

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



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

(831) 427-4863

coastal.ca.gov

COMMENTS REGARDING REQUIRED FINDINGS

Application No. 251501

625 Beach Drive, Aptos (APN 043-152-54)

Submitted by:

Richard Tallman

633 Beach Drive. Aptos, California

Date: July 15, 2026

INTRODUCTION

Dear Zoning Administrator:

I respectfully submit these comments regarding Application No. 251501 and request that the application be denied or, alternatively, continued for additional legal and factual review.

These comments are not intended to oppose reasonable development of the property. Rather, they are intended to assist the County in ensuring that each required finding is supported by substantial evidence in the administrative record.

I recognize that the property lies within a FEMA Coastal High Hazard Area and that flood protection requirements require the proposed residence to be elevated. However, compliance with FEMA regulations does not automatically establish compliance with the Santa Cruz County Code, the County's certified Local Coastal Program (LCP), or the findings required to approve multiple variances.

For the reasons discussed below, I do not believe the current administrative record adequately supports several of the findings necessary for approval.

PROJECT HISTORY

The history of this property is directly relevant to the current application.

The applicant previously sought approval to construct a new single-family residence on the beachfront portion of the property together with a 364-square-foot attached ADU. That proposal required a discretionary Coastal Development Permit and was ultimately denied, after which the applicant appealed the denial.

The current application adopts a materially different approach.

Rather than constructing a small attached ADU as previously proposed, the applicant

now proposes to redesignate the existing 2,568-square-foot principal residence as an ADU while constructing a new approximately 2,909-square-foot principal residence on the beachfront portion of the property.

The practical result remains that the property will contain two substantial residential dwellings. The principal difference is that the current proposal relies upon interpreting the County's ADU ordinance to permit redesignation of the property's existing principal residence as an ADU.

Because this revised proposal depends upon that interpretation, the legal authority supporting the County's interpretation of the ADU ordinance becomes a central issue in this proceeding.

FINDING 1

The County has not demonstrated that the proposed ADU conversion is authorized by County Code.

The existing residence has historically functioned as the property's principal dwelling.

The proposal would redesignate that principal residence as an Accessory Dwelling Unit (ADU) while constructing a new principal residence on the beachfront portion of the property.

The staff report acknowledges that Santa Cruz County Code §13.10.681 authorizes conversion of "any portion" of a single-family dwelling into an ADU but also acknowledges that the ordinance does not define the word "portion" or clarify whether conversion of an entire dwelling is permitted.

When an ordinance does not define a term, it should ordinarily be interpreted according to its common meaning. The ordinary meaning of "portion" is a part of something—not the entirety of it.

Had the Board of Supervisors intended to authorize conversion of an entire principal residence into an ADU, it could easily have said so. Instead, the ordinance uses the narrower term "portion."

The staff report cites no ordinance amendment, published HCD interpretation, or judicial authority supporting the conclusion that "portion" includes an entire dwelling. Respectfully, the absence of an express prohibition is not the same as an affirmative grant of authority.

FINDING 2

The requested variances extend beyond what FEMA regulations require.

FEMA regulations require the occupied floor to be elevated above the Base Flood Elevation. They do not require construction of an approximately 2,909-square-foot residence, retention of the existing 2,568-square-foot residence as an ADU, increased Floor Area Ratio, increased lot coverage, increased building mass, or the overall development intensity proposed.

Government Code section 65906 requires each variance to be supported by special physical circumstances. The staff report does not clearly distinguish between variances required by the property's physical constraints and those requested to accommodate the applicant's chosen development program.

FINDING 3

The Local Coastal Program compatibility finding is not adequately supported.

The staff report compares the proposal to residences at 531, 533, and 539 Beach Drive.

Those homes range from approximately 2,152 to 2,385 square feet.

The completed project would contain an existing 2,568-square-foot ADU together with a new approximately 2,909-square-foot principal residence.

The staff report primarily compares only the new residence. It does not meaningfully evaluate the compatibility of the completed development.

Compared with the applicant's earlier proposal, which included a 2,128-square-foot residence and a 364-square-foot attached ADU, the current application substantially increases the total residential floor area. The staff report does not explain why this increase remains compatible with neighborhood character.

FINDING 4

The project's visual impacts have not been fully evaluated.

Although the proposed zoning height measures approximately 22 feet under the County's height calculation, the structure will appear substantially taller because the occupied floor must be elevated above the floodplain.

The staff report acknowledges an approximately 22-foot wall extending roughly 75 feet

in length with limited façade articulation, roofline variation, and building modulation.

The project will also materially reduce existing coastal and ocean views from residences on the inland side of Beach Drive. While California law does not guarantee preservation of private views, these impacts remain relevant to neighborhood compatibility and Local Coastal Program consistency.

FINDING 5

The Design Review findings are not adequately supported.

The staff report acknowledges that the proposed building lacks several architectural features intended to reduce visual bulk. Despite acknowledging these deficiencies, the report concludes that the project satisfies the Design Review Ordinance without adequately explaining how those conclusions are reconciled.

FINDING 6

The County should explain why its interpretation is consistent with the purposes of California's ADU legislation.

California broadly encourages ADUs as a means of expanding housing opportunities.

This proposal redesignates the property's longstanding principal residence as an ADU while constructing an entirely new principal residence on the beachfront portion of the property. A vacation compound is not expanding housing opportunities.

The current application follows an earlier proposal that attempted to achieve substantially the same objective through a different project design. The County should clearly explain why this interpretation of its ADU ordinance is consistent with both the ordinance itself and the purposes underlying California's ADU legislation.

CONCLUSION

For the reasons stated above, I respectfully submit that the current administrative record does not contain substantial evidence supporting all of the findings required for approval.

Accordingly, I respectfully request that the Zoning Administrator either deny the application or continue the hearing until these legal and factual issues have been fully addressed.

Respectfully submitted,
Richard Tallman

APPENDIX A

Questions for the Zoning Administrator

1. What legal authority supports interpreting 'portion' to include conversion of an entire principal residence?
2. If HCD has not provided guidance, what legal authority supports the County's interpretation?
3. Has Santa Cruz County previously approved redesignation of an entire principal residence as an ADU to facilitate construction of a new principal residence? If so, what application and findings?
4. Which requested variances are required solely because of FEMA regulations?
5. Which requested variances result from the applicant's chosen building program rather than the property's physical constraints?
6. What evidence demonstrates that each requested variance independently satisfies Government Code section 65906?
7. Why does the compatibility analysis compare only the new residence rather than the completed development?
8. How were impacts on existing coastal and ocean views evaluated?
9. What objective criteria support the conclusion that the approximately 75-foot-long elevated wall is compatible with neighborhood character?
10. How are the acknowledged design deficiencies reconciled with the Design Review findings?
11. If approved, will this interpretation be relied upon in future applications involving conversion of an entire principal residence into an ADU? If not, why not?

Evan Ditmars

From: Kori <korivan@gmail.com>
Sent: Wednesday, July 15, 2026 7:08 PM
To: Evan Ditmars
Subject: Comments regarding Application No. 251501 625 Beach Drive, Aptos (APN 043-152-54)

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

COMMENTS IN OPPOSITION

Application No. 251501, 625 Beach Drive, Aptos (APN 043-152-54)

Kori Shaw, Owner, 629 Beach Drive, Aptos, California (immediate neighbor)

July 15, 2026

Dear Zoning Administrator:

I am the owner of 629 Beach Drive, the immediate neighbor to the proposed project, and for the reasons below I respectfully oppose the project under review.

1. Converting the primary home to an ADU in order to build a much larger home on the open portion of the lot is not a good-faith application of the ADU laws. Redesignating the existing 2,568-square-foot residence as an "ADU" so that a new 2,909-square-foot residence can be built adds no housing inventory for the community, it adds a second, larger house. That is not what the ADU initiative was created for.
2. This lot has a documented history: a prior proposal to build here was denied, and this application reaches a substantially larger result. I do not want to prohibit responsible development of this area, but a structure of this size will create real impacts during and after construction and will change the character of the neighborhood.
3. The design maxes out the building envelope in every dimension and is out of line with the size of its immediate neighbors on either side. It is simply too tall and too big for this site: an elevated structure of this height and length will permanently change the profile of the coastline and diminish the open, low-scale character that defines this stretch of Beach Drive.
4. The number of variances speaks for itself. Per the staff report, the "Project requires a Coastal Development Permit, a Site Development Permit, and Variances to exceed development standards for building height, number of stories, front yard setback, floor area ratio (FAR), and lot coverage." A project that requires bending this many rules at once is telling us it does not fit the lot. Approving it would set a dangerous precedent for every parcel on Beach Drive.

Please deny the application or require the applicant to scale the project back to a size that respects its neighbors and this stretch of coast.

Respectfully,

Kori Shaw

629 Beach Drive

Evan Ditmars

From: Debbie <d.bosley@sbcglobal.net>
Sent: Monday, August 3, 2026 12:50 PM
To: Evan Ditmars
Subject: Application #251501 625 Beach Drive "Please Include in for August 7th hearing"
Attachments: 08022026 Beach Drive Zoning letter.docx

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

Dear Mr. Ditmars,

Attached is my letter to be included in to the public records and correspondence for the upcoming Zoning Administrator Hearing.

Please confirm that you have received my submission and it will go on record.

Thank you so much,

Debbie

Date: August 2, 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 located in close proximity to the proposed development at **625 Beach Drive (Application #251501, APN 043-152-54)**. We respectfully request that this letter be included in the public record and correspondence for the upcoming **August 7, 2026, Zoning Administrator hearing**.

Responsible Development and Neighborhood Standards

We want to be clear that we are **not opposed to development of the beach-side property or to the construction of a new home**. We support responsible development and recognize the property owner's right to develop their land. However, that right must be balanced with the development standards that apply equally to neighboring properties and are intended to protect the character, scale, and livability of this coastal neighborhood.

Our concern is specifically with the **size, scale, and massing of the proposed development and the multiple substantial variances required to achieve it**.

Previous Proposal and Current Development Approach

We are concerned about the significant change in the proposed development from what was previously considered. The project originally included a **364-square-foot ADU and a single-family home**, which was denied due to inconsistencies with the **Local Coastal Program (LCP)**, including issues related to maximum density and coastal hazards.

The current proposal is now for a **2,909-square-foot principal residence**, while the existing family home on the Bluff side is proposed to be converted into an ADU.

We respectfully request clarification as to how the proposed conversion of the existing family home qualifies as an **Accessory Dwelling Unit (ADU)** under the applicable Santa Cruz County regulations. Based on our understanding, ADU regulations establish specific size and other requirements depending on factors such as whether the unit is attached or detached and the size and configuration of the parcel. We would appreciate an explanation of how the existing home meets the applicable requirements and qualifies as an ADU under the current proposal.

More importantly, this change in approach raises legitimate concerns for neighboring property owners. After the original proposal to develop the coastal-side portion of the property was denied

due to LCP inconsistencies, including concerns regarding **maximum density and coastal hazards**, the current proposal appears to take a substantially different approach by designating the existing Bluff-side family home as an ADU while pursuing a substantially larger principal residence on the coastal side.

We believe these circumstances warrant careful review. We respectfully ask the Zoning Administrator to consider whether the current proposal is consistent with the **intent of the LCP, applicable ADU regulations, coastal-hazard requirements, density standards, and the overall development framework for this neighborhood.**

Coastal Hazards and LCP Considerations

This raises an important question for neighboring property owners:

What has changed regarding the coastal hazards and applicable LCP considerations that would now allow a substantially larger residence to be constructed and occupied on this site?

If the coastal hazards that contributed to the denial of the previous proposal remain, we respectfully ask the Zoning Administrator to explain how the current proposal addresses those same concerns and why a substantially larger structure is now considered appropriate.

Our concern is not to prevent development. Rather, we want to ensure that development at **625 Beach Drive and along the coastal side of Beach Drive** is responsible, appropriate for the site, and subject to the same standards and protections that apply to neighboring property owners.

We believe development can occur on the coastal side, but on a **much smaller scale that respects the applicable standards and treats all neighboring property owners fairly and consistently**. Development should remain within a reasonable interpretation of the established standards, with only limited adjustments that are truly justified by the unique characteristics of the property.

Five Requested Variances and Cumulative Impact

The proposal requires **five separate variances** from fundamental development standards governing:

- Height
- Number of stories
- Setbacks
- Floor area ratio (FAR)
- Lot coverage

These should not be viewed as isolated or minor exceptions. **Taken together, they substantially alter the development standards that govern this neighborhood.** Granting all five variances

would allow a project that is significantly larger and more imposing than what those standards were designed to permit.

The cumulative effect is particularly concerning to neighboring property owners. The proposed structure would materially affect surrounding properties and establish a scale and intensity of development that is inconsistent with the existing neighborhood and the protections provided by the applicable zoning standards.

We respectfully urge the Zoning Administrator to consider the **cumulative impact of all five requested variances**, rather than evaluating each deviation independently. The fact that this project requires multiple substantial variances should be carefully considered when determining whether the proposal is appropriate for this site and consistent with the intent of the zoning regulations.

A proposal requiring five significant variances to achieve its intended size and configuration warrants serious scrutiny. We respectfully ask the Zoning Administrator to carefully consider the **cumulative impact on adjacent properties and the broader neighborhood**, as well as the prior LCP and coastal-hazard concerns, before granting the requested variances.

Thank you for including our concerns in the public record and for carefully considering the neighboring property owners who will be directly affected by this decision.

Respectfully,

Beach Drive – Cliff Side Property Owners

Richard Tallman
633 Beach Drive
Aptos, CA 95003

August 2, 2026

Zoning Administrator
Santa Cruz County Community Development and Infrastructure Department
701 Ocean Street
Santa Cruz, CA 95060

**Re: Supplemental Comments – Application No. 251501
625 Beach Drive, Aptos (APN 043-152-54)**

Dear Zoning Administrator:

I previously submitted comments regarding Application No. 251501. Since those comments were submitted, the California Coastal Commission transmitted a comment letter dated July 13, 2026, recommending that the application be denied. Because those comments were submitted after my original letter, I respectfully provide this brief supplement to the administrative record.

The Coastal Commission concludes that the proposal remains inconsistent with the County's certified Local Coastal Program and recommends denial. Among other findings, Commission staff states that:

- it is unclear whether converting 100 percent of an existing single-family residence into an Accessory Dwelling Unit is consistent with Santa Cruz County Code Section 13.10.681 or State ADU law;
- the revised proposal appears to constitute an "administrative work-around" following the denial of the earlier, materially similar application;
- the project continues to present significant Local Coastal Program consistency issues relating to coastal hazards, density, height, stories, and other development standards; and
- for these reasons, the proposal "should be denied."

These comments independently reinforce several of the concerns raised in my original submission, particularly regarding the legal basis for converting an entire principal residence into an ADU, the adequacy of the required findings, and the continued inconsistency of the proposal with the County's certified Local Coastal Program. Commission staff further notes that the current application follows the denial of a materially similar proposal and concludes that the revised application does not resolve the underlying Local Coastal Program issues identified in that earlier proceeding.

The Coastal Commission's comments are particularly significant because they come from the state agency charged with interpreting and overseeing implementation of the California Coastal Act and certified Local Coastal Programs. While the Commission's comments may not be

binding on the County, they merit substantial consideration in determining whether the findings required for approval can lawfully be made.

Accordingly, I respectfully request that the Zoning Administrator give careful consideration to the Commission's analysis, together with the comments previously submitted by members of the public, before determining whether the required findings are supported by substantial evidence.

My previously submitted comments remain my primary submission. This supplemental letter is intended only to bring the Commission's recent analysis to the forefront of the administrative record and to emphasize its relevance to the issues presently before the County.

Thank you for your consideration.

Respectfully submitted,

Richard Tallman

Attachment: California Coastal Commission Comment Letter dated July 13, 2026.