



PRICE, POSTEL & PARMA LLP

Counsellors at Law

200 East Carrillo Street, Suite 400  
Santa Barbara, CA 93101-2190

Mailing Address: P.O. Box 99  
Santa Barbara, CA 93102-0099

www.ppplaw.com

Ph (805) 962-0011 Fax (805) 965-3978

E-mail: [taa@ppplaw.com](mailto:taa@ppplaw.com)

Todd A. Amspoker  
Kristen M. R. Blabey  
Shannon D. Boyd  
Timothy M. Cary  
Melissa J. Fassett  
Ian M. Fisher  
Arthur R. Gaudi  
Cameron Goodman  
Christopher E. Haskell  
James H. Hurley, Jr.  
Eric P. Hvolbøll  
Mark S. Manion  
Steven K. McGuire

Timothy E. Metzinger  
Shereef Moharram  
Craig A. Parton  
Kenneth J. Pontifex  
Hana Princip  
Paul A. Roberts  
Douglas D. Rossi  
Peter D. Slaughter  
Jeremy D. Stone  
David W. Van Horne  
C.E. Chip Wullbrandt  
Ryan D. Zick

Our File Number:  
20170-1

CAMERON PARK OFFICE  
3330 Cameron Park Drive, Suite 100  
Cameron Park, CA 95682-7652  
Ph (805) 962-0011  
Fax (805) 965-3978

October 18, 2021

**VIA E-MAIL AND PERSONAL DELIVERY**

Board of Supervisors  
County of Santa Barbara  
105 East Anapamu Street  
Santa Barbara, CA 93101

RECEIVED  
2021 OCT 18 P 4: 53  
COUNTY OF SANTA BARBARA  
CLERK OF THE  
BOARD OF SUPERVISORS

Re: October 19, 2021 Board Meeting  
Closed Session Agenda – St. Mary’s Seminary, 1964 Las Canoas Road

Dear Members of the Board of Supervisors:

This firm represents several interested property owners in the Las Canoas area, near the St. Mary’s Seminary. We just learned this afternoon about your closed session agenda item scheduled for tomorrow, regarding real property negotiations for the Seminary at 1964 Las Canoas Road. We understand from press reports that Mr. Bertie is attempting to generate interest in this property being used as a large homeless shelter.

We have no idea why the County would be considering acquiring this property. The property is in the city limits of the City of Santa Barbara. The County would not be exempt from the permitting authority of the City for a homeless shelter. We are speculating that perhaps the County is considering providing funds towards the acquisition of the property by others, although this is not reflected in the closed session agenda.

It would be a grave mistake for the County to provide funds for the purchase of this property. The local neighborhood is almost universally against the idea of a large homeless shelter being operated at the Seminary. The Las Canoas area is in an extreme fire danger zone.

**Board of Supervisors  
County of Santa Barbara**

Re: Hearing on Resolution of Necessity

October 18, 2021

Page 2

Multiple fires have occurred in the area in recent years. Las Canoas is a narrow windy road. Depositing 200 homeless persons, none of whom with automobiles to escape a fire, would be a tragedy waiting to happen. Not only would this be a danger to homeless persons at the Seminary, it would be an extreme danger to the current inhabitants of the area, who would also need to escape the area during the next fire. The obvious significant increase in traffic to provide services and transportation to a large homeless shelter at the Seminary would be intolerable.

There has been no careful study of this proposed use, as would be required if a homeless shelter is proposed for the Seminary. No formal application has been filed with the City for a homeless shelter on the property. If the property is eventually purchased, and an application filed for a conditional use permit, there would be significant and relentless public opposition. We can assure you that the Las Canoas neighborhood would do everything legally possible to prevent such an unfounded and inappropriate use of the Seminary.

We do understand that a meeting was conducted at the property in recent weeks, perhaps including County officials and staff. The Las Canoas neighborhood was not invited to that meeting, which the neighborhood found particularly distressing and inappropriate. Planning for such a significant use without consulting the neighbors is frankly shocking, and we are surprised that the County would engage in any formal discussions about this at your October 19 meeting without considering the consequences to the neighborhood. Your apparent intent to discuss this in a secret closed session meeting, without any public discussion, is an affront to good government.

We respectfully request that you permanently terminate any further discussions about the acquisition of the Seminary for a homeless shelter. Thank you for your attention to this matter.

Very truly yours,



Todd A. Amspoker  
for PRICE, POSTEL & PARMA LLP

TAA/sh