

Date: July 9, 2026

To:

[Evan Ditmars](#), Project Planner

Santa Cruz County Community Development & Infrastructure Department

701 Ocean Street, 4th Floor

Santa Cruz, CA 95060

Email: Evan.Ditmars@santacruzcountyca.gov

Subject: Written Objection to Application #251501 – 625 Beach Drive, Aptos

Dear Mr. Ditmars,

We are owners on Beach Drive (Cliff Side) whose property is proximal to the proposed development at **625 Beach Drive (Application #251501, APN 043-152-54)**. I respectfully request that this letter be included in the public record / correspondence for the July 17, 2026 Zoning Administrator hearing.

At the outset, I want to make clear that **we are not opposed to the development of the beach side land or to the construction of a new home**. We support responsible development that respects both the rights of property owners and the planning framework that applies equally throughout our neighborhood.

Our objection is to the **scale of the proposed development that can only be realized through five separate variances** from fundamental development standards governing height, number of stories, setbacks, floor area ratio (FAR) and lot coverage. In our view, these are not minor deviations. Taken together, they would permit a home whose size, scale and massing are inconsistent with the surrounding neighborhood, materially affect adjacent properties and represent a significant departure from the standards established to protect the scale, character, and livability of this coastal neighborhood.

It is the applicant's burden, not the public's to demonstrate, through substantial evidence in the administrative record, that each required finding for every requested variance and the Coastal Development Permit can lawfully be made. Specifically, we would like to call out:

1. The proposed height and overall building mass will materially impact neighboring properties.

The requested height variance, when combined with the increased floor area and building mass, creates a structure that is substantially larger than what would otherwise be permitted.

As a proximal property owner on Beach Drive, I believe the proposal will fundamentally alter the relationship between our properties by introducing a building of a scale that is inconsistent with the surrounding homes (see Figures 1 and 2).

Height limits and bulk standards exist to balance the rights of individual property owners with the rights of neighboring residents. The cumulative effect of the requested variances significantly changes that balance.

The ask is that the County must determine that the project will **not be injurious to surrounding properties**, and I respectfully submit that the current proposal raises legitimate questions as to whether that finding can be made and no evidence that we have seen has been provided that this is not the case.

2. The proposal is inconsistent with the established character of the neighborhood.

Beach Drive is characterized by homes that maintain a relatively consistent relationship to one another in terms of height, scale, and massing especially on the beach side.

The concern is not any single variance in isolation. Rather, it is the **combined effect** of the five variances. Together, these departures would permit a home whose overall scale is materially different from the surrounding neighborhood. While there is another property on beach side that is 22ft tall (618 Beach Drive). The proximal properties behind this on the cliff side are approx. 28-30 ft tall (617 and 619 Beach Drive). This is not the case with this application and its proximal houses. The proximal houses in this case stand at between 18-23ft (Figure 2).

Based on the submitted plans, the current application appears likely to increase visual prominence and affect coastal views from neighboring properties. I respectfully request that the staff report explain how these impacts were evaluated and why the project remains consistent with the applicable Coastal Act and Local Coastal Program (LCP) policies protecting scenic coastal resources.

3. The proposed development will diminish existing ocean views.

One of the most significant impacts of the proposed design is the obstruction of ocean views, coastal vistas and degradation of scenic resources.

Ocean views and vistas are an important characteristic of this section of Beach Drive. While I understand that no individual has an absolute legal right to a private view, the requested height variance enables a building envelope that appears unnecessarily large. A project that more closely complies with the established development standards and viewpoints of the neighborhood could reduce this impact while still allowing development of the site.

The ask is for the County to consider not only whether public coastal views are directly obstructed, but also whether the project's overall scale, elevated massing, and rooftop elements are visually compatible with the established character of the neighborhood on the beach side and overall perception of building height and mass. The ask is also for the County to provide evidence stating if Santa Cruz County Code Section 13.10.323(F)(1) applies in this case whereby the county treats any deck built on top of a lower story as a second-story deck. [As noted in a prior application for 625 Beach Drive \(hyperlinked\)](#).

Reference:

<https://www2.santacruzcountyca.gov/planning/plnmeetings/PLNSupMaterial/PC/agendas/2025/20250723/009d.pdf>

4. The Coastal Development Permit findings should be carefully evaluated.

Because this project requires a Coastal Development Permit, the ask is that the County determines that the proposed plans are consistent with the Local Coastal Program and the applicable development standards.

Given the number and significance of the requested variances, I respectfully request that the staff report clearly explain how these findings can be supported by substantial evidence and how the cumulative impact of the requested departures from the County's development standards have been evaluated.

5. The requested variances have not been demonstrated to be necessary.

Santa Cruz County's variance process exists to address unique circumstances affecting a property, not simply to permit a larger or more intensive development than the zoning would otherwise allow.

In this case, the applicant seeks relief from **five separate development standards**. From the materials available to neighboring property owners, I have not seen evidence demonstrating that these collective departures are necessitated by unique physical characteristics of the site rather than by the size and design of the proposed residence.

In addition, the application does not appear to explain whether alternative designs were evaluated that could achieve the applicant's objectives and still meet FEMA requirements while requiring fewer variances or reducing the project's overall height, mass, and visual impact. Because a variance is intended to provide only the minimum relief necessary to address a site's unique physical constraints, I respectfully request that the administrative record explain why the proposed design and each of the five requested variances represents the minimum relief necessary rather than a design preference.

The County's own guidance explains that variances should be granted only where the required findings can be supported by unique circumstances affecting the property. Unlike other cases where a height variance has been granted to accommodate FEMA elevation requirements, this property already contains an existing 2,568-square-foot single-family residence. As such, the applicant does not face the same site-specific hardship as property owners who were required to construct a new residence on an otherwise vacant lot. The requested height increase is therefore not driven by an unavoidable constraint. Instead, the requested variance arises from the applicant's decision to pursue a substantially larger development. A self-created design choice should not be construed as the exceptional circumstance necessary to justify a variance.

Reference:

<https://cdi.santacruzcountyca.gov/UPC/DiscretionaryPermitsZoning/DiscretionaryPermits/ConditionalPermits-ZoningAdministrator/Variances.aspx>

6. The property has a recent history of applications requiring significant planning review.

This property has been the subject of [prior Planning Commission proceedings](#). In July 2025, the Planning Commission considered an appeal relating to an earlier proposal for development of 625 Beach Drive and ultimately upheld the Planning Department's administrative denial of that application.

I recognize that the current application is different and must be evaluated on its own merits. However, the history of this property demonstrates that development of this site has previously raised substantive planning and Coastal Act compliance issues requiring careful review by the County.

Given that the current proposal again seeks relief from **multiple core development standards** I respectfully request that the County apply the same careful scrutiny to whether each required finding for these variances can be supported by substantial evidence per section 5.

Reference:

<https://www2.santacruzcountyca.gov/planning/plnmeetings/PLNSupMaterial/PC/agendas/2025/20250723/009e.pdf>

7. The proposed conversion of the existing residence into a detached Accessory Dwelling Unit warrants careful review.

According to the submitted plans, the proposal includes converting the existing **2,568-square-foot detached single-family residence** into an **Accessory Dwelling Unit (ADU)** while constructing a new **2,909-square-foot primary residence**.

I recognize that California has enacted legislation to encourage the development of ADUs as a means of increasing housing supply, and that state law permits the conversion of existing legal structures into ADUs in certain circumstances.

However, the proposed conversion of an entire **2,568-square-foot detached residence** into an ADU is an unusual aspect of this application and the proposal does not identify that the ADU will provide additional housing for anyone other than the applicant or family members. The application should clearly identify the statutory authority relied upon and demonstrate how the proposal satisfies all applicable State ADU requirements.

Given that this project already seeks **five separate variances** from the County's core development standards, I respectfully request that the staff report clearly identify:

- The specific provisions of California's ADU statutes and the Santa Cruz County Code that authorize this configuration.
- The basis on which the County determined that a **2,568-square-foot detached residence** qualifies as an **accessory dwelling** to the proposed new primary residence.
- How this determination is consistent with the intent of California's ADU legislation and the County's Local Coastal Program.
- Whether the size and configuration of the proposed ADU were considered when evaluating the project's overall compatibility with the surrounding neighborhood.

I am not asserting that this aspect of the proposal is prohibited by California law. Rather, I respectfully request that the County clearly identify the legal authority supporting this determination so that neighboring property owners and the public can understand the basis for its approval if granted.

Request

For the reasons outlined above, I respectfully request that the Zoning Administrator deny the requested variances unless the applicant demonstrates, through substantial evidence in the administrative record, that each required variance finding, each Coastal Development Permit finding, and each applicable Local Coastal Program consistency finding can lawfully be made.

This is **not** an objection to the development of the property or to the construction of a new home. Rather, it is an objection to a proposal that relies upon **five separate variances** with the conversion of an existing **2,568-square-foot detached residence into an ADU**, resulting in a residential development of approximately **5,477 square feet**.

It is the **cumulative scale and number of variances** of this proposal, that gives rise to our concerns regarding neighborhood compatibility, building mass, impacts to existing ocean views, and the precedent that approval of multiple simultaneous variances could establish for Beach Drive.

If the County determines that development of the property is appropriate, I respectfully request that the applicant be required to redesign the project to reduce its height, mass, bulk, and reliance on multiple variances so that it more closely complies with the County's development standards. A design requiring fewer variances would better demonstrate that the requested relief is limited to the minimum necessary and would more appropriately balance the applicant's development objectives with the County's responsibility to protect neighborhood character and coastal resources.

Thank you for your consideration.

Figure 1



Figure 2

