

**EXHIBIT 7 – CONSISTENCY WITH THE NON-COASTAL ZONING ORDINANCE FOR
CAMP RAMAH MAJOR MODIFICATION TO CONDITIONAL USE PERMIT NO. 3048
AND VARIANCE, CASE NOS. PL18-0052 AND PL23-0002**

Pursuant to Section 8105-4 of the Ventura County NCZO, the proposed use is allowed in the OS-80 acres, OS-40 acres, and RE-20 ac zone districts with the granting of a CUP. Upon the granting of the CUP, the proposed project will comply with this requirement.

The proposed project includes the construction and use of structures that are subject to the development standards of Section 8106-1.1 of the Ventura County NCZO. Table 1 lists the applicable development standards and a description of whether the proposed project complies with the development standards.

Table 1 – Development Standards Consistency Analysis

Type of Requirement	Zoning Ordinance Requirement	Complies?
Minimum Lot Area (Gross)	Rural Exclusive (RE) 20 acres minimum parcel size	Yes. APNs 010-0-110-120 (27.68 acres), 010-0-110-130 (28.32 acres), and 010-0-120-040 (20.45 acres) are zoned RE 20 ac. These APNs consist of one legal lot (Certificate of Compliance No. 22-12-1562).
	Open Space (OS) 40 and 80 acres minimum parcel size	Yes. APN 010-0-060-030 (173.04 acres) is zoned OS 40 and OS 80 minimum acre size; the lot is legal (Certificate of Compliance 18-04-1271).
		APN 010-0-060-070 (149.96 acres), is zoned OS 80 acres minimum parcel size; the lot is legal (Certificate of Compliance No. 23-01-1566).
		Yes. APN 010-0-070-030 (110 acres) and APN 010-0-070-300 (5.0 acres) are zoned OS 80 acres minimum parcel size. ¹ These two APNs constitute one legal lot created by deed recorded August 28, 1901, in Book 77, Page 226; Book 3174, Page 587 recorded July 31, 1967; and, in Document No. 98-169693 of the Official Records.
		No. APN 010-0-070-310 is 25 acres and zoned OS 80 acres. However, pursuant to Section 8214-3.3 of the Ventura County

¹ Government Code Section 66428 and Ventura County Subdivision Ordinance Section 8214-3.3 Lots Created By Government Conveyance.

Table 1 – Development Standards Consistency Analysis

Type of Requirement	Zoning Ordinance Requirement	Complies?
		Subdivision Ordinance, a lot created by land conveyed to or from a governmental agency is entitled to a certificate of compliance, which recognizes the lot as being a legal lot. This APN was legally created by conveyance deed from The United States of America recorded October 01, 1998, as Document No. 98-169693 of Official Records, in compliance with the State Subdivision Map Act and the Ventura County Subdivision Ordinance. The parcel was also issued a Certificate of Compliance on February 9, 2023 (Certificate of Compliance 23-01-1565).
Maximum Percentage of Building Coverage	5 percent (OS Zone) and 25 Percent (RE Zone)	Yes. APN 010-0-070-030 (110 acres, OS Zone) Existing: 1,715 sq. ft. (0.03 percent) APN 010-0-070-300 (5 acres, OS Zone) Existing 1,163 sq. ft. (0.05 percent) APN 010-0-070-310 (25 acres, OS Zone) Proposed: 10,609 sq. ft. (0.09 percent) APNs 010-0-110-130, 010-0-120-040, and 010-0-110-120 (76.45 acres, RE Zone) Existing: 97,849 sq. ft. (2.9 percent) ²
Front Setback	20 feet	Yes. APN 010-0-070-310: The proposed Machon Village is on a separate legal lot and will be setback approximately 1,760 feet north of the southern property line of APN 010-0-110-130. APN 010-0-110-130: Existing camp structures and outdoor activity areas are setback more than 580 feet north of the southern property line.
Side Setback	10 feet (OS Zone) and 5 feet (RE Zone)	Yes. APN 010-0-070-310: The proposed Machon Village will be setback approximately 50 feet from the western

² Existing development on APNs 010-0-110-130, 010-0-110-120 and 010-0-120-040 does not include the 7,402 sq. ft. of unpermitted structures; however, the additional 7,402 sq. ft. would increase the maximum building coverage to 3.1 percent.

Table 1 – Development Standards Consistency Analysis

Type of Requirement	Zoning Ordinance Requirement	Complies?
		property line and 100 feet from the eastern property line. APN 010-0-110-130: Existing camp structures and outdoor activity areas are setback more than 29 feet and 64 feet from the eastern and western property lines, respectively.
Rear Setback	15 feet	Yes. APN 010-0-070-310: The proposed Machon Village will be setback more than 1,230 feet from the northern property line. APN 010-0-110-130: Existing camp structures and outdoor activity areas are setback more than 27 feet from the northern property line.
Maximum Building Height	35 feet	Yes. The proposed central building of Machon Village is 26 feet, 6 inches in height. The proposed 1-story cabins will be a maximum of 14 feet in height. Unpermitted Structures (As Built to be Legalized): The addition to the Dining Hall will be 15 feet, 6 inches in height; the shade structures are 19 feet, 5 inches feet in height on center; and, the trellises are 13 feet in height.

The proposed continued use of the camp and proposed development is subject to the special use standards of Section 8107-17 of the Ventura County NCZO. Table 2 lists the applicable special use standards for camps and a description of whether the proposed project complies.

Table 2 – Special Use Standards Consistency Analysis for Camps

Special Use Standard	Complies?
Section 8107-17.0: Camps shall be allowed on property zoned Open Space (OS) only if the property is in agricultural production.	Yes. There is agricultural production on the OS zoned property owned by Camp Ramah.
Section 8107-17.1: Minimum lot area shall be ten acres on property zoned Rural Exclusive (RE). Minimum lot area shall be 50 acres on property zoned Open Space (OS).	Yes. RE Zoned Property: APNs 010-0-110-130 (28.32 acres), APN 010-0-120-040 (20.45 acres) and 010-0-110-120 (27.68 acres) OS Zoned Property: APNs 010-0-060-030 (173.04 acres), 010-0-060-070 (149.96 acres),

Table 2 – Special Use Standards Consistency Analysis for Camps

Special Use Standard	Complies?
	APN 010-0-070-310 (25 acres): For the purpose of complying with this special standard, the Planning Director has determined the permit area constitutes a “Lot” (refer to NCZO Article 2, definition of “Lot”) and the combined total acreage for the CUP boundary exceeds the required acreage for the RE and OS zones.
<p>Section 8107-17.2: Overnight population of guests and staff shall be limited by the following calculations. These standards shall apply to staff employed for camp activities. Where an employee is engaged in both camp and working ranch activities, the employee’s time shall be counted at 0.5 staff for calculating the staff limitation for camps. If an employee is not engaged in camp activities, none of the employee’s time shall be applied to the staff limitation for camps.</p> <p>Section 8107-17.2.2: Camps on property zoned Rural Exclusive (RE) - lot size in acres x 10.24 = the maximum number of persons to be accommodated overnight.</p> <p>APN 010-0-110-120 (27.68 acres) APN 010-0-110-130 (28.32 acres) <u>APN 010-0-120-040 (20.45 acres)</u> 76.45 acres</p> <p>76.45 acres x 10.24 = 782.8 (783 persons)</p> <p>Section 8107-17.2.3: Camps on property zoned Open Space (OS) – lot size in acres x 0.25 = the maximum number of persons to be accommodated overnight. There shall be a maximum overnight population limit of 250 guests and staff.</p> <p>APN 010-0-060-030 (173.04 acres) APN 010-0-060-070 (149.96 acres) APN 010-0-070-310 (25.00 acres) APN 010-0-070-300 (5.00 acres) <u>APN 010-0-070-030 (2.00 acres)</u> 355.00 acres 355 acres x 0.25 = 88.75 (89 persons)</p> <p>Total: 872 persons</p>	<p>Yes. Summer Months. Will comply if the applicant’s requested variance to deviate from NCZO Sections 8107-17.2.2 and 8107-17.2.3 to allow a maximum overnight population of 1,014 for the Camp’s nine-week summer session, is granted.</p> <p>Non-Summer Months. According to the Camp Ramah 2019 Programs and Activities Table (Exhibit 4, Attachment 5), during the non-summer session, Camp programs can occur simultaneously and on multiple nights. To allow the camp the flexibility to adjust non-summer month program scheduling and attendance, Planning staff identified a total of 59,400 cumulative program participant days (i.e., estimated attendees multiplied by the number of days the program is scheduled for). Camp Ramah would limit overnight population to between 550 and 872 attendees for a maximum of 28 days. All remaining programs are limited to an overnight population not to exceed 549, with a maximum of 59,400 program participant days annually (Exhibit 5, Condition Nos. 1 and 24).</p> <p>Overnight population on lots zoned OS: 194</p> <p>APN 010-0-070-310 Machon Bed Count: 116 APNs 010-0-060-030 and APNs 010-0-060-070 Overnight Camping: 75 APN 010-0-070-030 [2 acres] Residence: Camp Manager & Family</p>
Section 8107-17.3: Total daily on-site population of guests and staff shall be limited by the following calculations:	Yes. Summer Months. Maximum daily population includes overnight population (1,014) plus

Table 2 – Special Use Standards Consistency Analysis for Camps

Special Use Standard	Complies?
<p>Section 8107-17.3.2: Camps zoned Rural Exclusive (RE) - 20.48 x lot size in gross acres = total population allowed on site.</p> <p>APN 010-0-110-120 (27.68 acres) APN 010-0-110-130 (28.32 acres) APN 010-0-120-040 (20.45 acres) 76.45 acres 76.45 acres x 20.48 = 1,565.6 (1,566 persons)</p> <p>Section 8107-17.3.3: Camps zoned Open Space (OS) - 0.5 x lot size in gross acres = total population allowed on site. There shall be a maximum daily population limit of 500 guests and staff, except as permitted in Section 8107-17.3.4 below.</p> <p>APN 010-0-060-030 (173.04 acres) APN 010-0-060-070 (149.96 acres) APN 010-0-070-310 (25.00 acres) APN 010-0-070-300 (5.00 acres) APN 010-0-070-030 (2.00 acres) 355.00 acres 355 acres x 0.5 = 177.5 (178 persons)</p> <p>Total: 1,744 persons</p> <p>Section 8107-17.3.4: A larger total daily population may be allowed for special events, the frequency to be determined by the camp's Use Permit.</p>	<p>approximately 154 individuals (i.e., 73 daytime counselors); 1,241 total.</p> <p>Non-Summer Months. A maximum 1,744 daily population is potentially permitted under the NCZO. However, the conditions of approval for this project will limit the regular daily maximum during non-summer months to 549 program participants, with 37 regular daytime staff; except that for up to 28 days per year the camp may have up to 872 program participants. Each program participant day is deducted from the maximum 59,400 participant days.</p> <p>Daily population on lots zoned OS: 401</p> <p>APN 010-0-070-310 Machon Occupancy Load: 220 APNs 010-0-060-030 and APNs 010-0-060-070 Day Use (hiking): 150 APN 010-0-070-030 [2 acres] Residence: Camp Manager & Family APN 010-0-070-300 Maintenance Yard: 10</p> <p>One family visitation day is scheduled per four-week camp session where families are invited to visit the camp during the day only (a maximum of 1,250 additional daily visitors).</p>
<p>Section 8107-17.4: Building intensity shall be limited by the following standards. These standards shall apply to structures used for camp activities. Where a structure is used for both camp and working ranch activities, one-half of that structure shall be applied to the square footage limitation for camps. If a structure is not used for camp activities, it shall not be considered in the square footage limitations for camps.</p> <p>Section 8107-17.4.1 - Overnight Accommodations: Structures or portions of structures intended for sleeping and restrooms/showers (excepting those for permanent staff as defined in Sec. 8107-17.4.3) shall be limited to a collective average of 200 square feet per overnight guest and staff</p>	<p>Camp Ramah has no working ranch activities; all structures within the CUP boundary are used for or are incidental to the camp.</p> <p>No. Camp Ramah was established in 1969. The boys and girls tent villages, boys and girls bunk houses, boys and girls shower / restroom facilities, staff housing, restrooms, dining hall, amphitheater, library, Manager's House, Caretaker's House, Whizin, Friedland, Bassen Heiser Adult housing, Director's House, staff lounge, laundry, Fingehut Chapel, office</p>

Table 2 – Special Use Standards Consistency Analysis for Camps

Special Use Standard	Complies?
<p>allowed per Sec. 8107-17.2 (Overnight Population).</p> <p>Section 8107-17.4.2 - All Other Roofed Structures or Buildings: The total allowed square footage of all roofed structures or buildings other than sleeping and restroom/shower facilities shall be limited to 100 square feet per person allowed per Sec. 8107-17.3 (Daily On-Site Population).</p> <p>Section 8107-17.4.3: The residence(s) of a limited number of permanent staff such as the director, manager or caretaker are exempt from the limitations of Section 8107-17.4.1 (Overnight Accommodations).</p> <p>Section 8107-17.4.4: Since the two building intensity standards (Overnight and Total Daily) address distinctly different facilities, they shall not be interchangeable or subject to borrowing or substitutions.</p> <p>Section 8107-17.4.5: For camps/guest ranches located in the Open Space (OS) zone, no single structure shall exceed 25,000 square feet in area, and the total area of all structures used for camp/guest ranch purposes shall be limited to 50,000 square feet.</p>	<p>complex, swimming pool bathrooms, and infirmary were built prior to the adoption of Ordinance No. 4317 (2005) and are considered legal nonconforming structures (NCZO Section 8113-1). These structures are legally permitted and are not proposed to be modified as a part of the subject modification request.</p> <p>Yes. Approximately 3,298 sq. ft. is dedicated to permanent staff (i.e. director's house, 970 sq. ft., manager house, 1,715 sq. ft.; and, caretaker's house, 613 sq. ft.). This square footage is exempt from the limitations of NCZO Section 8107-17.4.1. (See NCZO, Section 8107-17.4.3.)</p> <p>Yes. The proposed Machon Village provides 4,320 sq. ft. of overnight accommodations. Approximately 116 guests, campers, and staff can stay overnight at Machon Village with each guest, camper or staff afforded approximately 36 sq. ft.</p> <p>Yes. No structure in the OS zone exceeds 25,000 sq. ft. Total square footage in the OS zone is 12,487 sq. ft. and includes the following:</p> <p>APN 010-0-070-310: Proposed Machon Village (10,609 sq. ft.) APN 010-0-070-300: Maintenance Center (1,163 sq. ft.) APN 010-0-070-030: Camp Manager's House and Garage (1,715 sq. ft.)</p>
<p>Section 8107-17.5: Camp facilities shall have adequate sewage disposal and domestic water.</p>	<p>Yes. Water service is provided by CMWD. Wastewater service is provided by the OVSD. The proposed Machon Village located on APN 010-0-070-310 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 Ventura County LAFCo.</p>
<p>Section 8107-17.6: Camp facility lighting shall be designed so as to not produce a significant amount of light and/or glare at the first offsite receptive use.</p>	<p>Yes. All new and retrofitted exterior lighting must comply with the Ventura County Dark Sky (DKS) Overlay lighting standards (NCZO Section 8109-4.7). Refer to Table 3 (below) for a detailed discussion of the DKS development standards.</p>
<p>Section 8107-17.7: Camp facilities shall be developed in accordance with applicable County standards so as to not produce a significant amount of noise.</p>	<p>Yes. MMs N-1 through N-4 (Exhibit 5, Condition Nos. 41 through 44) require the applicant to comply with General Plan Hazards Policy 9-2 Noise Compatibility Standards. Camp Ramah has incorporated the following noise control measures: (1) position the</p>

Table 2 – Special Use Standards Consistency Analysis for Camps

Special Use Standard	Complies?
	amphitheater speakers to the northwest and northeast, into the audience, and away from the eastern property line; (2) install noise attenuation devices at the tennis courts; (3) install a sound monitoring system on the amplification systems; and (4) designate a primary and secondary contact person that are available, via telecommunication, 24 hours a day.
Section 8107-17.8: Occupation of the site by a guest shall not exceed 30 consecutive days	Yes. The Camp sponsors two, four-week summer sessions (28 days) between June and August. 1. When summer camp is not in session (typically mid-August through early-June), overall annual daily and overnight population is limited to 59,400 program participants. Occupation of the site by a guest shall not exceed 30 days (Exhibit 5, Condition No. 24).
Section 8107-17.9: To ensure that the site remains an integral and cohesive unit, specific methods such as the following should be employed on a case-by-case basis: open space easements; CC&R's that restrict further use of the land, with the County as a third party; low density zoning to prevent subdivision of the site; and/or merger of parcels to create one parcel covering the entire site.	Yes. The applicant will be required to record a deed restriction with the County of Ventura to preserve and provide public access for recreational purposes over the areas containing the Cozy Dell trail and the U.S. Forest Service Trail System on APNs 010-0-060-030 and 010-0-060-070 (Exhibit 5, Condition No. 26). Additionally, except for 1.7 acres dedicated to Machon Village, the remaining 23.3 acres on APN 010-0-070-310 will be deed restricted prohibiting any further development. Passive recreational uses (i.e., hiking, walking, non-motorized biking, wildlife viewing, and camping) will be permitted on the existing trails and firebreaks (Exhibit 5, Condition No. 27).
Section. 8107-17.10: To avoid the loss of the site's natural characteristics several methods should be employed on a case-by-case basis to preserve these values: 60% of the total site should remain in its natural state or in agriculture.	Yes. The existing CUP encompasses APNs 010-0-070-300, 010-0-070-030, 010-0-110-120, 010-0-110-130 and 010-0-120-040 (83.45 acres) and will be expanded to include APNs 010-0-060-030, 010-0-060-070 and 010-0-070-310 (348 acres) for a total CUP area of 431.45 acres. The existing camp buildings and facilities total 100,727 sq. ft. Proposed structures to be legalized total 17,587 sq. ft. The maximum building coverage of the existing CUP boundary is approximately 3 percent. The maximum building coverage for the expanded CUP is 0.63 percent.
Section 8107-17.11: Parking Standards - See Article 8	Yes. Pursuant to Section 8108-4.7 of the Ventura County NCZO the number of parking spaces for a camp use is determined by the decision-making body. There are 134 existing parking spaces in the main lot adjacent to Fairview Road and 34 parking spaces distributed elsewhere around the camp (168 total). Approximately 75 parking spaces are dedicated to daytime employees. There are 255 overnight employees during the summer camp which would require 85 parking spaces (1 space is dedicated for every 3 overnight employees). Day and overnight

Table 2 – Special Use Standards Consistency Analysis for Camps

Special Use Standard	Complies?
	<p>staff therefore require 160 parking spaces. When the Camp holds Family Visitation Day during the Camp's summer programming, it arranges to rent additional parking spaces (e.g., at the Nordhoff Junior and High School at 1401 Maricopa Highway in Ojai) and shuttles guests via bus from that location two times a year. Condition No. 28 (Exhibit 5) requires the applicant to provide the contract with Nordhoff High School (or alternative location) that allows the Camp visitors to park at the school (or alternative location). Other events are arranged separately, and campers are bussed from their location or airport around the greater LA area. During the non-summer months, guests and counselors arrive and depart by bus; approximately 37 daytime staff (administrative, kitchen/housekeeping, maintenance and security) arrive and depart by private vehicle. In accordance with NZCO Section 8108-4.7, parking requirements are determined by the decision-making body. The Planning Division recommends the Planning Commission determine the existing 168 parking spaces provide sufficient parking to serve Camp Ramah.</p>
<p>Section 8107-17.12: The Camp facility project description shall address transportation to and from and within the project site, including the types of vehicles, and road and trail locations.</p>	<p>Yes. Access to the project site is available from Fairview Road (a paved public road) to Camp Ramah Road (a paved private road). Summer month campers are primarily bussed in. Non-summer month visitors would be bussed to the project site or arrive in personal vehicles. The on-site parking area and bus drop off point is located more than 100 feet from Fairview Road, south of the softball field. The applicant is proposing to reconfigure the bus drop off area (adjacent to the existing Dining Hall) with a turnaround which will improve bus circulation at the drop-off area when arriving and departing.</p> <p>The Cozy Dell and the United States Los Padres National trail system are located on APN 010-0-060-030. The applicant will be required to record a deed restriction with the County of Ventura to preserve in perpetuity public access for recreational purposes over these trails (Exhibit No. 5, Condition of Approval No. 26).</p>

The proposed project is located within a Dark Sky Overlay Zone and, therefore, is subject to the standards of Section 8109-4.7 of the Ventura County NCZO. Table 3 lists the applicable Dark Sky Overlay Zone standards and a description of whether the proposed project complies with those standards.

Table 3 – Dark Sky Overlay Zone Standards Consistency Analysis

Overlay Zone Standard	Complies?
<p>Section 8109-4.7.2(b) Existing Lighting Non-Essential Luminaires: Except for lighting subject to subsection (d) below, existing non-essential luminaires may remain in use until replaced, but shall comply with the following requirements as of November 1, 2019:</p> <p>(1) Luminaires that have adjustable mountings with the ability to be redirected shall be directed downward, to the extent feasible, to reduce glare and light trespass onto adjacent properties; and</p> <p>(2) The lighting shall be turned off during dark hours as described in Sec. 8109-4.7.4(d).</p>	<p>Yes. Existing exterior lighting at Camp Ramah consists of lighting along walking paths, under building overhangs, at building entrances, and parking and recreational area lights. There are three parking lot light poles (~8-9 feet in height) and a light above the guard shack on motion sensors that provide light on an as-needed basis. There are a total of 9 lights (20-feet in height) at the tennis courts; 4 lights, (24-feet in height) at the basketball courts; and 6 lights (15-feet in height) between the tennis and basketball courts and behind the Infirmary. Outdoor recreational facilities will not be illuminated between 10:00 p.m. and sunrise, except to complete a recreational event or activity that is in progress as of 10:00 p.m. Lighting in the basketball courts and in the area between the courts and behind the Infirmary are turned on manually and have timers which automatically turn them off when people are no longer present. (Exhibit 3, Project Plans and Speaker Location Plan). Existing non-essential lighting either has or will have adjustable mounts directed downward to avoid light trespass and glare. Existing lighting either has or will be turned off during dark hours. The applicant will be required to submit a lighting plan for all replacement and new lighting verifying compliance with NCZO Sections 8109-4.7.4(a) through (g), (i) and (j) and the special requirements and standards in accordance with MM BIO-9. (Exhibit 5, Condition No. 39).</p>
<p>Section 8109-4.7.2(c) Existing Lighting Essential Luminaires: Except for lighting subject to subsection (d) below, existing essential luminaires may remain in use until replaced, including during dark hours as described in Sec. 8109-4.7.4(d). As of November 1, 2019, existing essential luminaires that have adjustable mountings with the ability to be redirected shall be directed downward, to the extent feasible, to reduce glare and light trespass onto adjacent properties.</p>	
<p>Section 8109-4.7.4(a) General Standards Shielding and Direction of Luminaires: All outdoor luminaires shall be fully shielded, directed downward, and installed and maintained in such a manner to avoid light trespass beyond the lot line in excess of those amounts set forth in Section 8109-4.7.4(i) below. Lights at building entrances, such as porch lights and under-eave lights, may be partially shielded.</p>	
<p>Section 8109-4.7.4(b) General Standards Lighting Color: The correlated color temperature of each outdoor luminaire, except those used for security lighting (see Section 8109-4.7.4(e)), shall not exceed 3,000 Kelvin.</p> <p>Section 8109-4.7.4(c) General Standards Maximum Lumens Per Luminaire: Each outdoor luminaire, except those used for security lighting and outdoor recreational facility lighting, shall have a maximum output of 850 lumens. (See Section 8109-4.7.4(e) for standards regarding security lighting, and Section 8109-4.7.4(g) for standards regarding outdoor recreational facility lighting.)</p>	

Section 8109-4.7.4(d) General Standards Dark Hours: All outdoor luminaires, other than an essential luminaire, shall be turned off from 10:00 p.m., or when people are no longer present in exterior areas being illuminated, or the close of business hours, whichever is latest, until sunrise.

Section 8109-4.7.4(e) General Standards Security Lighting: (1) Outdoor luminaires used for security lighting shall not exceed a maximum output of 2,600 lumens per luminaire. (2) Where the light output exceeds 850 lumens, motion sensors with timers programmed to turn off the light(s) no more than 10 minutes after activation must be used between 10:00 p.m. and sunrise. The foregoing does not apply to security lighting used for agricultural operations conducted on parcels within the Agricultural Exclusive (AE), Open Space (OS), and Rural Agricultural (RA) zones. (3) Where security cameras are used in conjunction with security lighting, the lighting color may exceed 3,000 Kelvin but shall be the minimum necessary for effective operation of the security camera.

Section 8109-4.7.4(f) General Standards Parking Area Lighting: Parking area lighting shall comply with the standards set forth in Section 8108-5.12 and is not subject to any other standard set forth in this Section 8109-4.7.4.

Section 8108-5.12 Lighting: Lighting shall be provided for all parking areas in compliance with Section 8106-8.6 and the following:

- a. Parking areas that serve night-time users shall be lighted with a minimum 1 foot-candle of light at ground for security.
- b. All lights in parking areas that serve non-residential land uses, except those required for security per subsection (a) above, shall be extinguished at the end of the working day. Lights may be turned on no sooner than 1 hour before the commencement of working hours.
- c. Light poles shall be located so as not to interfere with motor vehicle door opening, vehicular movement or accessible paths of travel. To the extent possible light poles

<p>shall be located away from existing and planned trees to reduce obstruction of light by tree canopies. Light poles shall be located outside of landscape finger planters, end row planters, and tree wells. Light poles may be located in perimeter planters and continuous planter strips between parking rows.</p> <p>d. Any light fixtures adjacent to a residential land use or residentially zoned lot shall be arranged and shielded so that the light will not directly illuminate the lot or land use. This requirement for shielding applies to all light fixtures, including security lighting. e. In order to direct light downward and minimize the amount of light spilled into the dark night sky, any new lighting fixtures installed to serve above-ground, uncovered parking areas shall be full cut-off fixtures as defined by the Illuminating Engineering Society of North America (IESNA). New lighting fixtures installed for parking area canopies or similar structures shall be recessed or flush-mounted and equipped with flat lenses.</p> <p>Section 8109-4.7.4(g) General Standards Outdoor Recreational Facility Lighting:</p> <p>(1) Outdoor recreational facility lighting may exceed 850 lumens and 3,000 Kelvin per luminaire. Lighting levels for these facilities shall not exceed those recommended in the Lighting Handbook available online by the Illuminating Engineering Society of North America (IESNA) for the class of play (Sports Class I, II, III or IV).</p> <p>(2) In cases where fully-shielded luminaires would cause impairment to the visibility required for the intended recreational activity, partially-shielded luminaires and directional lighting methods may be utilized to reduce light pollution, glare and light trespass.</p> <p>(3) With the exception of security lighting as specified in Section 8109-4.7.4(e), and parking area lighting as specified in Section 8108-5.12, outdoor recreational facilities shall not be illuminated between 10:00 p.m. and sunrise, except to complete a</p>	
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<p>recreational event or activity that is in progress as of 10:00 p.m.</p> <p>(4) See Section 8109-4.7.4(j) for additional lighting requirements for outdoor recreational facilities, by zone.</p> <p>(5) The lighting system design (including lumens, Kelvin, etc.) shall be prepared by a qualifying engineer, architect or landscape architect, in conformance with this Section 8109-4.7.</p> <p>(6) The proposed lighting design shall be consistent with the purpose of this section and minimize the effects of light on the environment and surrounding properties.</p>	
<p>Section 8109-4.7.4(h) General Standards Service Station Lighting: All luminaires mounted on or recessed into the lower surface of the service station canopies shall be fully shielded and utilize flat lenses. No additional lighting is allowed on the columns of the service station.</p>	<p>Not Applicable. The proposed project does not include a service station.</p>
<p>§ 8109-4.7.4(i) General Standards Allowable Light Trespass: Outdoor lighting shall conform to the quantitative light trespass limits shown in Table 1, measured from the property line illuminated by the light source. The more restrictive zone will apply. For example, when a commercial zone abuts a single-family residential zone, the light trespass limit shall be 0.1 foot-candles at the property line.</p> <p>Table 1 Quantitative Light Trespass Limits: For the Open Space (OS), Agricultural Exclusive (AE) and Rural Exclusive (RE) Zones the Horizontal- and Vertical-plane limit is 0.1 foot-candles at property lines.</p>	<p>Yes. The applicant will be required to submit a Lighting Plan for all new lights to the Planning Division for review and approval (Exhibit 5, Condition No. 39).</p>
<p>Section 8109-4.7.4(j) General Standards Maximum Height Allowance: (1) Luminaires affixed to structures for the purpose of lighting outdoor recreational facilities (such as for equestrian arenas, batting cages, tennis courts, basketball courts, etc.) shall not be mounted higher than 15 feet above ground level. In cases where luminaires are affixed to fences, the top of the fixture shall not be higher than the height of the fence. (2) Freestanding light fixtures used to light walkways, driveways, or hardscaping shall utilize luminaires that are no higher than two feet above ground level. Freestanding light fixtures used for commercial and industrial uses shall comply with subsection (j)(3) below. (3) All other freestanding light fixtures shall not be</p>	<p>Yes. Outdoor recreational and parking lot lighting was erected prior to the adoption of the Dark Sky Overlay Ordinance (2018).</p> <p>There are 14 pathway lights that stand at 19 inches in height, three lights that light up the path between the tennis courts and the basketball courts that are 9 and a half feet in height and lollipop lights around the access road. All lights are LED 60 watts. The camp is in the process replacing all existing lights to comply with Section 8109-4.7.4(j)(2) of the NCZO, which requires freestanding light fixtures used to light walkways, driveways, or hardscaping to be no higher than two feet above finished grade.</p>

higher than 20 feet above ground level, unless specifically authorized by a discretionary permit granted under this Chapter.	
Section 8109-4.7.4(k) General Standards Night Lighting for Translucent or Transparent Enclosed Agriculture Structures: All night lighting within translucent or transparent enclosed structures used for ongoing agriculture or agricultural operations (e.g., greenhouses for crop production) shall use the following methods to reduce sky glow, beginning at 10:00 p.m. until sunrise: (1) Fully- or partially-shielded directional lighting; and (2) Blackout screening for the walls and roof, preventing interior night lighting from being visible outside the structure.	Not Applicable. There are no translucent or transparent enclosed agriculture structures associated with the proposed project.

Temporary Rental Unit Overlay Zone Special Use Standard

The proposed project is located within the Temporary Rental Unit (TRU) Overlay Zone. For properties within the boundary of the Ojai Valley Area Plan, the issuance of a permit for a TRU is permissible only on properties designated by the County as a landmark or site of merit. All other existing TRUs located within this area were required to be phased out within two years following the adoption of Ordinance No. 4523 (June 19, 2018). Camp Ramah has not operated as a TRU. Further, Camp Ramah is not considered a landmark or site of merit.

Homeshares are not considered TRU's and are allowed in the Ojai Valley area. The camp includes a manager's house and a caretaker dwelling which are occupied year-round. The caretaker's house on APN 010-0-110-130 is considered the principal dwelling and meets the definition of a homeshare, specifically a primary residence of an owner who possesses at least a twenty percent ownership interest in the subject parcel. While the caretaker dwelling could be utilized as a homeshare, the applicant has not proposed a homeshare use as part of the proposed project. A separate permit application is required to be submitted and reviewed by County staff for a homeshare use.