

**ATTACHMENT 3: APPLICANT APPEAL APPLICATION DATED JUNE 21, 2021**



PLANNING & DEVELOPMENT  
APPEAL FORM

SITE ADDRESS: 2905 Via La Selva, Santa Ynez, CA 93460

ASSESSOR PARCEL NUMBER: 141-100-076

Are there previous permits/applications? no yes numbers: \_\_\_\_\_  
(include permit# & lot # if tract)

Is this appeal (potentially) related to cannabis activities? no yes

Are there previous environmental (CEQA) documents? no yes numbers: \_\_\_\_\_

1. Appellant: \_\_\_\_\_ Phone: \_\_\_\_\_ FAX: \_\_\_\_\_

Mailing Address: \_\_\_\_\_ E-mail: \_\_\_\_\_

2. Owner: Jacqueline Abbud Street 2905 Via La Selva City Santa Ynez State CA Zip 93460 Phone: 805 636-8848 FAX: \_\_\_\_\_

Mailing Address: 2905 Via La Selva, SY CA 93460 E-mail: jabbuds@gmail.com

3. Agent: \_\_\_\_\_ Phone: \_\_\_\_\_ FAX: \_\_\_\_\_

Mailing Address: \_\_\_\_\_ E-mail: \_\_\_\_\_

4. Attorney: \_\_\_\_\_ Phone: \_\_\_\_\_ FAX: \_\_\_\_\_

Mailing Address: \_\_\_\_\_ E-mail: \_\_\_\_\_

COUNTY USE ONLY

Case Number: \_\_\_\_\_ Companion Case Number: \_\_\_\_\_  
Supervisory District: \_\_\_\_\_ Submittal Date: \_\_\_\_\_  
Applicable Zoning Ordinance: \_\_\_\_\_ Receipt Number: \_\_\_\_\_  
Project Planner: \_\_\_\_\_ Accepted for Processing \_\_\_\_\_  
Zoning Designation: \_\_\_\_\_ Comp. Plan Designation \_\_\_\_\_

RECEIVED  
2021 JUN 21 P 5:00  
COUNTY OF SANTA BARBARA  
CLERK OF THE  
BOARD OF SUPERVISORS

# COUNTY OF SANTA BARBARA APPEAL TO THE:

BOARD OF SUPERVISORS

PLANNING COMMISSION:  COUNTY  MONTECITO

RE: Project Title Hacienda Amador Home Stay permit

Case No. 21 HOM - 00005

Date of Action June 9, 2021

I hereby appeal the  approval  approval w/conditions  denial of the:

Board of Architectural Review – Which Board? \_\_\_\_\_

Coastal Development Permit decision

Land Use Permit decision

Planning Commission decision – Which Commission? Planning and zoning

Planning & Development Director decision

Zoning Administrator decision

Is the appellant the applicant or an aggrieved party?

Applicant

Aggrieved party – if you are not the applicant, provide an explanation of how you are and “aggrieved party” as defined on page two of this appeal form:

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Reason of grounds for the appeal – Write the reason for the appeal below or submit 8 copies of your appeal letter that addresses the appeal requirements listed on page two of this appeal form:

- A clear, complete and concise statement of the reasons why the decision or determination is inconsistent with the provisions and purposes of the County’s Zoning Ordinances or other applicable law; and
- Grounds shall be specifically stated if it is claimed that there was error or abuse of discretion, or lack of a fair and impartial hearing, or that the decision is not supported by the evidence presented for consideration, or that there is significant new evidence relevant to the decision which could not have been presented at the time the decision was made.

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**Specific conditions imposed which I wish to appeal are (if applicable):**

- a. section 3.1 purpose and intent
- b. section 3.2 nuisance response plan
- c. section 2.0 community plan consistency
- d.

Please include any other information you feel is relevant to this application.

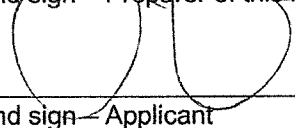
**CERTIFICATION OF ACCURACY AND COMPLETENESS** Signatures must be completed for each line. If one or more of the parties are the same, please re-sign the applicable line.

**Applicant's signature authorizes County staff to enter the property described above for the purposes of inspection.**

*I hereby declare under penalty of perjury that the information contained in this application and all attached materials are correct, true and complete. I acknowledge and agree that the County of Santa Barbara is relying on the accuracy of this information and my representations in order to process this application and that any permits issued by the County may be rescinded if it is determined that the information and materials submitted are not true and correct. I further acknowledge that I may be liable for any costs associated with rescission of such permits.*

Jacqueline Abbud 6/21/2021  
\_\_\_\_\_  
Print name and sign – Firm Date

  
\_\_\_\_\_  
Print name and sign – Preparer of this form Date

  
\_\_\_\_\_  
Print name and sign – Applicant Date

\_\_\_\_\_  
Print name and sign – Agent Date

\_\_\_\_\_  
Print name and sign – Landowner Date

The main reason for the appeal is that we disagree with the verdict handed out. All two of the points which they used to deny our homestay are skewed. To start the issue 3.2 which states that I blocked the appellant's phone number does not mean I have cut all communication with my neighbor. Both me and my family have open and fruitful communication with Bill Jackson, the husband of Ingrid Jackson, the main appellant. Additionally the reason for blocking Miss Jackson comes from her aggressive and threatening language and years of harassing behavior. We have tried repeatedly to have good communication with Miss Jackson but after failing time and time again we were forced to block her number, and only have communication with Bill Jackson. This came only as she threatened our children, our animals, defamed us on social media such as facebook, and has threatened to take to court over walking on the easement in front her home to our property behind hers. The second issue 3.1 starts by stating the homestay is approximately 120 feet from the neighbors dwelling. We believe that this is a very short estimate and that a much more correct estimate would be closer to 150 feet which still only brings us to the edge of her garage. If we include the mandated 20 feet minimum that her garage must be in length a more correct estimate would be closer to 170 feet from her dwelling. We believe that 170 feet is more than sufficient and a respectful distance to not cause issues of noise for the neighbors as this is a part of our house that we have always used as a family. The guests that are invited are limited in size to only four at most. As we live in front of Jacksons property the guests have no reason to impact them as they would only drive to our home and not closer than 150 feet from the Jacksons dwelling at most. We are a normal family and while in the past we had operated without correct permitting, we have since been notified of the requirements such as permits and we are doing our best to operate a homestay through the correct legal channels. We comply with all the rules for a short term rental as you can see from the initial acceptance of the homestay and the initial report from Ben Singer stating that we had swiftly dealt with any and all violations. Upon notification we promptly obtained the TOT certificate number 823 and paid all of our taxes. Additionally as you can see through our submission our home was rented out on a regular basis by the previous owner with no complaint from Miss Jackson.