



Planning Commission Staff Report Hearing on May 1, 2025

County of Ventura • Resource Management Agency

800 S. Victoria Avenue, Ventura, CA 93009 • (805) 654-2478 • www.vcrma.org/divisions/planning

Camp Ramah Major Modification and Variance to Conditional Use Permit No. 3048 and Discretionary Tree Permit Case Nos. PL18-0052 and PL23-0002

A. PROJECT INFORMATION

1. **Request:** The applicant requests approval of a Major Modification and Variance to Conditional Use Permit (CUP) No. 3048 for the continued operation and maintenance of a camp for an unlimited term¹, incorporation of adjacent open space parcels into the CUP boundary, the construction of new structures, the legalization of existing structures, and a variance to maintain the historic camp occupancy as a deviation from the Ventura County Non-Coastal Zoning Ordinance (NCZO) development standards related to overnight population during the summer months (Case Nos. PL18-0052). The applicant further requests a discretionary tree permit for the removal of four protected Coast Live Oak trees and encroachment into the Tree Protection Zone (TPZ) of four protected Coast Live Oak trees (Case No. PL23-0002).
2. **Applicant/Property Owner:** Camp Ramah in California, Rabbi Joe Menashe, 6505 Wilshire Blvd., Suite 440, Los Angeles, CA 90048
3. **Applicant's Representative:** Mr. Steve Welton, AICP, c/o SEPPS Land Use Consulting, 1625 State Street, Santa Barbara, CA 93101
4. **Decision-Making Authority:** Pursuant to the Ventura County NCZO (Section 8105-4 and Section 8111-1.2 et seq.), the Planning Commission is the decision-maker for the requested CUP.
5. **Project Site Size, Location, and Parcel Number:** Camp Ramah's current CUP boundary encompasses 83.45 acres (APNs 010-0-110-130, 010-0-110-120, 010-0-120-040, 010-0-070-300 (2-acre lease), and 010-0-070-030 (5-acre lease)). The proposed CUP modification would incorporate adjacent open space parcels APNs 010-0-070-310, 010-0-060-070, and 010-0-060-030 into the CUP Boundary, for a total of 431.45 acres. The project site is located at 385 Fairview Road, north of the intersection of Camp Ramah Road and Fairview Road, in the community of Ojai, in the unincorporated area of Ventura County. The Tax Assessor's parcel numbers for the parcels that constitute the project site are 010-0-110-130, 010-0-110-120, 010-0-120-040, 010-0-070-300 (2-acre lease), 010-0-070-030 (5-acre lease), 010-

¹ As discussed more fully below, the Planning Division supports a 50-year term rather than an unlimited term.

0-070-310, 010-0-060-070 and 010-0-060-030 (Exhibit 2a, Existing and Proposed CUP Boundary).

6. Project Site Land Use and Zoning Designations (Exhibit 2b):

- a. **General Plan Land Use Designation:** Rural (APNs 010-0-110-130, 010-0-110-120, and 010-0-120-040) and Open Space (APNs 10-0-070-310, 010-0-060-070, 010-0-060-030, 010-0-070-300 and 010-0-070-030)
- b. **Ojai Valley Area Plan Land Use Designation:** Rural Institutional (APNs 010-0-110-120, 010-0-120-040, portion of 010-0-110-130), Rural Institutional 5-10 acres minimum lot size (and a portion of APN 010-0-110-130) and Open Space 80 acres minimum lot size (APNs 010-0-070-310, 010-0-070-300, 010-0-060-070, 010-0-060-030, and 010-0-070-030).

c. Zoning Designations:

Table 1		
APN	Total Acres	Zoning
010-0-070-310 010-0-070-300 010-0-070-030	25.0 110.0 5.0	OS-80 acres/TRU/DKS (Open Space 80 acres minimum lot size / Temporary Rental Unit Overlay (TRU) / Dark Sky (DKS) Overlay zones
010-0-110-130 010-0-110-120 010-0-120-040	28.3 27.6 20.45	RE-20 ac TRU/DKS (Rural Exclusive 20 acres minimum lot size)
010-0-060-070	149.9	OS-80 acres/TRU/DKS and OS 80 acres SRP (Scenic Resource Protection (SRP) Overlay Zone)/TRU/DKS
010-0-060-030	173.04	OS-80 acres / TRU/DKS and OS 40 acres SRP/TRU/DKS

7. Adjacent Zoning and Land Uses/Development (Exhibit 2b):

Table 2		
Location in Relation to the Project Site	Zoning	Land Uses/Development
North	OS-80 ac TRU/SRP/DKS	Open space and undeveloped land
East	RE-20 ac TRU/DKS/Habitat Connectivity Wildlife Corridor (HCWC), OS-20 ac TRU/DKS, RE-20 ac TRU/DKS, and RA-2 ac TRU/DKS	Open space, agricultural and residential uses

Table 2		
Location in Relation to the Project Site	Zoning	Land Uses/Development
South	RE-5 ac TRU/DKS and RA-5 ac (Rural Agricultural 5-acre minimum lot size) TRU/DKS	Agricultural and residential uses
West	OS-80 ac TRU/DKS, AE-40 ac (Agricultural Exclusive 40-acre minimum lot size) TRU/DKS, OS-40 ac TRU/DKS	Camp Ramah Retreat Center and agricultural uses

8. **History:** In the 1940's and 1950's, the land that Camp Ramah is located on was known as "Orchid Town", which included acres of lathe houses for the growing and selling of cymbidium orchids. A western village of false fronts was built to conceal the hundreds of orchid plants. In the late 1950's, Orchid Town ceased operation.

In 1955, Camp Ramah was established on the grounds of the Foothills Hotel on Foothill Road by the United Synagogues of America as a Jewish youth camp. In 1969, Camp Ramah purchased APNs 010-0-110-130, 010-0-110-120, 010-0-120-040, and 010-0-060-030, and entered into a Special Use Permit with the U.S. Forest Service for use of APN 010-0-070-300 and 2 acres on APN 010-0-070-030 (5-acre lease). On April 16, 1969, CUP No. 3048 was approved for the construction and operation of a year-round camp for the use by children, youth and university personnel for study, sports, and entertainment. At the time CUP No. 3048 was approved, the CUP boundary included APNs 010-0-110-130, 010-0-110-120, 010-0-120-040, 010-0-060-030 (5-acre lease), APN 010-0-070-300 (2-acre lease).

On August 14, 1979, the Ventura County Board of Supervisors ("Board") adopted the Ojai Valley Area Plan (OVAP). The OVAP includes the land use designation Rural Institutional (R1). The purpose of the R1 designation is to recognize camps and educational uses in the Ojai Valley that require large acreage and are set in a rural environment.

On April 10, 1984, the Board adopted Ordinance No. 3685, Ojai Valley Rezone Phase V, North of the City of Ojai. Camp Ramah is included in Subarea 18. APNs 010-0-110-130, 010-0-110-120 and 010-0-120-040, were rezoned from RA (Rural Agricultural, 20-acre minimum parcel size) to OS (Open Space, 20 acres minimum parcel size). The zone change was required to achieve consistency between the zoning and area plan designations of the OVAP.

In 1987, it was discovered by Planning staff that five established schools and nine established camps located throughout unincorporated Ventura County were legal non-conforming with respect to zoning ordinance development standards governing camps; specifically, these camps were found to be non-conforming with the development standards that existed at that time for such uses. The Board

directed Planning staff to rectify these situations by restoring these fourteen established uses to conforming status through appropriate General Plan Amendments, zone changes, and/or zoning ordinance text amendments.

On December 20, 1988, the Board adopted Ordinance No. 3883 which included a General Plan Amendment to change the land use designation of APNs 010-0-110-130, 010-0-110-120 and 010-0-120-040 from Open Space to Rural and to change the Ojai Valley Area Plan land use designation from VL-1 (Very Low 1 dwelling unit /20-40 ac) to VL-2 (Very Low 1 dwelling unit /10-20 ac)². Additionally, APNs 010-0-110-130, 010-0-110-120 and 010-0-120-040 were rezoned from OS 20 acres (Open Space) to RE 20 acres (Rural Exclusive). The Rural designation identifies institutional uses such as boarding and non-boarding elementary and secondary schools and recreational uses such as retreats, camps, recreational vehicle parks, and campgrounds.

On March 15, 2005, the Board adopted Ordinance No. 4317. The purpose of this ordinance was to add and amend definitions and development standards to the NCZO for Rural Tourism, and to provide additional opportunities for rural tourism that were not possible under the previous ordinance.

On September 13, 2016, Camp Ramah acquired APNs 010-0-060-070 and 010-0-070-310. The proposed project CUP boundary will include APNs 010-0-060-070, 010-0-070-310 and 010-0-060-030.

The following discretionary permits have been issued to Camp Ramah.

- November 3, 1971: Modification No. 1 to CUP No. 3048 was approved for the relocation of buildings and roads on the camp property.
- April 4, 1973: Modification No. 2 to CUP No. 3048 was approved for the relocation of one cabin, tents and restroom facilities, and a reorientation of the amphitheater.
- March 7, 1980: Modification No. 3 to CUP No. 3048 was approved for the expansion of two restroom areas located in the tent area. Boys tent bathrooms are currently 1,035 square feet (sq. ft.) and Girl's tent bathrooms are currently 836 sq. ft.
- August 29, 1989: Permit Adjustment to CUP No. 3048 was approved for the remodel of the existing library. All work was performed under the existing roof area.

² The area plan land use designation of APNs 010-0-110-130, 010-0-110-120 and 010-0-120-040 changed from VL-2 to R1 (Rural Institutional 20 to 40 acres minimum lot size) in 1995 when the Ojai Valley Area plan was updated (see Figure 3.4-5, Ojai Valley Area Plan EIR, adopted July 18, 1995).

- September 10, 1990: Permit Adjustment to CUP No. 3048 was approved for a 300 sq. ft. addition to a cabin, resulting in 700 sq. ft. of floor area.
- June 1, 1992: Permit Adjustment to CUP No. 3048 was approved for the relocation of a 6,728 sq. ft. adult only dormitory. The Permit Adjustment included a condition requiring the Camp to file a Master Plan with the Planning Division that included an inventory of all existing structures and those proposed for future construction. The Master Plan was approved by the Planning Division on March 3, 1994.
- July 5, 2000: Permit Adjustment to CUP No. 3048 was approved for the addition of a 1,380 sq. ft. gazebo with interior lighting.
- July 8, 2003: Permit Adjustment to CUP No. 3048 was approved for the installation of a second gazebo (1,380 sq. ft.) near the baseball field.
- May 12, 2004: Permit Adjustment to CUP No. 3048 was approved for the addition of a 720 sq. ft. trellis and modifications to a deck around the existing swimming pool.
- November 10, 2005: Modification No. 4 to CUP No. 3048 was approved for a 4,400 sq. ft. second story addition to the infirmary building.

Additionally, ministerial Zoning Clearances (ZC) that have been approved include the following: ZC 80629 was approved for the construction of 3 new dormitories, totaling 6,348 sq. ft (December 6, 1999); ZC04-0796 was approved for the installation of a pool trellis (May 12, 2004); ZC05-0399 was approved for conversion of a shower to a bath in the building adjacent to the pool (March 31, 2005), ZC07-1314 was approved for the construction of a new pool and water slide (October 1, 2007); and ZC10-0124 was approved for the rebuild of the Bassan-Heiser Lodge dormitory that was damaged by fire (February 16, 2010).

On November 30, 2020, a Permit Adjustment, Case No. PL20-0120, to CUP No. 5234, Camp Ramah Adult Retreat Camp, was approved. Condition No. 25 required the applicant to deed restrict 3.81 acres of California annual native grasslands on APN 010-0-060-030. The applicant elected to deed restrict 13 acres. APN 010-0-060-030 will be incorporated into the pending CUP No. 3048. Prohibitions of the deed restriction are incorporated in Condition No. 26 for Case No. PL18-0052 (Exhibit 5).

Camp Population:

The applicant provided attendance logs for the Years 2010 through 2019. The data indicates on average there are 998 overnight campers and staff. In 2016 there were 1,091 overnight campers and staff. In 2017 and 2018, overnight attendance was reduced by over 100 campers and staff due to the Thomas and Woolsey Fires. In March 2020, the camp was completely shut down, due to coronavirus-related restrictions. In the summer of 2021, the camp resumed full operation.

9. **Project Description:** The applicant requests a Major Modification to CUP No. 3048 for an unlimited term (staff's recommendation is for a 50-year term), incorporation of adjacent open space parcels into the CUP boundary, construction of new structures, the legalization of existing structures, and a discretionary Tree Permit for the removal and encroachment of protected oak trees, as described below and included in the project plans (Exhibit 3, Project Plans and Speaker Location Map).

CUP Boundary

The CUP boundary encompasses 83.45 acres and will incorporate the adjacent open space parcels into the CUP for a total of 431.45 acres under APNs 010-0-110-130; 010-0-110-120, 010-0-120-040, 010-0-060-030, 010-0-060-070, 010-0-070-030, 010-0-070-310, and a portion of 010-0-070-300 (Exhibit 2a, Existing and Proposed CUP Boundary Map).

New Structures and Improvements (12,285 approximate sq. ft.)

The following structures and site improvements are authorized:

- Machon Village: The construction of "Machon Village," (10,609 sq. ft.) on 1.7 acres of land located on APN 010-0-070-310. The village consists of six new cabins, four of the cabins have a second story, (4,320 sq. ft.) and a central gathering structure (the "Machon") that includes counselor sleeping quarters, a prep kitchen, meeting spaces, storage, and restrooms (6,289 sq. ft.).
- A 1,436 sq. ft. reception, meeting, and storage area attached to the Dining Hall.
- A 240 sq. ft. trellis adjacent to the proposed reception area.
- The widening of the existing driveway to Machon Village.
- The extension of the existing secondary access road with a fire access turnaround, located along the western property line to provide emergency vehicle access to Machon Village.
- Reconfiguration of the drop off area (adjacent to the existing Dining Hall).

- In order to accommodate fire access required for Machon Village, the removal of four protected Coast Live Oak trees (Tree Nos. 437, 438, 478, and 480) and encroachment into the Tree Protection Zone (TPZ) of four protected Coast Live Oak trees (Tree Nos. 481, 482, 598 and 599) (Exhibit 4, Attachment 4, Arborist Report and Tree Protection Plan, prepared by Kenneth A. Knight Consulting, LLC., February 7, 2019).

The applicant has proposed to grade approximately 1,190 cubic yards of cut and 322 cubic yards of fill, with excess cut being balanced onsite.

Table 3 below includes a list of existing structures to be legalized.

Table 3 – Existing Structures to be Legalized		
Name	Size (in sq. ft.)	Use
Sport Court (one basketball court)	2,100	Recreation
Outdoor Sanctuary Trellis	1,700	Gathering Area
Meditation Deck and Shade Structure	1,250	Assembly Uses, yoga
Shade Structures	2,352	Outdoor Dining
TOTAL 7,402 sq. ft. (approximate)		

Table 4 below includes a list of existing, legal structures.

Table 4 – Existing, Legal Structures		
Name	Size (in sq. ft.)	Use
Dining Hall	14,800	meals
Fingerhut Chapel	1,156	chapel
Old Library	1,020	library
Friedman Library	2,070	library
Office Complex	4,727	office/staff housing/kindergarten
Laundry	1,050	laundry
Director's House	970	lodging
Staff Lounge	1,375	staff lounge
Arts Building	2,237	art
Bassan Heiser	5,600	adult housing
Friedland	5,600	adult housing
Whizin	10,356	adult housing
Infirmery (Kaye building)	4,400	lodging and medical
Caretaker's house	613	lodging
Cabins (1 through 10)	10,500	lodging
Boys' tents	4,800	lodging
Boys' tents	2,048	lodging

Boys' Bathroom	1,035	bathroom
Girls' Tents	3,600	lodging
Girls' Tents	4,096	lodging
Girls' Bathroom	836	bathroom
Staff Housing	898	lodging
Camp Manager's House and Garage	1,715	lodging
Sheds/Storage (7)	3,767	sheds/storage
Cabins (11 through 16)	6,348	lodging
Bakery Addition to Dining	710	bakery
2 nd story to Kaye Building	4,400	infirmary/lodging
Amphitheater	N/A	outdoor theater
Trellis and Pool Deck	N/A	trellis and pool deck
Outdoor Sanctuary Trellis	1,700	outdoor sanctuary trellis
Swimming pool bathrooms	744	swimming pool bathrooms
Gazebos	2,760	gazebos
Swimming Pool/Slides	N/A	swimming pool/slides
Parking	N/A	168 spaces
Reservoir	N/A	N/A
TOTAL		
100,727 sq. ft. (approximate)		

Camp Ramah Youth Summer Camp

The Camp Ramah youth summer camp is approximately nine weeks (June to August) and consists of 11 days of training/intercession/debrief for counselors/staff and two (2), four-week sessions for campers. During the 11 days of training there are approximately 255 counselors and staff. Within the four-week sessions, there are two (2), 2-week sessions available for campers that need or desire a shorter stay. During the two (2), four-week sessions, the maximum overnight population will be 1,014 people (i.e., campers, overnight staff, daycare assistants, spouses, visiting educators, and special guests). Daily populations include up to 154 people arriving and departing the camp daily (i.e., daytime counselors and visitors). The camp also employs 73 regular daily staff (i.e., kitchen, housekeeping, maintenance, administration, security) Sunday through Saturday to support camp operations. Therefore, the total maximum daily camp population is 1,241 people. One family visitation day is scheduled for each four-week camp session where families are invited to visit the camp during the day only and a maximum of 1,250 additional daytime visitors are expected to be onsite, for a maximum total of up to 2,491 daytime visitors for these two days. Camp Ramah

youth summer camp is a 24-hour program. Outdoor programs occur between 7:45 a.m. and 10:00 p.m. Monday through Sunday, except for Café Ezra, which closes at 11:00 p.m. on Thursday nights during the summer.

Camp Ramah Non-Summer Programs and Activities

When summer camp is not in session (typically mid-August through early-June), regular daily staff include 37 employees, Sunday through Saturday.

To allow the camp the flexibility to adjust non-summer month program scheduling and attendance, non-summer month total population, daily and overnight population, will be limited to a maximum 59,400 cumulative program participant days.³ A program participant is an individual (guest, camper, staff) that is onsite during any portion of a day or evening. Whether a program participant stays just for the day or also stays overnight, each day shall count as one program participant day against the total maximum. For the purpose of the calculation, Camp Ramah shall multiply the program participants by the number of program participant days and subtract the total from the 59,400 annual program participant days. For example, if 100 program participants are scheduled to be onsite and stay overnight between September 13-15, a total of 300 program participants are deducted from the 59,400 with 59,100 remaining. If over that same three-day time period there were an additional 50 non-overnight program participants onsite each of the three days, then an additional 150 program participant days would be deducted from the total allowable.

Cumulative attendance for all programming, including multiple programs occurring simultaneously, is limited by the following categories:

- For a maximum of 28 days per year, non-summer program participants may range between 550 and 872 people on site.
- The remaining non-summer month programs shall not exceed 549 program participants in any given program.
- Total daily and overnight non-summer month camp population shall not exceed 59,400 cumulative program participants.

Use of Open Space Lots

Use of the Cozy Dell trail and a U.S. Forest Service Trail System on APN 010-0-060-030 is restricted to passive recreational uses (e.g., hiking, walking, non-motorized bicycling, outdoor education, and wildlife viewings). Hiking, walking, overnight camping, outdoor education, wildlife viewing, and transportation of

³ The 37 regular daily staff do not count toward the cumulative program participant days.

portable toilet(s) is permitted by the Camp only on existing trails and fire break trails on APNs 010-0-060-030, 010-0-060-070, 010-0-070-030, 010-0-070-300 and 010-0-070-310⁴. Occasional recreational overnight tent camping on these parcels is limited to 20-25 persons at three designated camping areas (see Exhibit 4, Attachment 3A, Recreational Trails and Fire Break Roads Map). No campfires or camp stoves are permitted. Supplies and camping equipment are packed in and packed out, including all trash. Portable toilets are brought to the camp sites via a 4x4 quad runner or pickup.

There are five legal lots within the CUP boundary zoned Open Space (OS). The maximum daily and overnight population (i.e., guests and staff) to be accommodated for on lots zoned Open Space is as follows:

APN	Daily Population	Overnight Population
010-0-070-310 Machon Village	220 individuals	116 Bed Count
010-0-060-030 010-0-060-070 Open Space Lots Day hiking/camping	150 individuals	75 individuals
010-0-070-030 Camp Manager's Residence	Camp Manager and family +120 individuals	Camp Manager and family
010-0-070-300 Maintenance Yard	10	None

Permanent Residents: There are six permanent residents who live onsite.

Outdoor Amplified Sound and Music

Camp Ramah staff may use a portable voice amplifier to direct campers to programs and locations. Other activities and programs may include the use of microphones and amplified music. All sound amplification devices used outdoors, for both day and nighttime use, are devices owned and controlled by Camp Ramah; vendors are prohibited from installing and using amplified equipment outdoors at Camp Ramah. The use of portable sound amplification systems shall be turned off by 9:00 p.m. except for Café Ezra, which may use a portable speaker for low level ambient music up to 11:00 p.m. on Thursday nights during summer camp sessions. The use of fixed outdoor amplification equipment may only occur at the following locations: inside Girl's gazebo for use during summer camp and non-summer camp programs (e.g., dance classes, occasional outdoor dining); Basketball Court (requires sound blankets); Main Dining Room Lawn; amphitheater; and Fire Pit at Boy's Tent Area (Exhibit 3, Project Plans and Speaker

⁴ The US Forest Service parcels (010-0-070-030 and 010-0-070-300) are already developed.

Location Plan). The use of fixed outdoor sound amplification systems shall end by 10:00 p.m. At least one representative of Camp Ramah staff shall remain on-site and be available for noise monitoring and to respond to noise complaints. The use of fireworks/pyrotechnics, and similar explosions are prohibited.

Dining Services

The majority of meals are prepared and served in the dining hall. However, catering services throughout the year may be provided by other catering and/or food trucks licensed in Ventura County.

Security and Earthquake/Disaster Procedures

Access to the Camp is restricted by a gate and security kiosk. Adult supervision of youth campers is provided throughout the year. Camp Ramah maintains and must continue to maintain a handbook, which includes procedures for the staff to follow to protect the campers and on-site personnel in the event of a disaster. Warning alarms located in the center of the camp must be tested monthly. Security personnel will be provided by Camp Ramah staff as needed.

Access

Access to the project site is available from Fairview Road (a paved public road) to Camp Ramah Road (a paved private road). The on-site parking area (134 spaces), south of the softball field, is located more than 100 feet from Fairview Road; the bus drop off is located by the Dining Room Reception. Thirty-four additional spaces are located near the Administration building, maintenance center and preschool.

The applicant shall enter into a contract between the applicant and the Property Owner of the lot on which off-site parking will occur (e.g., Nordhoff High School, addressed at 1401 Maricopa Highway in Ojai) to accommodate parking associated with two Family Visitation Days during the Camp's summer programming.

Water and Wastewater Services

Water service is provided by the Casitas Municipal Water District (CMWD). Wastewater service is provided by the Ojai Valley Sanitary District (OVSD).

Machon Village will be located on APN 010-0-070-310. This parcel is outside the OVSD Sphere of Influence. To provide wastewater service, OVSD will need to request annexation of approximately 1.7 acres of APN 010-0-070-310 from the Ventura County Local Agency Formation Commission (LAFCo) limiting the wastewater service to only Machon Village and not the entire 25 acres (Exhibit 5, Condition No. 1). LAFCo will evaluate the request after permit approval, and permit approval will be conditioned on LAFCo's approval.

Variance

A variance to NCZO Sections 8107-17.2.2 and 8107-17.2.3 is requested to maintain the camp's historic overnight population of 1,014 campers and staff for the nine-week summer session, deviating from the maximum overnight population of 872 campers and staff otherwise permitted under Ventura County NCZO code revisions enacted after Camp Ramah was established.

10.CUP Term: Despite the currently-operative permit having no expiration date, Planning Division staff has consistently maintained to the applicant that any Major Modification to the CUP would require a finite term limit on the permit as a condition of approval, as is County practice for all CUP's and modifications. The applicant thus initially indicated agreement to a CUP term of 30-years, and based on that, the Planning Division prepared the MND for public comment indicating a 30-year permit term (as described below). It was not until November 2022, following the release of the recirculated MND, that the applicant formally requested that the Planning Commission consider an unlimited term of the CUP, rather than a 30-year term (Exhibit 4A, Attachment 4). The applicant indicated that it would be agreeable to a 50-year term if its request for an unlimited term were not granted. In their November 2022 and 2023 letters, the applicant provides the following reasons for the requested term:

- 1) The camp's long-term business model is based upon securing permanent land use rights to fulfill its mission of a permanent location for camp operations;
- 2) The camp has invested more than \$18,000,000 into the acquisition and improvement of the site to date. Funding for the capital was dependent on Ramah's continuous land use rights. Approximately 85% percent of the \$18,000,000+ investment was funded by individual tax-deductible donations with roughly 15% percent of the \$18,000,000+ investment funded by third-party financing. The present-day replacement value of the acquisition and improvements exceed \$45,000,000, and as a nonprofit, the camp could not simply generate this level of income (even by selling the parcels) and relocate at the end of the CUP term;
- 3) The camp's current anticipated timeline puts completion of occupation of the Machon at 4 to 6 years after project approval. The camp's initial fundraising was sufficient for project completion. Additional consultant costs and County staff/permit fees, the costs for continued noise mitigation with inflation and changing technology and estimated construction costs increasing by more than 100% were not anticipated and require additional fundraising to complete the construction; and

- 4) The camp needs at least a 50-year term to protect its program income. Under its business model, the camp's program income includes summer camp fees and off-season program fees. These programs contribute to summer camp scholarships and standard operating costs such as salaries and stipends, program supplies, food expenses, utility costs, annual maintenance of the property, minor repairs to the property, and similar matters.

Staff recommends a 50-year term. Unlike a Planned Development permit for uses or structures allowed as a matter of right based on the zoning designation, such as a single-family dwelling, a CUP is a conditionally permitted use, for uses not allowed as a matter of right. (Ventura County NCZO Section 8111-1.2.1). Conditions of approval are placed on the project in order to assure compliance with the requirements of the Ventura County NCZO related to the zone designation, applicable site development standards such as height and setbacks, and special uses standards such as is required for camps. CUP's are also conditioned in order to address public interest concerns such as traffic, parking, safety, noise, and nuisance problems. A CUP is a discretionary action which requires Planning Commission approval. The Planning Commission must find that the use is compatible for the full term of the CUP and must be conditioned to be compatible with the surrounding environment for the length of the permit term. It is County practice to impose finite term limits on all CUP's and modifications, as doing so allows the County to, during the CUP renewal process, review, revise, add, or otherwise modify a CUP to reflect a range of potentially changed conditions, including the current physical condition of the site and surroundings, the potential availability of new applicable technologies, and any applicable legal and regulatory requirements, including General Plan policies and ordinance provisions that may exist at the time of permit renewal. It also allows additional CEQA review to determine whether any new mitigation measures should be imposed to protect the environment.

The County has approved CUPs typically with 10-, 20- and 30-year terms based upon the type of land use permit sought and the context of the site and adjacent lands, but only approved a few CUPs with longer terms based upon case specifics. For example, a CUP with a 50-year term was approved for Thomas Aquinas College for a campus master plan with phased development; or a mining CUP may be granted a longer term tied specifically to the duration of time calculated at engineering rate to excavate the resource and conduct reclamation. In the case of the Camp, the Planning Director sought and received justification from the applicant, as noted above, and concluded a longer term up to 50-years is warranted for the time horizon in their financial business model and for buildout of the camp while still making the required CUP findings, but does not support an unlimited term. If the Planning Commission considers granting the unlimited term, the Commission must make findings to support the unlimited term with regard to project compatibility in perpetuity. As noted, while still requesting an unlimited term, the applicant has indicated a 50-year would be sufficient to address their

financial concerns. Therefore, staff recommends the Planning Commission grant a 50-year term for the subject project, as Action 8 contained in Section I, Recommended Actions.

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) COMPLIANCE

Pursuant to CEQA (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (Title 14, California Code of Regulations, Division 6, Chapter 3, Section 15000 et seq.), the proposed project is subject to environmental review.

County staff prepared an Initial Study in accordance with the County's Initial Study Assessment Guidelines. Based on the information contained in the Initial Study, the County prepared a Mitigated Negative Declaration (MND) (Exhibit 4) and made the MND available for public review and comment from April 25, 2022, to May 25, 2022. An MND is a written statement briefly describing the reasons that a proposed project will not have a significant effect on the environment and therefore does not require the preparation of an Environmental Impact Report. The MND identified 9 potentially significant effects on the environment related to biological resources (species and habitat connectivity), cultural resources (archaeological resources), and noise and vibration. But revisions in the project plans and proposals made by, or agreed to by, the applicant before the MND was released for public review would avoid the effects or mitigate the effects to a point where no significant effect on the environment would occur.

A Notice of Intent to Adopt an MND was mailed to property owners within 300 feet of the project site and to members of the public who had requested notification of the MND. Notification was also sent to the California Department of Fish and Wildlife Service (CDFW), United States Fish and Wildlife Service (USFWS), United States Forest Service, United States Army Corps of Engineers (USACE) and Ventura County LAFCo. On April 15, 2022, notification was placed in the Ventura County Star, a copy of the MND was posted on the Planning Division website and a copy was made available at the County of Ventura Government Center, addressed at 800 S. Victoria Avenue, Ventura, CA 93009. The project was also sent to the State of California Office of Planning and Research.

During the public comment period, Staff received 112 public comments related to the frequency of programs and activities, the number of guests during non-summer months, noise, water demand, expansion of the CUP boundary, and use of public recreational trails. Exhibit 4.a includes the public comments and Planning staff's response to the comments.

In accordance with Public Resources Code (PRC) Section 21092.1 and CEQA Guidelines Sections 15073.5(a) and 15073.5(b), the Planning Division recirculated the MND for an additional 30-day public review to amend the environmental document with the following information: (1) add to the Project Description proposed passive recreational uses in the Open Space lots (APNs 010-0-060-030 and 010-0-060-070), (2) identify a 30-year CUP term (based on the applicant's then-current permit term request); and (3) incorporate

information that discusses special-status plant and wildlife species occurrence and potential impacts to these biological resources as a result of the proposed project. Five recommended Mitigation Measures (MMs BIO-1, BIO-3, BIO-6, BIO-7, and BIO-8) were added to reduce potentially significant biological impacts to a less than significant level. Before the MND was released for public review, the applicant accepted these mitigation measures which are summarized below in item B.2 (Mitigation Monitoring and Reporting Program).

The recirculated MND was made available to the public from October 28, 2022, to November 27, 2022. A Notice of Intent to Adopt an MND was mailed to property owners within 300 feet of the project site and to members of the public who had requested notification on the status of the project. On October 18, 2022, notification was placed in the Ventura County Star, a copy of the MND was posted on the Planning Division website, and a copy was made available at the County of Ventura Government Center, addressed at 800 S. Victoria Avenue, Ventura, CA 93009. The project was sent to the state and federal agencies listed above, and the State of California Office of Planning and Research.

During the second public comment period, staff received 9 public comments related to noise, traffic, biological resources, night lighting, the CUP term, the number of non-summer months events, number of overnight guests during the summer months, and camp compliance with their conditions of approval.

The applicant initially requested, and the MND therefore analyzed, a maximum overnight summer population of 905 campers and staff. In July 2023, the applicant requested a variance to allow 954 overnight campers and staff during the nine-week summer session, which aligned with the Associated Traffic Engineers trip generation analysis based on 2019 operational data. In October 2024, the applicant amended the variance request seeking to allow 1,014 overnight campers and staff, accounting for approximately 60 additional overnight campers and staff, including spouses, daycare providers, visiting educators, and special guests.

According to the applicant, Camp Ramah has historically accommodated up to 60 overnight guests per night during summer camp that were not previously counted as regular overnight campers or staff. The specific individuals vary across the summer season, but generally include staff spouses (20-25); young children of staff members who are not old enough to participate in camp programs (20-40); daycare staff (8-10), visiting doctors (1-2); visiting rabbis (1-2) and other educators for camp arts and sports (2-4); board members, donors, and their spouses (2-10); and institutional partners such as representatives from National Ramah's staff and board (8-15). Some of these individuals may stay for several weeks (e.g., spouses, children) while others may visit for a night or a weekend (e.g., visiting rabbis, board members, and donors). These guests are not tracked in CampMinder (the software system through which campers enroll in camp and staff apply to work at camp). However, at any given time during the summer camp season, there has historically been approximately 60 additional overnight guests per night.

These individuals arrive at and depart from camp in a way that minimizes traffic impact. Many guests carpool with staff members who are already accounted for in the camp's staff occupancy numbers or travel by bus with campers while the remainder travel during the day outside of AM/PM peak traffic hours. Camp Ramah staff will confirm the individuals who drive themselves to and from camp to schedule their arrival and departure times with camp administration in advance to ensure that they are traveling outside of peak traffic hours. According to the applicant, these guests are an important part of summer camp. Their presence supports camp operations and governance, staff wellness, educational programming, and institutional partnerships.

The recirculated MND analyzed the proposed project based on a camp population contained in Camp Programs and Activities as defined in Exhibit 4 Attachment 5, which included a maximum of 905 overnight campers, staff and guests (attendees) during the summer session, and with a 30-year permit term. As described above, following this recirculation, the applicant provided additional information and now seeks authorization for a maximum overnight camp population for summer session of 1,014 attendees in order to maintain the camp's historic overnight population. It also now seeks an unlimited term for the CUP, rather than a 30-year term previously sought (Exhibit 4A, Attachment 4). As discussed more fully above, Planning Division staff do not support an unlimited term and recommend approval of the project with a 50-year term. Regardless, Planning analyzed if these changes altered any of the environmental impact determinations in a way that would require recirculating the MND, and concluded that they did not.

CEQA Guidelines Section 15073.5 generally requires recirculation when the MND has been "substantially revised." "Substantially revised" means that "a new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance," or "[t]he lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required." Section 15073.5 generally says recirculation is not required when mitigation measures are replaced with equal or more effective measures, when new project revisions are added in response to comments and are not new avoidable significant effects, measures or conditions of approval are added which are not required by CEQA and do not create any new significant environmental effects and are not necessary to mitigate an avoidable significant effect, and when new information is added which merely clarifies, amplifies, or makes insignificant modifications to the MND.

Planning staff evaluated the recommended change in CUP term, and the relatively slight change in number of overnight guests, and determined that recirculation is not required as the additional years and additional guests will not create a new significant avoidable effect. As described above, the 60 additional guests will not create any significant increase in vehicle trips because they are largely either family members of already-counted staff, arrive via bus or carpool with already-counted staff or campers, or arrive

during non-peak traffic hours. Nor will it cause any additional noise impacts, as the various noise and hours restrictions will remain in place, and noise monitoring of the sound system and noise attenuation at the Tennis and Basketball Courts, required by Mitigation Measures N-2 and N-3, will still be applied for the life of the permit. In addition, the camp would possess sufficient lodging for this number of guests and authorizing these 60 additional guests to stay will not create any new significant avoidable effect. Nor will there be any new significant effects on the use of open space, as only 1.7 acres of open space zoned land will be developed with the Machon Village, with the remaining 346.3 acres of the expanded CUP boundary remaining in open space. Use of the trails by the public on land owned by the state or federal government will continue by right and the camp will provide public access for recreational purposes over the areas containing the Cozy Dell trail and the U.S. Forest Service that are owned by the applicant through a deed restriction (Exhibit 5, Condition No. 26). Similarly, the CUP term change does not in and of itself result in any impact to the environment. Therefore, a recirculation of the MND is not required.

- 1. Findings for Adoption of an MND:** The CEQA Guidelines [Section 15074(b)] state that an MND shall only be adopted by a decision-making body if there is no substantial evidence, in light of the whole record, that the proposed project may have a significant adverse effect on the environment and that the MND reflects the Lead Agency's independent judgment and analysis.

The MND identified 14 potentially significant effects on the environment. Impacted areas include biological resources, cultural resources and noise and vibration. Revisions in the project plans and proposals made by, or agreed to by, the applicant before the MND was released for public review would avoid the effects or mitigate the effects to a point where no significant effect on the environment would occur. These impacts and the recommended Mitigation Measures (MMs) are described in Section B.2 below. The proposed MND, including written comments on the MND (Exhibit 4) and Planning staff's responses to the comments on the MND (Exhibit 4), is attached as Exhibit 4.a.

Therefore, based on the information provided above and in light of the whole record, there is no substantial evidence that the proposed project may have a significant adverse effect on the environment and the MND (Exhibits 4 and 4.a) reflects the County's independent judgment and analysis.

- 2. Mitigation Monitoring and Reporting Program:** The CEQA Guidelines [Section 15074(d)] state that, when approving a project for which an MND has been prepared, the agency shall also adopt a program for reporting on, or monitoring, the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures. The mitigation measures (Exhibit 5, Condition Nos. 31 through

44) that address these issues are listed below and are included in the MND (Exhibits 4 and 4.a) for the proposed project:

- a) Biological Resources, Item 4a through Item 4e: The recirculated MND evaluated biological resources in the impact discussion for Section B, Item 4. Approved modifications to CUP No. 3048 resulted in minor additions to the camp in areas that were previously disturbed or reorienting of structures from an approved location. Unpermitted structures that are proposed to be legalized are located in previously disturbed areas. The proposed Machon Village will potentially impact sensitive plant and wildlife species; however, with implementation of Recommended Mitigation Measures BIO-1 through BIO-9, impacts would be reduced to less than significant. Recommended Mitigation Measure BIO-1 requires a qualified biologist to conduct pre-construction surveys and relocate special-status plants within the following vegetation alliances: Coast Live Oak Woodland (*Quercus agrifolia*), Bush mallow Shrubland (*Malacothamnus fasciatus*) and Mule-fat Shrubland. Further, the County-approved, qualified biologist is required to prepare a Restoration Plan to establish these relocated plant alliances at a 3:1 mitigation to impact ratio. Recommended Mitigation Measure BIO-2 requires the qualified biologist, in consultation with the contractor, to install temporary protective fencing a minimum of 100 feet from the edge of the scrub habitat and oak woodland during construction of the Machon Village. Recommended Mitigation Measure BIO-3 requires a qualified biologist to prepare and implement a fuel modification plan that minimizes impacts to Coast Live Oak Woodland (*Quercus agrifolia*), Bush mallow Shrubland (*Malacothamnus fasciatus*) and Mule-fat Shrubland Alliances and meets the Ventura County Fire Protection District's requirements to modify fuels surrounding proposed structures. Recommended Mitigation Measure BIO-4 and Mitigation Measure BIO-5 require a qualified arborist to prepare and implement a Tree Protection Plan to offset the impacts to protected oak trees and to submit annual arborist monitoring reports, which address the success of the tree protection measures and the overall condition of encroached-upon trees relative to their condition prior to the widening of the access road. Recommended Mitigation Measure BIO-6 requires a qualified biologist to conduct and prepare pre-construction surveys for special-status wildlife (e.g., mountain lion (*Felis concolor*), western fence lizard (*Sceloporus occidentalis*), western skink (*Eumeces skiltonianus*), southern alligator lizard (*Elgaria multicarinata*), gopher snake (*Pituophis melanoleucus*), common kingsnake (*Lampropeltis getulus*), and western rattlesnake (*Crotalus oreganus*)) and conduct construction monitoring. Recommended Mitigation Measure BIO-7 requires a qualified biologist to conduct pre-construction surveys for bat roosts and relocate identified bat roost sites if found during the nesting season (April 1 to September 30) or commence land clearing and construction activities outside the bat roost season. Recommended Mitigation Measure BIO-8 prohibits the use of fertilizers, rodenticides, pesticides, or herbicides by the applicant during the life of the

permit or preparation and implementation of a Pest Management Plan that includes pest management practices, and identifies the fertilizers, rodenticides, pesticides, or herbicides for use, location of storage, and areas for application on the project site, if these are utilized. Recommended Mitigation Measure BIO-9 requires an electrical engineer to submit a lighting plan that minimizes impacts to wildlife movement and reduces offsite glare.

- b) Item 8A: Cultural Resources, Archaeological: The MND found that the proposed project is in an area of potential archaeological sensitivity. To avoid potential archaeological resources that could inadvertently be encountered, MM CUL-1 requires a qualified Archaeologist and Native American to monitor ground disturbance activities associated with the construction of Machon Village. The monitors will also be required to provide monthly reports to the Planning Division summarizing the activities during the reporting period. If no archaeological resources are discovered, the Archaeologist and Native American monitor shall submit a brief letter to the Planning Division, stating that no archaeological resources were discovered and that the monitoring activities have been completed. With the implementation of this recommended mitigation measure, impacts to cultural resources will be less than significant.
- c) Item 21: Noise and Vibration: The MND found that the proposed project would have significant impacts associated with noise generated by camp activities. To avoid potential impacts, MMs N-1 through N-4 require the applicant to position the speakers at the amphitheater directed to the northeast and northwest, in the direction of the audience, and away from the eastern property line; for all outdoor programs that extend past 9:00 pm, the installation of noise attenuation devices (i.e., sound blankets) on the southern and eastern fence at the tennis courts and basketball courts; installation of a sound monitoring system on the amplification systems; and, a designated primary and secondary contact person that is available, via telecommunication, 24 hours a day. With the implementation of these recommended mitigation measures, impacts associated with noise will be less than significant.

Therefore, a mitigation monitoring and reporting program has been prepared in compliance with the CEQA Guidelines. Based on the foregoing information, the project complies with the requirements of CEQA.

C. CONSISTENCY WITH THE GENERAL PLAN

The 2040 Ventura County General Plan *Goals, Policies and Programs* (page 1-1) states:

All area plans, specific plans, subdivisions, public works projects, and zoning decisions must be consistent with the direction provided in the County's General Plan.

Furthermore, Section 8111-1.2.1.1.a of the Ventura County NCZO states that in order to be approved, a project must be found consistent with all applicable policies of the Ventura County General Plan.

Planning staff's evaluation for consistency of the proposed project with the applicable policies of the Ventura County General Plan Goals, Policies and Programs and Ojai Valley Area Plan is provided in Exhibit 6. This analysis concludes the project is consistent with all applicable general plan and area plan policies.

D. ZONING ORDINANCE COMPLIANCE

The proposed project is subject to the requirements of the Ventura County NCZO. Planning staff's evaluation for consistency of the proposed project with the applicable development, special use, and overlay standards of the Ventura County NCZO is provided in Exhibit 7. This analysis concludes the project is consistent with all applicable NCZO development standards.

E. CUP FINDINGS AND SUPPORTING EVIDENCE

The Planning Commission must make certain findings in order to grant a CUP pursuant to Section 8111-1.2.1.1a of the Ventura County NCZO. The ability to make the required findings is evaluated below.

- 1. The proposed development is consistent with the intent and provisions of the County's General Plan and of Division 8, Chapters 1 and 2, of the Ventura County Ordinance Code [Section 8111-1.2.1.1a.a].**

Based on the information and analysis presented in Sections C and D of this staff report, the finding that the proposed development is consistent with the intent and provisions of the County's General Plan and of Division 8, Chapters 1 and 2, of the Ventura County Ordinance Code can be made.

- 2. The proposed development is compatible with the character of surrounding, legally established development [Section 8111-1.2.1.1a.b].**

The camp has been in operation on the project site since 1969. Most of the camp buildings are located on APN 010-0-110-130; a few cabins are located in the northern portion of APN 010-0-110-120, a maintenance building is located on APN 010-0-070-300, and a caretaker's unit is located on APN 010-0-070-030. The proposed Machon Village (1.7 acres) will be located in the southern portion of APN 010-0-070-310; the remaining 23.3 acres will be deed restricted prohibiting future development of the lot. APN 010-0-060-070 and APN 010-0-060-030 are proposed to be included within the boundary of the CUP for passive recreation; no structures or vegetation removal is proposed. The existing camp and proposed Machon Village are not located within the SRP overlay zone (RMA GIS; April 2022).

Residential development is located south and east of the current CUP boundary. The Camp lies within a valley at an elevation of 914 feet above mean sea level (msl); residential land uses are at an elevation between 976 and 1,309 feet above msl. During the summer camp season, hollering, cheering, singing, and laughter are all common noises. Camp Ramah also includes programs that involve amplified sound. Camp activities have coexisted in relative proximity to noise sensitive land uses, however as the camp expanded over time, neighbors have experienced camp activities generating noise louder than ambient noise levels which is intensified by the topography of the surrounding area.

The applicant is requesting all amplified sound equipment be permitted until 10:00 pm except for Café Ezra, where ambient music is played on Thursday nights during the summer session until 11:00 pm. On December 10, 1996, the Board adopted Ordinance No. 4124 concerning loud and raucous nighttime noise in residential zones. The Ordinance prohibits loud or raucous noise in any residential zone which is audible to the human ear from 9:00 p.m. to 7:00 a.m. at a distance of 50 feet from the property line of the noise source, operation of any mechanical device for production, reproduction or amplification of the human voice (e.g., radio, musical instrument, amplification system) or other mechanical or electrical device or hand tool (e.g. lawn mower, backpack blower, etc.). Most of the camp structures and facilities are located on APN 010-0-110-130, zoned RE, and the Loud and Raucous Noise Ordinance (Government Code Section 6299-1 through 6299-4) would apply.

Recommended MMs N-1 through N-4 address noise impacts by requiring the applicant to position the amphitheater stage speakers so they are not directed towards the eastern property line, install sound attenuation blankets along the tennis court fence where outdoor programs and activities take place, install sound monitoring systems and a signal processor unit to ensure maximum speaker output is set no higher than the level which would maintain sound levels at or below 50 dBA Leq1H between the hours of 7:00 p.m. and 10:00 p.m., and to designate a primary and secondary contact person to respond to complaints (Exhibit 5, Condition Nos. 41 to 44). Following implementation of the required noise attenuation measures, the applicant will be required to test the sound system equipment to ensure that the system is properly programed (Exhibit 5, Condition No. 29). Residents will still hear activities being conducted at the camp; however, noise levels must not exceed the required noise thresholds set forth in General Plan Policy HAZ-9.2.4.

Camp Ramah creates a camping experience that explores traditional Jewish texts, prayer, practice, and values. Religious Land Use and Institutionalized Persons Act of 2000 (RLUIPA) protects religious institutions from unduly burdensome or discriminatory land use regulations. Judaism religious practices involve weekly Shabbat celebrations which begin at sunset on Friday nights and ends at sunset

on Saturdays. The longest day of the year, June 21, the sun sets in Ojai at approximately 8:13 p.m. When evaluating the proposed project for compliance with noise ordinances, the key question is whether a 9:00 p.m. no outdoor amplification noise limit would impose a "substantial burden" on religious exercise. If the camp were holding an event that would have to occur after sunset in June, the 9:00 p.m. noise restriction could arguably create a substantial burden. Further, restricting outdoor noise to 9:00 p.m. is not necessary to achieve a compelling government interest (see 42 U.S.C. § 2000cc.).

Campers and guests arrive by bus and private vehicles. During the summer camp sessions busses arrive at least four times for each summer session to drop-off and pick up campers. During the non-summer months, busses arrive and depart depending on the scheduled program. Busses can be perceived as obnoxious and not typically a part of the street network within a rural area. The Camp has utilized bus service since initiating the use in 1969. Bus service minimizes the number of personal vehicles arriving and departing from the site and the number of onsite parking spaces. The access driveway between Fairview Road and the pick-up drop-off area is approximately 1,500 feet in length. The applicant is proposing to improve the interior access driveway on APN 010-0-110-130, which will improve bus circulation. Additionally, the applicant will be required to conduct an engineering analysis of the turning radius at the east corner of the driveway as it intersects with Fairview Road to determine that the radius meets current code requirements, that there is adequate sight distance on both sides of the driveway, and the driveway meets the County Road Standard Plate E-2a (Commercial Driveways) and E-7 (Rural Driveway ADT < 1,000) (Exhibit 5, Condition No. 52).

Note, Ventura County Municipal Code 7220 restricts any vehicle from stopping where parking is prohibited. While there are no "No Parking" signs located along Fairview Road, Fairview Road is considered a connector road where parking is prohibited. While there will be buses traveling along Fairview Road, buses will not be permitted to park on Fairview Road and on- and off-site road improvements will ensure buses are not idling on Fairview Road waiting to enter the camp.⁵

The Camp is visible from the Cozy Dell trail and United States Los Padres National Forest trail system, and residential land uses. The Camp is located more than 600 feet north of Fairview Road and cannot be seen from this public road. To ensure proposed development is compatible with the existing camp facilities and blends in with the natural environment and character of the community, the applicant will be required to incorporate natural materials, earth tones colors, and non-reflective paints and glass for all new development (i.e., Machon Village, Dining Hall addition, shade structures and trellises) (Exhibit 5, Condition No. 21).

⁵ The driveway is required to meet the County Road Standard Plate E-2a (Commercial Driveways) and E-7 (Rural Driveway ADT < 1,000), or as modified and approved by the VCPWA-RT's Permit Engineer (Exhibit 5, Condition No. 52).

Based on the discussion above, this finding can be made.

3. The proposed development would not be obnoxious or harmful, or impair the utility of neighboring property or uses [Section 8111-1.2.1.1a.c].

Neighboring properties and uses include agriculture to the west and south, residential land uses to the south and east, and open space to the north. The lot immediately to the west (APN 010-0-170-020) is zoned OS and developed with Camp Ramah Zimmer Retreat and Conference Center which is permitted under a separate permit (CUP No. 5234). West of APN 010-0-170-020 is land zoned AE (APN 010-0-170-210) and is currently in active cultivation. The Zimmer Retreat and Conference Center provides a 475-foot buffer between Camp Ramah and active agriculture.

The CUP boundary would incorporate adjacent open space parcels APNs 010-0-060-030, 010-0-060-070, and 010-0-070-310 into the CUP boundary. Hiking, walking, overnight camping, outdoor education, wildlife viewing, and transportation of portable toilet(s) is proposed only on existing trails and fire break trails on APNs 010-0-060-030, 010-0-060-070, 010-070-030, 010-0-070-300, and 010-0-070-310⁶. Occasional recreational overnight camping on these parcels is limited to 20-25 persons at three designated camping areas (see Exhibit 4, Attachment 3A, Recreational Trails and Fire Break Roads Map). Passive recreational uses would not conflict with existing agricultural uses, located approximately 949 feet to the south of existing trails/fire break roads.

Camp Ramah operates numerous programs throughout the year, the summer session being the maximum occupancy for overnight guests, campers and staff. The interface between residents living in a rural area next to an active camp may at times have unpleasant noise but not necessarily obnoxious or harmful. In accordance with NCZO Section 8105-4, Permitted Uses in Open Space, Agricultural, Residential and Special Purpose Zones, camps are permitted in the OS, RA and RE zones with an approved CUP. To ensure compatibility between camps and adjoining land uses, NCZO Section 8107-17.7 requires camp facilities to be developed in accordance with applicable County standards so as to not produce a significant amount of noise. Recommended Mitigation Measures (MM) N-1 through N-4 ensure noise levels do not exceed the required noise thresholds set forth in General Plan Policy HAZ-9.2.4 (Exhibit 5, Condition Nos. 41 through 44). Residents will still hear activities being conducted at the camp; however, noise levels would be within the acceptable audible range. No amplified equipment for outdoor activities/programs are proposed at Machon Village.

⁶ The US Forest Service parcels (010-0-070-030 and 010-0-070-300) are already developed.

The project site is located in the Dark Sky Overlay zone. The purpose of this overlay zone is to protect, promote and preserve the rural quality of life while minimizing light pollution and ensuring that sufficient lighting can be provided where needed to promote safety and security. The camp is outfitted with essential luminaries along walkways, parking and recreational areas, building entrances, and outdoor gathering areas. All outdoor luminaires, other than an essential luminaire, are required to be turned off from 10:00 p.m., or when people are no longer present in exterior areas being illuminated, until sunrise. To ensure compliance with the Dark Sky development standards, the applicant will be required to submit a lighting plan (Exhibit 5, MM BIO-9, Condition No. 39).

Lastly, the applicant is required to designate a primary and secondary contact person(s) to respond to complaints from citizens (Exhibit 5, MM N-4, Condition No. 44). If County staff receives a written complaint about the Project, Planning staff will investigate the alleged violation/complaint. This oversight is in addition to the required condition compliance review conducted by Planning staff every three years (Exhibit 5, Condition No. 11.i).

Based on the discussion above, this finding can be made.

4. The proposed development would not be detrimental to the public interest, health, safety, convenience, or welfare [Section 8111-1.2.1.a.d].

The proposed development would not create risk of harm to persons, nearby properties, or the environment based on fire hazards, geologic hazards, flood hazards, hazardous materials, or increased risk of vandalism or trespass. The project was reviewed by the VCFPD which has conditioned the project to comply with state law and the VCFPD Ordinance (Exhibit 5, Condition Nos. 60 through 80). The removal of four protected Coast Live Oak trees and encroachment into the tree protection zone of four protected Coast Live Oak trees is necessary for compliance with Ventura County Fire Protection District standards for secondary access. Camp Ramah does arrange bonfires in a designated fire pit located south of the gazebo and the Boys Tent Village. VCFPD Ordinance 32, Section 307.2 requires an open flame permit be obtained for bonfires (Exhibit 5, Condition No. 78). Ventura County Fire Station 21, addressed at 1201 Ojai Avenue in Ojai, is located approximately 3.1 miles southeast of the project site.

The project site is located within the Zone X Unshaded floodplain as shown on FEMA Flood Insurance Rate Map Panel 06111C0559E (Effective Date 01/10/2010). As such, the project site is not located in the 100-year or 500-year floodplain. The applicant will be required to submit a grading permit application prepared by a State licensed civil engineer including geotechnical and hydrology reports to ensure compliance with Appendix J of the Ventura County Building Code (Exhibit 5, Condition Nos. 45 and 46). The continued operation and maintenance of the camp will not utilize hazardous materials which require permitting or

inspection from Ventura County Environmental Health Division/Certified Unified Program Agency. Security cameras are used throughout the camp to monitor operations and to hinder criminal activity. Camp counselors are provided training prior to the summer camp session to learn camp rules, enforce the regulations, and ensure the safety of children as they engage in camp activities.

The proposed Machon Village is considered an extension of the existing camp. Casitas Municipal Water District will provide water and wastewater service would be provided by OVSD following approval by the County Local Agency Formation Commission (LAFCo) to annex approximately 1.7 acres of APN 010-0-070-310.

Existing unpermitted development (basketball court, outdoor sanctuary, shade structures, and meditation decks) provide recreational and assembly uses located wholly within the developed portions of the camp CUP boundary.

The CUP boundary would incorporate adjacent open space parcels APNs 010-0-070-310, 010-0-060-070, 010-0-060-030. These lots are zoned OS. Outdoor recreation is permitted in the OS zone. The applicant intends to use existing trails, firebreak roads and three designated camping areas for hiking, walking, outdoor education, wildlife viewing, and overnight camping; the latter also includes the transportation of portable toilet(s) to accommodate occasional overnight camping for up to 20-25 persons at each of the designated camping areas (Exhibit 4, Attachment 3A, Recreational Trails and Fire Break Roads Map). No campfires or camp stoves are permitted. Supplies and camping equipment are packed in and packed out, including all trash.

The Cozy Dell and the U.S. Forest Service Trail System on APN 010-0-060-030 are public trails. The project has been conditioned to ensure these trails are permitted for public use in perpetuity (Exhibit 5, Condition No. 26).

Therefore, the proposed project will not be detrimental to the public interest, health, safety, convenience or welfare. Based on the discussion above, this finding can be made.

5. The proposed development, if allowed by a Conditional Use Permit, is compatible with existing and potential land uses in the general area where the development is to be located [Section 8111-1.2.1.1a.e].

The proposed project is located on property zoned OS and RE. In accordance with Section 8105-4 of the Ventura County NCZO, camps are permitted in these zones with an approved CUP.

On April 16, 1969, CUP No. 3048 was approved for the construction and operation of Camp Ramah, a year-round camp for the use by children, youth and university personnel for study, sports, and entertainment.

Proposed development is considered accessory and incidental to existing permitted uses at Camp Ramah. Passive recreational uses on APNs 010-0-060-030, 010-0-060-070 and 010-0-070-310, which were acquired in 2007 and 2016, comply with the purpose and intent of the OS zone, specifically, outdoor recreation and the preservation of natural resources.

Mitigation Measures/Conditions of Approval (Exhibit 5) ensure proposed development is compatible with existing agricultural and residential uses and potential land uses in the general area.

Based on the discussion above, this finding can be made.

6. The proposed development will occur on a legal lot [Section 8111-1.2.1.1a.f].

The legal lot status of the APNs that are included as part of the proposed project are included in Table 5 below.

Table 5 – Legal Lot Status	
APNs	Legal Lot Status
010-0-070-310	One legal lot created through Certificate of Compliance No. CC23-01-1565 recorded with the County Recorder on February 9, 2023 (Document Number 2023000010804)
010-0-070-030 and 010-0-070-300	One legal lot created by deed recorded August 28, 1901, in Book 77, Page 226 and after in Book 3174, Page 587 recorded July 31, 1967 and in on October 1, 1998 (Document No. 98-169693) of the Official Records
010-0-060-070	One legal lot created through Certificate of Compliance No. CC23-01-1566 recorded with the County Recorder on February 9, 2023 (Document Number 2023000010805)
010-0-060-030	One legal lot created through Certificate of Compliance No. CC18-04-1271 recorded with the County Recorder on November 19, 2018 (Document Number 20181119-00129465-0)
010-0-110-120 010-0-110-130 010-0-120-040	One legal lot created through Certificate of Compliance No. CC23-01-1562 recorded with the County Recorder February 9, 2023 (Document Number 202300010803)

Based on the discussion above, this finding can be made.

7. The proposed development is approved in accordance with the California Environmental Quality Act and all other applicable laws (Section 8111-1.2.1a.g).

As discussed in Section B, above, the proposed project was subject to the preparation of an Initial Study. The Initial Study concluded that the project would have potentially significant impacts to biological and archaeological resources and would generate noise in excess of the standards for noise in the Ventura County General Plan Goals, Policies and Programs. The applicant, however, proposed to incorporate mitigation measures to address these impacts. With incorporation of the mitigation, impacts are anticipated to be less than significant. As a result, an MND was prepared (Exhibit 4).

In accordance with Public Resources Code (PRC) Section 21092.1 and CEQA Guidelines Sections 15073.5(a) and 15073.5(b), the Planning Division recirculated the MND for an additional 30-day public review to amend the environmental document with the following information: (1) add to the Project Description proposed passive recreational uses in the Open Space lots (APNs 010-0-060-030 and 010-0-060-070), (2) identify a 30-year CUP term;⁷ and (3) incorporate information that discusses special-status plant and wildlife species occurrence and potential impacts to these biological resources as a result of the proposed project. Five additional recommended mitigation measures (MMs BIO-1, BIO-3, BIO-6, BIO-7, and BIO-8) were added to reduce potentially significant biological impacts to less than significant. Before the MND was released for public review, the applicant accepted the mitigation measures which are summarized above in item B.2 (Mitigation Monitoring and Reporting Program).

All applicable provisions of the CEQA Guidelines and Public Resources Code were followed in the preparation and circulation of the MND.

Based on the discussion above, this finding can be made.

8. Development within any overlay zone having specific development standards must comply with such standards [Section 8111-1.2.1.4 and Article 9].

As discussed in section D of this staff report (above), the proposed project complies with special use standards for camps, and all applicable standards of the Dark Sky Overlay Zone and the Temporary Rental Unit Regulation (TRU) Overlay Zone. Upon the granting of this CUP, the applicant will be in compliance with the Ventura County NCZO.

⁷ As previously noted, the 30-year CUP term was what was sought by the applicant at the time of the recirculation, and the subsequent change in requested term length does not in and of itself result in any impact on the environment requiring recirculation.

Based on the discussion above, this finding can be made.

F. DISCRETIONARY TREE PERMIT FINDINGS AND SUPPORTING EVIDENCE

Pursuant to the Ventura County Non-Coastal Zoning Ordinance (NCZO) (Sec. 8105-4, Sec. 8111-1.2 et seq.), the Planning Commission is the decision-maker for the requested modification to CUP No. 3048. Though the Planning Director would ordinarily be the decision-maker for the requested Discretionary Tree Permit (NCZO Section 8105-4), the Planning Director has elected to defer the decision to the Planning Commission, as it would be most efficient to consolidate review and not to hold duplicative hearings (NCZO Sections 8111-1.2 and 8111-4.1.1(e)). Therefore, the Planning Commission must make certain findings in order to determine that the proposed project is consistent with the permit approval standards of the Ventura County NCZO Section 8107-25.7.1. The applicable standards and the ability to make the required findings are evaluated in Exhibit 8.

G. EVIDENCE AND PROPOSED FINDINGS FOR THE VARIANCE

Variances are adjustments in the regulations and development standards, are based on discretionary decisions, and may be granted to allow deviations from ordinance regulations. The applicant shall have the burden of proving to the satisfaction of the Planning Commission that the standards for variances pursuant to NCZO Section 8111-1.2.2 can be met. The variance findings and the applicant's supporting evidence to make these findings is provided in Exhibit 9.

H. PLANNING COMMISSION HEARING NOTICE, PUBLIC COMMENTS, AND JURISDICTIONAL COMMENTS

On December 16, 2019, and May 16, 2022, the proposed project was presented to the Ojai Valley Municipal Advisory Council (MAC). Property owners living adjacent to Camp Ramah voiced their concerns regarding the frequency of outdoor events being leased to third parties, number of guests during non-summer months, expansion of the CUP boundary, and noise. The MAC's recommended changes and the applicant's response are contained in Exhibit 10 of this staff report, which also includes the Ojai Valley MAC meeting minutes.

The Planning Division provided public notice regarding the Planning Commission hearing in accordance with the Government Code (Section 65091), and Section 8111-3.1 of the Ventura County NCZO. On April 11, 2025, the Planning Division mailed notice to owners of property within 300 feet of the property on which the project site is located. On April 11, 2025, the Planning Division placed a legal ad in the Ventura County Star and the Ojai Valley News. As of the date of this document, staff has received 10 comments in support of the project and 2 comments opposing the project (Exhibit 11). These comments include concerns about the frequency of events, noise, traffic, and community compatibility.

The project site is located within the City of Ojai's Sphere of Influence. Therefore, on May 4, 2018, the Planning Division notified the City of Ojai of the proposed project and requested the City of Ojai to submit any comments that the City might have on the proposed project. As of the date of this staff report, no comments have been received.

I. RECOMMENDED ACTIONS

Based upon the analysis and information provided above, Planning Division Staff recommends that the Planning Commission take the following actions:

1. **CERTIFY** that the Planning Commission has reviewed and considered this staff report and all exhibits thereto, and has considered all comments received during the public comment process;
2. **FIND**, based on the whole of the record before the Planning Commission, including the Initial Study and any comments received, that upon implementation of the project revisions and/or mitigation measures there is no substantial evidence that the project will have a significant effect on the environment and that the MND reflects the Planning Commission's independent judgment and analysis;
3. **ADOPT** the MND (Exhibit 4) and Mitigation Monitoring Program (Exhibit 5);
4. **MAKE** the required findings to grant a Variance pursuant to Section 8111-1.2.2.2 of the Ventura County NCZO, based on the substantial evidence presented in Section G of this staff report and the entire record;
5. **MAKE** the required findings to grant a Major Modification to CUP 3048 pursuant to Section 8111-1.2.1.1a of the Ventura County NCZO, based on the substantial evidence presented in Sections D through F of this staff report and the entire record;
6. **MAKE** the required findings to grant a discretionary tree permit pursuant to NCZO Section 8107-25.7.1, based on the substantial evidence presented in Section F of this staff report and the entire record;
7. **GRANT** the Variance and Major Modification to CUP 3048 (Case No. PL18-0052), subject to the conditions of approval (Exhibit 5), and discretionary tree permit (Case No. PL23-0002); and
8. **GRANT** Major Modification to CUP 3048 (Case No. PL18-0052) for a 50-year CUP term, subject to the conditions of approval (Exhibit 5).
9. **SPECIFY** that the Clerk of the Planning Commission is the custodian, and 800 S. Victoria Avenue, Ventura, CA 93009 is the location, of the documents and materials that constitute the record of proceedings upon which this decision is based.

The decision of the Planning Commission is final unless appealed to the Board of Supervisors within 10 calendar days after the permit has been approved, conditionally approved, or denied (or on the following workday if the 10th day falls on a weekend or holiday). Any aggrieved person may file an appeal of the decision with the Planning Division. The Planning Division shall then set a hearing date before the Board of Supervisors to review the matter at the earliest convenient date.

County Counsel has reviewed this Staff Report.

If you have any questions concerning the information presented above, please contact Kristina Boero at (805) 654-2467 or kristina.boero@ventura.org.

Prepared by:



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Residential Permits Section
Ventura County Planning Division

Reviewed by:



Dave Ward, Director
Ventura County Planning Division

EXHIBITS

- Exhibit 2a Proposed and Existing CUP Boundary Maps
- Exhibit 2b Project Site Land Use and Zoning Designations Map
- Exhibit 3 Project Plans and Speaker Location Plan
- Exhibit 4 Mitigated Negative Declaration dated October 25, 2022
 - Attachment 1 Aerial Location Map
 - Attachment 2 Maps (Zoning, General Plan and Area Plan)
 - Attachment 3 Project Plans and speaker location plan
 - Attachment 3A Recreational Trails and Fire Break Roads Map
 - Attachment 4 Arborist Report and Tree Protection Plan, prepared by Kenneth A. Knight Consulting, LLC., February 7, 2019
 - Attachment 5 Camp Ramah Programs and Activities (2019)
 - Attachment 6 Map of Pending and Recently Approved Projects within a 5 Mile Radius of the Project Site
 - Attachment 7 Dudek Water Allocation Report, dated October 15, 2018
 - Attachment 8 Dudek Water Allocation Report Addendum, dated November 12, 2020 and SEPPS Water Quality Assessment Addendum, dated January 19, 2021
 - Attachment 9 Initial Study Biological Assessment, prepared by Hunt and Associates Biological Consulting Services February 20, 2019
 - Attachment 10 Feffer Geotechnical Report, dated July 7, 2014, Addendum, dated October 17, 2017 and Responses to Application Incompleteness determination, dated October 29, 2018
 - Attachment 11 Historical Resources Report, prepared by San Buenaventura Research Associates, October 5, 2018
 - Attachment 12 Lewis Engineering Drainage Report, dated November 9, 2018
 - Attachment 13 Dudek Noise Assessment Technical Reports, dated February 2020 and October 2019

- Attachment 14 Dudek President's Day Weekend Noise Survey, dated March 6, 2020
- Attachment 15 Dudek Noise Clarification Memorandum, dated September 30, 2020
- Attachment 16 Associated Transportation Engineers Trip Generation Analysis, dated December 16, 2021
- Attachment 17 Works Cited
- Exhibit 4.a Response to Public Comment on the MND
- Exhibit 5 Conditions of Approval and Mitigation Monitoring and Reporting Program
 - Sub-exhibit 1 Project Plans and Speaker Location Plan
 - Sub-exhibit 2 Recreational Trails and Fire Break Roads Map
 - Sub-exhibit 3 Map of Open Space Deed Restriction Area for APN 010-0-370-310
 - Sub-exhibit 4 Initial Study Biological Assessment, Figure 4
 - Sub-exhibit 5 Dudek Noise Assessment Technical Reports, Appendix G
 - Sub-exhibit 6 Dudek Noise Assessment Technical Reports, Table 5
- Exhibit 6 General Plan Consistency Analysis
- Exhibit 7 Zoning Ordinance Compliance
- Exhibit 8 Discretionary Tree Permit Findings
- Exhibit 9 Applicant's October 2024 Variance Request and County Response
- Exhibit 10 Ojai Valley MAC Recommended Action and Minutes
- Exhibit 11 Additional Public Comments