

**EXHIBIT 6 – GENERAL PLAN CONSISTENCY ANALYSIS FOR CAMP RAMAH  
MAJOR MODIFICATION TO CONDITIONAL USE PERMIT NO. 3048 AND  
VARIANCE, CASE NOS. PL18-0052 AND PL23-0002**

The 2040 Ventura County General Plan *Goals, Policies and Programs* (2020, page 1-1) states:

*All area plans, specific plans, project, 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.

**Land Use and Community Character**

**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 OS and RE with most of the camp buildings and structures on the lots zoned RE. Surrounding land uses are also zoned RE and developed with residential land uses. Pursuant to NCZO Section 8105-4, a Planning Commission approved CUP is required for camps 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 camp has been operating onsite since 1969. Existing buildings and structures have been constructed to blend in with the natural environment using wood and earth tone colors. Proposed development includes the construction of Machon Village. To ensure proposed development is compatible with the existing camp facilities and blends in with the natural environment and character of the community, the applicant will be required to incorporate natural materials, earth tones colors, and non-reflective paints and glass (Exhibit 5, Condition No. 21). The applicant will also be required to submit a lighting plan that complies with the development standards of the Ventura County Dark Sky Overlay zone (Exhibit 5, Condition No. 39).

The Camp lies within a valley at an elevation of 914 feet above mean sea level (msl). Adjoining residential land uses are at an elevation between 976 and 1,309 feet above msl. The nearest offsite residence is 85 feet east of the parking lot. Other offsite residences are approximately 1,100 and 1,300 feet to the east and 600 feet to the south of developed areas of the camp. During the summer camp season, hollering, cheering, singing, and laughter are all common noises. Camp Ramah also includes programs that involve amplified sound equipment. Camp activities have coexisted in relative proximity to noise sensitive land uses, however as the camp expanded over time, neighbors have experienced camp activities generating noise louder than ambient noise levels which is intensified by the topography of the surrounding area. The proposed use can coexist in relative proximity, and is not expected to unduly interfere with, the existing land uses of the surrounding properties with incorporation of the following mitigation measures:

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

It is important to note that frequency and types of events change from year to year, where there may be more events with less attendees or vice versa. The currently operative permit—CUP No. 3048—does not include any limitations for overnight or daily populations. Since 1969, when CUP No. 3048 was approved, Camp Ramah's daily and overnight population has fluctuated. Population increased when interest in the organization's social and religious camp programs became popular. Camp Ramah hosted camp programs for camps affected by the Thomas Fire in December 2017 and the Woolsey Fire in November 2018. When coronavirus-related activity restrictions were issued in March 2020, the camp was completely shut down. To better understand population at Camp Ramah, the applicant provided a list of programs and activities and the number of attendees (guests and campers) for year 2019 (Exhibit 4, Attachment 5); the number of staff was identified from the Associated Transportation Engineers Trip Generation Analysis dated December 16, 2021 (Exhibit 4, Attachment 16). In the summer months there are two, four-week summer sessions with an estimated 954 attendees and an estimated 73 daily staff, approximately 60 additional overnight campers and staff, including spouses, daycare providers, visiting educators, and special guests. During the non-summer months there are 37 daily staff. Individual non-summer month programs had between 23 and 850 attendees. Ordinance 4317, adopted in 2005, limits overnight and daily population at Camp Ramah to a maximum 872 and 1,744, respectively. Daily populations are separate from overnight populations and do not come close to the maximum 1,744, except during family visitation days when the total may be up to 2,491 as allowed under the Ventura County NCZO (Exhibit 5, Condition No. 24). The applicant is requesting a variance to deviate from this ordinance standard to allow overnight summer camp population maximum to be 1,014. To allow the camp the flexibility to adjust program scheduling and attendance during the non-summer months and identify large events, a maximum of 59,400 program participant days would be permitted annually. Program participant days are derived by multiplying the program participants by the program participant days. Between 550 and 872 program participants would be permitted for a maximum 28 days; all remaining programs would be limited to a maximum 549 program participants or less.

Based on the above discussion, the proposed project with variance approval 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.

## **Circulation, Transportation, and Mobility**

### **2. Transportation Impacts**

**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 (Roadways 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.*

The project site is in the unincorporated area of Ojai, adjacent to Fairview Road and approximately three-quarters of a mile east of Highway 33. The existing Level of Service (LOS) on Fairview Road is LOS "A" (General Plan Background Report, Transportation and Mobility Chapter, Table 6-10). LOS A means the roadway includes free uninterrupted low volume flow at high speeds with no restriction on maneuverability (lane changing) and with little or no delays. The existing LOS for Highway 33 is "E". LOS E means the roadway is at capacity, with time delays and no usable gaps in the traffic stream to maneuver. 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.

The Associated Transportation Engineers' (ATE) December 2021 traffic study (Exhibit 4, Attachment 16) evaluated<sup>1</sup> trip generation for the camp based on the applicant's 2019 Programs and Activities log which represents the programs, activities and attendance that were held onsite that year. Based on this 2019 operational data, ATE estimated that trip generation for the summer months is 213 Average Daily Trips (ADT) and 80 ADT during non-summer months for a total of 293 ADT. As these programs events and attendees are representative of the applicant's typical operations, they are considered the existing baseline setting regarding traffic impacts.

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

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

The NCZO Section 8107-17.3 permits a maximum daily population up to 1,744; however, this is a maximum potential not an entitlement, and maximum allowable population for a specific project is subject to the discretion of the permit-approving decision-maker in an amount to be set forth in the Conditions of Approval. The maximum daily population at Camp Ramah during the summer session is 1,241 (does not include the two family visitation days where a daily population of 2,491

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<sup>1</sup> ATE also evaluated traffic impacts based on the Institute of Transportation Engineers Trip Generation Manual and the San Diego Association of Governments Traffic Generators model.

people is allowed per the Ventura County NCZO) (Exhibit 5, Condition No. 24). During the non-summer session (typically mid-August through early-June), a maximum daily population at Camp Ramah include 37 staff. To allow the camp the flexibility to adjust program scheduling and attendance during the non-summer months, and to align with the Camp Ramah 2019 Events Table (Exhibit 4, Attachment 5), Planning Division staff identified a total of 59,400 program participant days in the non-summer season. A program participant is a camper, guest, or staff person that is onsite during any portion of a day/evening during the non-summer months. The camp is requesting authorization for between 550 and 872 attendees for a maximum of 28 days; all other days the maximum will be 549. Whether a program participant stays just for the day or also stays overnight, each day shall count as one program participant day against the total maximum. As noted in the example provided in Condition of Approval No. 24 (Exhibit 5), if 100 program participants are scheduled to be onsite and stay overnight between September 13-15, a total of 300 program participants are deducted from the 59,400 with 59,100 remaining. If over that same three-day time period there were an additional 50 non-overnight program participants onsite each of the three days, then an additional 150 program participant days would be deducted from the maximum. Staff and delivery trips to and from the site during summer and non-summer months will not change. The applicant's use of buses to transport people to and from the site will continue to be employed, which will reduce the number of trips on Fairview Road and State Route 33. Forty-four charter bus loads (22 trips) will accommodate the arrival and departure of 1,200 campers during the summer months. During the non-summer months, the applicant has historically held 90 events. This equates to an estimated 5,614 passenger car and bus trips per year.

To ensure arrivals and departures from the camp do not impede residential traffic on the surrounding local public roads, the applicant has proposed to reconfigure the drop off area adjacent to the existing dining hall with the construction of a traffic turnaround. The applicant will also be required to improve the turning radius and sight distance at the private driveway adjacent to Fairview Road to comply with County Road Standards (Exhibit 5, Condition No. 52). These sight improvements will increase traffic visibility and improve circulation onsite, minimizing traffic on Fairview Road and on the local roads surrounding the project site.

Public Works Agency (PWA) staff has reviewed the proposed project and determined that approval of the project would not result in the degradation of LOS for any identified roadway segments or intersections in the area. Based on the Office of Land Use and Climate Innovation (LCI) 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). As no new trips would be generated by the proposed project, the project is consistent with General Plan policies CTM-1.1 VMT Standards. In addition, a Traffic Impact Mitigation Fee is not required as no new traffic would be generated by 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.

## **Public Facilities, Services, Infrastructure, and Water Resources**

### **3. Water and Wastewater**

**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 (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 Casitas Municipal Water District (CMWD) with water service being extended to Machon Village (Conditional Water Will Serve Letter dated February 8, 2024). The applicant's current water allocation from CMWD is 37.055-acre feet per year (AFY). When the applicant submitted this CUP modification request, CMWD was under a Stage 3 Water Supply Condition that imposed a mandatory 20 percent allocation reduction resulting in an



adjusted allocation of 29.644 AFY for Camp Ramah. The applicant's projected water demand at that time was 42.6 AFY, which is 5.5 AFY more than its allocation and 13.0 AFY more than its Stage 3 allocation. On April 12, 2023, the CMWD Board of Directors adopted a Resolution recognizing that CMWD is no longer under a Stage 3 Water Supply Condition that imposed a mandatory 20 percent allocation reduction for its customers. CMWD is now in a Stage 1 Condition which increases the allocation by ten percent and discontinues the Conservation Penalty for water usage exceeding monthly allocations for residential customers and annual allocations for all other customers. Although the applicant's projected water demand exceeds by 5.5 AFY its current allocation of 37.055 AFY, CMWD will provide water to meet this demand (personal communication from Julia Aranda to Kristina Boero, dated February 8, 2024).

A portion of the proposed project overlies the Upper Ventura River Basin which is identified as a medium priority ground water basin not in critical overdraft. Groundwater will be extracted from an existing well (State Well Number [SWN] 04N23W02D01), for the purpose of irrigation. The well is located outside of the Upper Ventura River Groundwater Basin boundary. According to the Dudek Water Allocation Report, dated October 15, 2018, as amended (Exhibit 4, Attachments 7 and 8), onsite well production is currently 0.99 AFY.

The proposed project will be subject to the standards of the California Plumbing and Building Codes. These standards include requirements for water conservation, low flow plumbing fixtures, and efficient appliances. The applicant will also be required to prepare a water offset plan to offset any additional or increased water use (i.e., the additional water demand of 5.5 AFY). The plan must provide information on the number and type of new plumbing fixtures, or any other mitigations, to offset the total calculated water demand required to service the permitted use within the CMWD service area (Exhibit 5, Condition No. 57).

Wastewater service for the main camp will be provided by the Ojai Valley Sanitary District (OVSD). To provide wastewater service to the proposed Machon Village, OVSD will need to request from the Ventura County Local Agency Formation Commission (LAFCo) approximately 1.7 acres of APN 010-0-070-310 be annexed into the District's service boundary. With LAFCo's approval of the annexation, the project will be consistent with the General Plan and Ojai Valley Area Plan.

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

#### **4. Solid Waste**

**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 & Sons will provide 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 for projects 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 and construction/demolition debris recycling program ensures that the 65 percent diversion goal is met prior to the Ventura County Building and Safety Division's issuance of a building permit, consistent with the General Plan. The project has been conditioned to address recycling during the construction phase of the project (Exhibit 5, Condition Nos. 20, and 48 through 51).

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

## **5. Stormwater, Drainage, and Flood Control**

**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 06111C0559E, effective date 01/10/2010, the project site is in a location identified as Zone X, Area of Minimal Flood Hazard. The project will not require the development of new flood control facilities or 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 disturb less than 20,000 square feet (sq. ft.) of impervious surfaces and will create a soil disturbance over one acre. The applicant will be required 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 applicant will also be required to obtain a General Construction Stormwater Permit from the State Water 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).

Drainage from the project site is currently conveyed as sheet flow. The applicant has provided a hydrology analysis (Lewis Engineering, November 2018) to analyze pre- and post-development conditions. As discussed in this analysis, all post-development drainage associated with Machon Village flows into the existing sports field to the south of the development and continues as sheet flow across the field. This will distribute drainage and prevent erosive conditions. The analysis concludes that, due to the site's infiltration capacity and steep slopes, the addition of impervious surfaces resulting from the project will result in a minimal increase in stormwater volume and peak flow rates. As such, the project will not have an adverse effect on drainage and will not impact downstream facilities. The applicant will be required 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 Nos. 45 and 46).

No new landscaping is proposed. Should any changes to the existing landscaping occur, the applicant will be required to submit a landscaping and irrigation plan in compliance with the requirements of the Ventura County NCZO Sections 8106-8.2.1(d), 8106-8.2.2, 8106-8.2.3, 8106-8.2.8, and 8109-0.6.5<sup>2</sup>, as amended.

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.

## **Conservation and Open Space**

### **6. Biological Resources**

**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:*

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<sup>2</sup> Minimum landscaping for design, screening, stormwater management, slope stabilization, or revegetation purposes may be required by the Planning Director or designee dependent upon the type of development project.

*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 Plant 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.*

An Initial Study Biological Assessment (ISBA) dated February 20, 2019, was prepared by Hunt and Associates Biological Consulting Services (Exhibit 4, Attachment 9). Construction of Machon Village will result in approximately 1.7 acres of disturbance to native vegetation. Recommended MM BIO-1 through BIO-9 would reduce potential impacts to biological resources to less than significant. MM BIO-1 requires a qualified biologist to conduct pre-construction surveys and relocate special-status plants within the following vegetation Alliances: Coast Live Oak Woodland (*Quercus agrifolia*), Bush mallow Shrubland (*Malacothamnus fasciatus*) and Mule-fat Shrubland. Further, the County-approved, qualified biologist is required to prepare a Restoration Plan to establish these relocated plant alliances at a 3:1 mitigation to impact ratio. MM BIO-2 requires the qualified biologist, in consultation with the contractor, to install temporary protective fencing a minimum of 100 feet from the edge of the scrub habitat and oak woodland during construction of Machon Village. MM BIO-3 requires a qualified biologist to prepare and implement a fuel modification plan that minimizes impacts to Coast Live Oak Woodland (*Quercus agrifolia*), Bush mallow Shrubland (*Malacothamnus fasciatus*) and Mule-fat Shrubland Alliances and meets the Ventura County Fire Protection District's requirements to modify fuels surrounding proposed structures. MM BIO-6 requires a qualified biologist to conduct and prepare pre-construction surveys for special-status wildlife (e.g., mountain lion (*Felis concolor*), western fence lizard (*Sceloporus occidentalis*), western skink (*Eumeces skiltonianus*), southern alligator lizard (*Elgaria multicarinata*), gopher snake (*Pituophis melanoleucus*), common kingsnake (*Lampropeltis getulus*), and western rattlesnake (*Crotalus oreganus*)) and conduct construction monitoring. MM BIO-7 requires a qualified biologist to conduct pre-construction surveys for bat roosts and relocate identified bat roost sites if found during the nesting season (April 1 to September 30) or commence land clearing and construction activities outside the bat roost season. MM BIO-9 requires an electrical engineer to submit a lighting plan that minimizes impacts to wildlife movement and reduces offsite glare (Exhibit 5, Condition Nos. 31 through 33, 36, 37 and 39).

An Arborist Report and Tree Protection Plan, dated February 7, 2019, was prepared by Kenneth A. Knight Consulting, LLC (Exhibit 4, Attachment 4). The widening and improvements to the access road leading to Machon Village will result in the removal and encroachment of protected Coast Live Oak trees (removal of Tree Nos. 437, 438, 478, and 480 and encroachment into the Tree Protection Zone (TPZ) of Tree Nos. 481, 482, 598 and 599). To meet VCFPD minimum access standards (i.e., road width, turning radius, and turnaround), impacts to these trees could not be avoided (Exhibit 5, Condition Nos. 52, 61, 63 and 64). MM BIO-4 and MM BIO-5 require a qualified arborist to prepare and implement a Tree Protection Plan to offset the impacts to protected oak trees and to submit annual arborist monitoring reports, which address the success of the tree protection measures and the overall condition of encroached-upon trees relative to their condition prior to the widening of the access road (Exhibit 5, Condition Nos. 34 and 35).

Lastly, MM BIO-8 prohibits the use of fertilizers, rodenticides, pesticides, or herbicides by the applicant during the life of the permit or preparation and implementation of a Pest Management Plan that includes pest management practices, and identifies the fertilizers, rodenticides, pesticides, or herbicides for use, location of storage, and areas for application on the project site, if these are utilized (Exhibit 5, Condition No. 38).

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, OV36.7 and OV-36.8.

## 7. 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 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.*



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

**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 camp has been in operation on the project site since 1969. The camp is located more than half a mile north of State Highway 150, an eligible scenic highway. The camp is adjacent to Fairview Road; however, camp structures and outdoor activity areas and the proposed Machon Village are setback more than 600 and 2,000 feet north of Fairview Road, respectively.

APNs 010-0-060-030, 010-0-060-070 and 010-0-070-310 are proposed to be included as part of the CUP. The southeastern and northwestern portions of APN 010-0-060-070 and southeastern portions of APN 010-0-060-030 are located within the Scenic Resource Protection (SRP) overlay zone. The SRP Overlay Zone requires that applicants “[m]inimize alteration of the natural topography, physical features, and vegetation” (NCZO § 8109-4.1.5(a)(2)). No development is proposed on these APNs, however passive recreation (i.e., hiking and camping) is proposed along the firebreak roads and designated camping sites (Exhibit 4, Attachment 3A). Public views of the camp and the proposed Machon Village would be visible from public trails (Cozy Dell, Foothill and U.S. Forest Service Trail System). The proposed Machon Village will be an extension of the camp, being located north of existing tennis courts. A standard condition of approval requires Machon Village be constructed with colors and materials that will blend in with the surrounding areas (e.g., earth tone colors, non-reflective glass, and other non-reflective materials) and be compatible with existing camp facilities. (Exhibit 5, Condition No. 21). Additionally, the project has been conditioned to require utilities to be placed underground (Exhibit 5, Condition No. 25). The area where Machon Village will be located is relatively flat and will not be located on a ridgeline. Based on a review of the proposed grading plans (Exhibit 3), the proposed development will create a 10 percent slope in the natural grade and is designed in a manner that will minimize grading, alteration of natural landforms, and vegetation removal.

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policies PFS-7.4, COS-1.6, LU-16.10, COS-3.1, and Ojai Valley Area Plan Policy OV-41.1.

## 8. 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.*

**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 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.*

An Archaeological Phase I Report was prepared by Padre and Associates (dated September 2019) to investigate if historical and cultural resources are present on the project site. The study concluded that there are no cultural resources that exist within the project site.

On December 9, 2019, Planning Division staff consulted with the County's Native American Tribal consultant, Ms. Julie Tumamail-Stenslie. While the Archeological Phase I Report concluded there were no cultural resources located onsite, the area is still considered archaeologically sensitive. As such, the consultation concluded that the applicant will be required to obtain a qualified archaeologist and Native American monitor to observe any subsurface grading, trenching, or construction activities for proposed development on the project site (Exhibit 5, Condition No. 40).

The proposed project is underlain with Quaternary Alluvium and Older Alluvium deposits. According to the Ventura County Initial Study Assessment Guidelines, these deposits do not have a strong likelihood of containing paleontological resources. However, in the event resources are discovered onsite during ground disturbance, the project has been conditioned to require the applicant to stop all work and retain a paleontologist or geologist to assess the significance of the find and provide recommendations on the disposition of the resources (Exhibit 5, Condition No. 22).

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

## 9. Open Space

**General Plan Policy COS-9.1 (Open Space Preservation):** *The County shall preserve natural open space resources through:*

- *the concentration of development in Urban Areas and Existing Communities;*
- *use of cluster or compact development techniques in discretionary development adjacent to natural open space resources;*
- *maintaining large lot sizes in agricultural areas, rural and open space areas; discouraging conversion of lands currently used for agricultural production or grazing;*
- *limiting development in areas constrained by natural hazards; and*
- *encouraging agricultural and ranching interests to maintain natural habitat in open space areas where the terrain or soil is not conducive to agricultural production or grazing.*

**General Plan Policy COS-9.3 (Open Space Preservation):** *The County shall place a high priority on preserving open space lands for recreation, habitat protection, wildlife movement, flood hazard management, public safety, water resource protection, and overall community benefit.*

**Ojai Valley Area Plan Policy OV-15.1 (Purpose of the Open Space Designation):** *The County shall use the Open Space designation to define the boundaries of the*

*Existing Community and Rural designated areas, in order to prevent urban sprawl and to promote the efficient use of public facilities and services by confining the areas of development.*

**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 camp provides a recreational amenity to community youth and various organizations in a context of a camp use and property, which includes use of the open space consistent with General Plan Policy COS 9.3. The applicant will utilize the public recreational trails for hiking and camping in the open space on APN 010-0-060-030 (Exhibit 5, Condition Nos. 26 and 27). Although the subject property is not located in a critical habitat area or designated wildlife corridor, wildlife could utilize the open spaces areas in the Los Padres National Forest and migrate south. Night lighting will be limited in intensity, shielded, and cast down and away from any adjacent habitat areas (Exhibit 5, Condition No. 29), in order to avoid adversely affecting wildlife.. To ensure adequate public safety levels are maintained during indoor/outdoor public gatherings on the camp-owned open space and rural exclusive zoned parcels, the applicant will be required to develop and maintain a Public Safety Plan that addresses such items as emergency vehicle ingress and egress, fire protection, emergency medical services, evacuation and safe dispersal areas, public assembly areas and the directing of both attendees and vehicles (including the parking of vehicles), vendor and food concession distribution, and method(s) for emergency response at each onsite event (Exhibit 5, Condition No. 79). Finally, the applicant will also be required to obtain a General Construction Stormwater Permit from the State Water Control Board. The permit requires the SWPPP to include details of 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) on the camp-owned open space and rural exclusive zoned parcels.

Wastewater service for the main camp will be provided by the Ojai Valley Sanitary District (OVSD). To provide wastewater service to the proposed Machon Village, OVSD will need to request from the Ventura County Local Agency Formation Commission (LAFCo) approximately 1.7 acres of APN 010-0-070-310 be annexed into the District's service boundary. The remaining 23.3 acres of APN 010-0-070-310 would be deed restricted to confine development to only 1.7 acres and to prevent urban sprawl into the open space (Exhibit 5, Condition No. 27).

To preserve natural resources, including but not limited to trails, the applicant will be required to record a deed restriction with the County of Ventura to preserve in perpetuity and to provide public access to pass and repass for recreational purposes over the areas containing the Cozy Dell trail and a U.S. Forest Service trail located

on APN 010-0-060-030 (Exhibit 5, sub-exhibit 1, Recreational Trails and Fire Break Roads Map), (Exhibit 5, Condition No. 26).

Based on the above discussion, the proposed project is consistent with Ventura County General Plan Policies COS-9.1, COS-9.3 and Ojai Valley Area Plan Policies OV-15.1 and OV-32.1.

## 10. Fire Hazards and 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 (Adequate Water Supply, Access, and Response Times for Firefighting 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 Ventura County Fire Protection District (VCFPD) reviewed the project and determined there were no significant issues with respect to access or fire flow. 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). All existing and proposed development will be required to comply with the requirements of the current Ventura County Building and Fire Code requirements.

The nearest fire station is Ventura County Fire Station No. 21, located at 1201 Ojai Avenue in Ojai approximately 3.1 miles southeast of the project site. Emergency access to the project site will be provided via the existing driveway extending from Fairview Road. The driveway has been designed to meet fire safety standards, including maximum grade and minimum width. The applicant will be required to conduct an engineering analysis of the turning radius at the east corner of the driveway adjacent to Fairview Road to determine that the radius meets current code

requirements, that there is adequate sight distance on both sides of the driveway, and ensure the driveway meets the County Road Standard Plates E-2a (Commercial Driveways) and E-7 (Rural Driveway ADT < 1,000). The existing secondary access road will be extended with a fire access turnaround, located along the western property line to provide emergency vehicle access to Machon Village (Exhibit 5, Condition Nos. 52, 64 and 65).

The proposed project will be served with water by the Casitas Municipal Water District (CMWD). The applicant will be required to provide certification that the minimum required fire flow is available at the site (approximately 1,500 gallons per minute at 20 pounds per square inch (psi) for a minimum 2-hour duration). Fire hydrants shall also be installed per the current adopted edition of the Ventura County Fire Code, Appendix C, which requires the approval of a site plan identifying the location, type of hydrant and number and size of outlets prior to building permit issuance (Exhibit 5, Condition Nos. 70 and 71). CMWD facilities are adequate to provide the needed fire flow to the property.

A 100-foot fuel modification zone around all structures must be maintained, and all grass and brush will be required to be removed a distance of 10 feet on each side of all access roads/driveways. In addition, the applicant will be required to obtain a County-approved qualified biologist to prepare a Fuel Modification Plan that specifies the methods of modifying vegetation surrounding proposed structures at Machon Village (Exhibit 5, Condition No. 33).

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, 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.

## **11. 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 Machon Village 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. There are no known active or potentially active faults extending through the proposed project based on State of California Earthquake Fault Zones in accordance with the Alquist-Priolo Earthquake Fault Zoning Act. The site will however be subject to moderate ground shaking caused by 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 Geotechnical Investigation, prepared by Feffer Geological Consulting, dated July 7, 2014 (Exhibit 4, Attachment 10), provides the structural seismic design criteria (Page 9) for the proposed project, and may be required to be updated to the Building Code in effect at the time of building permit issuance.



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 Policy OV-52.1.

## **12. 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.*

**Ventura County 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 in Zone 1, Ventura River Watershed. An unnamed tributary to McDonald Canyon Drain crosses through the camp from APN 010-0-070-030 to the east, moving southwest across APN 010-0-110-130. The proposed Machon Village will not negatively impact this drainage channel because proposed development is over 500 feet from this tributary, separated by existing camp facilities, and outside the surface water feature layer (Ventura County GIS, October 2022).

As discussed in Section 5, above, the project site presently discharges drainage as sheet flow. Stormwater runoff will continue to flow overland in a southerly direction to the sports field directly to the south where it will be detained in the grassy field. This will reduce stormwater velocity and disperse the flow.

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. During construction, the applicant will be required to implement Best Management Practices (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 ensures 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 disturb less than 20,000 sq. ft. of impervious surfaces and will create a soil disturbance over one acre. The applicant will be required to include BMPs designed to ensure compliance with the County's NPDES permit through implementation of an effective combination of erosion and sediment control measures for construction activities to protect surface water quality during any soil disturbance activities. The applicant will also be required to obtain a General Construction Stormwater Permit from the State Water Control Board. The permit requires the SWPPP to include details of 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.

### 13. 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.*
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.*

A Noise Assessment prepared by Dudek & Associates, dated October 2019 (amended in February 2020), March 6, 2020, and September 30, 2020 (Exhibit 4, Attachment 13) that evaluated new noise impacts resulting from the proposed project, concluded that camp activities/programs taking place at the amphitheater and tennis courts exceed the General Plan noise thresholds. Recommended MMs N-1 and N-2 require the applicant to position the speakers away from the amphitheater stage and eastern property line and to install noise blankets at the basketball and tennis courts. MM N-3 requires the applicant to identify a noise monitor responsible for ensuring amplified noise remains below the General Plan noise thresholds and ceases by 10:00 pm, and installation of a sound monitoring system on the exterior amplification. MM N-4 requires the applicant to designate a

primary and secondary contact person to be onsite and be available, via telecommunication, 24 hours a day. In addition, the applicant will be required to coordinate with the property owners of 1447 Foothill Road, 406 Fairview Road, and 312 Fairview Road to measure noise levels at these offsite locations to the extent the property owners agree to noise monitoring and authorize access to the property to measure noise (Exhibit 5, Condition No. 21). to determine if sound attenuation measures are reducing amplified noise to or below the General Plan noise thresholds and, if not, to provide recommendations for additional noise attenuation measures (Exhibit 5, Condition No. 29). Development on the project site will be done in compliance with the 2019 California Building Code. Energy standards in the Building Code include requirements such as insulation and double-paned windows, which help to reduce interior noise levels. Compliance with the Building Code typically attenuates 20 to 25 dB(A) of noise. As a result, the interior habitable space will not exceed a CNEL of 45 dB(A).

To ensure construction activities associated with Machon Village are in compliance with the requirements of the Ventura County General Plan, Construction Noise Threshold Criteria and Control Plan (2010a), the applicant will be required to limit site preparation and construction activity to the hours 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. (Exhibit 5, Condition No. 23).

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.

#### **14. 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 a standard condition of approval relating to fugitive dust control (Exhibit 5, Condition Nos. 58) and to ensure that ozone precursor and diesel particulate emissions from mobile construction equipment are reduced during construction by prohibiting the idling of construction equipment for more than five minutes (Exhibit 5, Condition No. 59).

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.