

**SANTA CRUZ COUNTY PLANNING DEPARTMENT POLICY/ORDINANCE  
INTERPRETATION**

Interpretation No.: RES-VRTCLACCSS-01 (Vertical Access and Residential Two Story  
Limitation within the USL))  
Effective Date: 04/05/05  
Originally Issued: 04/05/05  
Revised:

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**Question:**

How does the two-story limitation for residential structures (within the Urban Services Line) apply to portions of the structure that serve to provide vertical access to other portions of the structure, such as stairwells and elevator shafts?

**Applicable Ordinance Section(s)  
And/or General Plan/LUP Policy(ies)**

13.10.323 (b): Site & Structural Dimensions  
13.10.323 (e)(4): Structures Exceeding Two Stories  
13.10.700-S: Definition of “Story”

**INTERPRETATION:**

For zoning purposes, vertical portions of a structure that serve only to provide access to other portions of the structure, such as elevator shafts, stairwells, and dumbwaiters, are not subject to the two-story limitation applicable to residential structures within the Urban Services Line.

**Reason:**

The Residential Site and Structural Dimensions Chart [13.10.232 (b)] limits structures to two or fewer stories. Section 13.10.323 (e)(4) states that structures outside of the Urban Services Line are not limited to two stories. Section 13.10.700-S defines a story as “that portion of a building included between the upper surface of any floor and the lower surface of the floor or ceiling above.” The definition further excludes attics, basements, mezzanines, and underfloor areas from being considered a story. The definition is silent on the applicability to elevator shafts, stairwells, and dumbwaiters. When providing access between two-story elements that step down a hillside, these features often must be three-story in design.

Since elevator shafts, stairwells, and dumbwaiters do meet the definition of “that portion of a building included between the upper surface of any floor and lower surface of the ceiling above”, they are not subject to the two-story limitation if they are not intended for habitation and serve only to connect and provide vertical access to portions of a structure that does not otherwise exceed two stories, as defined in Section 13.10.700-S.

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**13.10.323(b)**