

ATTACHMENT 3

**Orcutt Key Site 18 (OASIS) Project
Final Environmental Impact Report**

December 1, 2020

Revision Letter No. 2 (supersedes Revision Letter No. 1 dated September 3, 2020)

SCH#2017041065

Project Case Nos. 14GPA-00000-00020, 16RMM-00000-00001, 16CUP-00000-00006, 16DVP-00000-00002, 16LLA-00000-00004, 17CUP-00000-00013, 18GOV-00000-00005

1.0 Introduction

The proposed project consists of the construction of a new, 15,661-square-foot Orcutt Area Seniors in Service (OASIS) facility, which includes a 14,069-square-foot main building and a 1,592-square-foot ancillary BBQ/crafts building. The project also includes the construction of a related access road, 143 parking spaces, landscaping, and private trails within the development area. The project includes associated development consisting of the construction of a section of the multi-use Orcutt Creek Trail, and a request to modify the required number of parking spaces from 229 required spaces to 143 spaces.

The project site is approximately 5 acres and is located within the Orcutt Community Plan (OCP), identified as “Key Site 18/Southpoint” (KS18). The OASIS property is comprised of two APNs (105-020-063, -064), which together are one legal lot. The OASIS property is part of an approximately 33-acre common open space lot (Lot 165) of the original Southpoint Estates (SPE) subdivision.

In addition to a Development Plan and Conditional Use Permits, the proposed OASIS development requires amendments to the General Plan, modifications to the Southpoint Estates Tract Map conditions of approval and recorded maps, and OASIS’ acquisition of the property’s development rights previously deeded to the County. The project also includes a minor lot Line Adjustment involving 0.12 acres. The project requests are proposed to allow the development and use of the OASIS Center on approximately five acres of Orcutt Community Plan Key Site 18.

An Environmental Impact Report (EIR) was completed for the project. The Draft EIR was circulated for public review from September 6 to October 21, 2019, and a public hearing to accept comments on the Draft EIR was held on October 3, 2019. In addition to comments relayed at the public hearing, 30 comments (letters and emails) were submitted during the public review period. The comments, responses to comments, and a summary of the October 3, 2019 hearing are included in OASIS EIR Section 9.0.

2.0 Requested Revision to FEIR

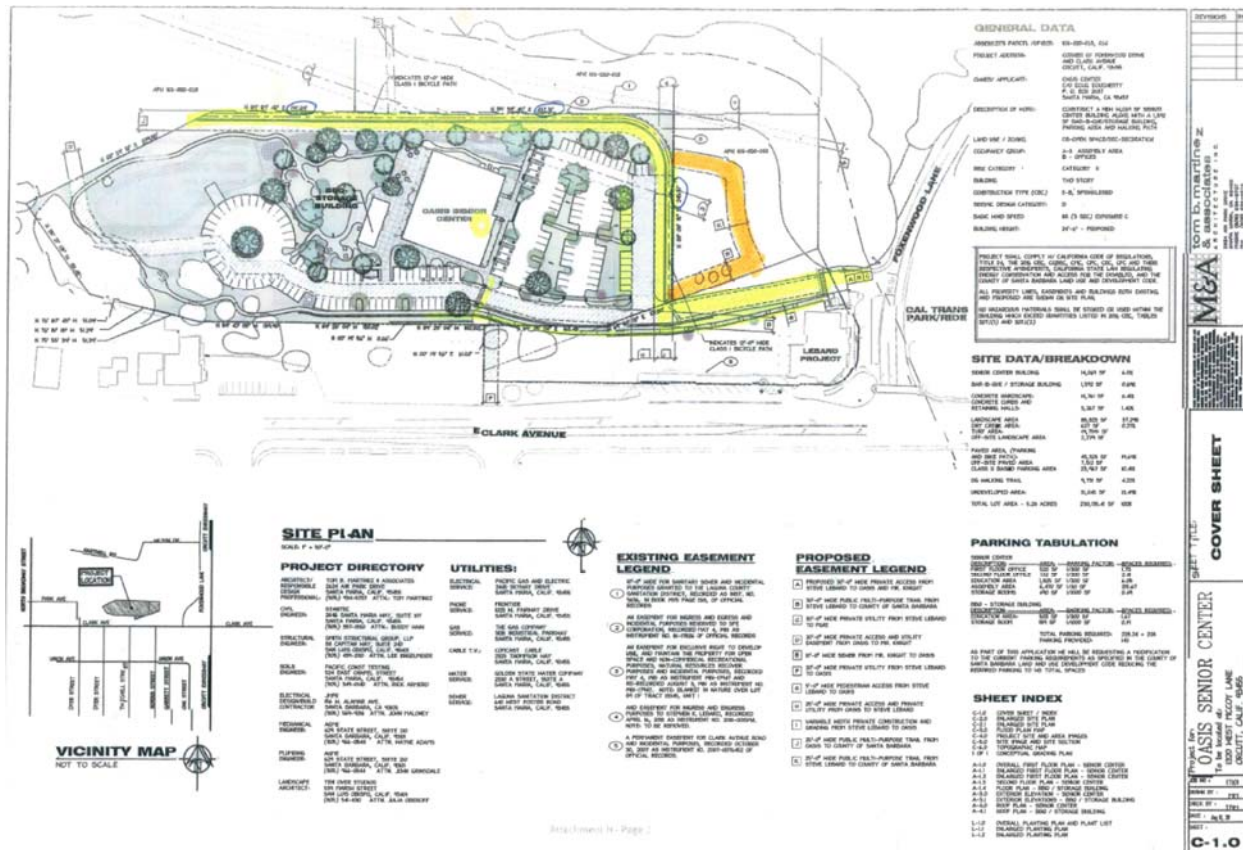
After the Final EIR was released, the following changes were proposed to the project:

An additional trail/bikeway was proposed as part of the Development Plan on the adjacent parcel to the east, APNs 105-020-052, -053, together one legal parcel. OASIS proposes to construct the trail as a Class 1 Bikeway/Trail and grant an easement to the County for the trail/bikeway. **See Figure 1, below.**

The project revisions addressed in this revision letter involve only the new trail/bikeway location visually depicted in orange on APNs 105-020-052 and -053, together one legal parcel, in Figure 1. The proposed trail alignment is located on a parcel directly adjacent to the OASIS property. As described in the Biological and Geological Resources Sections of the EIR for the project, EIR Section 4.3 and 4.6 respectively, incorporated herein by reference, the biological and geological analyses study area included the OASIS property as well as all adjacent areas around the OASIS property that are located on Key Site 18, which includes APNs 105-020-052 and -053. According to Figures 4.3.3 and 4.6.1 of the Final EIR, the composition of vegetation communities and soil types located on this adjacent parcel are similar to those located on the Oasis project site. Therefore the project area for the proposed trail was included in the biological and geological resources studied in the EIR. There are no new or additional resources that would be impacted by the proposed trail/bikeway, and therefore the trail/bikeway would not result in new significant impacts, would not require new mitigation measures to reduce impacts to less than significant levels and would not result in a substantial increase the severity of previously identified significant impacts. Further, the proposed project's impacts to biological and geologic resources would be substantially the same as the approved project. No additional mitigation measures are necessary. No changes will occur to the General Plan Amendment, Recorded Map Modification, Conditional Use Permit or Lot Line Adjustment project descriptions.

For example, existing mitigation measure GEO-1 requires implementation of an erosion and sediment control plan and storm water pollution prevention plan and would ensure that storm water runoff is retained onsite and siltation/sedimentation impacts to Orcutt Creek are mitigated to less than significant. In addition, implementation of Mitigation Measures BIO-1 and BIO-3 through BIO-19, and REC 1-4 identified in the Final EIR would reduce impacts biological sensitive species and fragmentation of open space areas to the maximum extent feasible.

Figure 1



COVER SHEET

PROJECT TITLE: OASIS SENIOR CENTER
PROJECT ADDRESS: 1501 WEST AVENUE, CREST, CALIF. 92624
DATE: 10/20/20

SCALE: AS SHOWN

PREPARED BY: M&A
CHECKED BY: M&A
DESIGNED BY: M&A
DATE: 10/20/20

C-1.0

3.0 Policy Consistency

The Final EIR includes an evaluation of the proposed Project's consistency with applicable policies of the Santa Barbara County Comprehensive Plan. This evaluation concluded that Oasis proposed project would be potentially consistent with each of the identified policies. The additional trail segment does not create any new policy inconsistencies that were not analyzed in the policy consistency analysis in Section 6.2 of the September 3, 2020 Planning Commission staff report.

4.0 Mitigation Monitoring Program

The mitigation measures and mitigation monitoring program discussed in the Final EIR have been amended to include the additional trail/bikeway proposed as part of the Development Plan on the adjacent parcel to the east, APNs 105-020-052, -053, and all applicable mitigation measures will also apply to the Modified Project pursuant to the conditions of approval and the Mitigation Monitoring and Reporting Program, and would remain the same as the proposed Project.

5.0 Omitted Response to Comments – Ridolfi Letter

Staff omitted one EIR comment letter by Don and Lori Ridolfi, dated October 21, 2019 (Attachment 1). The Ridolfi EIR comment letter raised concerns on the following issues: timing of approvals, effects of special events, including noise, security, air quality, parking and economic viability. Staff provided a response to the comment letter (Attachment 2) and found that all of the issues raised in the Ridolfi comment letter were adequately addressed and/or mitigated in the Final EIR.

6.0 Conclusion

It is the finding of the Board of Supervisors that based on revisions to the Final EIR as described above, impacts resulting from implementation of the OASIS Project would not otherwise result in a change in the levels of impact identified in the existing analysis contained in the Final EIR. As such, the revisions to that analysis incorporated into the EIR by this Revision Letter dated December 1, 2020, may be used to fulfill the environmental review requirements for the current project, and the information contained herein does not require recirculation pursuant to CEQA Guidelines Section 15088.5.

Attachments:

1. Comment letter, Don and Lori Ridolfi, October 21, 2019.
2. Response to Ridolfi Comment Letter from County, September 4, 2020

To: Planning & Development
Attn: Natasha Campbell
634 W. Foster Road
Santa Maria, CA 93455
ncampbell@co.santa-barbara.ca.us

From: Don & Lori Ridolfi
424 Hartnell Rd
Santa Maria CA 93455

Date: 21 October 19

Subject: Public Comment - OASIS Center Project – Draft EIR

FF-1 We have concerns regarding the OASIS Meeting Center Draft Environmental Impact Report (DEIR), dated September 2019. The DEIR is based on a best case optimistic evaluation of circumstances. As written, it is NOT an accurate, reliable and independent assessment of all relevant issues and impacts related to the proposed project. It contains inadequate mitigations. Described below are DEIR inadequacies and the Action needed to remedy the shortfall. Note: Our property borders the open space where the Oasis Center proposes to build.

FF-2 **One-Sided Consistency Analysis.** The consistency analysis discussion is one-sided and therefore incomplete. Table 4.8-2 Applicable General Plan / County Land Use and Development Code Preliminary Consistency Analysis only contains potentially consistent comments. An explanation of the inconsistencies is vital to understanding and evaluating if the proposed mitigations actually and adequately address the impacts.
ACTION: Table 4.8-2 must include a counterbalancing analysis of items that are potentially inconsistent.

FF-3 **Pending Approvals.** The pending Class I bikeway easement and driveway design standard exception decisions would drive significant redesign and/or plan adjustments if disapproved. The DEIR includes the following: 1) “Rec-1 Trail/Bikeway Location: The project development, including buildings, parking lot, landscaping, etc. shall be shifted/reoriented within the OASIS property to accommodate the Class I Bikeway/Orcutt Creek.”; 2) “TC-2 Transportation/Circulation. Driveway. The Owner/Applicant shall receive approval of exception from design standards for the proposed driveway.” and 3) “Impact TC-2 (Intersections): ... subject to approval of final roadway improvement plans. Therefore, the project would result in less than significant project specific traffic impacts.” Disapproval would also necessitate reassessment of multiple impact areas and potentially invalidate associated proposed mitigations upon which favorable approval depends. Disapproval of the driveway design standard exception would result in additional significant (Class I) specific traffic impacts.
ACTION: The EIR must not be published/approved until pending approval decisions are resolved. Update Mitigation TC-2 Plan Requirements to reflect “Prior to Planning Commission.” If the bikeway easement is disapproved, reassess/update applicable impacts/mitigations throughout the EIR.
ACTION: If the driveway design standard exception is disapproved: 1) Remove mitigation TC-2 (mentioned in multiple locations) and reassess/update applicable impacts/mitigations throughout the EIR. 2) Change Impact TC-2 to, “...the project would result in less than significant project specific traffic impacts (Class I).” and 3) Change the discussion of Transportation/Circulation (Section 4.12) Class II Impacts to a Class I impact discussion throughout the applicable EIR sections.

FF-4 **Maximum Attendance.** The proposed OASIS facility includes two buildings totaling approximately 15,333 square feet. Per the DEIR, “In response to neighborhood comments, the project description was revised to reduce the maximum allowed population onsite to 200 people including those working onsite, although the facility is designed to accommodate larger numbers of attendees. Although the physical improvements (structural development, parking areas) have not been reduced, the project description was revised to reduce maximum attendance levels to no more than 200 people (including workers onsite). This substantially reduces the number of people allowed at the OASIS facility at any given time, compared to the original project description, which allowed for 300-person events, plus 12 much larger events per year (e.g., concerts “in the park”, harvest festivals, etc.)” Multiple impacts and mitigations rely on the 200 person maximum attendance limit. As a condition of approval, future requests for increased attendance limits must be prohibited otherwise impacts/mitigations which rely on the 200 person maximum attendance limit are invalidated. It would also circumvent the response to neighborhood comments. **ACTION:** The EIR must stipulate, as a condition of approval, that future requests for increased attendance limits must be prohibited. (This must also be coupled with a requirement for facility size redesign/reduction to match the 200 person maximum limits). Without this action, reassess/update applicable impacts/mitigations throughout the EIR using the original 300 person limits.

FF-5 **Facility Size.** The new facility (15,333 ft) is approximately 5 times larger than the original facility (~3000 ft). As discussed under Maximum Attendance above, the facility is much larger than needed based on 200 person maximum attendance. The larger facility sets the stage for/makes possible a future request to increase maximum attendance which would invalidate mitigations which rely on the 200 person maximum attendance limit as well as circumvent response to neighborhood comments. A facility redesign to a size appropriate for the 200 person maximum attendance would prevent expansion beyond the 200 person maximum attendance limits evaluated in this EIR. This must be a condition of approval. **ACTION:** The EIR must stipulate, as a condition of approval, that the facility must be redesigned to reduce the size such that it is no bigger than needed to support the proposed 200 person maximum attendance. Without this action, reassess/update applicable impacts/mitigations throughout the EIR using the original 300 person limits.

FF-6 **Attendance limits.** Without controlled access (such as at a stadium) there is no safe, effective way to monitor and enforce attendance limits. Mitigations which rely on attendance limits are effectively invalidated since, without effective monitoring and enforcement (coupled with a larger than needed facility), attendance could easily exceed mitigated limits. This also puts the burden on the community to prove the attendance limits were exceeded. Given the significance of attendance limits in the proposed mitigations, the project needs a feasible method to monitor and enforce attendance limits during all activity (OASIS & non-OASIS). **ACTION:** The EIR must stipulate, as a condition of approval, that the applicant must provide a feasible method to monitor and enforce attendance limits during all activity (OASIS & non-OASIS). Without this action, characterize mitigations which rely attendance limits as invalid and reassess/update applicable impacts/mitigations throughout the EIR which rely on attendance limits.

FF-7 **Noise limits.** The proposed mitigations (NS-3 Special Noise Limiters, NS-4 Special Amplification and NS-7 Noise Contact) are insufficient to proactively prevent violations of noise limitations. This subjects the community (sensitive receptors) to potential repeated violations and inevitable delay/wait for resolution of complaints. See below.

FF-8 **Mitigation NS-3 Special Noise Limiters.** The proposed mitigation does not prevent noise violations and has no impact on unamplified noise. The DEIR states, “...many musical instruments and combinations of instruments (e.g., in rock, jazz, or mariachi bands) normally exceed the assumed 80.5 dBA noise level in the 1-hour averaged noise projections individually,

even without amplification...” The mitigation proposes, “For non-amplified music which exceeds this noise level, the music shall be performed indoors unless measures can be implemented that effectively limit the sound level of the music to no more than 80.5 dBA.” There is however no mechanism proposed to ensure unamplified outdoor activity including music (or any noise) doesn’t exceed noise limits.

ACTION: Mitigation NS-3 Special Noise Limiters. Restrict amplification of all outdoor activity (remove the exception for OASIS activity) and do not allow noisy outdoor activities, including loud acoustic music (e.g., bagpipes, horns, drums, etc.). Without this action, rate Noise as a Class I impact.

FF-9 **Mitigation NS-4 Special Amplification.** The DIER noise analysis section (based on the project description) states, “Amplification for OASIS activities, including for the spoken voice (e.g., instructor for outdoor exercise classes, DJ for a party, speaker at a celebration of life) and for instrumental or recorded music, would be permitted indoors and outdoors.” The mitigation’s proposed limits for “Amplification (e.g., voice, music, bullhorns, etc.) and loud acoustic music (e.g., bagpipes, horns, drums, etc.)” based on length of activity (“Maximum of three hours per day”) or time of day (“Sunday through Thursday, limited to the hours of 10:00 AM to 7:00 PM ... Friday and Saturday, limited to the hours of 10:00 AM to 9:00 PM”) do nothing to actually prevent noise violations.

ACTION: Mitigation NS-4 Special Amplification. Restrict amplification of all outdoor activity (remove the exception for OASIS activity) and do not allow noisy outdoor activities, including loud acoustic music (e.g., bagpipes, horns, drums, etc.). Without this action, rate Noise as a Class I impact.

FF-10 **Mitigation NS-7 Noise Contact:** This mitigation is reactive. There is no criteria for what constitutes promptly. The mitigation requires availability during rental activities but these violations could occur any time. Other than hours of operation violations (which should be readily apparent), there is no mechanism to measure noise levels or attendance numbers. Noise complaints are problematic for both parties. The noise makers may believe they are in compliance when sensitive receptors complain of excess noise. The noise contact may ask for proof of violation (noise or attendance) and the sensitive receptors would be unable to do so creating an unresolvable and therefore un-mitigatable conflict. In discussion with law enforcement, noise complaints are an unenforceable nuisance for the aforementioned reasons.

ACTION: Mitigation NS-7 Noise Contact. Change mitigation language to “The OASIS noise contact shall be available during ~~rental~~ all activities...” Define promptly as “within 15 minutes of notification” and change mitigation language to “...promptly (within 15 minutes of notification) address neighbor complaints and to ensure activities are consistent with identified noise mitigation...” Without this action, rate Noise as a Class I impact.

ACTION: The EIR must require the applicant to implement feasible, reliable and effective methods of measuring compliance with noise and attendance limits. Without this action, rate Noise as a Class I impact.

FF-11 **Noise Monitoring.** Per the project description, “All OASIS programs would comply with Santa Barbara County regulations, including the requirement that noise (from indoor or outdoor activities) would not result in noise levels of 60 dBA at the OASIS property line.” Compliance with noise limits in the DEIR relies on subjective assessment of the noise heard by sensitive

receptors. Without objective measuring devices at multiple locations on the border of the property, there is no effective way to monitor and enforce noise limits. Lack of objective monitoring puts the burden of proof on the community (sensitive receptors) to prove limits were exceeded. Without proactive monitoring, the community has to wait for a complaint/response to address the nuisance.

ACTION: The EIR must include the following requirements for noise monitoring. It must be real-time and include multiple sensors bordering the project at key points affecting sensitive receptors. The data (including date, time, location and sound level at each sensor indicating acceptable and highlighting unacceptable levels) must be tracked, stored and accessible to the public via internet to provide transparency and accountability. Without this action, rate Noise as a Class I impact.

FF-12 Air Quality. “Mitigation AQ-1 Special – Gas Fireplace/BBQ: Barbeques, fire pits, fireplaces, etc. shall be gas fired ...” is required to mitigate Impacts AQ-3, AQ-4 and Cumulative Air Quality to less than significant levels. This restriction is not specified for portable/transportable barbeques, fire pits, fireplaces, etc. (e.g. wood fired trailers used for Santa Maria BBQ prep).
ACTION: The EIR must specify a restriction for all activity (Rental agreement language for events/rentals shall include the requirement) that Barbeques, fire pits, fireplaces, etc. shall only be gas fired. Without this action, rate Air Quality (Impacts AQ-3, AQ-4 and Cumulative Air Quality) as a Class I impact.

FF-13 After-Hours Security. The site’s physical characters raise security concerns that demand an after-hours security plan. Per the DEIR, 1) “The OASIS portion of KS18 is less visible from some vantage points in the surrounding area, due to existing vegetation and off-site structures, and the OASIS site’s lower elevation.” and 2) “Due to the site’s elevation in the valley along Orcutt Creek, the property sits well below the elevation of surrounding developed properties and public roadways.” These physical characteristics along with lighting mitigations are likely to mask the presence of people on site when the facility is vacant. Without effective after-hours security, these conditions have the potential to invite unwanted/undesirable activity (e.g. trespassing, graffiti, drinking, crime, illegal drug use, etc.). The security plan must not burden the overtaxed Santa Barbara County Sheriff’s Office (SBSO). It must include an appropriate and sufficient combination of monitoring, on site presence, patrols etc. and be evaluated and approved by the SBSO or other competent authority.

ACTION: The EIR must stipulate, as a condition of approval, that the applicant must provide feasible, reliable and effective after-hours security which does not burden the SBSO and includes an appropriate and sufficient combination of monitoring, on site presence, patrols etc. and be evaluated and approved by the SBSO or other competent authority. Without this action, rate Police Services as a Class I impact.

FF-14 Security/Traffic Control. Per the SBSO, “A specific concern is that any large event at the OASIS site, whether it includes alcohol or not, that doesn’t have sufficient private/contracted security and appropriate traffic mitigation might severely impact the SBSO’s ability to respond to and administer to the rest of the community.” Given this comment, the security/traffic control mitigation (FP-1 Special- Event Contractor) is inadequate as written. The mitigation states, 1) “A contract for private security/traffic control shall be required for non-OASIS activities involving more than 100 people onsite.” 2) “For OASIS activities, OASIS shall provide adequate

security/traffic control themselves or may contract for this service.” and 3) “For OASIS activities involving more than 100 people onsite, OASIS shall coordinate with the SBSO to determine whether a SBSO permit and private security/traffic control will be needed.” The requirements for OASIS are insufficient and unacceptable because OASIS does not have sufficient staff (5 people) nor have they identified other available personnel capable of providing adequate security/traffic control. Therefore, the requirement for contract or private security/traffic control for events involving more than 100 people onsite must also apply to OASIS. Per the DEIR, “OASIS proposes that the 200-person maximum attendance restriction that is identified for special events also apply to regular activities onsite.” Since that attendance could occur anytime, the applicant must submit a plan to handle security/traffic control (via contract, dedicated staff or other qualified personnel) on a daily basis rather than burdening the SBSO to evaluate each activity. (By definition, OASIS would need to do this for lunch and daily given their 200 person anytime attendance.) It follows that if events over 100 people require security/traffic control and the daily anytime use allowed is 200 people, then logically the OASIS security/traffic control must be required for all “regular activities onsite”, especially since any event or combination of events including lunch (133 estimated attendees) could exceed 100 people.

ACTION: The EIR must stipulate, as a condition of approval, that the applicant must provide security/traffic control at all OASIS “regular activities onsite” Modify mitigation FP-1 to include this requirement as well as the requirement for contract or private security/traffic control at OASIS activities involving more than 100 people onsite. Without this action, rate Police Services as a Class I impact.

FF-15

Parking limits. The project description states that weekend/evening “Parking [will be] limited to onsite parking” It is an optimistic assumption that limiting events to onsite parking will prevent unsafe overflow offsite and into adjacent neighborhoods or limit attendance to the 200 person anytime limit. The proposed parking plan utilizes a parking study analysis that determined sufficient parking existed on site to preclude unsafe overflow parking off site or “spillover effects on the surrounding neighborhood.” This analysis is used to justify having only 155 parking spaces when the County Land Use and Development Code (LUDC) requires 228 on-site parking spaces (Impact TC-6). This analysis also depends on the 200 person limit being followed (though no method of monitoring and enforcement is proposed). The analysis does not preclude the occurrence of the significant impact and there is no mitigation proposed. It does not account for individuals who choose to park on the street or in adjacent neighborhoods when adequate parking exists. It is also optimistic and unrealistic to assume people will not be inclined to try to avoid the bottleneck of a single entrance close to a corner with known/acknowledged traffic issues. People choosing to park on the street cannot be precluded by an analysis and therefore must be rated significant. If the analysis is wrong then the overtaxed SBSO is burdened with enforcement and/or the community suffers with unsafe conditions. Having security/traffic control at all events (OASIS and Non-OASIS) should help mitigate unsafe offsite parking but likely not help with overflow into adjacent neighborhoods. There must also be a person to contact regarding parking violations similar to the mitigation NS-7 Noise Contact.

ACTION: The EIR must, as a condition of approval, require the applicant (Rental agreement language for events/rentals shall include the requirement) to have security/traffic control at all (OASIS and Non-OASIS) events and a person to contact regarding parking violations. Without this action, rate Impact TC-6 as a Class I impact.

FF-16 Alternatives. The CEQA Guidelines state that an “EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The DEIR must state that alternatives #2 and 3 meet this criteria and are therefore also superior to the proposed project. While this could be discerned from Table 7-1 Project Alternatives – Impact Classification and Comparison with Proposed Project Impacts, stating it makes it easier for everyone involved (the public, decision makers etc.) to notice and consider when evaluating the alternatives.

ACTION: The EIR must state that alternative #2 (Existing OASIS Location/KS17) and alternative #3 (AquaCenter) also avoid all of the proposed project’s significant and unavoidable (Class I) impacts and are therefore also superior to the proposed project.

FF-17 Economic Viability. The DEIR does not assess the economic viability of the project. In defining feasibility of alternatives, the *CEQA Guidelines* state that “*among the factors that may be taken into account when addressing the feasibility of alternatives are ... economic viability ...*” Without an economic viability analysis, comparison of potential alternatives is incomplete. The DEIR must assess the impacts of the project and mitigations to determine if is too expensive to build and operate as proposed. **ACTION:** The EIR must include an economic assessment of the proposed project and mitigations. Without this action, rate Economic Viability as a Class I impact.

We look forward to your responses to our concerns.

//signed//
Don & Lori Ridolfi

“FF” Don and Lori Ridolfi Letter 10/21/19

- FF-1** This comment identifies concern with the accuracy, adequacy and independent assessment of project impacts and mitigation. The comment also identifies the commenters’ residence bordering the open space. No additional response is required.
- FF-2** The policy consistency table identifies whether Planning and Development (P&D) considers the project to be potentially consistent or potentially inconsistent with applicable General Plan policies and development standards. The discussion and conclusions reflect P&D’s determinations and direction regarding the project’s consistency with the identified policies and development standards. P&D determined the project is consistent with all applicable General Plan policies and development standards, subject to the Board of Supervisors approving the four amendments that OASIS is proposing to the Orcutt Community Plan:
- DevStd KS18-1;
 - Open Space Area Map;
 - Parks, Recreation and Trails Map; and
 - Bikeways Map
- FF-3** This comment addresses a revised trail alignment and the driveway design exception. The mitigation timing for the design exception is changed in the Final EIR to prior to Planning Commission. In addition, the Design Exception was approved. The letter addressing the approved design exception (dated May 27, 2020) is included in Appendix D-12 of the Final EIR, available for review/download online from the OASIS project webpage www.countyofsb.org/pln/dev/projects/oasiscenter.sbc. The driveway will continue to include striped bike lanes in each direction (Class II bikeway within the approximately 300-foot section of driveway). Impact REC-2 and Mitigation Measure REC-1 have been revised to reflect revised plans for trail/bikeway easements. In addition to the updated impact discussion and mitigation language in the Final EIR, the revised plans will be included in the project staff report, so they will be available for public comment and for decision-maker consideration.
- FF-4** This comment questions feasibility of the 200-person maximum attendance onsite given structural development designed to the original project operation parameters for higher attendance. While P&D cannot limit the applicant’s ability to request a modification to an approved permit, any future requests to increase attendance would be subject to a separate discretionary review process including additional environmental review.
- FF-5** This comment recommends the project be conditioned to reduce the size of the facility, as the structural development was designed to accommodate higher attendance levels. P&D considered this comment and determined that a condition of approval that requires a reduction in the size of the proposed structures is not needed to ensure enforcement of the maximum attendance cap.
- FF-6** The comment requests that the applicant must provide a feasible method to monitor and enforce attendance limits during all activities. The project description limits attendance to 200 people. Exceedance of 200 people for an event would be a violation of permit conditions and would be subject to enforcement.

FF-7 In coordination with David Lord, who prepared the acoustical analysis for the project, P&D has determined that EIR noise mitigation measures, including required use of noise limiter on amplified instruments, would feasibly address excess noise issues. The noise limiter in particular will cut off amplification if noise levels are exceeded.

FF-8 This comment addresses loud acoustic music (bagpipes, drums, horns, etc.) which are not restricted to indoor areas. All noise-generating activity (either indoors or outdoors, OASIS related or not) is subject to Santa Barbara County regulations, including the requirement that noise would not result in levels of 60 dBA at the OASIS property line.

FF-9 This comment recommends that all loud activities be restricted to indoor areas. Planning and Development has determined that EIR MM# NS-4 is adequate to reduce noise impacts to adverse, but less than significant levels.

FF-10

This comment recommends a need to promptly address neighbor complaints of excessive noise. Planning and Development recommends that the following language be included, underlined. The staff report and EIR have been finalized. Staff will prepare a memo to the Planning Commission to recommend this change, underlined below:

NS-7 Noise Contact: OASIS shall identify a contact person to promptly respond to noise complaints, hours of operation and attendee numbers. **PLAN REQUIREMENTS AND TIMING:** OASIS shall designate a contact person to facilitate resolution of potential complaints involving noise levels, number of attendees (larger attendance increases noise levels) and hours of use (if activities extend past dusk outdoors and past 9:00 PM indoors). The contact information shall be listed in a prominent location on the OASIS website. The OASIS noise contact shall be available during rental activities to promptly within 15 minutes of notification address neighbor complaints and to ensure activities are consistent with identified noise mitigation, including use of noise limiters, door/window closures, hours of operation, etc. **MONITORING:** P&D shall confirm that a contact to address noise issues is included on the OASIS website and in a hand-out prior to zoning clearance. The hand-out shall be made available upon request to interested members of the public with noise concerns.

FF-11 This comment recommends installation/operation of multiple sensors bordering the project at key points affecting sensitive receptors and requirement that the data (including date, time, location and sound level at each sensor indicating acceptable and highlighting unacceptable levels) must be tracked, stored and accessible to the public via internet to provide transparency and accountability. Planning and Development has determined that existing EIR mitigation is adequate and that the measures recommended in this comment are not necessary to reduce noise impacts to less than significant levels.

FF-12 This comment recommends that Barbeques, fire pits, fireplaces, etc., shall only be gas fired. The comment states that this is required to mitigate Impacts AQ-3, AQ-4 and Cumulative Air quality to less than significant levels. The final comment letter from Santa Barbara County Air Pollution Control District dated May 26, 2020 does not identify an impact or suggest conditions to mitigate particulates, smoke or odor from these sources.

With the exception of the on-site permanent Barbeque, all wood fired, mobile or permanent fire pits, fireplaces, etc., shall be prohibited. Staff acknowledges that the wood-fueled

Barbeque may have the potential to create an odor nuisance. MM# AQ-3, Odor Abatement Plan is in place to address this concern and to mitigate this issue.

FF-13 The EIR incorporates the mitigation recommended by Santa Barbara County Sheriff's Office (SBSO). Therefore, this impact is identified as a Class II impact.

FF-14 Planning and Development defers to SBSO for safety issues. See Response to Comment FF-13.

FF-15 See Response to Comments FF-13 and FF-14.

FF-16 CEQA requires identification of the Environmentally Superior Alternative. In addition, referenced Table 7-1 as well as the discussion of each project alternative compare the impacts of each alternative with the proposed project.

FF-17 The reference to economic viability was considered in identifying the various project alternatives. The alternatives in the EIR were included as these alternatives appeared to be potentially feasible when the EIR was prepared. The CEQA findings in the staff report include additional information provided by the applicant regarding the economic feasibility of some of the project alternatives.