

Forward to City Clerk

PRICE, POSTEL & PARMA LLP

JAMES H. HURLEY, JR.
J. TERRY SCHWARTZ
DAVID W. VAN HORNE
PETER D. SLAUGHTER
DOUGLAS D. ROSSI
ERIC P. HVOLBOLL
CRAIG A. PARTON
CLYDE E. WULLBRANDT
KENNETH J. PONTIFEX
CHRISTOPHER E. HASKELL
TIMOTHY E. METZINGER
TODD A. AMSPOKER
PENNY CLEMMONS
MARK S. MANION
MELISSA J. FASSETT
IAN M. FISHER
SHEREEF MOHARRAM
SAM ZODEH
KRISTEN M.R. BLABEY
LESLEY E. CUNNINGHAM
DARRYL C. HOTTINGER

COUNSELLORS AT LAW
200 EAST CARRILLO STREET, SUITE 400
SANTA BARBARA, CALIFORNIA
93101-2190

MAILING ADDRESS P. O. BOX 99
SANTA BARBARA, CA 93102-0099

TELEPHONE (805) 962-0011
FACSIMILE (805) 965-3978

OF COUNSEL
ARTHUR R. GAUDI
DANIEL C. DAVID
SUSAN M. BASHAM
STEVEN K. MCGUIRE

RETIRED PARTNERS
DAVID K. HUGHES
GERALD S. THEDE

OUR FILE NUMBER

21799.1

June 19, 2008

R

VIA HAND DELIVERY

James L. Armstrong
City Administrator/Clerk/Treasurer
735 Anacapa Street
Santa Barbara, CA 93101

ADMINISTRATOR
SANTA BARBARA

Re: Haley/De La Vina Streets Bridge Replacement Project
Notice of Hearing – 430 De La Vina St.; Request to be Heard at Council Meeting

Dear Mr. Armstrong:

This office represents David and Ella Flint, owners of property located at 430 De La Vina Street, Santa Barbara. On June 5, 2008, Pat Kelly of the City directed a letter to our clients notifying them of an upcoming hearing on July 1, 2008 before the City Council. The purpose of the hearing is to consider the adoption of a Resolution of Necessity to temporarily acquire portions of our clients' property in order to allow for construction of the Haley/De La Vina Streets Bridge Replacement Project ("Project").

The Project will effectively prevent the occupation of our clients' property during the course of the construction of the Project. Although the City has had an appraisal performed of the property rights proposed to be acquired, the City's offer is inadequate to redress my clients' expected damages and loss of income. On behalf of our clients, we therefore ask that you not adopt the Resolution of Necessity, and instead direct City staff to renegotiate this proposed taking with our clients in order to properly compensate them for the impact of the Project. Our clients are in the process of obtaining their own appraisal of the property, and expect to make the results of that appraisal available to City staff at the appropriate time.

We ask that you make this letter a part of the administrative record in connection with this matter. Our clients also request the opportunity to be heard in connection with this matter at the City Council hearing on July 1, 2008.

Very truly yours,

Todd A. Amspoker
For PRICE, POSTEL & PARMA LLP

TAA:lb

James L. Armstrong
June 19, 2008
Page 2

cc: City Council
Pat Kelly
Stephen Wiley
Paul Casey
Jim Colton
Cathy Springford
David and Ella Flint