

Memorandum

March 3, 2026

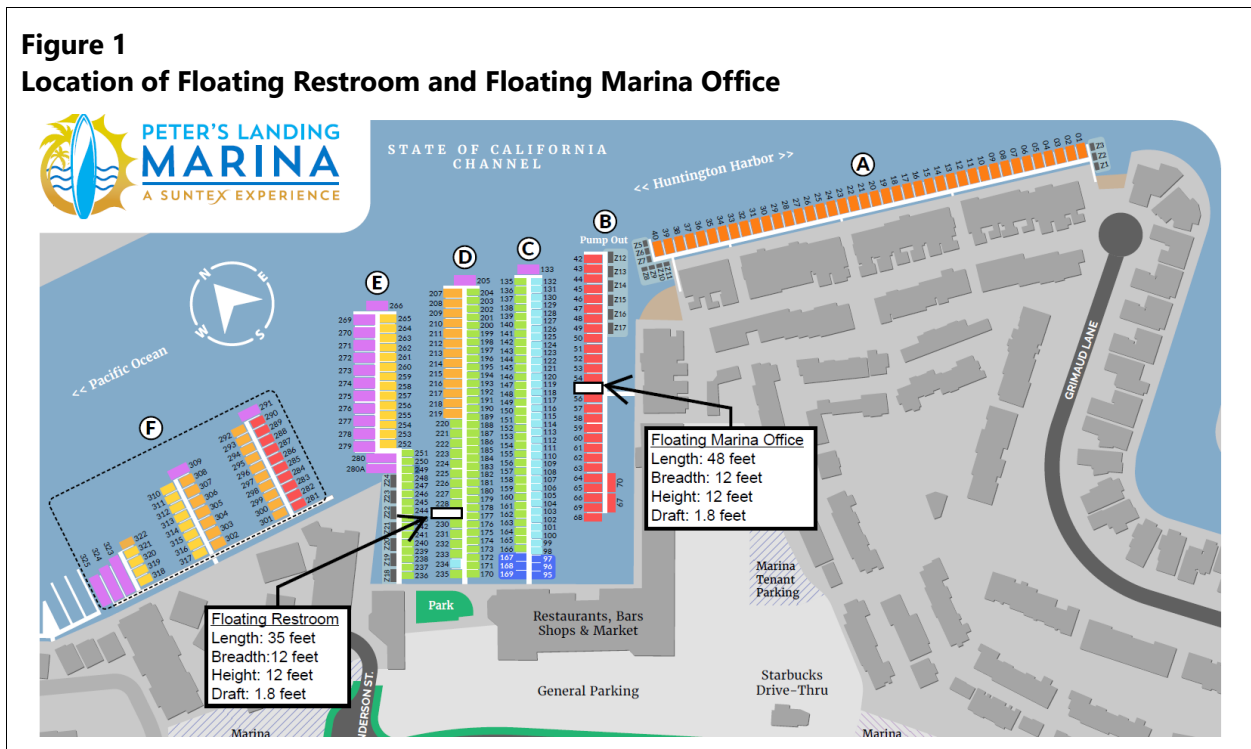
Re: Demonstration of Compliance with City of Huntington Beach Flood Requirements for Floating Facilities and Peter's Landing Marina – City of Huntington Beach Conditional Use Permit No. 25-033

Project Summary

In November 2024, Argo SMI purchased Peter's Landing Marina from PG Marina Investors II. The purchase included two registered vessels: a floating restroom and a floating office, which had already been placed in two of the 325 slips at the marina at the time of acquisition. On behalf of Argo SMI Peter's Landing, LLC (an affiliate of Suntex Marina Investors, LLC), Anchor QEA submitted a Conditional Use Permit application to seek post-placement approval from the City of Huntington Beach (City) for these floating facilities.

The floating restroom is located in a slip on Dock D, and the floating marina office is located in a slip on Dock B, as shown in Figure 1.

**Figure 1
Location of Floating Restroom and Floating Marina Office**



Memorandum Purpose

Per the City's flood zone map, Peter's Landing Marina is located within the AE Flood Zone, FP2 Subdistrict. To obtain a Conditional Use Permit for the floating structures, the applicant must demonstrate how the proposed structures comply with the flood requirements in HBZSO Ch. 222.14 (B), which establishes requirements for elevating or floodproofing fixed structures within the floodplain. These standards are intended to reduce flood risk to buildings constructed on permanent foundations by requiring that the lowest floor be elevated above the Base Flood Elevation plus 1 foot of freeboard or, alternatively, floodproofed to resist hydrostatic and hydrodynamic forces.

However, these provisions are not applicable to registered vessels such as the floating restroom and floating office because they are buoyant and rise and fall with tidal fluctuations and floodwaters rather than remaining at a fixed elevation relative to the Base Flood Elevation. These floating structures are not constructed on a permanent foundation, do not rely on fill for elevation, and are not subject to hydrostatic imbalance across enclosed foundation walls in the manner of a land-based structure. Instead, they are secured to a floating dock, which is in turn is a pile-guided system that prevents lateral movement while allowing vertical travel with changing water levels.

This memorandum provides a brief technical description of how floating marina structures are connected to the floating dock system and how the overall system responds to tidal fluctuations and flood events through guide piles to demonstrate overall compliance with flood requirements.

Marina Overview

As shown in Figure 2, Peter's Landing Marina consists of the following:

- Floating dock modules
- Finger piers extending from main walkways
- Concrete guide piles embedded into the seabed
- Pile guides or collars attached to the dock framing

The dock system is buoyant and supported by encapsulated flotation. The system's vertical position is governed by the water surface elevation, whereas lateral and rotational movements are restrained by guide piles.

Figure 2
Floating Dock and Concrete Guide Piles at Peter's Landing Marina



The floating restroom (Figure 3) and the floating marina office (Figure 4) are connected to the floating dock with rigid framed connections (bolted aluminum or steel brackets) where the attached element must move integrally with the dock. These connections are designed so that attached structures rise and fall together with the floating dock system, maintaining consistent freeboard and accessibility relative to the dock surface.

Figure 3
Floating Restroom and Connection to the Dock



Figure 4
Floating Office and Connection to the Dock



Floating Structures Under Tidal Cycles and Flooding

Under normal tidal cycles, the dock system and attached structures (i.e., the restroom and marina office) rise and fall passively with the water surface. The guide piles prevent horizontal drift, and vertical travel is limited only by pile height. During flood conditions, the dock system continues to rise with increasing water levels, traveling upward along the guide piles. Guide pile embedment depth and exposed height are typically established based on astronomical tides, storm surge levels, and regulatory flood elevations.

Conclusion

Because the floating structures are attached to the floating docks, which are maintained in place by guide piles, they inherently accommodate flood events without the need for elevation or dry floodproofing measures intended for conventional buildings.

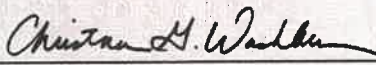


UNITED STATES OF AMERICA

DEPARTMENT OF HOMELAND SECURITY
UNITED STATES COAST GUARD

NATIONAL VESSEL DOCUMENTATION CENTER

CERTIFICATE OF DOCUMENTATION

VESSEL NAME PLM REST ROOM		OFFICIAL NUMBER 1352141	IMO OR OTHER NUMBER 8287-06062023	YEAR COMPLETED 2024	
HAILING PORT HUNTINGTON BEACH CA		HULL MATERIAL FRP (FIBERGLASS)		MECHANICAL PROPULSION YES	
GROSS TONNAGE 49 GRT	NET TONNAGE 49 NRT	LENGTH 32.0	BREADTH 12.0	DEPTH 1.8	
PLACE BUILT WOODLAND WA					
OWNERS PLM VESSELS LLC		OPERATIONAL ENDORSEMENTS COASTWISE			
MANAGING OWNER PLM VESSELS LLC 318 DIABLO ROAD STE 150 DANVILLE CA 94526					
RESTRICTIONS NONE					
ENTITLEMENTS NONE					
REMARKS NONE					
ISSUE DATE NOVEMBER 13, 2024		 DIRECTOR, NATIONAL VESSEL DOCUMENTATION CENTER			
THIS CERTIFICATE EXPIRES NOVEMBER 30, 2025					



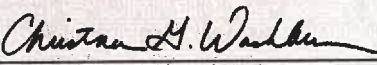


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CERTIFICATE OF DOCUMENTATION

VESSEL NAME PLM OFFICE		OFFICIAL NUMBER 1352133	IMO OR OTHER NUMBER 8287-05062023	YEAR COMPLETED 2024	
HAILING PORT HUNTINGTON BEACH CA		HULL MATERIAL FRP (FIBERGLASS)		MECHANICAL PROPULSION YES	
GROSS TONNAGE 52 GRT	NET TONNAGE 52 NRT	LENGTH 48.0	BREADTH 12.0	DEPTH 1.8	
PLACE BUILT WOODLAND WA					
OWNERS PLM VESSELS LLC			OPERATIONAL ENDORSEMENTS COASTWISE		
MANAGING OWNER PLM VESSELS LLC 318 DIABLO ROAD SUITE 150 DANVILLE CA 94526					
RESTRICTIONS NONE					
ENTITLEMENTS NONE					
REMARKS NONE					
ISSUE DATE NOVEMBER 07, 2024		 DIRECTOR, NATIONAL VESSEL DOCUMENTATION CENTER			
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