

Michael Lam

From: Lezanne Jeffs
Sent: Friday, March 25, 2022 5:50 PM
To: Michael Lam
Subject: Fwd: Parcel 028-242-25

Correspondence re 211155 for April 1 ZA

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From: Lezanne Jeffs <Lezanne.Jeffs@santacruzcounty.us>
Sent: Friday, March 25, 2022 5:48:56 PM
To: Joe Pruss <joepruss@gmail.com>
Subject: Re: Parcel 028-242-25

Dear Joseph,

I am so sorry but I'm not sure what happened to your letter. Please, if you can resend it, I will make sure that this is included into the public record for the project and that it will be taken into consideration at the upcoming Zoning Administrator hearing.

Notices are sent out to all properties within 300 feet of the project site and property owners within 100 feet. I'm glad that your neighbor was able to pass the information along to you.

Sincerely,

Lezanne Jeffs

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From: Joe Pruss <joepruss@gmail.com>
Sent: Friday, March 25, 2022 3:27:55 PM
To: Lezanne Jeffs <Lezanne.Jeffs@santacruzcounty.us>
Subject: Re: Parcel 028-242-25

******CAUTION:**This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear Lezanne,

I am writing to you today after receiving a link to the Staff Report from my neighbors Pat and Amber.

I have to ask why my letter to you, sent in early February, was not included in the Staff Report and why I did not receive this link from Planning.

This omission has me ask that you ammend the Staff Report to include my concerns and provide the same time others have to inform the Planning Commission of their concerns.

This omission also denies my formal communication to the County Planning if needed for further action.

I know that considerable effort was put into this report.

With this email I request that the Planning Meeting or Hearing be rescheduled so my concerns receive equal time.

Regards,
Joseph Pruss
22628 East Cliff Dr.
831.325.6458

On Fri, Feb 11, 2022, 3:53 PM Lezanne Jeffs <Lezanne.Jeffs@santacruzcounty.us> wrote:

Dear joseph,

Thank you for your letter, which will be included into the public record for this application. Please know that I will be taking your comments into consideration as I continue my review of this project.

With regard to the public hearing for this project, since you own property that is within 300 feet f the subject property, you are already included in the mailing list and will be receiving notification by mail ahead of the hearing date. Instructions on how to participate online will be posted on the Planning Department website at www.sccoplanning.com before the hearing date. In addition, to mailed notices, a Notice of Public Hearing placard should be displayed in front of the property around 10 days before the hearing.

Regards,

Lezanne

Lezanne Jeffs

Principal Planner, Development Review

Tel: (831) 454 2480; Cell (831) 345 7839

Email: lezanne.jeffs@santacruzcounty.us



The Department's Zoning, Building, and Environmental Planning counters are open

BY APPOINTMENT, Monday through Thursday from 8:00 to 11:30 AM

Either in-person or telephone.

Self-schedule your appointment [here](#).

From: Joe Pruss <joepruss@gmail.com>

Sent: Friday, February 11, 2022 3:11 PM

To: Lezanne Jeffs <Lezanne.Jeffs@santacruzcounty.us>; Cheryl Pruss <cherylpruss@gmail.com>; Joe Pruss <joepruss@gmail.com>

Subject: Parcel 028-242-25

*****CAUTION:**This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.***

Dear Lezanne Jeffs,

My name is Joseph Pruss, East Cliff Drive resident for 25 years and owner of 3 parcels 028-47-107, 028-47-108 and 028-47-109 on East Cliff Drive.

I am writing to you today, having noticed the large Public Notice fronting my neighbors house at Parcel 028-242-25. Being familiar with the County's GIS system, I reviewed the limited information available.

The County lists you as the County Planner for my neighbor's project and I want you to be aware of my concerns for this project.

First: I request to be added to the mailing list for all Public/Zoom meetings.

Second: I believe a basement of any kind will destabilize the bluff and the "Domino Effect" will endanger my property.

Third: The unknown status of the Casitas Del Mar property between our properties is currently under review with the Coastal Commission and without a resolution I don't believe Coastal Bluff Geotech Engineering can complete.

Fourth: The size of the house with the full basement is over 10,000 sq.ft. and that is quite large for Pleasure Point.

Thank You for reading my concerns,

Joseph Pruss

22628 East Cliff Dr.

Santa Cruz, Ca. 95062

joepruss@gmail.com

Michael Lam

From: Lezanne Jeffs
Sent: Thursday, March 31, 2022 1:31 PM
To: Michael Lam
Subject: FW: APN 028-242-25 Proposed Development Application #2111155

Late mail re 211155 on tomorrow's ZA agenda.

Lezanne

Lezanne Jeffs

Principal Planner, Development Review
Tel: (831) 454 2480; Cell (831) 345 7839
Email: lezanne.jeffs@santacruzcounty.us



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From: Mike Malbon <mrmikez28@hotmail.com>
Sent: Thursday, March 31, 2022 1:23 PM
To: Lezanne Jeffs <Lezanne.Jeffs@santacruzcounty.us>
Subject: APN 028-242-25 Proposed Development Application #2111155

******CAUTION:**This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear Jeff Lezanne,

I was somewhat taken aback by the proposed development sign posted at 22702 East Cliff Drive in Santa Cruz

It refers to demolishing an existing house of 2474 sq ft and replacing it with a gigantic house of 6,260 sq ft! This is certainly not in keeping with the existing neighborhood. It sounds more like a gigantic vacation rental complex especially including the 4,463 sq ft "non-livable" basement that somehow needs two more bathrooms? Why not just a three-story condominium complex....just joking.

This proposal should not be permitted by the Santa Cruz County Planning Dept.

1. The size is way out of line with what's reasonable for the area.
2. The basement that needs two bathrooms doesn't pass the sniff test

3. Has the Coastal Commission has any say on this?
4. This will be a visual blight for people visiting the 26th Ave beach
5. Is there any concern about digging into the cliff to create such a large basement?

I'm definitely opposed to permitting such a huge project in this area.

Mike Malbon
154 26th Ave

Dear Lezanne,

Thank you for the time you put into the proposed project and staff report for Applicant 211155. We completely support and appreciate the Pleasure Point Combining District criteria was upheld, the exemptions were inconsistent, and therefore not granted. In reading through the staff report we have some concerns regarding the geological determinations made by the Applicant's Geologist Zinn Geology that were then used by planning staff to determine that it is anticipated that the top of the coastal bluff will remain relatively unchanged for 100 years. Zinn Geology's determinations contradict Coastal Commission's stated determinations which we have attached to this letter. From our understanding and research, we agree with and support Coastal Commission's determinations "the LCP's required 100-year geologic setback line should be determined without consideration to any armoring." (Please see in detail the attached letter from Coastal Commission). We would like the discrepancies found in Coastal Commission's comments addressed and clarified before moving forward with project approval. Please note Coastal Commission also has differing determinations and conclusions with not only the geological set back but the basement, visual resource protections, and large dwelling permit findings. We would like Coastal Commission's determinations to be taken into consideration and be furthered reviewed before approval of the current staff findings are issued.

Thank you for your time and consideration,

Pat O'Neill and Amber Jones (neighbors)

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
FAX: (831) 427-4877
WEB: WWW.COASTAL.CA.GOV

**11/22/2021**

Lezanne Jeffs
Santa Cruz County
701 Ocean Street
Santa Cruz, CA 95060

Subject: **Comments Re: Application 211155**

Dear Lezanne:

Thank you for the opportunity to review and comment on the above-referenced Coastal Permit application. Please include these comments as part of the administrative record for this project and distribute to the applicant and appropriate staff.

Project Description:

The project proposes to demolish an existing residence and replace it with an approximately 6,260-square foot two-story house with an additional approximately 4,463-square foot basement.

Comments:

Note that this project is appealable and does not appear consistent with Santa Cruz County's LCP in its current form. Our goal is to inform applicants of a project's conformity with the County's Local Coastal Program (LCP) to aid in the application process. The below comments were sent for the first and second application routings and were not addressed by the applicant.

- 1. Geologic Setback.** The LCP requires that a coastal bluff building site be stable for a minimum of 100 years in its pre-development application condition, and that any development be set back an adequate distance to provide stability for the development's lifetime, and at least 100 years. The minimum 100 years of stability must be established through the use of appropriate setbacks and siting, and shall "not [be] dependent on shoreline or coastal bluff protection structures" (see LUP Policy 6.2.15). Relatedly, LUP Policy 6.2.15 specifies that shoreline protection structures shall be limited to "protect existing structures from a significant threat" (LUP Policy 6.2.16). Thus, the LCP has a two-part minimum 100-year stability requirement: first, there must be a portion of the site in question that itself will be stable for at least 100 years in a pre-development (i.e., no project) scenario without reliance on structural development; and second, any development then introduced onto the site must also be stable for its lifetime measured for at least 100 years without reliance on engineering measures.

Comments Re: Application 211155

In this case, the geologic setback line is predicated on the armoring (in this case a riprap revetment) being both maintained and remaining in place for the lifetime of the development. Specifically, the geology report notes, "it is safe to assume that the bluff retreat in the future will be nil, provided the existing armoring system is adequately maintained." However, the neighboring upcoast property, Casitas Del Mar, has open and unresolved violations (in addition to seacaves on either side of the natural headland including one near to the property line shared with the subject site that are due, in part, to work that was completed without the requisite geotechnical evaluation or coastal permit authorization. Because shoreline armoring may only protect *existing structures* in danger of erosion; and Casitas Del Mar is not "in danger of erosion," resolution of the violations at the Casitas Del Mar property may entail removal of all armoring fronting the property, particularly in light of the fact that the proposed project would render the MacDonell residence a redeveloped structure (i.e., revoking its "existing structure" status). Accordingly, the LCP's required 100-year geologic setback line should be determined without consideration to any armoring (i.e., without consideration to any armoring fronting both the Casitas Del Mar property and the MacDonell property). In other words, the geologic setback line should provide for 100 years of stability assuming the removal of the riprap revetment immediately upcoast and fronting the subject site.

2. **Basement.** The "basement" component of the project should be eliminated from the proposed project including because the basement would represent substantial landform alteration of a coastal bluff, and the LCP requires site design to minimize grading (see LUP Policy 6.3.9). Moreover, in the event the basement becomes threatened (due to sea level rise, storm surge, tidal inundation, etc.), its removal would also result in damaging landform alteration. Furthermore, basements have the potential to impact the natural erosional processes of coastal bluffs and in some instances function as de facto upper bluff shoreline armoring. Finally, basements have consistently been denied by the Commission for the reasons stated above (see especially [A-6-ENC-16-0060 \[Martin SFD\]](#) and [A-6-ENC-16-0068 \[Hurst SFD\]](#)), and thus it is reasonable to assume that any future basements proposed to be excavated and constructed into a coastal bluff would also be denied by the Commission.
3. **Visual Resource Protection.** The proposed project would be substantially visible from the beach, which raises LCP consistency issues including with respect to LUP Policies 5.10.2 "Development within Visual Resource Areas", 5.10.4 "Preserving Natural Buffers", and 5.10.7 "Open Beaches and Blufftops". LUP Policy 5.10.2 acknowledges the importance of visual resources and requires that projects be evaluated against their unique environment (i.e., the surrounding projects and natural context), and LUP Policy 5.10.7 prohibits the placement of new permanent structures that would be visible from the public beach except where allowed on existing parcels of record and "where compatible with the pattern of existing development." These visual resource

Comments Re: Application 211155

provisions are further codified in the requisite coastal permit findings (see IP Section 13.20.110(E)). The proposed 6,000+ square foot residence set back only 25 feet from the coastal bluff would not be compatible with surrounding residential development and would represent a significant intrusion into the public viewshed. However, reducing the size of the residence and setting the house back landward of the 100-year setback line without reliance on shoreline armoring (including to meet other LCP consistency issues—see Items #4 and #1, respectively) would, however, help address inconsistencies with the LCP's visual resource protection standards.

- 4. Large Dwelling Permit Findings.** Finally, any proposed residence over 5,000 square feet in size must also meet the required large dwelling permit findings including that the proposed structure is compatible with the surroundings/locational/environmental context; that the project meets the coastal permit findings of 13.20 including that it is consistent with all other LCP provisions including those identified above; and that the project include mitigations such as re-siting/FAR reduction to meet the large dwelling permit findings. Given the significant LCP compliance issues discussed in more detail above and that the resident directly overlooks the beach, it does not appear that the findings necessary to approve a residence over 5,000 square feet in size can be made, and thus the project should be reduced below 5,000 square feet in addition to relocated landward as is discussed in more detail above.

Please let me know if you have any questions on the above comments.

Rob Moore

Coastal Planner
California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060
(949) 613-3309 cell

Lezanne Jeffs
Santa Cruz County Planning Department
701 Ocean Street
Santa Cruz, CA 95060
March 21, 2022

Re: Application No. 211155
APN: 028-242-25

Dear Ms. Jeffs,

I am writing to express our strong opposition to Application #211155, the demolition and building of a structure at 22702 East Cliff Drive. While I support the ability of homeowners to remodel their coastal homes, the proposed development raises safety, environmental, and aesthetic concerns that should disqualify the application from approval.

A house of the size they are proposing would change the character of the neighborhood. In size alone, the plans would outstrip any other house visible from the 26th Street Beach. There is no attempt to fit into “a compatible community aesthetic,” as required by the Santa Cruz County code. The Application seeks to maximize the size of the house in every dimension, with significant code exemptions unsupported by any rationale. It also raises concerns about visual impacts and sightline for residents and the public alike, given the dramatic increase in height and plans to build up to the Applicant’s property lines. A house of this size, when fully occupied, will also represent a traffic and parking nuisance within this quiet neighborhood. The current plan only has a 1 car garage and a car port for a house with 10+ bedrooms.

The demolition of the house at 22702 East Cliff may also have significant implications for the Coastal Development Permits of its neighbors. The Coastal Commission has already indicated the proposed demolition could result in the loss of a CDP, and the removal of the adjoining riprap. This would adversely impact the structure of the bluff, upon which many of our homes rely—especially given the sea caves on the adjacent parcels. I also have significant concerns about the implications of the proposed basement, which may impact the structure, stability, and safety of the East Cliff bluff and the 26th Street Beach, an issue also raised by the Coastal Commission.

The Applicant has not shown that the project justifies a setback exemption or that the plan is consistent with the structure of the homes around it. As a community, we had no knowledge of this project for the many months it has been under development. We would have expected that the Applicant and the architect involved would have considered the feelings and wishes of the community.

I urge you to take a second look at this project and deny Application #211155. I am unable to attend the public hearing on 4/1/22 but I hope that my opposition to this application.

Cheri Sacks Hospodor

Cheri Sacks Hospodor
22735 East Cliff Dr. Santa Cruz, CA 95062
cmsacks@gmail.com

Attn: Santa Cruz County Planning Office/Lezanne Jeffs
Re: Application 211155

We are writing to express our opposition to Application #211155, the demolition and building of a structure at 22702 East Cliff Drive. While we support the ability of homeowners to remodel their coastal homes, the proposed development raises safety, environmental, and aesthetic concerns that should disqualify the application from approval.

We do not believe that the proposed development is consistent with our neighborhood in style or substance. In size alone, the plans would outstrip any other house visible from the 26th Street Beach. There is no attempt to fit into “a compatible community aesthetic,” as required by the Santa Cruz County code. The Application seeks to maximize the size of the house in every dimension, with significant code exemptions unsupported by any rationale. It also raises concerns about visual impacts and sightline for residents and the public alike, given the dramatic increase in height and plans to build up to the Applicant’s property lines.

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Signed,

Steve Forer; 22752 E Cliff Dr
Heidi McCarty-Forer; 22752 E Cliff Dr
Fred Ruegg; 22756 E Cliff Drive
Dominique Ruegg; 22756 E Cliff Drive
Mary Blanchard; 22780 E. Cliff Drive
Harry Blanchard; 22780 E. Cliff Drive
Frank Alberti; 22754 East Cliff Drive
Linda Alberti; 22754 East Cliff Drive

Attn: Santa Cruz County Planning Office/Lezanne Jeffs
Re: Application 211155

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Signed,

Marion Morris; 22680 East Cliff Dr., Unit 4, Santa Cruz CA 95062
Dennis Morris; 22680 East Cliff Dr., Unit 4, Santa Cruz CA 95062
Laura Milligan; 22670 East Cliff Drive, Santa Cruz, CA 95062

March 21, 2022

To Whom It May Concern

Please do not allow someone, someone
to "Tear down" and rebuild a 6064 ft
"replacement dwelling" on E. Cliff Dr.

→ No BODY wants to live next to a
→ Memorous house!

Hopefully the community will be against
this display of wealth and greed!
Enough is enough. —

Homeless everywhere —

no body but the rich can afford
to live here. — that is not a good thing!

This is not right nor sensible
in any way. Water usage triples.?
STOP THIS PLEASE!

Property owner and citizen of Santa Cruz
County.