

CALIFORNIA COASTAL COMMISSION

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



July 13, 2026

Evan Ditmars
Santa Cruz County Community Development and Infrastructure Department (CDID)
701 Ocean Street, 4th Floor
Santa Cruz, CA 95060
Sent via email to: Evan.Ditmars@santacruzcountyca.gov

**Subject: Agenda Item No. 6: July 17, 2026 Zoning Administrator Hearing on CDP
Application Number 251501 (625 Beach Drive, APN 043-152-54)**

Dear Mr. Ditmars:

Please accept the following comments on the above-referenced Zoning Administrator item scheduled for hearing on July 17, 2026. Please note that Commission staff previously commented on the project (see attached comments dated January 9, 2026), highlighting Local Coastal Program (LCP) consistency issues related to conversion accessory dwelling units (ADUs), coastal hazards, maximum allowed density, maximum height, and maximum stories, among other issues.

Further, we would note that a denial for a previous CDP application for a materially identical project submitted as a two-unit development under Government Code Section 65852.21 (also known as Senate Bill (SB) 9 development) was upheld by the Board of Supervisors on September 30, 2025. That project was denied due to LCP inconsistencies related to maximum density and coastal hazards issues. It appears that the applicants here are seeking an administrative work-around by proposing to convert an existing single-family dwelling into an ADU and to construct a second single-family dwelling on the seaward side of the same lot—inconsistent with the spirit and intent of State ADU law and with the County's LCP for the reasons explained in the attached comments. In both cases, whether viewed as an SB 9 project or as a conversion ADU project, the proposal suffers from significant inconsistency with the LCP, and thus should be denied.

Thank you for your consideration.

Sincerely,

DocuSigned by:

Nolan Clark

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Nolan Clark
Coastal Planner
California Coastal Commission

Santa Cruz County CDP Application 251501

cc: Kevin and Sandy Huber, Applicant
Cove Britton, Applicants' Representative
Jocelyn Drake, Santa Cruz County CDID

Attachments:

- A. January 9, 2026 CCC staff comments on CDP application 251501

From: [Clark, Nolan@Coastal](mailto:Clark.Nolan@Coastal)
To: [Evan Ditmars](mailto:Evan.Ditmars)
Cc: [Jessica deGrassi](mailto:Jessica.deGrassi); [Cove Britton](mailto:Cove.Britton); khuber@grupehuber.com
Subject: CDP Application 251501 - First Routing Comments
Date: Friday, January 9, 2026 3:05:06 PM

Hi Evan,

Thank you for the opportunity to 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 an approximately 2,500 square foot single-family dwelling (SFD) with attached garage and carport constructed on structural piers elevated above the VE Flood elevation, with underfloor enclosed by breakaway walls below. The project site is developed with one existing SFD that is proposed to be converted to an ADU. The project site is designated as a mix of Urban Low Density Residential (R-UL) and Parks, Recreational, and Open Space (O-R), zoned as Single-Family Ocean Beach Residential (RB), and located at beach level at 625 Beach Drive (APN 043-152-54) in the unincorporated community of Aptos.

Broadly, the proposed project raises core LCP consistency problems and would intensify residential development in an area of extreme coastal hazards risk. Along Beach Drive, development is located between an eroding coastal bluff and the beach/ocean, and thus is impacted by both wave action as well as by bluff sloughing and landslides. As such, the County's public policy objectives should not increase residential development in these locations.

Comments:

1. **Conversion ADUs and Recent SB 9 Project Denial.** As a preliminary comment, it is unclear whether converting 100% of an existing house into an ADU is consistent with the intent of IP Section 13.10.681 and State ADU law, which both provide distinct mechanisms for converting portions of existing structures for ADU use. We also note that the denial of CDP application 241334 for essentially the same project at the subject site for a two-unit development under SB 9 was upheld by the Board of Supervisors on September 30, 2025, and the practical and LCP consistency problems as explained both in that denial and below herein for this proposal remain largely the same.
2. **New Building Sites in Coastal Hazards Areas Prohibited.** LUP Policy 6.2.17 prohibits new building sites, lots, or parcels in areas subject to coastal hazards. IP Section 13.10.700-B defines "building site" as "an area of land occupied by or proposed as a location for a building or for a manufactured or mobile home on a permanent foundation" (emphasis added in underline). Therefore, because the project site is in an area subject to coastal hazards (including significant wave runup and flood risk which is only expected to be exacerbated by sea level rise), the proposed new SFD is inconsistent with the LCP, and cannot be approved.
3. **Maximum Density.** IP Section 13.10.323(B)(3)(c) sets the minimum land area per dwelling unit (i.e., the maximum allowed density) in the RB zoning district at 4,000

square feet. IP Section 13.10.323(B)(1) states that “[i]nside the urban services line or rural services line, land area is based on gross site area, minus any coastal bluffs, beaches, and land seaward of the mean high tide line of Monterey Bay.” As applied to this project site, because the parcel is at beach level (i.e., on the beach) and seaward of the toe of the coastal bluff, there is no developable land area per IP Section 13.10.323(B)(1), and thus the proposed additional SFD is not permissible.

4. **Parks, Recreation, and Open Space (O-R) Designation.** According to the Santa Cruz County Geographical Information System (GIS), portions of the project site are designated as Parks, Recreation, and Open Space (O-R), extending into the building site for the proposed SFD. LUP Policy PPF-1.2.1 lists the appropriate uses in the O-R designation, including active recreation uses, outdoor entertainment, and expanded recreation opportunities for the public. The O-R designation does not allow private residential development, and thus should be removed from this area.
5. **Lot Size.** Sheet A0.1 of the proposed project shows the “total lot size” as 22,357 square feet and uses that figure to determine proposed lot coverage and floor area ratio (FAR). However, the County’s GIS system shows the Assessor’s square footage as 15,115 square feet. Please explain the reason for this discrepancy and/or update the “total lot size” to 15,115 square feet and subsequent lot coverage and FAR calculations accordingly.
6. **Maximum Height.** IP Section 13.10.323(C) sets the maximum height allowed for beach parcels at 17 feet in the RB zoning district. The proposed maximum height for the project is 21 feet and 7 inches. This discrepancy in height is due to the proposal to elevate the structure above base VE flood elevation, as well as proposed design considerations such as high ceilings, sloping roof structure, and a decorative chimney. However, a variance would be required to approve a height above the maximum allowed in the RB zoning district. Please see findings required for variances in IP Section 13.10.230(C). The project should be modified to reduce the proposed variance to the maximum extent feasible.
7. **Maximum stories.** IP Section 13.10.323(C) sets the maximum number of stories for beach parcels at 1 story in the RB zoning district. The proposed number of stories for the project is 2 stories. The reason for this discrepancy is not clear or justified in the project application materials. The project should be modified to remove the second story and conform to the maximum allowed stories for beach parcels in the RB zoning district.

Please do not hesitate to contact me should you have any questions regarding these comments.

Thank you,

Nolan Clark

Coastal Planner

Central Coast District

California Coastal Commission

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coastal.ca.gov