261178 Late Mail 2

Outlook

Resident Comments Opposing Building Permit Application B-265458

From Brady Boone <leahandbrady@gmail.com>
Date Thu 11/5/2026 10:10 PM
To Jonathan DiSalvo <Jonathan.DiSalvo@santacruzcountyca.gov>

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Dear Jonathan,

This isn't about a general opposition to affordable housing - we all know someone who has moved away due to affordability issues in our area and we all know we need more housing.

This is about residents who feel like the County has seemingly not considered them or neighborhood dynamics during the review and approval process of this project. We're opposed to the project as currently proposed. If the County has indeed considered its residents and the neighborhood impacts, we haven't heard or seen it.

Everyone knows traffic on 7th Avenue is at an all time high, especially due to the harbor bridge project. Street parking has been an issue for each of the nearly 20 years we've lived in our home and it's only getting worse.

- Will the county pay for its own traffic study? Or its own parking count and use study to truly understand what it's like to live in this neighborhood even before development begins? Doing so would feel like thoughtful and considerate investment as ight now, we regularly cannot easily exit our driveways during daily peak traffic hours. Our friends and family can't find parking when they come to visit. This has always been our norm - it's not new news and and the County should know this already.
- What is the plan for where this project's tenant's park when their spaces are filled? Will you require on-site overflow parking within the projects undeveloped phases for each additional car their tenants bring?
- For construction traffic, what is the approved route? Are you bringing them in off Brommer only and restricting 7th Avenue construction traffic access?
- For emergency evacuation events, has the County considered if and how we can safely leave an already congested neighborhood?

The County has not made any of this clear! Again, any action and communication on these fronts would feel as if our County has gone above and beyond to ensure housing needs are safely and appropriately met while existing resident needs are protected.

It's not cheap or easy to live here and all of this makes it harder. We hope our County will approve developments only after thoughtful consideration of its neighbors. Please make it clear how you're approving not only affordable housing but an affordable housing project designed to positively impact the neighborhood and not just County statistics.

Thank you,

Leah and Brady Boone
7th Ave. Home Owner

Outlook

URGENT: Public Hearing Testimony for Nov 6, 2026 - Application #261178 (7th & Brommer) - Technical Objections

From Lauren Lai <lai83188@gmail.com>

Date Thu 11/5/2026 11:46 PM

To Riley Rhodes <Riley.Rhodes@santacruzcountyca.gov>; Jonathan DiSalvo <Jonathan.DiSalvo@santacruzcountyca.gov>; Planning.ZoningAdministrator@santacruzcountyca.gov <Planning.ZoningAdministrator@santacruzcountyca.gov>

Cc Barbara Palmer <bparty2000@yahoo.com>; Stephen <computerexec@yahoo.com>; Lauren Lai <lai83188@gmail.com>; Erin.Collins@centralfiresc.org <Erin.Collins@centralfiresc.org>; Alexis Reed <alexis.reed@centralfiresc.org>; PublicComments@centralfiresc.org <PublicComments@centralfiresc.org>

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ATTENTION HEARING CLERK: FOR THE PERMANENT ADMINISTRATIVE RECORD
HEARING DATE: November 6, 2026
AGENDA ITEM: Application #261178 (Brommer / 7th Avenue Multi-Family Housing)
TO: Santa Cruz County Zoning Administrator

Please immediately print and distribute this formal testimony to the Zoning Administrator prior to the call to order of the November 6, 2026 public hearing.
[2]

Formal Administrative Comment Letter

Date: November 5, 2026

To: Riley Rhodes, Project Planner
Agency: Santa Cruz County Community Development & Infrastructure (CDI) Department
Email: Riley.Rhodes@santacruzcountyca.gov
Delivery Via: Electronic Mail

Subject: Technical Objections to Application #261178 (Brommer/7th Avenue Housing Project Phase 1)
Project Locations: 855, 901, & 905 7th Avenue, Santa Cruz, CA 95062
Assessor's Parcel Numbers (APNs): 026-261-16, 026-261-13, 026-261-17

cc: Central Fire District of Santa Cruz County, Community Risk Reduction Division (Erin.Collins@centralfiresc.org, Alexis Reed@centralfiresc.org,

PublicComments@centralfiresc.org) for formal review of structural fire-apparatus access road constraints and aerial apparatus deployment safety.

Dear Mr. Rhodes,

Please accept the following comprehensive, multi-point technical objection letter on behalf of the concerned residents and community stakeholders regarding the proposed multi-family housing development under **Application #261178 (Brommer Street / 7th Avenue Housing Project Phase 1)**. While we acknowledge that this project is being evaluated under the Ministerial Combining (-Min) District, a ministerial review track does not exempt the developer from absolute adherence to the county's objective building, safety, infrastructure, and environmental codes. To preserve our legal rights prior to the close of the public record, we are formally entering into the permanent administrative record the following **nine distinct, objective violations and structural hazards** that require the immediate rejection or substantial modification of the current plan set.

1. Failure to Conform to Objective Fire Safety and Emergency Evacuation Standards

Under State Density Bonus Law, a county may deny a requested waiver—including the requested 58-foot-2-inch building height and 4-story configuration—if the waiver creates a "specific, adverse impact upon public health and safety" that cannot be mitigated.

The current Phase 1 design introduces a critical, unmitigated life-safety hazard:

- **Aerial Ladder Apparatus Constraints:** The proposed 58'2" building height requires rapid deployment of heavy aerial ladder trucks by the Central Fire District. The narrow configuration of the 7th Avenue corridor, combined with the proposed interior driveways and turning radii on the site plans, physically precludes the safe positioning, outrigger stabilization, and deployment of a standard fire department aerial ladder.
- **Evacuation Bottlenecks:** Squeezing this massive density onto a fractional footprint without a dedicated secondary ingress/egress route creates a severe physical entrapment risk for future occupants and emergency responders during a fire or localized disaster event.

The project fails to meet objective fire apparatus access road standards (California Fire Code, Appendix D), which mandates minimum unobstructed widths and overhead clearances for structures exceeding 30 feet in height.

2. Feasibility of Alternative On-Site Distribution to Eliminate the Height Waiver

The developer asserts that the height waiver to 58 feet is legally required under the "Physical Preclusion Rule" because the 40-foot, 3-story limit would prevent them from achieving their target density. **This assertion is mathematically and spatially false.**

The developer controls a contiguous **3.5-acre site footprint** across the three designated APNs, yet has artificially and arbitrarily crammed the entirety of the Phase 1 density onto a restricted **2.36-acre subset** of the property.

- **Redistribution is Feasible:** The developer can completely achieve their desired 100-unit density without violating the county's 40-foot, 3-story standard by horizontally redistributing the square footage across the entire 3.5-acre footprint.

- **No Loss of Density:** Utilizing the full acreage eliminates the claimed "physical preclusion." Spreading the massing across the master-planned site preserves the full unit count, maintains economic viability, and respects the 40-foot height threshold.

Because the height waiver is not physically necessary to achieve the density on the property as a whole, the county is not legally obligated to grant the deviation.

Formal Demand for Administrative Action

We demand that the Community Development and Infrastructure Department take the following actions prior to any ministerial sign-off or Zoning Administrator action:

1. **Require an Independent Fire Safety Audit:** Order a formal, third-party Fire Behavior and Aerial Apparatus Access Simulation to prove that a 58-foot building can be safely defended given the site's ingress limitations.
2. **Deny the Height Waiver:** Instruct the developer to submit a revised site plan that spreads the Phase 1 density across the complete 3.5-acre parcel alignment, eliminating the safety hazards of the 4th story while stepping down the profile to seamlessly match the surrounding neighborhood fabric.

3. Inadequate Parking Infrastructure and Public Safety Hazards on 7th Avenue Corridor

The allocation of only 66 parking spaces for 100 multi-family units creates an unmitigated public safety hazard on 7th Avenue. While state density provisions limit standard parking minimums, they do not permit the creation of severe off-site traffic hazards.

- **Curb Utilization and Evacuation Bottlenecks:** 7th Avenue is a vital neighborhood corridor. The predictable spillover of vehicles failing to find parking within the 66-space lot will force hazardous on-street shoulder parking. This spillover will physically compromise critical sight-distance triangles for vehicles exiting the site and narrow the available roadway width, directly violating California Fire Code emergency access widths.
- **Request for Verification of Transit Qualifications:** We formally request that the Planning Department verify the exact peak-hour frequencies of the transit stops within the 0.5-mile radius. If the adjacent stops do not strictly meet the 15-minute high-frequency threshold mandated by state law, the maximum parking reductions applied to Application #261178 must be denied, and standard county parking ratios must be enforced.

4. Violation of Objective Spatial Boundaries: Encroachment on Urban Open Space (O-U) Buffers

The western boundaries of APNs 026-261-16, 026-261-13, and 026-261-17 feature an official General Plan and Local Coastal Plan designation of **Urban Open Space (O-U)**. Under Santa Cruz County planning policy, this overlay identifies land completely unsuited for structural development due to steep slope gradients, wooded ravines, and hydrological connections to the harbor watershed.

- **Demand for Accurate Footprint Delineation:** We formally demand that the Community Development & Infrastructure Department verify that the project's

proposed limits of grading, foundation footings, and structural columns do not encroach upon the O-U boundary lines or their mandatory riparian buffer zones.

- **Abuse of Density Bonus Massing:** While the developer is legally permitted to use density credits from the unbuildable O-U land to increase unit counts, they are not permitted to create a localized public safety or fire access hazard by over-compressing that massing into a 58-foot structural wall directly adjacent to established neighborhoods. The county should reject the current configuration and mandate a wider, lower, site-compliant horizontal footprint.

5. Unlawful Project Piecemealing and Failure to Analyze Cumulative Infrastructure Capacity

The current application seeks standalone ministerial approval for Phase 1 (100 units) on 2.36 acres, while explicitly designating the remaining 1.14 acres of the contiguous parcel footprint for subsequent high-density development, totaling an estimated 300 units.

- **The Objection:** Under established California land-use principles, a master-planned development cannot be segmented or "piecemealed" into isolated fragments to circumvent baseline infrastructure capacity evaluations. Even within a ministerial framework, infrastructure utility providers (including water, sanitation, and electrical) must objectively certify that the surrounding network can absorb the cumulative demand of the *entire* multi-phase footprint.
- **Administrative Demand:** We demand the County halt final ministerial sign-off until a comprehensive **Cumulative Infrastructure Capacity Analysis** is conducted for all 300 planned units. Approving Phase 1 without verifying that the underlying 7th Avenue sewer trunks and water mains can handle the total master-planned capacity constitutes an arbitrary and unverified application of objective engineering standards.

6. Failure to Meet Objective Stormwater Management and Runoff Retention Codes

Replacing 2.36 acres of highly permeable, unpaved soil with a massive 4-story building complex and expansive surface parking lot will result in an exponential, non-linear spike in localized stormwater runoff.

- **The Objection:** Because this project borders an environmentally sensitive **Urban Open Space (O-U)** designation feeding directly into the Woods Lagoon/Schwan Lagoon watershed, strict adherence to the **County Stormwater Management Ordinance** is mandatory. The current plan set fails to demonstrate that an adequately sized, structurally sound, on-site retention and filtration system can successfully mitigate peak-flow discharge without eroding the adjacent protected slopes.
- **Administrative Demand:** The CDI Department must reject the site design unless the developer provides independent engineering verification proving 100% on-site runoff containment that matches pre-development hydrological conditions. Discharging unmitigated or poorly managed urban runoff into the adjacent open space is a violation of objective county environmental codes.

7. Direct Spatial and Safety Conflicts with TCAC "Large Family" Guidelines

The project application explicitly states that it is designed to comply with California Tax Credit Allocation Committee (TCAC) "Large Family" standards, mandating that 54 out of the 100 units consist of large 2-bedroom and 3-bedroom configurations.

- **The Objection:** A TCAC Large Family designation objectively dictates a high concentration of children and multi-vehicle working families. The developer's internal layout—which squeezes 54 multi-bedroom units into a bottlenecked footprint with only 66 parking spaces—creates a direct structural hazard. The plans lack safe, designated school bus drop-off/pick-up zones, commercial delivery vehicle staging areas, and adequate pedestrian-segregated play spaces required to support a population of this size and demographic.
- **Administrative Demand:** The Zoning Administrator must deny the current configuration on the grounds that the physical site layout internally conflicts with the objective operational safety guidelines required for high-density, multi-bedroom family housing.

8. Insufficient Alternative Transit Infrastructure and Documented Pedestrian/Cyclist Hazards

The county's justification for waiving standard parking minimums relies entirely on the objective assumption that alternative transit infrastructure on the 7th Avenue corridor is sufficient to safely support a non-vehicular community.

- **The Objection:** For an objective planning standard to be legally valid, its real-world implementation cannot actively force residents into known hazardous conditions. According to official California transit safety metrics, Santa Cruz ranks as the 6th most dangerous city for cyclists out of 270 studied municipalities in the state. 7th Avenue lacks protected Class IV bike lanes and continuous, barrier-free pedestrian walkways capable of handling an influx of hundreds of high-density housing residents.
- **Administrative Demand:** The County cannot objectively certify that "alternative transit options are sufficient" to waive parking when the adjacent infrastructure actively endangers pedestrian and cyclist life-safety. Standard county parking ratios must be enforced to prevent hazardous vehicle spillover.

9. Improper Acceleration of Ministerial Review Driven by Financial Urgency

Public statements confirm that the developer is aggressively accelerating this ministerial track to meet an impending **December 11, 2026** contract deadline tied to **$46 Million in state funding**.

- **The Objection:** The administrative rush to secure funding has resulted in an uncritical, incomplete checking of objective county building, safety, and environmental codes. Under California law, an impending financial deadline or the potential forfeiture of state housing subsidies does not grant a local jurisdiction the legal authority to overlook, bypass, or fast-track the verification of objective code requirements.

- **Administrative Demand:** The Zoning Administrator is legally obligated to hold this project to the absolute letter of the law. Rushing a ministerial review without resolving the clear parking, fire safety, and open-space buffer conflicts outlined in this record constitutes an abuse of administrative discretion and exposes the County to immediate post-approval litigation.

Thank you for your attention to these critical, objective matters. Please ensure this letter is entered into the permanent administrative record for Application #261178.

Sincerely,

Lauren Lai, Harbor Cove Homeowner

lai83188@gmail.com

(831) 331-3452

Outlook

Formal Written Objections — 7th Avenue & Brommer — Application 261178

From Ian Gibb <idgoog@gmail.com>
Date Fri 11/6/2026 7:47 AM
To Riley Rhodes <Riley.Rhodes@santacruzcountyca.gov>
Cc Jonathan DiSalvo <Jonathan.DiSalvo@santacruzcountyca.gov>

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

Dear Zoning Administrator:

Please accept this correspondence as formal written objections concerning Application 261178, the proposed 7th Avenue and Brommer residential development, scheduled for consideration on November 6, 2026.

I respectfully request that the following legal and factual issues be addressed and incorporated into the administrative record before approval:

1. **Biological Review:** The staff report identifies biological review REV261090 as ongoing. Please clarify its current status and identify the evidence supporting compliance with applicable coastal-resource protection standards, including any required mitigation or protective measures.

2. **Coastal Development Standards:** The California Coastal Commission's May 2026 modifications to LCP Appendix G require development within the smallest feasible building footprint, not exceeding 3.5 contiguous acres. Please identify the analysis establishing that the proposed footprint is the smallest feasible and satisfies the applicable clustering and coastal-resource protection requirements. Please also confirm the effective date of these modifications.

3. **Project Scope:** County documents appear to reference differing overall development totals of 200 and 240 residential units. Please reconcile these figures and identify which development assumptions were used in evaluating infrastructure, transportation, drainage, and coastal-resource impacts.

4. **Environmental Review:** The staff report and supporting exhibits appear to contain inconsistent statements concerning completion of federal NEPA review. Please clarify the current status, identify the applicable federal environmental determination, and explain whether any outstanding federal requirements affect the proposed approval or subsequent project commitments.

5. **Appeal Rights:** The November 6 agenda characterizes this hearing as nondiscretionary and nonappealable, while its general appeal instructions describe local administrative appeal procedures. Please identify the specific statutory and regulatory authority governing appeal rights for this application, including the Coastal Development Permit.

I respectfully request that these issues be addressed on the record before the Zoning Administrator makes a determination.

To the extent that the required findings cannot be supported by the existing administrative record, I request that the hearing be continued until the necessary evidence is available.

Please confirm receipt of these objections and their inclusion in the official administrative record.

Respectfully,

Ian Gibb

--
Ian Gibb
Santa Cruz, CA
831-854-5191

Riley Rhodes

From: Luxury Transit <luxurytransit1@gmail.com>
Sent: Thursday, November 5, 2026 8:20 PM
To: Riley Rhodes
Subject: Fwd: 261178 & B 265458 opposition

Follow Up Flag: Follow up
Flag Status: Flagged

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I am a resident of Live Oak, living less than two miles from the proposed development. I am writing to express my strong opposition to this project.

In addition to the issue of high-density architectural design, the local infrastructure in this area cannot support such a significant influx of traffic and population. Please do not allow the Live Oak entrance to the harbor turn into something resembling the far end of Pacific Avenue - boxes and boxes of No personality and terrible architectural design.

I urge you to reconsider this proposal and protect the character and capacity of our neighborhood.

Riley Rhodes

From: Creedence Shaw <creedenceshaw@gmail.com>
Sent: Friday, November 6, 2026 6:14 AM
To: Riley Rhodes
Subject: Fwd: 7th and Brommer Proposed Project

Follow Up Flag: Follow up
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For your consideration.

---------- Forwarded message ---------
From: **Creedence Shaw** <creedenceshaw@gmail.com>
Date: Sat, Oct 31, 2026 at 7:23 AM
Subject: 7th and Brommer Proposed Project
To: <centralcoast@coastal.ca.gov>
CC: <Manu.Koenig@santacruzcountyca.gov>

Dear Central Coast District Staff,

I am a Live Oak resident writing about the proposed 100-unit affordable housing project at 905 7th Avenue and Brommer Street (County Application No. 261178). I support affordable housing. My concern is that the project, as currently designed and reviewed, has not been evaluated for its effect on public coastal access, and I respectfully ask the Commission to consider it.

1. A designated Coastal Priority Site. The Local Coastal Program identifies this site as a Coastal Priority Site intended for visitor-serving uses. I understand the Commission's 2026 action on LCP Amendment No. LCP-3-SCO-25-0050-2-Part C allowed housing on a limited footprint of no more than 3.5 contiguous acres. Housing on the site now displaces visitor-serving and public-serving uses, so the remaining public-access impacts deserve careful review.

2. Parking and spillover onto access routes. The County application proposes 100 units with 66 onsite parking spaces. Neighbors counted only about 52 street spaces along roughly 1.3 miles of 7th Avenue between Capitola Road and Eaton Street, most already occupied. This area serves the Santa Cruz Harbor, Twin Lakes Beach and Park, and Arana Gulch. If residents' vehicles spill onto nearby streets, beach and harbor visitors will have fewer places to park. One of the many impacts I can think of off is the elimination of overflow truck and trailer parking. This will force these visitors on to street parking making coastal access more difficult for everyone.

3. Reliance on transit. I understand the reduced parking may rest on proximity to transit. Santa Cruz METRO's own materials describe a structural funding deficit with no replacement revenue source and warn of roughly 40% service cuts without new funding. I am not aware of any published analysis showing that bus service at this location is frequent enough to qualify as a major transit stop under state law, or sufficient to offset reduced parking.