



California Coastal Commission  
455 Market Street, Suite 300  
San Francisco, CA 94105

May 8, 2026

**RE: Agenda Item Th14a; Santa Cruz County LCP Amendment No. LCP-3-SCO-25-0050-2-Part C  
(Housing Redesignations/Rezoning)**

**Hearing Date: May 14, 2026**

**Position: APPROVE with Staff Recommended Modifications**

Dear Chair Harmon and Commissioners,

Thank you for the opportunity to comment on this LCP Amendment. The Sierra Club recognizes that this Amendment presents a conflict between the competing values of providing and preserving community recreational facilities and public access, and of the provision of housing, especially affordable housing. The Sierra Club believes that the Staff recommended modifications to the Santa Cruz County LCP Amendment strikes a proper balance between these competing concerns.

*Regarding the 7<sup>th</sup> and Brommer site:*

The 7th and Brommer Coastal Priority and Designated Park Site has long been planned as a visitor-serving, recreational, and open space site. Its location at the upper end of the harbor allows for visitors to access both the upcoast Seabright Beach area and the downcoast Twin Lake Beach area, depending on which side of the harbor one chooses to travel along. To rezone this entire site, and to a ministerial review designation, would undercut the coastal access plans for this area.

The recommended modifications allow for a 3.5-acre housing development project on the 10-acre site. As the exact contours of the housing development are not yet defined, the "partial" site approach recommended by your staff allows for the exact determination of the 3.5 acres to be made later, at which point the remaining acreage would revert back to the prior coastal priority use. Without that reversion the planning of the public use portions of the site may be greatly affected.

The Sierra Club believes that this approach addresses both providing site area needed for housing, which is likely to be 100% affordable housing, and also to protect the rest of the site. It is our understanding that the County of Santa Cruz has agreed to the suggested modifications, and that the housing that they had intended for this site can be met with this approach.

*Regarding the Portola Site:*

Parcel 03204167 on Portola Drive houses the well-loved Portola Shopping Center, including such long-time community favorites as Dynasty Restaurant, Coffetopia, and Dunlops Donuts, not to mention

Crossfit Pleasure Point. The Sierra Club supports mixed zoning and redevelopment of the site to add affordable housing, but not elimination of all the commercial elements of the site. An important aspect of a livable community is having such amenities in the coastal neighborhood.

Sect. 13.10.497 (B) of the Min combining district requires a Coastal Permit for such projects in the Coastal Zone: "(B) Projects located within the -Min Combining District and in the Coastal Zone shall require a coastal development permit pursuant to SCCC 13.20.100, the approval of which is subject to the required findings found in SCCC 13.20.110. Proposed housing developments within the Coastal Zone that are eligible for ministerial review pursuant to this section may be eligible for waiver of the SCCC 13.20.100(A)(2) public hearing requirement pursuant to SCCC 13.20.100(A)(2). Coastal development permits issued pursuant to this section may be appealable to the Coastal Commission pursuant to SCCC 13.20.120.

Please update the staff report to make explicit that any proposal that would entail razing all or part of the Commercial uses on the site, or constructing a mixed use of residential and commercial, would require a CDP, not simply ministerial review.

**In summary**, we support the Santa Cruz County LCP Amendment with the staff recommended modifications. Thank you for your consideration of these comments.

Sincerely,

Nancy Okada  
Co-Chair, Sierra Club California Coastal Committee

Michael Guth,  
Co-Chair, Sierra Club California Coastal Committee  
Chair, Santa Cruz County Group of the Ventana Chapter of the Sierra Club