



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](http://www.ppplaw.com)

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

E-mail:

Mark S. Manion  
Steven K. McGuire  
Timothy E. Metzinger  
Shereef Moharram  
Craig A. Parton  
Kenneth J. Pontifex  
Douglas D. Rossi  
J. Terry Schwartz  
Peter D. Slaughter  
David W. Van Horne  
C.E. Chip Wullbrandt  
Sam Zodeh

CAMERON PARK OFFICE

3300 Cameron Park Drive, Suite 2000  
Cameron Park, CA 95682  
Ph (805) 962-0011  
Fax (805) 965-3978

Todd A. Amspoker  
Susan M. Basham  
Kristen M. R. Blabey  
Shannon D. Boyd  
Timothy M. Cary  
Melissa J. Fassett  
Ian M. Fisher  
Arthur R. Gaudi  
Cameron Goodman  
Paul J. Hamill  
Christopher E. Haskell  
James H. Hurley, Jr.  
Eric P. Hvolbøll  
Drew Maley

Our File Number:  
24045-1

November 4, 2019

**VIA PERSONAL DELIVERY**

Board of Supervisors  
Santa Barbara County  
105 E Anapamu St # 407  
Santa Barbara, CA 93101

Re: Reggie and Teddi Drew; Santa Barbara Trolley Company  
315 Chapala Street  
November 5, 2019 Board Meeting

Dear Members of the Board:

This firm represents Reggie and Teddi Drew, owners of 315 Chapala Street (“Property”) and the Santa Barbara Trolley Company. The Santa Barbara County Flood Control District is scheduled to consider adopting a Resolution of Necessity to acquire easements on a significant portion of the Property (“Easements”) for the Lower Mission Creek Project (“Project”) at the Board meeting on November 5, 2019.

Our clients have operated the Santa Barbara Trolley Company for many years. Mr. Drew has operated the business for nearly 30 years, having expanded his fleet of trolleys from one, when the business was purchased, to a modern fleet of 15. I would assume that all of you are very familiar with the Trolley Company red buses which are a long-time fixture in Santa Barbara. For years, these iconic red buses have taken Santa Barbara visitors to various points of interest in our city and nearby areas. The Trolley Company is a great credit to our community,

November 4, 2019

Page 2

and our clients' operation has welcomed millions of tourists and locals alike to our scenic and historic sights, and single-handedly has successfully promoted our community to the world at large. We have no doubt that the Trolley Company is one of the prime reasons for the continued generation of millions of dollars in vacation spending in Santa Barbara, to the significant economic benefit of our community. In addition, the Trolley Company employs many of our local residents who consistently do a great job welcoming tourists to our community.

Our clients understand as well as any that the creek project being discussed today is a very important project for our community. The recent debris flow and fires have certainly impacted our clients' business. However, tourism is doing very well currently, and I'm sure you have all noticed the steady stream of cruise ships which have deposited thousands of tourists (and spenders) in our community. The Trolley Company has had an exclusive contract for over 20 years with many cruise lines. These cruise ship customers commonly book Trolley Company tours during their shore time in Santa Barbara.

Although our clients appreciate the need for the Lower Mission Creek Project ("Project"), it is undeniable that the property takings being proposed today will have a devastating negative impact on our clients' business. The Property currently functions as a parking facility for our clients' trolley buses. The Property is immediately next to the freeway, and its visibility to the motoring public beneficially enhances our clients' business exposure. In addition, our clients also own nearby property at 217 West Gutierrez Street, where their corporate offices are located. The two properties are only a few hundred feet from each other, and together they are essential to the efficient operation of the business. In addition to their trolley business being run out of these properties, our clients' trolley yard and office also function as a storage facility for their business Wheel Fun Rentals. Wheel Fun Rentals has been a staple in our community for 38 years. 315 Chapala Street and 217 West Gutierrez are used to store extra bicycles in the fleet for summers, and the properties also offer their employees parking as no long term parking is available surrounding their business location.

The proposed easements are so extensive that they will destroy the use of the Property for its current parking use. Our clients undeniably will need to find a completely new property on which to operate the business. This will include the corporate office also. There are no suitable properties within walking distance of our clients' corporate office on Gutierrez Street which have room for the substantial amount of required parking area for the trolleys. The compensation offered by the Flood Control District is not remotely enough to allow our clients to buy a new property which would function for parking and corporate needs. Absent an appropriate settlement of this matter, our clients will aggressively pursue full compensation for their losses, including claims for severance damage to both properties, and loss of business goodwill pursuant to Code of Civil Procedure section 1263.510.

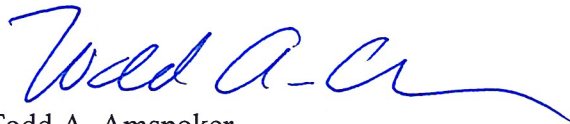
November 4, 2019

Page 3

Our clients have discussed this matter with District right of way agent James Cleary for more than a year. Recently, due to our clients' frustration at being unable to resolve this amicably with Mr. Cleary, my office has been retained to assist them. Together with my clients, we have developed a comprehensive solution to this matter and have conveyed that proposal to Mr. Cleary. The proposal was confirmed in e-mail correspondence which I sent to Mr. Cleary on October 30. We do not know when this will be discussed with you in closed session, but we hope it will be soon, in order to avoid protracted litigation and an inevitable adverse result for the District. Our clients' proposal is amply justified, and I would be happy to discuss it in detail with the Director of Public Works.

Thank you for your careful consideration of this matter.

Very truly yours,



Todd A. Amspoker  
For PRICE, POSTEL & PARMA LLP

cc: Reggie and Teddi Drew