

**Julie and Robert Teufel  
273 Sant Rosa Lane  
Santa Barbara CA 93108**

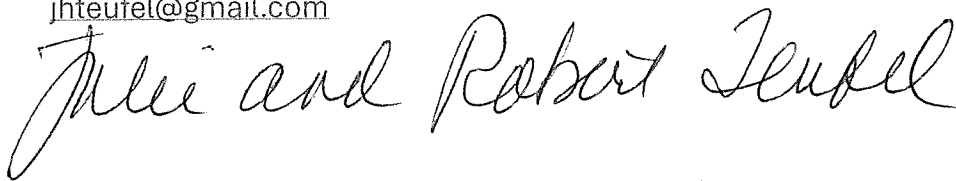
November 12, 2024

Steve Lavagnino  
Santa Barbara Board of Supervisors, Chair

Mr. Lavagnino,

Please see attached appeal application with regard to the Miramar Hotel Mixed Use  
Development Revision.

Thank you,  
Julie and Robert Teufel  
[jhteufel@gmail.com](mailto:jhteufel@gmail.com)

A handwritten signature in black ink that reads "Julie and Robert Teufel". The signature is written in a cursive, flowing style.



# Appeal Application

FILED  
2024 NOV 12 P 2:21

<b>County Use Only</b>	<b>Appeal Case No.:</b>
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### STEP 1: SUBJECT PROPERTY

**009-371-007, 009-333-013 & 009-010-004**

ASSESSOR'S PARCEL NUMBER(S)

1759 South Jameson Lane & 96 Eucalyptus Lane, Montecito, CA 93108

PROPERTY ADDRESS (IF APPLICABLE)

**Miramar Hotel**

BUSINESS/ESTABLISHMENT NAME (IF APPLICABLE)

### STEP 2: PROJECT DETAILS

**Miramar Hotel Mixed-Use Development Revision**

PROJECT TITLE

24RVP-00050, 24RVP-00051, 24AMD-00008 & 24CDP-00077

CASE NO(S).

**County Planning Commis: 11/1/2024**

DECISION MAKER

DATE OF ACTION

Is the appeal related to cannabis activities?  Yes  No

### STEP 3: APPEAL CONTACTS

#### APPELLANT

**PUT YOUR NAME HERE**

NAME (if LLC or other legal entity, must provide documentation)

**Julie and Robert Teufel**

STREET ADDRESS

**273 Santa Rosa Lane CA 93108**

CITY, STATE ZIP

**805-705-1715 jhteufel@gmail.com**

PHONE EMAIL

#### AGENT

**PUT YOUR NAME HERE**

NAME (if LLC or other legal entity, must provide documentation)

**Julie and Robert Teufel**

STREET ADDRESS

**273 Santa Rosa Lane CA 93108**

CITY, STATE ZIP

**805-705-1715 jhteufel@gmail.com**

PHONE EMAIL

#### ATTORNEY

**PUT YOUR NAME HERE**

NAME (if LLC or other legal entity, must provide documentation)

**Julie and Robert Teufel**

STREET ADDRESS

**273 Santa Rosa Lane CA 93108**

CITY, STATE ZIP

**805-705-1715 jhteufel@gmail.com**

PHONE EMAIL

### STEP 4: APPEAL DETAILS

Is the Appellant the project Applicant?  Yes  No

If not, please provide an explanation of how you are an "aggrieved party", as defined in Step 5 on page 2 of this application form:

Please provide a clear, complete, and concise statement of the reasons or ground for appeal:

- Why the decision or determination is consistent/inconsistent with the provisions and purposes of the County's Zoning Ordinances or other applicable law;
- There was error or abuse of discretion;
- The decision is not supported by the evidence presented for consideration;
- There was a lack of a fair and impartial hearing; or
- There is significant new evidence relevant to the decision which could not have been presented at the time the decision was made.
- Coastal Zone – Accessory Dwelling Unit appeals: Appellant must demonstrate that the project is inconsistent with the applicable provisions and policies of the certified Local Coastal Program or that the development does not conform to the public access policies set forth in the Coastal Act.

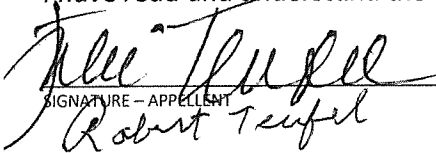
**STEP 5: APPELLANT, AGENT, AND ATTORNEY ACKNOWLEDGEMENTS**

I hereby certify under penalty of perjury that I have read the information below and that:

1. I have carefully reviewed and prepared the appeal application in accordance with the instructions; and
2. I provided information in this appeal application, including all attachments, which are accurate and correct; and
3. I understand that the submittal of inaccurate or incomplete information or plans, or failure to comply with the instructions may result in processing delays and/or denial of my application; and
4. I understand that it is the responsibility of the applicant/appellant to substantiate the request through the requirements of the appeal application; and
5. I understand that upon further evaluation, additional information/documents/reports/entitlements may be required; and
6. I understand that all materials submitted in connection with this appeal application shall become public record subject to inspection by the public. I acknowledge and understand that the public may inspect these materials and that some or all of the materials may be posted on the Department’s website; and
7. I understand that denials will result in no refunds; and
8. I understand that Department staff is not permitted to assist the applicant, appellant, or proponents and opponents of a project in preparing arguments for or against the project; and
9. I understand that there is no guarantee – expressed or implied – that an approval will be granted. I understand that such application must be carefully evaluated and after the evaluation has been conducted, that staff’s recommendation or decision may change during the course of the review based on the information presented; and
10. I understand an aggrieved party is defined as any person who in person, or through a representative, appears at a public hearing in connection with the decision or action appealed, or who, by the other nature of his concerns or who for good cause was unable to do either; and
11. Pursuant to California Civil Code Section 1633.5(b), the parties hereby agree that where this Agreement requires a party signature, an electronic signature, as that term is defined at California Civil Code Section 1633.2(h), shall have the full force and effect of an original (“wet”) signature. A responsible officer of each party has read and understands the contents of this Agreement and is empowered and duly authorized on behalf of that party to execute it; and
12. I understand that applicants, appellants, contractors, agents or any financially interested participant who actively oppose this project who have made campaign contributions totaling more than \$250 to a member of the Planning Commission or Board of Supervisors since January 1, 2023, are required to disclose that fact for the official record of the subject proceeding. Disclosures must include the amount and date of the campaign contribution and identify the recipient Board member and may be made either in writing as part of this appeal, in writing to the Clerk of the legislative body before the hearing, or by verbal disclosure at the time of the hearing; and
13. If the approval of a Land Use Permit required by a previously approved discretionary permit is appealed, the applicant shall identify:
  - How the Land Use Permit is inconsistent with the previously approved discretionary permit;
  - How the discretionary permit’s conditions of approval that are required to be completed prior to the approval of a Land Use Permit have not been completed;
  - How the approval is inconsistent with Section 35.106 (Noticing).

**REQUIRED SIGNATURES:** All aggrieved parties must sign the appeal application prior to the appeal deadline in order to be considered an aggrieved party. Please attach additional signature pages, as needed.

I have read and understand the above acknowledgements and consent to the submittal of this application.



Julie and Robert Teufel

11-11-2024

SIGNATURE – APPELLANT

PRINT NAME

DATE

SIGNATURE – AGENT

PRINT NAME

DATE

SIGNATURE – ATTORNEY

PRINT NAME

DATE

**Appeals to the Planning Commission.** Appeals to the Planning Commission must be filed with Planning and Development no later than 10 days following the date of the decision, along with the appropriate fees. Please contact P&D staff below for submittal instructions and to determine the appropriate fee.

South County projects: [front@countyofsb.org](mailto:front@countyofsb.org) or (805) 568-2090

North County projects: [nczoning@countyofsb.org](mailto:nczoning@countyofsb.org) or (805) 934-6251

**Appeals to the Board of Supervisors.** Appeals to the Board of Supervisors must be filed with the Clerk of the Board and must be filed no later than 10 days following the date of the decision, along with the appropriate fees. Appeal instructions are located online at the Clerk of the Board website: <https://www.countyofsb.org/2837/Filing-Land-Use-Appeals-Claims>

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273 Santa Rosa Lane  
Santa Barbara, CA 93108**

November 12, 2024

Santa Barbara County Planning and Development Department,  
Santa Barbara Board of Supervisors.

**Exhibit # 1**

We are so very opposed to the Caruso Affiliated Mall Proposal and so disappointed with the fact that as County Supervisors and Planning Department, who represent the residents, appear to be in approval of this project. Support of a mall in a residential community, across the street from a senior citizens daycare center, next door to a historical church, and preschool is so out of character to the neighborhood. The disruption to the immediate neighbors is unconscionable and should not be accepted, and for how long...3 years... 4 years? The noise pollution from this project cannot be masked, regardless of the noise study, and unsafe for immediate residents in the case of an emergency. The air pollution from the demolition and construction of the underground parking is a health hazard, especially for seniors and preschoolers. I quote Marc Chytillo...**“A meaningful environmental review process is particularly important for this Project to ensure that avoidable and mitigable impacts are identified and reduced to the extent possible.”** How does fast tracking this not require an Environmental Impact Report? Parking at this location is currently a problem, and will only get worse with a shopping mall, as well as the increase in traffic and safety issues to the neighbors. Residents of Montecito who have invested a great deal to live here, should expect better representation and support from the County. The Caruso Affiliated employees are not residents of Montecito and will not be experiencing the inconvenience that the residents will.

**MOST IMPORTANTLY...** is there an **EVACUATION** plan if we experience another fire, flood or debris flow.? This community has suffered a great deal. The loss of 23 lives and destruction and damage to over 400 homes, should give us **knowledge and caution**. Two freeway onramps that serve this location are closed; the 101 freeway is under construction. Is there any logic or common sense to add more construction, with construction crews, trucks and the support a project of this size requires, at this time, to this location? At the minimum, this project should be delayed until the freeway construction is completed and the onramps are reopened.

Mr. Cooney from the Planning Commission stated that what we see here today is “democracy in action, with each of the parties having their shot?” How has democracy and fairness been served when the Caruso Team was given 20 minutes to present their case, and the residents, and their legal team had 2-3 minutes?

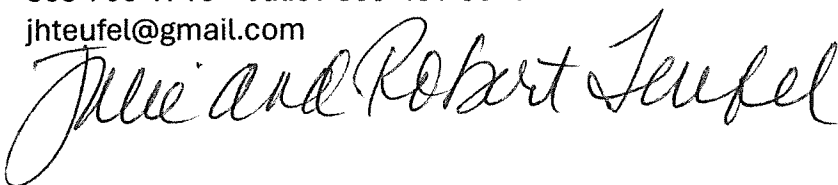
We hope you consider this carefully and understand what it will do to our beautiful town that so many of us call home.

Thank you.

Julie and Robert Teufel

805-705-1715 - Julie / 805-451-8848 - Robert

jhteufel@gmail.com



**Julie and Robert Teufel  
273 Santa Rosa Lane  
Santa Barbara CA 93108**

Exhibit #2

From Marc Chyttillo's letter to the Santa Barbara County Planning Commission.

Thus Public Resource Code § 21159.25 is limited in scope by: 1)its eligibility criteria(§ 21159.25(b)(3) “no more than five acres substantially surrounded by qualified urban uses”) and 2)the exceptions for projects with potentially significant impacts(§ 21159.25(b)(4-6) to habitat, transportation, noise, air quality, greenhouse gas emissions, or water quality and 3)exclusions if the Project involves significant cumulative impacts, significant impacts due to unusual circumstances, damage to scenic resources and substantial adverse change to historic resources. § 21159.25(c).

As is explained below and summarized at the end of this letter, the Project involves a number of potentially significant impacts and involves potential conflicts with the Montecito Community Plan, Local Coastal Plan, Coastal Zoning Ordinance and the California Coastal Act. Additional study and analysis is required of several critical issues to ensure the Planning Commission has the evidence it needs and answers to key questions before considering final action.