

From: [Board Of Supervisors](#)
To: [Jesseka Rodriguez](#)
Subject: Fwd: Primrose Bundle proposed Zoning changes
Date: Friday, May 9, 2025 2:21:30 PM

From: Kendel White [REDACTED] >
Sent: Thursday, May 1, 2025 8:35:34 AM
To: Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>
Subject: Re: Primrose Bundle proposed Zoning changes

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

I want to thank all of you for your thoughtful discussion and consideration of the county-wide rezoning effort. I know you are all trying to balance the community's needs with the potential impacts on the local stakeholders and homeowners.

Best Regards

Kendel White

Founder & President

www.kndlandscaping.com



On Mon, Apr 28, 2025 at 12:25 PM Kendel White [REDACTED] wrote:

Dear County Supervisors,

I understand you have received comprehensive examples of how modifying the zoning density for the "Primrose Bundles" development will contradict several aspects of the General Plan.

We are not opposed to developing these parcels. Our primary concern is ensuring the development meets the established residential area in proximity. Furthermore, I recognize the demands you face from the state to fulfill housing element objectives. Considering the potential conflicts with the county's stipulations for housing development, I hope you will thoroughly evaluate the site's location and the permitted housing density.

My concern extends to the anticipated increase in traffic and its impact on public safety along Green Valley Road, particularly given the recent approval of other sites within a mile of Primrose Lane. Please consider limiting the number of housing units authorized for construction within the Rural environment.

Respectfully,

Kendel White

Founder & President



RE: Item 7 on the 4/29/2025 Board of Supervisors meeting

Proposed rezoning development for 5 parcels on Primrose Lane:

Arguments **against** rezoning B-41, B-42, B-43, B-44, B-45 parcels clustered around Primrose Lane as shown on Map 10 in the March 26, 2025 staff report for the Planning Commission.

We, the neighbors, believe the 5 Primrose Lane parcels should not be considered for rezoning as part of the RHNA rezoning and large development plans, and that this proposal for the Primrose Lane parcels is **inconsistent** with the guidelines set forth in the Affirmatively Furthering Fair Housing document (AFFH) in the State mandate, AB686, and its enforcement tool, the Housing Element.

We have reviewed the General Plan (GP), Housing Element (HE), and the Build Environment Element (BE) documents in detail and believe that the proposed rezoning of the Primrose Lane parcels is completely inappropriate and not in compliance with multiple facets of the guidelines for development outlined in all these documents. The Primrose Lane parcels are situated in the North end of a section of Green Valley Road that is a 1.1 mile “island” Urban Service Line (USL) not near any transit hub or resources and disconnected from the main USL.

These parcels (050-041-35,-36,-38,-45,-46) are currently zoned **R-UVL**, which is very low-density housing and are surrounded by parcels with livestock and organic farming. The rezoning would put them at **R-UH** which would allow high density development in a **resource sparse** area. No other properties have been proposed to make such a drastic shift in zoning density. The proposed development with 161 units on the patchwork of adjoining parcels (a total of 9.3 buildable acres) is completely inconsistent with the surrounding farms and housing and would require multiple 3-4 story high buildings of which there are none as far as the eye can see in this area. There are also some serious concerns with access for fire response to such a high-density development in what is a limited access area.

- This is inconsistent with the General Plan that Primrose Lane and the Green Valley Road USL absorb such a massive development plan to satisfy the RHNA. In fact, the Planners already acknowledge and reported to the Planning Commissioners **that they already have enough units to satisfy the RHNA and buffer units without rezoning the Primrose Lane parcels.**
- If you look at the maps in the General Plan 2024 document, the focused growth area is shown to be the Capitola/Live Oak area and directs development to not be in a segregated community. There is no talk in the General Plan or in the Built Environment Element that the Green Valley Road USL area be part of such a focused increase development to satisfy the RHNA especially since:
 - This “island” USL is already in a segregated mostly Hispanic, low-income neighborhood, in a high disadvantaged community as is clearly pointed out in the Housing Element (Amesti, Interlaken, and Freedom which is exactly where the Primrose Lane parcels are located).
 - This 1.1 mile stretch on Green Valley Road already has maximum capacity in this island USL.
 - It is not in a “high resource” area
 - It is not “near employment centers”
 - It is not near “high performing schools”

- It is not in “high opportunity areas”
- It is not near any transportation hub
- AFFH is clear that new development should not be centered in areas of segregation, and concentration of low-income households and that the new development must be in high resource areas. It also states that new development must be distributed throughout the county, **but Green Valley Road has been targeted to satisfy almost 50% of the residential (omitting Commercial and Open space parcels) sites to be rezone in this 1.1 mile stretch in an already underserved, segregated, and disadvantaged population.**
- It seems completely inappropriate to allow such a massive increase in population on this 1.1 mile stretch that has no resources. This is especially concerning if a high percentage are from disadvantaged, extremely low- and low-income individuals that would be housed in this area far from any resources.
- **Traffic:** 190 units on Green Valley Road USL corridor have already passed through the Planning Commission. Approving the extra 161 units on the Primrose parcels, totaling 351 units, would increase that congestion **to potentially over 600 more car traffic** to an already highly congested road. The north end of Green Valley Road where the Primrose Lane properties are located is extremely narrow with no room for expansion. This area is not a “transit rich area”. The bus stops and bus system in this area would not be able to support such a massive increase in use.

Points for consideration:

- **Parcels:** Of the 75 parcels proposed for rezoning countywide, 45 are zoned residential (meaning not commercial or open space) and 7 of those residential parcels are on Green Valley Road, which means **15% of residential parcels proposed to be rezoned are in the Green Valley Road 1.1-mile USL island.**
- **UNITS:** There are 771 proposed residential units to be rezoned. 351 are in the Green Valley Road USL island, **which means 46% of the residential units proposed to be rezoned in the entire county are on the 1.1 mile stretch!**
- **Primrose Lane:** 161 units are proposed for Primrose Lane parcels. **161/771 = 21% of all proposed residential units to be rezoned are on Primrose Lane.** As a reminder, Primrose Lane parcels are **5 adjoining parcels. No other residential parcel area is asked to absorb such massive development.**
 - Please note, as mentioned above, under the current rezoning proposal, the average # of units per residential site is 10 units/site. For **Green Valley Road it is 50 units per site and for Primrose Lane it is 32/site, but really it is 161 units/ site because Primrose is a collection of 5 abutting sites, unlike any other site situation in the county.**
 - We want to know what the rationale is for dumping so many units on these Primrose parcels which is inconsistent not only with the Housing Element but also with the assignment of units for all the other residential sites. One developer owns these parcels. Is this a case of accommodating a developer’s desire to maximize development and taking advantage of the current housing crisis?
- RE: North Green Valley Road USL:
 - No activity center/no community center/no room to add commercial resources

- Green Valley Road USL is an “island” USL and the proposed rezoning and massive development does not conform with Objectives and Goals in the Built Environment Element (BE) (Objective BE-1.1)
- The BE requires development to be near existing developed areas with adequate public services to include stores and restaurants. The Primrose parcels are far from these resources, and, as discussed in the study session, Primrose Lane is not appropriate for ‘mixed use’ as parcels with this zoning must be centrally located if in the rural area (BE-3.1.2)
- Objective BE-1.2: Development along transportation corridors
 - Development must be located within ½ mile of “high-quality” transit corridors- Development on Primrose Parcels is not compliant
 - Primrose lane is not along a ‘multimodal corridor’
 - ‘Multiuse’ or ‘infill mixed use’ is not appropriate for Primrose parcels since these parcels are not near any activity or business center or transportation hub
 - Primrose Lane is 2.5 miles from the nearest grocery store (Safeway) (Harvest Moon is a liquor convenience store and cannot be considered a resource for groceries)
- BE-1.3 Defines Activity centers: Primrose Lane and Green Valley Road USL proposed rezoning and development does not fit with the definition for that guideline. Numerous areas were discussed in the Build Environment Element for focused growth areas, none of which were in the Green Valley Road island USL. Pages 2-19 to 2-22 in the Build Environment Element and Fig 2.2 outlines focused growth areas which are in the Live Oak and Pleasure Point areas and NOT on the Green Valley Road USL island.
- BE-1.4: **Complete Neighborhoods:** access to shopping and services within 15 minute walk. The Green Valley Road USL, and especially Primrose Lane parcels, are **not** in compliance with this to allow proposed development. BE-1.4 Fig. 2-3(pg 2-24)
- The General Plan identifies focused growth corridors and activity centers in the Capitola/Live Oak area (see maps in BE 2.3 Fig 2-1(pg 2-8) and BE 2.4 Fig. 2-2(pg 2-18). Green Valley Road island USL is not part of these corridors.
- General Plan 2024: **Resource Land Use Designation** map shows all agriculture surrounding the Green Valley Road USL which is **1.1 mile long stretch with no commercial businesses except for one small liquor store.**
- The developer who owns all the Primrose parcels can still exercise his right to split his parcels and have 2 units on each for 16 units on this site area, which is already greater than the average of 10 units/parcel on residential sites (omitting commercial and open space in these calculations).
 - It was disrespectful and insulting for the developer to reduce our valid concerns as simply a case of NIMBY, as was expressed by the developer’s agent at the study session.
 - It was also inappropriate for the developer who owns these parcels and does not live anywhere near these parcels, to threaten builder’s remedy since there would be no standing under the current zoning on these parcels.

Another deep concern is how is it appropriate that the rezoning of the Primrose Lane parcels falls into the Ministerial designation? The Ministerial designation for the Primrose parcels is **not** on the HE-E

(Table 7) or the HE-F, but it shows up on the Planners' staff report. **WHY?** Yet in both the Housing Element (pg 4-31 and 4-32) and the staff report (pg 30 for 3/26/2025 staff report) it references Program H-1C where 'overlay zones (-Min) are on about *"11.8 acres on 7 parcels in commercial zones, comprising a total of 5 sites"*. It further states *"All of these parcels are in commercial zones..."*. Primrose parcels are not commercial properties. Why was the -Min designation added to the Primrose Lane parcels? What were the criteria? Was it because of the inappropriately huge number of units assigned to the site, thereby assigning 42% to be Low- and Very Low-income units? If so, this -Min assignment is completely inappropriate.

We are not necessarily against the property owner's right to develop his parcels. He absolutely can do this without any rezoning needed. As we understand it, he can split his parcels and build 2 units on each with possible addition of ADUs. Even with that type of development, resource and transit availability is challenging. Certainly, it would be much harder for extremely low-, very low-, and low-income households (as defined in the Housing Element) to be placed in a resource desert that is the Green Valley Road USL, but our main concern is the volume of people proposed to be housed on these parcels (potentially 322 people plus children) in an already crowded USL with no resources or traffic mitigations plans. Whether they are all low-income or medium-income, we have the same concerns.

We believe it is important to help get people off the streets and find affordable housing. But we also believe that it is as important, if not more important, where we place them. We know the cities and counties have had a daunting task and are under a lot of pressure to follow the new requirements to find properties and streamline the building process, **but the properties should be in areas where people can actually have a chance to help themselves and have access to services.** This is where thoughtful protocols must be in place to assess what their lives might look like after they are placed in these housing units. We respect low-income people enough to create affordable housing, so we must also respect them enough not to place them in areas that are not user friendly for their most basic needs. Placing them in the Primrose Lane area or in sites miles away from any services, appears to only serve filling the requirement to find property to build and not to serve the very ones we are trying to help.

Thank you for your focused attention to this issue.

Cynthia Kern and neighbors of the Primrose Lane parcels