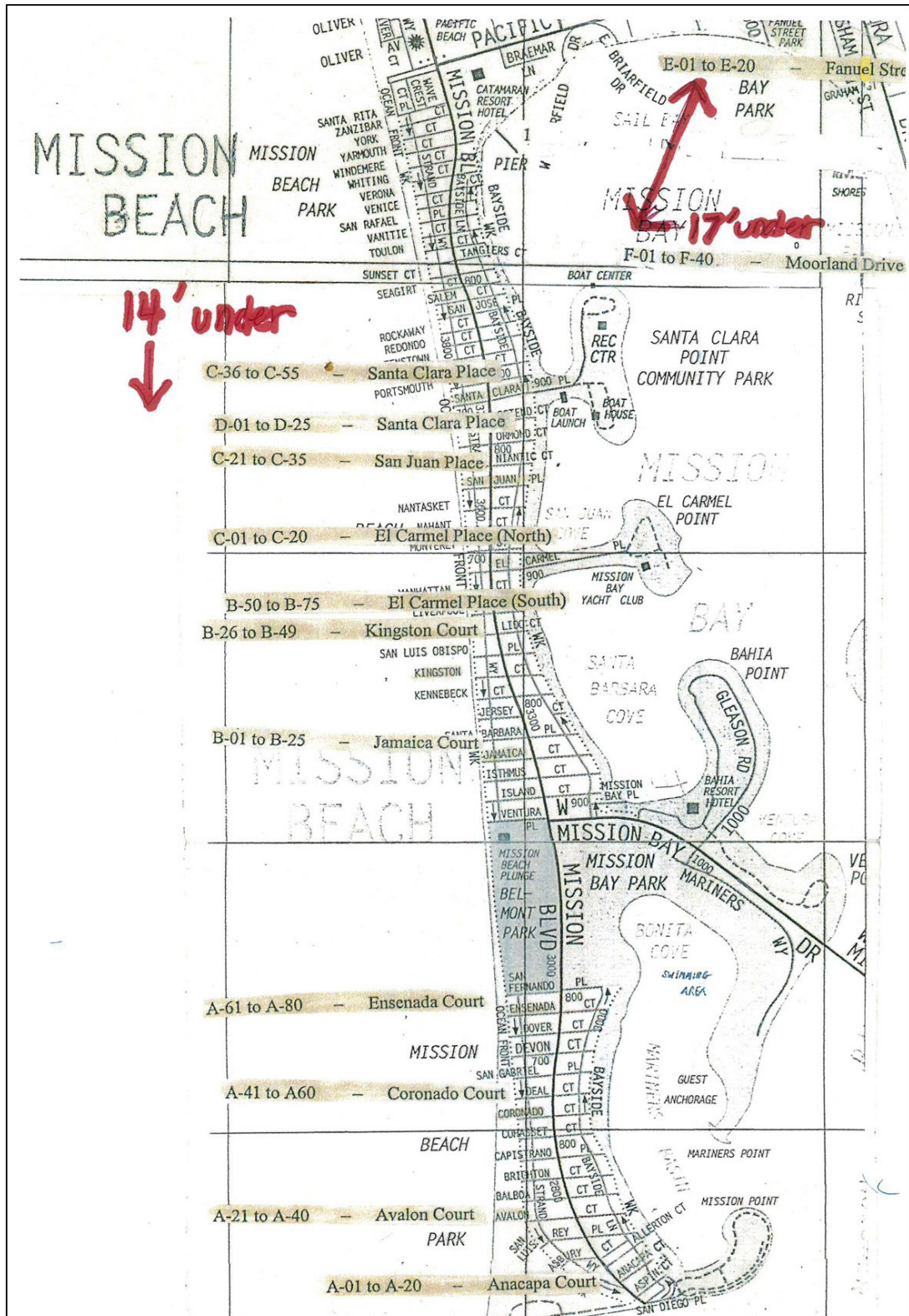
The Office of the City Auditor maintains a priority classification scheme for Fraud Hotline recommendations based on the importance of each recommendation to the City, as described in the table below. While the City Auditor is responsible for providing a priority classification for recommendations, it is the City Administration's responsibility to establish a target date to implement each recommendation, taking into consideration its priority. The City Auditor requests that target dates be included in the Administration's official response to the findings and recommendations.

PRIORITY CLASS*	DESCRIPTION
1	Fraud or serious violations are being committed. Significant fiscal and/or equivalent non-fiscal losses are occurring. Costly and/or detrimental operational inefficiencies are taking place. A significant internal control weakness has been identified.
2	The potential for incurring significant fiscal and/or equivalent nonfiscal losses exists. The potential for costly and/or detrimental operational inefficiencies exists. The potential for strengthening or improving internal controls exists.
3	Operation or administrative process will be improved.

* The City Auditor is responsible for assigning Fraud Hotline recommendation priority class numbers. A recommendation that clearly fits the description for more than one priority class shall be assigned the higher priority.

Appendix B

Map of Boat Storage Areas Provided by Parks and Rec





THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: November 12, 2024

TO: Andy Hanau, City Auditor, Office of the City Auditor

FROM: Robert Logan, Fire Chief, Fire-Rescue Department
Andy Field, Director, Parks and Recreation Department

SUBJECT: Management Response to the Office of the City Auditor's Hotline Report of Boat Storage Permits

This memorandum serves as the management response to the final draft of the Hotline Report of Boat Storage Permits (Hotline Report) received November 5, 2024.

At the time this response was written, the Hotline Report provided to management contained ten (10) recommendations, each directed to the Parks and Recreation Department (P&R). San Diego Fire-Rescue supports P&R with responding to many of these recommendations. Management agrees with all ten (10) recommendations within the Hotline Report.

While staff acknowledges the validity of the investigation and conclusions, the boat storage program recommendations discussed in the Report must be balanced with P&R's mission to "To provide healthy, sustainable, and enriching environments for all." To meet this mission statement, P&R works daily to provide safe, clean, and enjoyable parks and recreational amenities at all locations, including beach and bay areas. At this time, providing storage space for boats at racks are not a priority role for P&R for either operations and maintenance or capital improvement projects.

Operations and Maintenance Priorities

P&R prioritizes the following daily maintenance activities to ensure the department's mission of clean and safe parks is met at the beaches and bays, including: cleaning dozens of comfort stations multiple times per day, emptying trash and recycling receptacles multiple times per day, maintaining landscaping, sweeping walkways, maintaining safety and wayfinding signage, maintaining navigational safety buoys, repairing damaged fencing, removing graffiti, rolling out and maintaining accessible beach mats, grooming and leveling the beach sand, and building sand berms to manage flooding, among other priorities. P&R is also responsible for providing, maintaining, and repairing many park amenities and furnishings, including, playgrounds, outdoor hard courts, public boat launching ramps, picnic tables, benches, barbecue grills, hot coal containers, and fire rings.

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The Mission Bay Master Plan¹ offers some guidance on private boat storage. While not specifically mentioning beach bars and racks, Recommendation 46 (page 75) addresses the potential for dry-boat storage at Mission Bay Park:

46. Potential Dry-Boat Storage: In public forums it was suggested that provisions for dry-boat storage be considered in the Park. Dry-boat storage offers the convenience of advanced fueling, stocking, and launching while exercising optimum control of fueling and cleaning operations. However, dry-boat storage facilities would occupy valuable land for the benefit of comparatively few boat owners. They also require visually obtrusive sheds and, if commercially operated, would yield a marginal return. For these reasons, dry-boat storage is not recommended.

Even though this recommendation generally relates to larger marina-style facilities for boats, it is instructive for stating that “dry-boat storage facilities would occupy valuable land for the benefit of comparatively few boat owners.” It is for this reason P&R continues to evaluate the placement of boat racks and bars and may recommend removing some racks and bars rather than replacing or adding new racks and bars.

Coastal Project Priorities

The P&R Mission Bay and Shoreline Parks Division’s operations and maintenance activities described above occur within the California Coastal Commission’s (Commission) and/or City Development Services Department’s (DSD) coastal permit jurisdiction and are subject to the provisions of the California Coastal Act and San Diego Municipal Code. Some of the activities described above require permits or authorization from the Commission and/or DSD, including Coastal Development Permits (CDPs). P&R maintains a prioritized list of operations and maintenance projects requiring permits and authorizations from the Commission and/or DSD that are managed and overseen by P&R staff. This prioritized list includes the following project types:

1. Parking lot closures
2. Park curfews
3. Management of marine mammal breeding areas
4. Maintenance dredging
5. Bluff erosion control and safety barricades
6. Mitigation funds
7. Beach bonfire amenities
8. Odor control activities
9. Special events and filming
10. Capital projects

The provision and replacement of boat storage racks are not on the current list of planned applications for CDPs. Staff resources can only allow for two or three CDP applications to be sent to the Commission annually. If it is determined the recommendations in this report require Commission approval via the CDP application process, the application for boat storage racks will likely be prioritized lower than the above project types and thus will take significant time to be addressed.

¹ The Mission Bay Master Plan is available on the City webpage at:
https://www.sandiego.gov/sites/default/files/mission_bay_park_master_plan_2023.pdf.

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Mission Bay Park Improvement Fund (MBPIF)

Established by City Charter Section 55.2, the MBPIF is limited for Capital Improvement Program projects focused on bay dredging, water quality/wetlands, shoreline treatments, upland habitats, and deferred maintenance. It is likely that repair of boat storage racks would involve contractor work to fix existing structures and thus would not be eligible for MBPIF as they would not be capital projects.

Several projects are funded by MBPIF currently, and there is demand for additional MBPIF funds to address more capital projects that align more closely with the goal to provide clean and safe parks as well as Mission Bay Master Plan goals to improve water quality. P&R has recommended and will continue to recommend projects that align with the priorities in Charter Section 55.2, focusing on:

- Ongoing Programmatic Environmental Impact Reports (PEIRs) for the DeAnza Special Study (see <https://www.sandiego.gov/planning/programs/work-programs/de-anza-natural>) and Mission Bay Improvement Fund (see <https://www.sandiego.gov/cip/projectinfo/mbpeir>). Both PEIRs will be completed in coming years, and numerous new projects are anticipated to address water quality/wetlands, shoreline treatments, and upland habitats related to these PEIRs.
- Major deferred maintenance projects, including pathways, restrooms, playgrounds, fitness areas, parking lots, recreation centers, and related infrastructure that provide service to most park patrons.

In the context of P&R's mission and existing responsibilities and priorities, the boat storage program is a lower priority amenity that may not be considered the highest and best use of Mission Bay's sandy beach areas or P&R's limited budget and staffing resources. The prioritized list of coastal projects, coupled with the budget constraints laid out above, significantly limit P&R's ability to implement several of the recommendations in the Report. Any additional resources received in response to this Report must be shared with priority projects and responsibilities discussed above.

Recommendation 1.1: As an interim measure, the Parks and Recreation Department should implement reconciliation procedures to ensure that all available boat storage permits are offered for sale. (Priority 2)

Response: Agree. Permit Center staff will develop a process and written procedures to ensure the following:

1. All permits expire on February 28 each year.
2. Boat storage permits are reviewed quarterly, or on an as-needed basis when storage space becomes available.
3. Available permits are identified and offered to those on the wait list.
4. Wait lists are reviewed monthly, or on an as-needed basis when new permits are issued.
5. Contact with permit holders whose permits are expiring are notified of upcoming expiration date the first week of January each year.
6. All boat storage permits that are issued and active also have a corresponding sticker to display on the vessel.

These procedures will be developed in collaboration with Lifeguard Services.

Target Implementation Date: Fiscal Year 2026 – Quarter 1

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Recommendation 1.2: The Parks and Recreation Department should transition from mailed checks and manual recordkeeping to using online registration software to create permit data records for all available boat storage permits, issue permits using the online system, and make permits available to the public via the online system as they become available through revocations or cancelations. (Priority 3)

Response: Agree. However, implementation of this recommendation is contingent on funding.

ActiveNet, P&R's current online activity registration system, has the functionality to create permit records for current valid permits. However, ActiveNet does not have the functionality to perform the following:

1. Create permit data records for available boat storage permits.
2. Issue permits online.
3. Provide available permits to the public when a permit is revoked, canceled, or expired.

P&R will work with the Purchasing and Contracting Department (P&C) to identify a contracting method to obtain a permitting solution that contains all the capabilities listed above.

Target Implementation Date: Fiscal Year 2027 – Quarter 4

Recommendation 1.3: The Parks and Recreation Department should revise the boat storage permitting process to mitigate the current problems of extensive waitlists and permits that can be renewed in perpetuity. For example, Parks and Recreation could make all permits available to the general public annually on a first-come, first-served basis, use a lottery system, and/or establish a maximum number of years boat storage permits can be renewed. Parks and Recreation should propose revisions to SDMC section 63.25.73(d) if necessary to allow this change in practice. (Priority 3)

Response: Agree. P&R can explore implementing a lottery system and reducing the renewals to a maximum of two (2) years.

P&R will submit a Legal Services Request (LSR) to the City Attorney's Office to receive a legal analysis on whether an update to SDMC Section 63.25.73(d) is required to implement changes to the renewals and lottery system.

Implementation and enforcement of modifications to the permitting process is dependent on support from Lifeguard Services. Lifeguard Services have historically provided the compliance inspections for water safety and water worthiness of boats, and other water vessels. The inspection of water safety and water worthiness is not included in the Park Ranger or Park Maintenance staff job classifications and they are not trained for water safety inspections.

It is recognized that a system that limits the amount of time a permit can be held (two years) can generate more issues with derelict or abandoned vessels. The average life cycle of the types of vessels and watercraft that can be stored at the beach bars is 20-25 years. The cost of these types of vessels new range from \$600 to \$22,000. Allowing a permittee to hold a permit for only two years will attract lower quality used vessels and increase the problem of abandoned vessels or scuttled vessels. If the City went to a two-year maximum system, an assessment of inland and local storage areas should be made and provided to permit holders who did not win a permit in the lottery system.

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Several of the beach bars (A, B, and C) are also strategically placed in mooring ball areas. This provides customers with vessels on mooring balls to have a vessel on the shore to go to and from their vessel. Having a small paddle craft on a beach bar (A, B, and C) helps mooring ball permit holders stay in compliance with the current City rules and regulations and avoids them having to swim to their vessel (not recommended as a safe practice). If the City went to a two-year maximum system, some type of consideration should be made for mooring ball holders.

Target Implementation Date: Fiscal Year 2026 – Quarter 4

Recommendation 2.1: In order to ensure that the boat storage program is funded at a level that allows for efficient and effective management of the program, the Parks and Recreation Department should base boat storage permit fees on a comparison of what other jurisdictions charge for similar permits, rather than relying on the existing estimates of staff time costs. (Priority 2)

Response: Agree. P&R can perform benchmarking research with other jurisdictions that operate a boat storage program and gather permit data to compare against. P&R intends to engage a consultant to perform a cost-of-service study as part of the planned update to the Department's Fee Schedule scheduled to begin in Fiscal Year 2026 pending identification of funding for the consultant work. All fees associated with watercraft can be evaluated as part of this effort.

Target Implementation Date: Fiscal Year 2028

Recommendation 3.1: The Parks and Recreation Department should consider using more efficient storage options for smaller boats, such as shelf systems. (Priority 2)

Response: Agree. Staff considered the recommendation and found it infeasible to implement Recommendation 3.1. For the reasons described herein, P&R cannot proceed with installing shelf systems for smaller boats.

Boat Storage Options in Other Jurisdictions

The three example jurisdictions and boat storage options identified in support of Investigative Conclusion 3 do not provide an apples-to-apples comparison with the Mission Bay boat bars. The Naples, Florida shelf system example is not comparable as the state of Florida is not subject to the same state regulations that exist in California for the protection of coastal public access and views. Also, both the cities of Long Beach and Santa Barbara operate their boat storage programs jointly within larger marina complexes.

The City of Long Beach provides three dry boat storage options:

1. Alamitos Bay Dry Boat Storage
2. Marine Stadium Dry Boat Storage (for vessels on mobile trailers)
3. Peninsula Sandstake/Rings

Of the three storage options, only the Peninsula Sandstake/Rings provides a somewhat comparable boat storage amenity on the sand; however, this option is not a multi-level shelf system. The Peninsula Sandstake/Rings is two-level small canoe storage rack. The only multi-level shelf system example is the Alamitos Bay Dry Boat Storage option. However, this option is

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within an enclosed, fenced complex screened from view of the nearby sandy beach areas. The Marine Stadium Dry Boat Storage is not a multi-level system, is within a paved area, and is not directly adjacent to sandy beach area.

The City of Santa Barbara is the most comparable in terms of boat storage on sand, and this city limits their sand storage to two locations:

1. West Beach
2. Leadbetter Beach (Catamaran beach storage)

These two boat storage locations do not offer multi-level shelf systems on the sandy beach area. The storage racks at West Beach appear to be single level, and the Catamarans are stored directly on the sand at Leadbetter Beach. Also, the City of Santa Barbara limits their issuance of beach storage permits to six (6) storage rack permits, 51 outriggers/sailboats/rowing dories/surf skis permits, and 65 catamaran permits per year.

Based on staff's initial research, the majority of boat storage options that exist in California are provided by private commercial entities in conjunction with a harbor or marina.

That said, P&R has considered using more efficient storage options, such as shelf systems. However, due to existing Council Policies, Mission Bay Master Plan, and regulations supporting the preservation of beach areas for public use and access, it is infeasible to implement shelf systems on sandy beach areas.

Applicable Policies and Regulations

Council Policy 700-08 A.10 states, "It is the policy of the City Council that the beach areas of Mission Bay Park shall remain open and accessible to the general public at all times. The storage of vessels, vehicles, trailers or equipment of any type on the beaches is prohibited, except as permitted by ordinance." While San Diego Municipal Code Section 63.25.73 establishes the regulations for vessel, boat, and trailer storage within the beach and Mission Bay Park, Council Policy 700-08 recognizes the importance of maintaining beach areas within Mission Bay Park open and accessible to the general public at all times.

Also, California Coastal Act (Coastal Act) Chapter 3, Article 2. Public Access, Section 30211 establishes regulations for the protection of public coastal access. This section states, "Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation." Coastal Act Chapter 3, Article 6. Development, Section 30251 establishes regulations for the protection of scenic coastal views. This section states in part, "Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. Expansion of the boat storage system, such as through a multi-level shelf system, would constitute *development* requiring a permit and would have the potential to conflict with these policies.

Finally, installing a multi-level shelf system presents operational safety concerns for unstaffed facilities. It is likely that installation of these features would require additional Lifeguard and Park Ranger oversight or may require an operator or lessee to oversee the multi-level shelf systems. Due to lease limitations outlined in Charter Section 55.1 and the existing number of land

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leases in Mission Bay, it is unlikely a lessee could be identified to manage multi-level shelf systems.

Target Implementation Date: Implemented.

Recommendation 3.2: The Parks and Recreation Department should consider: (1) raising permit fees for catamarans based on their width, (2) limiting the number of boat permits available to catamarans, and/or (3) distributing permits to storage bars based on boat type and available space. (Priority 2)

Response: Agree. As noted in the response to Recommendation 2.1, P&R intends to engage a consultant to perform a cost-of-service study as part of the planned update to the Department's Fee Schedule scheduled to begin in Fiscal Year 2026 if funding is identified for this effort. All fees associated with watercraft can be evaluated as part of this effort.

Updating the fee schedule to include maintenance, replacement, repair, and enforcement of the beach bars is recommended. A calculation should be developed with an amortization schedule, administrative costs, and personnel hours associated with the beach bar system (admin staff, lifeguards, Rangers, disposal fees (dump)).

Fees should also be higher or lower based on the type of vessel a permit holder is storing. A kayak should be the baseline fee and the fee should go up based on the space the vessel is taking up on the sand.

Permit holders should also be required to maintain their space. The permitted spaces should be free of weeds, trash, and unpermitted equipment. This should include areas adjacent to the permitted space (between permitted vessels).

Additionally, E and F beach bars at Fanuel and Moorland were specifically added to accommodate larger catamarans (17' in length). The industry and production of catamarans have changed since the implementation of this program. There are no longer many new 14' catamarans. The most popular lengths are 16' and 18'. E and F bars should not limit the number of Catamarans. If anything, it should be considered for 18' catamarans. If catamarans were going to be limited or prohibited on any of the beach bars, it should be at the A, B, and C locations. It is more of a challenge to sail out of the A, B, and C areas and these areas are better suited for paddle vessels (dinghies and kayaks).

Target Implementation Date: Fiscal Year 2028.

Recommendation 3.3: The Parks and Recreation Department should consider recommending funding approval from the Mission Bay Park Improvement Fund Oversight Committee to reinstall the beach bar boat storage rack identified as rack D, replace heavily damaged racks, and/or consider adding one or more storage racks near Santa Clara Cove, or elsewhere. (Priority 3)

Response: Agree. Staff considered the recommendation and found it infeasible to implement Recommendation 3.3. As noted in the introductory statement at the beginning of the Management Response, repairing or replacing boat storage racks and beach bars may not be considered capital improvements, and there are other funding needs for Mission Bay Improvement Fund that have

higher priority for limited funding availability. Therefore, staff does not plan to request funding approval from the Mission Bay Park Improvement Fund Oversight Committee to reinstall the beach bar boat storage rack identified as rack D, replace heavily damaged racks, and consider adding one or more storage racks near Santa Clara Cove, or elsewhere.

As noted in the response to Recommendation 3.1 above, a variety of policies and regulations suggest expanding the number of boat racks is not feasible, including the California Coastal Act, Mission Bay Master Plan, Council Policy 700-08 Section A.10, San Diego Municipal Code.

Repair and replacement of boat storage racks would be accomplished through P&R's General Fund operating budget. If funds are not available, any unrepairable boat storage racks would be removed.

Target Implementation Date: Implemented.

Recommendation 3.4: The Parks and Recreation Department should identify beach bar boat storage racks that need repairs, estimate the costs for improvements, determine the relative priority for each identified location, and make repairs as indicated. (Priority 3)

Response: Agree. P&R will initiate the following steps to address damaged boat storage racks in Fiscal Year 2025:

1. Conduct site visits to determine which of the boat storage racks require repairs.
2. Determine whether repairs can be completed in-house.
3. Submit request(s) to the Department of General Services, Facilities Division, for repair of any broken boat storage racks.
4. Obtain quote(s) for outside vendors to complete work that cannot be completed by the General Services Department.

Repair and replacement of boat storage racks would be accomplished through P&R's General Fund operating budget. If funds are not available, any unrepairable boat storage racks would be removed.

Target Implementation Date: Fiscal Years 2026 – 2027.

Recommendation 4.1. The Parks and Recreation Department should develop written policies and procedures for boat storage permit compliance activities, including scheduled inspections, permit data collection and sharing, and compliance operations in coordination with Lifeguards. (Priority 3)

Response: Agree. P&R, in coordination with Lifeguard Services, will develop written inter-departmental policies and procedures documenting compliance activities, annual inspections, permit data collection and sharing, and compliance operations.

P&R, in coordination with Lifeguard Services, will investigate permit software options to facilitate permit data collection and sharing. ActiveNet, P&R's current online activity registration system, has the functionality to create permit records for current valid permits. However, ActiveNet does not have the functionality to perform the following:

1. Create permit data records for available boat storage permits.

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2. Issue permits online.
3. Provide available permits to the public when a permit is revoked, canceled, or expired.

P&R will work with the P&C to identify a contracting method to obtain a permitting solution that contains all the capabilities listed above. Implementation of this recommendation is contingent on funding.

Target Implementation Date: Fiscal 2027, Quarter 4

Recommendation 4.2: The Parks and Recreation Department should update and post current boat storage applications and permit "Specifications, Rules, and Regulations" sheets for both 14-foot and 17-foot boats online, include an updated revision date, and ensure consistency with DMV guidance. (Priority 3)

Response: Agree. P&R will update the webpage to incorporate this information.

Target Implementation Date: Fiscal Year 2025, Quarter 2.

Department staff and management appreciate the Hotline Report prepared by the Office of the City Auditor and thank the staff involved. Please contact us with any questions.

Thank you,


James Gartland (Nov 12, 2024 16:10 PST)

James Gartland
Lifeguard Chief for
Robert Logan
Fire Chief
Fire-Rescue Department



Andy Field
Director
Parks and Recreation Department

cc:

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