

EXHIBIT 6
CONSISTENCY WITH THE GENERAL PLAN AND OJAI VALLEY AREA PLAN FOR
CONDITIONAL USE PERMIT CASE NUMBER PL17-0012 AND DISCRETIONARY
PERMIT CASE NO. PL23-0040

The 2040 Ventura County General Plan *Goals, Policies and Programs* (2020, 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, the Ventura County Non-coastal Zoning Ordinance (NCZO) Section 8111-1.2.1.1.a states that in order to be approved, a project must be found consistent with all applicable policies of the Ventura County General Plan.

Evaluated below is the consistency of the proposed project with the applicable policies of the General Plan Goals, Policies and Programs and Ojai Valley Area Plan.

1. Land Use and Community Character

General Plan Policy LU-16.1 (Community Character and Quality of Life): *The County shall encourage discretionary development to be designed to maintain the distinctive character of unincorporated communities, to ensure adequate provision of public facilities and services, and to be compatible with neighboring uses.*

General Plan Policy LU-16.8 (Residential Design that Complements the Natural Environment): *The County shall encourage discretionary development that incorporates design features that provide a harmonious relationship between adjoining uses and the natural environment.*

General Plan Policy LU-16.9 (Building Orientation and Landscaping): *The County shall encourage discretionary development to be oriented and landscaped to enhance natural lighting, solar access, and passive heating or cooling opportunities to maximize energy efficiency.*

Ojai Valley Area Plan Policy OV-9.2 (Residential Development Compatibility): *The County shall condition new residential discretionary development so as to be compatible with its surroundings and to maintain the character of the Ojai Valley.*

Ojai Valley Area Plan Policy OV-17.1 (Character and Design Community Compatibility): *The County shall require all discretionary development projects to be reviewed and conditioned to ensure that they are compatible with their surroundings, are of high quality and good design, are consistent with the character of the Ojai Valley, and are beneficial to the community as a whole.*

The project site is zoned Rural Exclusive (RE-5 acres) and located in the East End neighborhood of Ojai. Parcels located south and east of the site are zoned Agricultural Exclusive (AE-40 acres) and are currently in agricultural production with orange and avocado orchards. Parcels north and west of the site are zoned RE-5 acres and developed with residential uses. The nearest offsite residential uses are approximately 64 feet and 32 feet from the project's northern property line. Pursuant to Ventura County NCZO Section 8105-4, a Planning Commission approved CUP is required for camps with sleeping facilities in the RE zone because the requested special uses associated with camps are not allowed as a matter of right within the RE zone district.

The Krishnamurti Center is intended for the study of the teachings of Jiddu Krishnamurti and provide an environment of quietness and natural beauty. The property is developed with 18,330 sq. ft. of structures. The structures are centrally located within the CUP boundary. Approximately 10,931 sq. ft. of additional accessory structures are proposed to be built onsite. With the addition of the proposed project, total building coverage will be 0.06 percent, which is below the 25 percent maximum building coverage for the zone designation. The yoga pavilion is in the southwest corner of the site within the organic garden area. Existing structures are painted in earth tone colors that blend in with the natural environment. The proposed Reception/Canteen building, Bookstore and Cottage Retreat will be clustered between the Administration and Pine Cottage Annex buildings in the middle of the project site. The garage / bookstore and solar array will be located immediately south of the Administration building near the center of the property. The detached restroom is immediately northwest of the Pine Cottage Library near the center of the property (Exhibit 3).

Existing onsite lighting is either on timers or motion sensors that operate between 10:00 pm and sunrise. The applicant will be required to submit a lighting plan that ensures all lighting is shielded downward and does not exceed 850 lumens, in compliance with the development standards of the Ventura County Dark Sky Overlay zone (Exhibit 5, Condition No. 24). Upward facing display lights, outdoor spotlights and laser lights are prohibited.

To ensure proposed development is compatible with the natural environment and character of the community, the project will be conditioned to require that the applicant incorporate natural materials, earth tones colors, and non-reflective paints and glass for new structures (Exhibit 5, Condition No. 29). Project plans indicate proposed construction finishes are compatible with existing development onsite and will not substantially alter the character of the adjoining residential community. The project will also be conditioned to require the applicant to install and maintain indigenous plant species where feasible and plant native trees, shrubs and grasses that are compatible with the historic nature of the project site (Exhibit 5, Condition No. 36). Specifically, the applicant will be required to include period-appropriate

plantings to maintain the appearance of the central island's parking planter and courtyard (Exhibit 5, Condition No. 36). In addition, stonework wall alterations at the northwest edge of the project site and proposed garage rehabilitation are required to match the existing stone walls in material, form and appearance (Exhibit 5, Condition Nos. 39 and 40). A maximum of 60 attendees would be on site each week during the Midweek Programs and Weekend Dialogues and Talks. The midweek programs and evening dialogues include small groups of 12 to 15 people gathering on site in the following areas: at the northwest parking area, in the grassy areas between the northwest parking area and the Arya Vhara structure, in the grassy area east of the Arya Vhara structure, in the grove west of the restroom and Pine Cottage, in the vegetable and flower garden, and in the open area north of the proposed shade structure. Visitors will be limited to 8 daytime guests on weekdays and 45 daytime guests on the weekends (Exhibit 5, Condition No. 1). All guests are required to make reservations online prior to their visit. The annual conference is held inside Pine Cottage. During the annual conference, attendees are limited to 64. Daytime visitors and the Weekly Programs and Events are cancelled during the annual conference.

All programs and events will occur onsite. Outdoor programs and activities are limited to small group discussions and instruction (i.e., midweek programs and evening dialogues) and occur between 2:30 p.m. to 10:00 p.m. The small groups of 12 to 15 people gather onsite in designated areas (Exhibit 3). All outdoor programs and events are setback more than 1,000 feet from the western and northern property lines. No amplified music or use of a portable public address system will be utilized on site at any time. The project will be conditioned to require that the applicant provide the Planning Director and all residents within 1,000 feet of the parcel boundary with the contact person who will be responsible for responding to noise complaints. The project will also be conditioned to require that the applicant maintain an events report that includes a brief description of the event, the date and time noise complaints were received, and how they were resolved (Exhibit 5, Condition Nos. 17 and 18).

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policies LU-16.1, LU-16.8, LU-16.9 and Ojai Valley Area Plan Policies OV-9.2 and OV-17.1.

2. Circulation, Transportation, and Mobility

General Plan Policy CTM-1.1 (Vehicle Miles Traveled (VMT) Standards and CEQA Evaluation): *The County shall require evaluation of County General Plan land use designation changes, zone changes, and discretionary development for their individual (i.e., project-specific) and cumulative transportation impacts based on Vehicle Miles Traveled (VMT) under the California Environmental Quality Act (CEQA) pursuant to the methodology and thresholds of significance criteria set forth in the County Initial Study Assessment Guidelines.*

General Plan Policy CTM-1.3 (Roadways County of Level of Service (LOS) Standards): *The County shall maintain LOS standards for use as part of the County's transportation planning including the traffic impact mitigation fee program, and the County's review and consideration of proposed land use legislation and discretionary development. For purposes of County transportation planning and review and consideration of proposed land use legislation and discretionary development, the County shall use the following minimum acceptable Level of Service (LOS) for road segment and intersection design standards within the Regional Road Network and all other County-maintained roadways:*

- a. *LOS-'C' for all Federal functional classification of Minor Collector (MNC) and Local roadways (L); and*
- b. *LOS-'D' for all Federal functional classifications except MNC and L, and Federal and State highways in the unincorporated area, except as otherwise provided in subparagraph (c and d);*
- c. *LOS-'E' for State Route 33 between the northerly end of the Ojai Freeway and the city of Ojai, Santa Rosa Road, Moorpark Road north of Santa Rosa Road, State Route 34 north of the city of Camarillo, and State Route 118 between Santa Clara Avenue and the city of Moorpark;*
- d. *LOS 'F' for Wendy Drive between Borchard Drive to Lois Avenue; and*
- e. *The LOS prescribed by the applicable city for all federal highways, state highways, city thoroughfares and city-maintained local roads located within that city, if the city has formally adopted and is implementing a General Plan policy, ordinance, or a reciprocal agreement with the County regarding development in the city that is intended to improve the LOS of County-maintained local roads and federal and state highways located within the unincorporated area of the county.*
- f. *At any intersection between two or more roads, each of which has a prescribed minimum acceptable LOS, the lower LOS of the roads shall be the minimum acceptable LOS for that intersection.*

General Plan Policy CTM-1.4 (Level of Service Evaluation) *County General Plan land use designation changes and zone changes shall be evaluated for their individual (i.e., project-specific) and cumulative effects, and discretionary developments shall be evaluated for their individual effects, on Level of Service (LOS) on existing and future roads, to determine whether the project:*

- a. *Would cause existing roads within the Regional Road Network or County-maintained roadways that are currently functioning at an acceptable LOS to function below an acceptable LOS;*
- b. *Would add traffic to existing roads within the Regional Road Network or County-maintained roadways that are currently functioning below an acceptable LOS; and*

- c. *Could cause future roads planned for addition to the Regional Road Network or County maintained roadways to function below an acceptable LOS.*
- d. *The Level of Service (LOS) evaluation shall be conducted based on methods established by the County.*

General Plan Policy CTM-1.7 (Pro Rata Share of Improvements): *The County shall require discretionary development that would generate additional traffic pays its pro rata share of the cost of added vehicle trips and the costs of necessary improvements to the Regional Road Network pursuant to the County's Traffic Impact Mitigation Fee Ordinance.*

Ojai Valley Area Plan Policy OV-22.2 (Roadways Evaluation of Level of Service (LOS) Impact Based on Land Use Changes): *The County shall evaluate Area Plan land use designation changes, zone changes, and discretionary development for individual and cumulative impacts on existing and future roads, with special emphasis on the following:*

- a. *Whether they would cause existing roads within the Regional Road Network or Local Road Network that are currently functioning at an acceptable Level of Service (LOS) to function below an acceptable LOS;*
- b. *Whether they would worsen traffic conditions on existing roads within the Regional Road Network that are currently functioning below an acceptable LOS; and*
- c. *Whether they could cause future roads planned for addition to the Regional Road Network or the Local Road Network to function below an acceptable LOS.*

Public Works Agency (PWA) staff has reviewed the proposed project and determined that approval would not result in the degradation of LOS or VMT for any identified roadway segments or intersections in the area. Based on the Office of Planning and Research (OPR) Screening Criteria under Senate Bill (SB) 743, projects that generate or attract fewer than 110 new trips per day are presumed to have a less-than-significant impact on Vehicle Miles Traveled (VMT).

The Associated Transportation Engineers' (ATE) May 2021 traffic study (Exhibit 4, Attachment 11) evaluated trip generation for the camp based on the applicant's existing operations, which include programs, events, and attendees (Exhibit 5, Condition No. 1). Based on this operational data, ATE estimated that trip generation for the camp will result in 96 additional average daily trips (ADT) on the local public roads and the Regional Road Network. Staff and delivery trips to and from the site will not change. As less than 110 trips would be generated by the proposed project, Public Works Roads and Transportation concluded that the project is consistent with

General Plan Policy CTM-1.1 and VMT Standards as the VMT threshold was not exceeded. In addition, the applicant will be required to pay a traffic impact mitigation fee to the City of Ojai, to offset impacts to the regional road network (Exhibit 5, Condition No. 53).

McAndrew Road is a Class 1, two-lane minor collector road with a 40 foot right of way. The road has a level of service (LOS) “A” and is not considered an impacted road (General Plan Background Report, Transportation and Mobility Chapter, Table 6-10). Roads with this level of service are characterized by free uninterrupted low volumes of traffic with little to no delays. The road network adjacent to the project site includes a two-lane road with narrow road shoulders, and no sidewalk or other traffic measures that separate pedestrians and bicyclists from motorists. With the overall daily population limited to 45 attendees on the weekdays, and 112 attendees on the weekends, and overnight population limited to 20 attendees, with an additional 9 attendees for 8 weeks each year the Public Works Roads and Transportation Department determined the level of service on McAndrew Road and State Route 33 (2.3 miles northwest of the project site) will create a less than significant impact to local roads and the regional road network as a result of the proposed project.

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policies CTM-1.1, CTM-1.3, CTM-1.4, CTM-1.7 and Ojai Valley Area Plan Policy OV-22.2.

3. Public Facilities, Services, Infrastructure, and Water Resources

General Plan Policy PFS-1.7 (Public Facilities, Services, and Infrastructure Availability): *The County shall only approve discretionary development in locations where adequate public facilities, services, and infrastructure are available and functional, under physical construction, or will be available prior to occupancy.*

General Plan Policy WR-1.11 (Water Supply Adequate Water for Discretionary Development): *The County shall require all discretionary development to demonstrate an adequate long-term supply of water.*

General Plan Policy WR-3.2 (Water Use Efficiency for Discretionary Development): *The County shall require the use of water conservation techniques for discretionary development, as appropriate. Such techniques include low-flow plumbing fixtures in new construction that meet or exceed the California Plumbing Code, use of graywater or reclaimed water for landscaping, retention of stormwater runoff for direct use and/or groundwater recharge, and landscape water efficiency standards that meet or exceed the standards in the California Model Water Efficiency Landscape Ordinance.*

Ojai Valley Area Plan Policy OV-64.1 (Water Conservation Techniques in New Development): *The County shall condition discretionary development to utilize all feasible water conservation techniques.*

Ojai Valley Area Plan Policy OV-64.2 (Retrofits to Limit Water Demand): *The County shall require new discretionary development to retrofit existing plumbing fixtures or provide other means so as not to add any net increased demand on the existing water supply. The County shall apply this policy until such time as a groundwater basin study is completed and it is found that the available groundwater, or other sources of water, could adequately provide for cumulative demand without creating an overdraft situation.*

Domestic water service will continue to be provided by the Senior Canyon Mutual Water District (Will Serve letter, dated April 20, 2022). Current water demand at the site is 11.12 acre-feet per year (AFY). Water usage for the project is estimated to increase by 2.52 AFY, bringing the total usage to 13.64 AFY. Senior Canyon Mutual Water District has confirmed that the allocation and water demand calculations have not changed since 2022 (personal communication from Peter Thielke to Kristina Boero, dated April 14, 2024).

The site overlies the Ojai Valley Basin, which is identified as a high-priority basin that is not currently classified as overdrafted and is not in hydrologic/hydrogeologic continuity with an overdrafted basin.

The proposed project will be subject to the standards of the California plumbing Code and California Building Code. These standards include requirements for water conservation, low flow plumbing fixtures, and efficient appliances. The project will be conditioned requiring the applicant to prepare a water offset plan to offset any additional or increased water use. This will be accomplished by the installation of plumbing retrofits onsite, removal of the existing citrus orchard and replacement of the trees with 196 drought tolerant olive trees. The proposed water demand will further be offset with the rainwater capture system, which can collect 129,938 gallons (0.40-AF) of rainwater annually (Exhibit 5, Condition Nos. 1 and 56).

The existing Ayra Vihara, Administration Building, and Pine Cottage are all served by existing onsite wastewater treatment systems (OWTS) (3,000-gallons). The new Retreat/Canteen building, and the new cottages will be served by two new 3,000-gallon septic tanks for a combined capacity of 6,000 gallons. All OWTS' are under the permitting authority of the State Regional Water Quality Control Board (SRWQCB).

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policies, PFS-1.7, WR-1.11, WR-3.2, and Ojai Valley Area Plan Policies OV-64.1 and OV-64.2.

General Plan Policy PFS-5.9 (Waste Reduction Practices for Discretionary Development): *The County shall encourage applicants for discretionary development to employ practices that reduce the quantities of wastes generated and engage in recycling activities to further reduce the volume of waste disposed of in landfills.*

Ojai Valley Area Plan Policy OV-27.1 (Waste Reduction in Discretionary Development): *The County shall encourage discretionary development to employ practices that reduce the quantities of wastes generated and shall be requested to engage in recycling activities.*

The proposed project would not result in a significant generation of waste. E.J. Harrison and Sons provides curbside garbage and recycling pickup services to the project site.

As required by California Public Resources Code (PRC) section 41701, Ventura County's Countywide Siting Element (CSE), adopted in June 2001 and updated annually, indicates that Ventura County has at least 15 years of disposal capacity available for waste generated by in-County projects. Ventura County Ordinance No. 4421 requires all applicants for discretionary permits that include construction and/or demolition to reuse, salvage, recycle, or compost a minimum of 65 percent of solid waste generated by their project. The Integrated Waste Management Division's (IMWD) waste diversion program (Recycling Plan and Reporting) ensures that the 65 percent diversion goal is met prior to Building and Safety Division's issuance of a certificate of occupancy, consistent with the General Plan. The project has been conditioned to address recycling during the construction phases of the project (Exhibit 5, Condition Nos. 50 and 51).

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policy PFS-5.9 and with Ojai Valley Area Plan Policy OV-27.1.

General Plan Policy PFS-6.1 (Flood Control and Drainage Facilities Required for Discretionary Development): *The County shall require discretionary development to provide flood control and drainage facilities, as deemed necessary by the County Public Works Agency and Watershed Protection District. The County shall also require discretionary development to fund improvements to existing flood control facilities necessitated by or required by the development.*

General Plan Policy PFS-6.5 (Stormwater Drainage Facilities): *The County shall require that stormwater drainage facilities are properly designed, sited, constructed, and maintained to efficiently capture and convey runoff for flood protection and groundwater recharge.*

General Plan Policy WR-2.2 (Water Quality Protection for Discretionary Development): *The County shall evaluate the potential for discretionary*

development to cause deposition and discharge of sediment, debris, waste, and other contaminants into surface runoff, drainage systems, surface water bodies, and groundwater. In addition, the County shall evaluate the potential for discretionary development to limit or otherwise impair later reuse or reclamation of wastewater or stormwater. The County shall require discretionary development to minimize potential deposition and discharge through point source controls, storm water treatment, runoff reduction measures, best management practices, and low impact development.

General Plan Policy WR-3.3 (Low-Impact Development): *The County shall require discretionary development to incorporate low impact development design features and best management practices, including integration of stormwater capture facilities, consistent with County's Stormwater Permit.*

General Plan Policy HAZ-2.5 (Recordation of a Notice of Flood Hazard): *The County shall require the recordation of a Notice of Flood Hazard with the County Recorder for all new discretionary entitlements (including subdivisions and land use permits) within areas subject to flooding as determined by the Federal Emergency Management Agency on the latest available Digital Flood Insurance Rate Maps (DFIRMs).*

General Plan Policy HAZ-2.8 (Natural Flood Protection Solutions): *The County shall consider natural, or nature-based flood protection measures for discretionary development or County-initiated development, when feasible.*

Ojai Valley Area Plan Policy OV-51.1 (Flood Hazard Protection): *The County shall require new development to be protected from flood hazards and to not adversely affect the flood carrying capacity of the area of Special Flood Hazard, as provided for in the Flood Plain Management Ordinance.*

As shown on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel 06111C0585F, effective date September 26, 2014, the project site is in a location identified as Zone X, Area of Minimal Flood Hazard and outside of the 100-year and 500-year floodplain. The project will not require the development of new flood control facilities or to contribute funds towards the development and/or maintenance of flood control facilities. The project is also not located within a Special Flood Hazard area.

The proposed project will not result in soil disturbance of greater than 1 acre but will introduce more than 10,000 sq. ft. of impervious surface. The project will be conditioned to include Best Management Practices (BMPs) designed to ensure compliance with the 2010 Ventura Countywide Municipal Stormwater National Pollutant Discharge Elimination System (NPDES) Permit Order no. CAS004002, "Development Construction Program" Subpart 4.F through implementation of an effective combination of erosion and sediment control measures for construction

activities in order to protect surface water quality during any soil disturbance activities. The project will also be conditioned to require that the applicant obtain a General Construction Stormwater Permit from the State Water Quality Control Board. The permit requires a Storm Water Pollution Prevention Plan (SWPPP) that details preconstruction control practices to reduce sediment and other pollutants in storm water discharges and implementation of BMPs for erosion and sediment control (Exhibit 5, Condition Nos. 54 and 55). Typical BMPs include fiber rolls and sandbag barriers around drainage inlets.

Proposed development will be subject to the requirements of the Grading Ordinance (Ventura County Building Code 2020, Appendix J) and Uniform Building Code (ICC 2018). Drainage is by sheet flow conditions along existing grades. The applicant has provided a hydrology analysis (Exhibit 4, Attachment 10) to analyze pre- and post-development conditions. As discussed in this analysis, all post-development drainage associated with the proposed development will be captured for reuse by rainwater tanks for the two cottages and canteen building. The tanks will distribute drainage and prevent erosive conditions. The analysis concluded that, due to the site's infiltration capacity, the addition of impervious surfaces from the project will result in a minimal increase in stormwater volume and peak flow rates and will not adversely impact onsite drainage and downstream facilities. The project will be conditioned to require the applicant to submit final drainage plans and hydrologic and hydraulic calculations, prepared by a registered civil engineer, to ensure structures are protected by a one percent annual chance storm (Exhibit 5, Condition No. 48).

No new landscaping is proposed. The project will be conditioned to require that the applicant submit a landscaping and irrigation plan for all new landscaping, in compliance with the requirements of the Ventura County NCZO Section 8106-8.2 et seq (Exhibit 5, Condition No. 36) and the Library of Congress Secretary of Interior (SOI) Standards and Guidelines for Archaeology and Historic Preservation for perimeter landscaping of the central island's parking and for the courtyard.

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policies PFS-6.1, PFS-6.5, WR-2.2, WR-3.3, HAZ-2.5 and HAZ-2.8 and Ojai Valley Area Plan Policy OV-51.1.

4. Conservation and Open Space

General Plan Policy COS-1.1 (Protection of Sensitive Biological Resources):

The County shall ensure that discretionary development that could potentially impact sensitive biological resources be evaluated by a qualified biologist to assess impacts and, if necessary, develop mitigation measures that fully account for the impacted resource. When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts. If the impacts cannot

be reduced to a less than significant level, findings of overriding considerations must be made by the decision-making body.

General Plan Policy COS-1.2 (Consideration of Sensitive Biological Resources): *The County shall identify sensitive biological resources as part of any land use designation change to the General Plan Land Use Diagram or zone designation change to the Zoning Ordinance that would intensify the uses in a given area. The County shall prioritize conservation of areas with sensitive biological resources.*

General Plan Policy COS-1.4 (Consideration of Impacts to Wildlife Movement): *When considering proposed discretionary development, County decision-makers shall consider the development's potential project-specific and cumulative impacts on the movement of wildlife at a range of spatial scales including local scales (e.g., hundreds of feet) and regional scales (e.g., tens of miles).*

General Plan Policy COS-1.5 (Development Within Habitat Connectivity and Wildlife Corridors): *Development within the Habitat Connectivity and Wildlife Corridors overlay zone and Critical Wildlife Passage Areas overlay zone shall be subject to the applicable provisions and standards of these overlay zones as set forth in the Non-Coastal Zoning Ordinance.*

General Plan Policy COS-1.9 (Agency Consultation Regarding Biological Resources): *The County shall consult with the California Department of Fish and Wildlife, the Regional Water Quality Control Board, the U.S. Fish and Wildlife Service, National Audubon Society, California Native Plant Society, National Park Service for development in the Santa Monica Mountains or Oak Park Area, and other resource management agencies, as applicable during the review of discretionary development applications to ensure that impacts to biological resources, including rare, threatened, or endangered species, are avoided or minimized.*

General Plan Policy COS-1.10 (Evaluation of Potential Impacts of Discretionary Development on Wetlands): *The County shall require discretionary development that is proposed to be located within 300 feet of a wetland to be evaluated by a County-approved biologist for potential impacts on the wetland and its associated habitats pursuant to the applicable provisions of the County's Initial Study Assessment Guidelines.*

General Plan Policy COS-1.11 (Discretionary Development Sited Near Wetlands): *The County shall require discretionary development to be sited 100 feet from wetland habitats, except as provided below. The 100-foot setback may be increased or decreased based upon an evaluation and recommendation by a qualified biologist and approval by the decision-making body based on factors that include, but may not be limited to, soil type, slope stability, drainage patterns, the potential for discharges that may impair water quality, presence or absence of*

endangered, threatened or rare plants or animals, direct and indirect effects to wildlife movement, and compatibility of the proposed development with use of the wetland habitat area by wildlife. Discretionary development that would have a significant impact on a wetland habitat shall be prohibited unless mitigation measures are approved that would reduce the impact to a less than significant level. Notwithstanding the foregoing, discretionary development that would have a significant impact on a wetland habitat on land within a designated Existing community may be approved in conjunction with the adoption of a statement of overriding considerations by the decision-making body.

General Plan Policy COS-1.12 (Discretionary Development and Landscaping):

The County shall require landscaping associated with discretionary development, or subject to the California Water Efficient Landscape Ordinance (WELO), to be water-efficient and include native, pollinator-friendly plants consistent with WELO guidelines, as applicable. The planting of invasive and watch list plants as inventoried by the California Invasive Plant Council shall be prohibited, unless planted as a commercial agricultural crop or grown as commercial nursery stock.

Ojai Valley Area Plan Policy OV-36.1 (Biological Resources Indigenous Plan Species): *The County shall require that required revegetation or landscaping plans to incorporate indigenous plant species where feasible in order to restore habitat in already disturbed areas.*

Ojai Valley Area Plan Policy OV-36.2 (Biological Resources Biological Field Reconnaissance Report Requirement): *The County shall require a biological field reconnaissance report detailing the composition of species at the site, the presence of rare, threatened, endangered or candidate plant or animal species, significant wetlands, locally important plant communities, and suitable mitigation measures to be prepared by the County's biological consultant as part of the environmental assessment of all discretionary development permits involving earth movement or construction on previously undeveloped land where the natural vegetation still exists.*

Ojai Valley Area Plan Policy OV-36.4 (Biological Resources Agency Notification): *The County shall require the California Department of Fish and Game, the U.S. Fish and Wildlife Service, the National Audubon Society, the California Native Plant Society and the Los Padres National Forest to be contacted during the initial 30-day project review period for discretionary development proposals when proposals are submitted which may adversely affect the biological resources under their purview. This policy does not apply to emergency permits.*

Ojai Valley Area Plan Policy OV-36.7 (Biological Resources Tree Protection Ordinance Compliance): *The County shall require discretionary development to be located to avoid loss or damage to protected trees as defined in the County's Tree Protection Ordinance. The County shall require the removal of protected trees to*

only occur after review of the necessity of such removal, and in accordance with the provisions of the County's Tree Protection Ordinance.

Ojai Valley Area Plan Policy OV-36.8 (Biological Resources Protected Trees):

The County shall require discretionary development on parcels containing protected trees as defined in the County's Tree Protection Ordinance, to design necessary grading to ensure the survival and health of all such trees, except those which have been expressly authorized for removal or encroachment into the protected zone. The County shall require these trees to be protected from grading activities. If a permit has been issued for encroachment into the protected zone, the County shall require the grading plan to be accompanied by details for retaining walls and drainage devices prepared by a landscape architect.

A site visit was conducted by the Planning Division's staff and the Planning biologist on August 17, 2018, to evaluate onsite biological resources. The survey area included a walkthrough of the entire project site. A review of the California Natural Diversity Database (CNDDDB), and Planning GIS Biological Resource data layers (RMA GIS, October 2022) was also conducted. Proposed development will result in approximately 25,561 sq. ft. of disturbance to native vegetation. Four recommended mitigation measures (MM BIO-1 through BIO-4) have been placed on the project that would reduce potential impacts to biological resources to less than significant. Recommended MM BIO-1 and MM BIO-2 require a qualified arborist to prepare and implement a Tree Protection Plan to offset the impacts to the encroachment into the Tree Protection Zone (TPZ) of 72 protected trees and the removal of four protected heritage sized coast live oak trees (tree nos. 19, 21, 63, and 64) (Exhibit 4, Attachment 4). The project will be conditioned to require that the applicant 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 site disturbance (Exhibit 5, Condition Nos. 33 and 34).

Recommended MM BIO-3 requires a County approved qualified biologist to conduct surveys for the special status wildlife species, including the San Bernadino Ringneck snake, and construction monitoring (Exhibit 5, Condition No. 35). Recommended MM BIO-4 requires a landscape architect to prepare a landscape plan that prohibits the planting of nonnative invasive plants, and includes the planting of native trees, shrubs and grasses that are compatible with the historic nature of the project site (Exhibit 5, Condition No. 36).

The Sierra Madre – Castaic Wildlife corridor is located approximately 600 feet east of the project site. An existing agricultural orchard and a blue line channel provide a buffer between the corridor and the project site. The project will be conditioned to require that the applicant install permeable wildlife fencing for all new fences or walls, except for those within 100 feet of structures and retaining walls (Exhibit 5, Condition No. 31).

On May 25, 2022, the California Department of Fish and Wildlife (CDFW) provided a comment letter requesting additional analysis and information regarding biological resources (Exhibit 4a). Staff provided a response to CDFW's comments, which is included in Exhibit 4a. Staff noted that the recommended mitigation measures address CDFW's concerns and changes to the recommended mitigation measures is not required. In addition, staff noted that the project will be conditioned to require that the applicant install permeable wildlife fencing for all new fences or walls, except for those within 100 feet of structures and retaining walls (Exhibit 5, Condition No. 31), and a nesting bird survey will be required if construction occurs during the nesting season (February 1 and September 1) (Exhibit 5, Condition No. 22).

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policies COS-1.1, COS-1.2, COS-1.4, COS-1.5, COS-1.9, COS-1.10, COS-1.11, COS-1.12 and Ojai Valley Area Plan Policies OV-36.1, OV-36.2, OV-36.4, OV-36.7 and OV-36.8.

5. Scenic Resources

General Plan Policy PFS-7.4 (Discretionary Development Utility Service Line Placement): *The County shall require discretionary development to place new utility service lines underground if feasible. If undergrounding is determined by the County to be infeasible, then new utility service lines shall be placed in parallel to existing utility rights-of-way, if they exist, or sited to minimize their visual impact.*

General Plan Policy COS-1.6 (Discretionary Development on Hillsides and Slopes): *The County shall require discretionary development on hillsides and slopes, which have an average natural slope of 20 percent or greater in the area where the proposed development would occur, to be sited and designed in a manner that will minimize grading, alteration of natural landforms, and vegetation removal to avoid significant impacts to sensitive biological resources to the extent feasible.*

General Plan Policy COS-3.1 (Scenic Resources): *The County shall protect the visual character of scenic resources visible from state or County designated scenic roadways.*

General Plan Policy LU-16.10 (Character and Design Visual Access for Rural Development): *The County shall encourage discretionary development in rural areas to maintain views of hillsides, beaches, forests, creeks, and other distinctive natural areas through building orientation, height, and bulk.*

Ojai Valley Area Plan Policy OV-41.1 (Scenic Views and Vistas from Public Roads or Publicly Owned Land Resources): *The County shall prohibit discretionary development/grading which will significantly degrade or destroy a scenic view or vista from public roads or publicly-owned land, unless the development/grading is a public project, or a private project for which there is a*

substantial public benefit, and overriding considerations are adopted by the decision-making body.

The project site is located about 2.3 miles northeast of State Highway 150, an eligible scenic highway. The project site is not located within the Scenic Resource Protection (SRP) overlay zone.

The project site is flat. Access to the site is made available by two existing paved driveways adjacent to McAndrew Road. A total of 50 uncovered parking spaces are provided onsite to accommodate staff and visitors for all programs, events and the annual conference. The parking areas are not visible from MacAndrew Road. The closest parking area is setback more than 450 feet from McAndrew Road and screened by existing mature vegetation planted along the western property line. Existing and proposed structures would be located more than 150 feet east of McAndrew Road and would be screened by existing dense vegetation located along this road.

The proposed accessory structures range in height between 18 feet, 6 inches (Cottage Retreat) and 8 feet, 6 inches (Maintenance shed / Bookstore), which is below the maximum height of 35 feet allowed by Sections 8106-1.1 and 8106-7.4 of the Ventura County NCZO.

Proposed structures will be designed to incorporate natural materials, earth tones colors, and non-reflective paints and glass (Exhibit 5, Condition No. 29). As the project site has been designated by the County as a Site of Merit in December 2000, new development or alterations to existing structures must be designed in compliance with the Library of Congress Secretary of Interior (SOI) Standards by retaining a historic preservation professional to review the proposed plans for stonework alterations at the northwest edge of the project site and the garage rehabilitation prior to construction (Exhibit 5, Condition Nos. 39 and 40). In addition, exterior repairs to existing buildings are required to be approved by the County's Cultural Heritage Board planner prior to commencement of work (Exhibit 5, Condition No. 41). All utility service lines are required to be placed beneath the secondary access driveway to minimize impacts associated with trenching and native vegetation removal (Exhibit 5, Condition No. 30). The applicant will also be required to submit a visual record of the existing historic district buildings and documentation of the historic cultural landscape, historic vistas, setting circulation elements, and landscape to Historic American Buildings Survey (HABS) standards to the Library of Congress, Ojai Museum and Museum of Ventura County (Exhibit 5, Condition No. 42).

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policies PFS-7.4, COS-3.1 and LU-16.10 and Ojai Valley Area Plan Policy OV-41.1.

6. Landscaping

General Plan Policy COS-1.12 (Discretionary Development and Landscaping):

The County shall require landscaping associated with discretionary development, or subject to the California Water Efficient Landscape Ordinance (WELO), to be water-efficient and include native, pollinator-friendly plants consistent with WELO guidelines, as applicable. The planting of invasive and watch list plants as inventoried by the California Invasive Plant Council shall be prohibited, unless planted as a commercial agricultural crop or grown as commercial nursery stock.

The applicant will be required to install and maintain a 150-foot-long vegetative screen along portions of the eastern and southern property lines to minimize potential conflicts between offsite agricultural operations within 300 feet of the project site. Plant materials proposed as part of the vegetative screen are required to be included in a landscape plan prepared by a licensed landscape architect and must comply with the requirements of the California Department of Water Resources' Model Water Efficient Landscape Ordinance¹ (Exhibit 5, Condition No. 57). Landscaping must use available non-potable water sources and include a variety of native plant species (Exhibit 6, Condition No. 36).

Project design is required to comply with the Library of Congress SOI Standards. Recommended Mitigation Measures CR-1 to CR-4 require the applicant to retain a historic preservation professional to review the proposed plans for compliance with the Library of Congress SOI Standards related to: (1) stonework alterations at the northwest edge of the site; (2) garage rehabilitation; (3) landscaping; and, (4) exterior repairs to existing buildings. The applicant will also be required to submit a visual record of the existing historic district buildings and documentation of the historic cultural landscape, historic vistas, setting circulation elements, and landscape to HABS standards to the Library of Congress, Ojai Museum and Museum of Ventura County (Exhibit 5, Condition Nos. 39 through 42).

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policy COS-1.12.

7. Cultural Resources

General Plan Policy COS-4.2 (b) (Cooperation for Tribal Cultural Resource Preservation): *For discretionary projects, the County shall request local tribes contact information from Native American Heritage Commission, to identify known tribal cultural resources. If requested by one or more of the identified local tribes, the County shall engage in consultation with each local tribe to preserve, and determine appropriate handling of, identified resources within the county.*

¹ <https://www.water.ca.gov/Programs/Water-Use-And-Efficiency/Urban-Water-Use-Efficiency/Model-Water-Efficient-Landscape-Ordinance>

General Plan Policy COS-4.4 (Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation Resources): *The County shall require discretionary development be assessed for potential cultural, historical, paleontological, and archaeological resources by a qualified professional and be designed to avoid impacts to these resources whenever to the maximum extent feasible. Unavoidable impacts, whenever possible shall be reduced to a less than significant level and/or shall be mitigated by extracting maximum recoverable data.*

Ojai Valley Area Plan Policy OV-44.1 (Cultural, Historical, Paleontological, and Archaeological Resources Review): *The County shall require all discretionary development permits involving construction or earth movement within the Ojai Valley to be reviewed by the County's designated archaeological resource review organization.*

- a. Whenever such discretionary development requires a field reconnaissance study, the County shall require such study to be conducted by a County approved archaeologist to determine the potential for surface or subsurface cultural remains.*
- b. The County shall require a qualified archaeological monitor to be present to monitor significant trenching or earth movement at any such site if deemed to be needed by the study. If the archaeological monitor is not a Native American and Native American cultural resources are found at the site, the County shall require a Native American monitor.*
- c. In the event that artifacts of historical or archaeological significance are uncovered, the County shall empower the qualified archaeological monitor to halt construction in the immediate vicinity of such unearthed artifacts until disposition of the site has been determined by the County Planning Division.*

On May 10, 2021, Planning Division staff consulted with the County's Native American Tribal consultant, Julie Tumamail-Stenslie, regarding the archeological sensitivity of the site. While proposed development will occur within the developed portions of the project site, the area is still considered archaeologically sensitive. As such, the consultation concluded that the project will be conditioned to require that the applicant obtain a qualified archaeologist and Native American to monitor any subsurface grading, trenching, or construction activities for proposed development on the project site (Exhibit 5, Condition No. 37).

The proposed project is underlain with Quaternary Alluvium and Older Alluvium deposits, which do not have a strong likelihood of containing paleontological resources. However, should resources be discovered onsite during ground

disturbance, the project will be conditioned to require that the applicant will be required to: (1) stop all work that has the potential to adversely affect paleontological resources; (2) retain a paleontologist or geologist to assess the significance of the find and provide recommendations on the disposition of the resources; and (3) implement any and all measures to protect and curate the resources, subject to the Planning Division's approval (Exhibit 5, Condition No. 23).

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policies COS-4.2(b) and COS-4.4, and Ojai Valley Area Plan Policy OV-44.1.

Ojai Valley Area Plan Policy OV-32.1 (Adverse Impacts from Discretionary Development): *The County shall condition discretionary development near existing trails to mitigate or avoid adverse impacts to the existing trail system.*

The Los Padres National Forest is located approximately 560 feet north of the project site. Horn Canyon Trail and the U.S. Forest Service Trail System are located approximately 1,518 feet and 1,351 feet northeast of the project site, respectively. At these distances, and the fact that all activities and the annual conference will occur on site in designated areas, the proposed project will not have an adverse effect on the development, maintenance, or use of public trails.

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policy OV-32.1.

8. Fire Safety

General Plan Policy CTM 2.28 (Emergency Access): *The County shall ensure that all new discretionary projects are fully evaluated for potential impacts to emergency access. Mitigation of these impacts shall be handled on a project-by-project basis to guarantee continued emergency service operations and service levels.*

General Plan Policy PFS-11.4 (Emergency Vehicle Access): *The County shall require all discretionary development to provide, and existing development to maintain, adequate access for emergency vehicles, including two points of access for subdivisions and multifamily developments.*

General Plan Policy PFS-12.3 (Fire Protection Adequate Water Supply Access, and Response Times for Fire Fighting Purposes): *The County shall prohibit discretionary development in areas that lack and cannot provide adequate water supplies, access, and response times for firefighting purposes.*

General Plan Policy PFS-12.4 (Consistent Fire Protection Standards for New Development): *The County, in coordination with local water agencies and the Fire*

Protection District, shall require new discretionary development to comply with applicable standards for fire flows and fire protection.

General Plan Policy HAZ-1.1 (Wildfire Hazard Prevention Design and Practices): *The County shall continue to require development to incorporate design measures that enhance fire protection in areas of high fire risk. This shall include but is not limited to incorporation of fire-resistant structural design, use of fire-resistant landscaping, and fuel modification around the perimeter of structures.*

General Plan Policy HAZ-1.2 (Defensible Space Clear Zones): *The County shall require adherence to defensible space standards, or vegetation “clear zones,” for all existing and new structures in areas that are designated as Hazardous Fire Areas by the Ventura County Fire Protection District and High Fire Hazard Severity Zones by the California Department of Forestry and Fire Protection.*

Ojai Valley Area Plan Policy OV-24.1 (Adequate Public Facilities and Services): *The County shall require discretionary development to demonstrate that there are adequate public facilities and services available to serve the needs of the proposed development.*

Ojai Valley Area Plan Policy OV-35.1 (Adequate Water for Firefighting): *The County shall require adequate water supplies and delivery system for firefighting purposes to serve any discretionary development in accordance with the standards of the Fire Protection District.*

Ojai Valley Area Plan Policy OV-47.1 (Fire Protection District Road Standards Compliance): *The County shall require all roads to meet or exceed the standards of the Fire Protection District.*

Ojai Valley Area Plan Policy OV-48.1 (Wildfire Hazards Adequate Water and Access for Firefighting): *The County shall condition discretionary development permits to provide adequate water and access for firefighting purposes as determined by the Fire Protection District. The County shall require adequate access and fire flow improvements to be completed prior to combustible construction.*

Ojai Valley Area Plan Policy OV-48.2 (Fuel Modification Zone Requirement): *The County shall require a Fire Protection District approved fuel modification zone (fuel break) of at least 100 linear feet to be provided around all combustible structures located in “high” or “very high” fire hazard areas.*

Ojai Valley Area Plan Policy OV-49.2 (Landscape Plan Requirements for High and Very High Fire Hazard Areas): *The County shall require discretionary development in “high” and “very high” fire hazard areas, as determined by the Ventura County Fire Protection District to develop landscape plans utilizing fire*

retardant plant material, cleared areas, or other acceptable means of reducing fire hazards consistent with Fire Protection District standards.

The project site is in a High Fire Hazard Area/Fire Severity Zone or Hazardous Watershed Fire Area that is under the jurisdiction of the State of California Department of Forestry (Cal Fire). A 100-foot fuel modification zone around all structures must be maintained, and all grass and brush will be required to be removed 10 feet on each side of all access roads/driveways (Exhibit 5, Condition No. 76).

The Ventura County Fire Protection District (VCFPD) reviewed the project and determined that the existing primary and secondary access from McAndrew Road meet current standards. The project will be conditioned to require that the applicant provide turnarounds, vertical clearance and a minimum 40-foot turn radius at all turns along the onsite access roads/driveways (Exhibit 5, Condition Nos. 64 to 66). In addition, the project will be conditioned to require that the applicant implement a public safety plan that addresses procedures to be executed during an emergency and during public gatherings onsite (Exhibit 5, Condition No. 32).

The project will be conditioned to require that the applicant demonstrate that Senior Canyon Mutual Water can provide the required volume and duration of fire flow (1,500 gallons per minute at 20 psi for a minimum 2-hour duration at the project site) prior to the issuance of building permits (Exhibit 5, Condition No. 69). The project will be conditioned to require that the applicant install and maintain fire hydrants capable of meeting the required fire flow (Exhibit 5, Condition No. 70).

Ventura County Fire Station 21, addressed at 1201 Ojai Avenue in Ojai, is located approximately 3.1 miles southeast of the project site. As such, the distance and response times for firefighting purposes is adequate.

Domestic water service will continue to be provided by the Senior Canyon Mutual Water District. The project will be conditioned to require that the applicant install landscaping methods that reduce fire hazards, such as utilizing landscaping and building materials that utilize fire retardant materials. In addition, invasive plants are prohibited. (Exhibit 5, Condition No. 36).

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policies CTM-2.28, PFS-11.4, PFS-12.3, PFS-12.4, HAZ-1.1 and HAZ-1.2, and Ojai Valley Area Plan Policies OV-24.1, OV-35.1, OV-47.1, OV-48.1, OV-48.2 and 49.2.

9. Geologic and Seismic Hazards

General Plan Policy HAZ-4.1 (Projects in Earthquake Fault Zones): *The County shall prohibit new structures for human occupancy and subdivisions that*

contemplate the eventual construction of structures for human occupancy in Earthquake Fault Zones unless a geologic investigation is performed to delineate any hazard of surface fault rupture and appropriate and sufficient safeguards, based on this investigation, are incorporated into the project design.

General Plan Policy HAZ-4.3 (Structural Design): *The County shall require that all structures designed for human occupancy incorporate engineering measures to reduce the risk of and mitigate against collapse from ground shaking.*

General Plan Policy HAZ-4.8 (Seismic Hazards): *The County shall not allow development of habitable structures or hazardous materials storage facilities within areas prone to the effects of strong ground shaking, such as liquefaction, landslides, or other ground failures, unless a geotechnical engineering investigation is performed and appropriate and sufficient safeguards, based on this investigation, are incorporated into the project design.*

General Plan Policy HAZ-4.10 (Development in Landslide/Debris Flow Hazard Areas): *The County shall not allow development in mapped landslide/debris flow hazard areas unless a geologic and geotechnical engineering investigation is performed and appropriate and sufficient safeguards, based on this investigation, are incorporated into the project design.*

General Plan Policy HAZ-4.11 (Alteration of Land in Landslide/Debris Flow Hazard Areas): *The County shall not allow alteration of land in landslide/debris flow hazard areas, including concentration of water through drainage, irrigation or septic systems, removal of vegetative cover, and undercutting of the bases of slopes or other grading activity unless demonstrated by geologic, geotechnical, and civil engineering analysis that the project will not increase the landslide/debris flow hazard.*

General Plan Policy HAZ-4.13 (Design for Expansive Soils): *The County shall not allow habitable structures or individual sewage disposal systems to be placed on or in expansive soils unless suitable and appropriate safeguards are incorporated into the project design to prevent adverse effects.*

Ojai Valley Area Plan Policy OV-52.1 (Seismic and Geologic Hazards): *The County shall require developers to provide all necessary information relative to seismic and geologic hazards which may affect their project. The County shall require the developer to specify how they intend to alleviate any and all identified hazards.*

The proposed project has been sited and designed in a manner that ensures stability and structural integrity. It would neither create nor contribute significantly to geologic instability or destruction of the site or surrounding areas. The nearest fault appears to run parallel to APN 029-0-033-260, approximately 240 feet northeast of the project

site. The nearest earthquake fault hazard zone is approximately 1.47 miles southeast of the project site and the site is not within 50 feet of an Alquist-Priolo Special Fault Hazard Area. The site will be subject to moderate ground shaking caused by local and regionally active faults. The County of Ventura Building Code (2023) adopted from the California Building Code, Chapter 16, Section 1613, requires structures be designed to withstand this ground shaking. The Advanced Geotechnical Services Geotechnical and Geology report (Exhibit 4, Attachment 8) provided the structural seismic design criteria for the proposed development. The report concludes that the site is suitable for the development of the proposed project. Through the building permit process, the County's Building and Safety Division will ensure that proposed construction techniques are based on the recommendations contained in the geotechnical report.

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policies HAZ-4.1, HAZ-4.3, HAZ-4.8, HAZ-4.10, HAZ-4.11, and HAZ-4.13 and Ojai Valley Area Plan Policies OV-52.1.

10. Soil Erosion and Water Quality

General Plan Policy HAZ-4.5 (Soil Erosion and Pollution Prevention): *The County shall require discretionary development be designed to prevent soil erosion and downstream sedimentation and pollution.*

General Plan Policy HAZ-4.6 (Vegetative Resource Protection): *The County shall require discretionary development to minimize the removal of vegetation to protect against soil erosion, rockslides, and landslides.*

General Plan Policy HAZ-4.7 (Temporary Revegetation on Graded Areas): *The County shall require, as necessary, the use of soil stabilization methods on graded areas to reduce the potential for erosion, particularly during the construction phase.*

General Plan Policy HAZ-4.11 (Alteration of Land in Landslide/Debris Flow Hazard Areas): *The County shall not allow alteration of land in landslide/debris flow hazard areas, including concentration of water through drainage, irrigation or septic systems, removal of vegetative cover, and undercutting of the bases of slopes or other grading activity unless demonstrated by geologic, geotechnical, and civil engineering analysis that the project will not increase the landslide/debris flow hazard.*

General Plan Policy HAZ-4.12 (Slope Drainage): *Drainage plans that direct runoff and drainage away from slopes shall be required for construction in hillside areas.*

General Plan Policy WR-1.2 (Watershed Planning): *The County shall consider the location of a discretionary project within a watershed to determine whether or not it could negatively impact a water source. As part of discretionary project review,*

the County shall also consider local watershed management plans when considering land use development.

General Plan Policy WR-1.12 (Water Quality Protection for Discretionary Development): *The County shall evaluate the potential for discretionary development to cause deposition and discharge of sediment, debris, waste and other pollutants into surface runoff, drainage systems, surface water bodies, and groundwater. The County shall require discretionary development to minimize potential deposition and discharge through point source controls, storm water treatment, runoff reduction measures, best management practices, and low impact development.*

General Plan Policy WR-2.2 (Water Quality Protection for Discretionary Development): *The County shall evaluate the potential for discretionary development to cause deposition and discharge of sediment, debris, waste, and other contaminants into surface runoff, drainage systems, surface water bodies, and groundwater. In addition, the County shall evaluate the potential for discretionary development to limit or otherwise impair later reuse or reclamation of wastewater or stormwater. The County shall require discretionary development to minimize potential deposition and discharge through point source controls, storm water treatment, runoff reduction measures, best management practices, and low impact development.*

The project site is situated approximately 320 feet east of Thacher Creek, and approximately 3,000 feet north of Reeve's Creek, which are Ventura County Watershed Protection District jurisdictional redline channels (Ventura County GIS, October 2022). No direct connections to these channels are proposed.

As discussed in Section 5, above, the project site presently discharges drainage as sheet flow. Stormwater runoff will continue to be captured for reuse by rainwater tanks in accordance with the Preliminary Drainage Letter, provided by Jensen Design and Survey, dated July 9, 2018 (Exhibit 4, Attachment 10), and constructed according to current codes and standards.

This project is required to comply with the County Stormwater Program and the County Stormwater Development Construction Program (Exhibit 5, Condition Nos. 54 and 55). Both programs are intended to enhance water quality by preventing pollutants from being discharged during the construction phase and for the life of the project. The project will be conditioned to require that during construction, the applicant will implement BMPs for high-risk sites to reduce the potential for erosion and sedimentation. Typical BMPs include fiber rolls and sandbag barriers around drainage inlets.

With the implementation of BMPs, the proposed project will not individually or cumulatively degrade the quality of surface water causing it to exceed water quality

objectives, as contained in Chapter 3 of the Los Angeles Basin Plan. The project will not impact surface water quality because the development is not expected to result in a violation of any surface water quality standards as defined in the Los Angeles Basin Plan. No erosion or sedimentation impacts are anticipated.

To achieve compliance with stormwater standards, the project's stormwater drainage system must be designed so that the impacts from the proposed increase in impervious areas will be insignificant. The Lewis Engineering Drainage Report, November 2018 (Exhibit 4, Attachment 12) was reviewed for compliance with Appendix J of the Ventura County Building Code by the County of Ventura Public Works Agency's Engineering Services Department to ensure that runoff from the project site will not be released at a greater rate than the undeveloped flow. Public Works' review also confirms that project runoff would not change peak flow, velocity, or duration in such a way as to create an adverse impact to downstream properties. The proposed project will not result in soil disturbance of greater than 1 acre but will introduce more than 10,000 sq. ft. of impervious surface. The project will be conditioned to require that the applicant include BMPs designed to ensure compliance with the 2010 Ventura Countywide NPDES Permit Order no. CAS004002, "Development Construction Program" Subpart 4.F through implementation of an effective combination of erosion and sediment control measures for construction activities in order to protect surface water quality during any soil disturbance activities. The project will be conditioned to require that the applicant obtain a General Construction Stormwater Permit from the State Water Control Board. The permit requires a SWPPP that details preconstruction control practices to reduce sediment and other pollutants in storm water discharges and implementation of BMPs for erosion and sediment control (Exhibit 5, Condition Nos. 54 and 55). The Public Works Agency and Watershed Protection District have concluded that the project's drainage plan sufficiently addresses any potential direct or indirect impacts on flood control facilities and watercourses.

The Ventura River Watershed Management Plan and the Upper Ventura River Valley Groundwater Sustainability Plan were evaluated as a part of the County of Ventura Public Works Agency's Groundwater Quality Section (Groundwater) review of the proposed project. The Groundwater section determined that impacts to the water quality sources included in the plan will not be affected (personal communication from James Maxwell to Kristina Boero, dated February 8, 2024).

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policies HAZ-4.5, HAZ-4.6, HAZ-4.7, HAZ-4.11, HAZ-4.12, WR-1.2, WR-1.12, and WR-2.2.

11. Noise

General Plan Policy HAZ-9.2 (Noise Compatibility Standards): *The County shall review discretionary development for noise compatibility with surrounding uses. The County shall determine noise based on the following standards:*

1. *New noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed CNEL 60 or Leq1H of 65 dB(A) during any hour.*
2. *New noise sensitive uses proposed to be located near railroads shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed L10 of 60 dB(A)*
3. *New noise sensitive uses proposed to be located near airports:*
 - a. *Shall be prohibited if they are in a Community Noise Equivalent Level (CNEL) 65 dB or greater, noise contour; or*
 - b. *Shall be permitted in the Community Noise Equivalent Level (CNEL) 60 dB to CNEL 65 dB noise contour area only if means will be taken to ensure interior noise levels of CNEL 45 dB or less.*
4. *New noise generators, proposed to be located near any noise sensitive use, shall incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor, measured at the exterior wall of the building, does not exceed any of the following standards:*
 - a. *Leq1H of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.;*
 - b. *Leq1H of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.; and*
 - c. *Leq1H of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m. Construction noise shall be evaluated and, if necessary, mitigated in accordance with the Construction Noise Threshold Criteria and Control Measures (Advanced Engineering Acoustics, November 2005).*

5. *Construction noise and vibration shall be evaluated and, if necessary, mitigated in accordance with the Construction Noise Threshold Criteria and Control Plan (Advanced Engineering Acoustics, November 2005).*

Ojai Valley Area Plan Policy OV-54.1 (Noise Impact Mitigation Requirement):

The County shall prohibit discretionary development which would create significant noise impacts to locate near residences and other noise sensitive uses (dwellings, schools, hospitals, nursing homes, churches and libraries) unless the impact is mitigated to an insignificant level, as defined in the Noise section of the Countywide General Plan Hazards and Safety Element.

The project site is located adjacent to McAndrew Road and approximately one mile north of Highway 150. Noise generated from vehicular traffic on McAndrew Road is mainly from residential uses and Thacher School. The project site is located outside of the Community Noise Equivalent Level (CNEL) 65 dB(A) noise contour for Highway 150 as indicated in Table 7.1 of the Ventura County General Plan; and thus, the project site is not subject to noise levels restrictions. To ensure that proposed construction activities do not exceed exterior noise level thresholds specified in Policy HAZ-9.2.1 and the requirements of the Ventura County General Plan Construction Noise Threshold Criteria and Control Plan (2010a) noise goals, site preparation and construction activity will be limited to between 7:00 a.m. and 7:00 p.m., Monday through Friday, and from 9:00 a.m. to 7:00 p.m. Saturday, Sunday, and State holidays. Construction equipment maintenance shall be limited to the same hours (Exhibit 5, Condition No. 28). In addition, future development shall comply with the interior noise threshold (45 dB(A)) by incorporating Title 24 building standards.

Noise associated with the programs and events (dialogues and talks) will occur indoors and outdoors more than 1,000 feet from the western and northern property lines, and is expected to produce some noise from approximately 2:30 p.m. to 10:00 p.m. These programs are currently conducted onsite and would not change. No amplified music or use of a portable public address system will be utilized onsite at any time including during any of the proposed programs or the annual conference. To resolve noise complaints that may arise during programs and the annual conference, The project will be conditioned to require that the applicant provide the Planning Division a written plan of how the camp will address noise complaints. The plan will include, but will not be limited to the following: 1) verification that all residents within 1,000 feet of the CUP boundary have received written correspondence identifying how the camp intends to resolve noise complaints, the contact information of more than one employee, and phone numbers where the complainant can call in; and, 2) an Events Report shall be maintained that includes a brief description of the event, the date and time noise complaints were received, and how they were resolved. The Events Report shall be submitted to the Planning Division upon request (Exhibit 5, Condition Nos. 17 and 18).

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policy HAZ-9.2 and Ojai Valley Area Plan Policy OV-54.1.

12. Air Quality

General Plan Policy HAZ-10.2 (Air Quality Management Plan Consistency): *The County shall prohibit discretionary development that is inconsistent with the most recent adopted Air Quality Management Plan (AQMP), unless the Board of Supervisors adopts a statement of overriding considerations.*

General Plan Policy HAZ-10.3 (Air Pollution Control District Rule and Permit Compliance): *The County shall ensure that discretionary development subject to Ventura County Air Pollution Control District (VCAPCD) permit authority complies with all applicable APCD rules and permit requirements, including the use of Best Available Control Technology (BACT) as determined by the VCAPCD.*

General Plan Policy HAZ-10.11 (Air Quality Assessment Guidelines): *In evaluating air quality impacts, the County shall consider total emissions from both stationary and mobile sources, as required by the California Environmental Quality Act. The County shall evaluate discretionary development for air quality impacts using the Air Quality Assessment Guidelines as adopted by the Ventura County Air Pollution Control District (APCD), except that emissions from APCD-permitted sources shall also be included in the analysis. The County shall revise the Initial Study Assessment Guides to implement this policy.*

General Plan Policy HAZ-10.12 (Conditions for Air Quality Impacts): *The County shall require that discretionary development that would have a significant adverse air quality impact shall only be approved if it is conditioned with all feasible mitigation measures to avoid, minimize or compensate (offset) for the air quality impact. The use of innovative methods and technologies to minimize air pollution impacts shall be encourage in project design.*

General Plan Policy HAZ-10.13 (Construction Air Pollutant Best Management Practices): *Discretionary development projects that will generate construction-related air emissions shall be required by the County to incorporate best management practices (BMPs) to reduce emissions. These BMPs shall include the measures recommended by VCAPCD in its Air Quality Assessment Guidelines or otherwise to the extent applicable to the project.*

General Plan Policy HAZ-10.14 (Fugitive Dust Best Management Practices): *The County shall ensure that discretionary development which will generate fugitive dust emissions during construction activities will, to the extent feasible, incorporate appropriate BMPs to reduce emissions to be less than applicable thresholds.*

Ojai Valley Area Plan Policy OV-55.1 (Adverse Impacts on Regional Air Quality): *The County shall find discretionary development in the Ojai Valley to have a significant adverse impact on the regional air quality if daily emissions would be greater than 5 pounds per day of Reactive Organic Compounds (ROC) and/or greater than 5 pounds per day of Nitrogen Oxides (NOx).*

The proposed project has been reviewed by the Ventura County Air Pollution Control District (APCD). The APCD has determined that the project would have less than significant effects on air quality. Additionally, the project will be subject to standard conditions of approval relating to fugitive dust control (Exhibit 5, Condition No. 59) and minimizing emissions from mobile construction equipment during construction by prohibiting the idling of construction equipment for more than five minutes (Exhibit 5, Condition No. 60).

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policies HAZ-10.2, HAZ-10.3, HAZ-10.11 through HAZ-10.14 and Ojai Valley Area Plan Policy OV-55.1.