

Katherine Douglas

Public Comment - Pierson Ferdinand

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From: Paul Beard II <paul.beard@pierferd.com>
Sent: Sunday, December 8, 2024 10:59 AM
To: sbcob; Supervisor Das Williams; Laura Capps; Steve Lavagnino; Joan Hartmann; Supervisor Nelson; Rachel Van Mullem
Subject: Dec. 10, 2024 BOS Meeting / Extension of Urgency Ordinance Forcing Parks To Unlawfully Discriminate in Housing
Attachments: 12-9-24 Letter to Board.pdf

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Please see attached comment letter concerning Tuesday’s hearing on the proposed extension of the county’s urgency ordinance, which purports to force Del Cielo and other mobilehome parks to illegally engage in familial, racial, and ethnic discrimination in the provision of housing.

Please ensure the letter is made a part of the record.

Sincerely,

Paul Beard II
Partner & Chair, Land Use Entitlements & Litigation
*Certified Specialist in Appellate Law**



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December 9, 2024

VIA ELECTRONIC MAIL

Board of Supervisors
Santa Barbara County
Email: sbcob@countyofsb.org

Re: Senior Mobile Home Park Conversion Interim Urgency Ordinance Extension

Dear Supervisors,

As you know, this law firm represents Del Cielo Manufactured Housing Community, LLC (“Del Cielo MHC, LLC”), which owns Del Cielo Mobile Estates (“Del Cielo”), a mobile home park located in unincorporated Santa Barbara County. This comment letter concerns the 12/10/24 board item titled, “Senior Mobile Home Park Conversion Interim Urgency Ordinance Extension.”

Your staff recommends an extension of the urgency ordinance enacted last month, which purports to force Del Cielo to convert to a “seniors only” park and purports to force other parks to remain “seniors only” parks. As stated in our recently filed lawsuit against the County (which staff documents for this item perplexingly fail to mention), County efforts to require parks to engage in familial, racial, and ethnic discrimination in the provision of housing are unlawful under federal and state laws. *See Del Cielo Manufactured Housing Community LLC v. County of Santa Barbara*, Santa Barbara Superior Court (Case No. 24CV06322). We hereby incorporate by reference all of the claims and arguments made in that complaint, which apply to the proposed extension.

We urge the County to correct course and reject the extension of the urgency ordinance.

Very truly yours,

PAUL BEARD II
Attorneys for Del Cielo MHC LLC

Cc: Supervisor Das Williams (SupervisorWilliams@countyofsb.org)
Supervisor Laura Capps (LCapps@countyofsb.org)
Supervisor Steve Lavagnino (Steve.Lavagnino@countyofsb.org)
Supervisor Joan Hartmann (JHartmann@countyofsb.org)
Supervisor Bob Nelson (Nelson@bos.countyofsb.org)
County Counsel Rachel Van Mullem (rvanmull@countyofsb.org)