

******CAUTION:**This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear Planning Commission and Board of Supervisors,

I am writing to express my deep concerns regarding the proposed ordinance permitting property owners in the rural areas of the County to operate commercial "Low Impact Camping Areas" (LICAs) on parcels larger than 5 acres. Furthermore, I am concerned that these campgrounds would be exempt from the CEQA (California Environmental Quality Act), and would not require an environmental review. The RBDA (Rural Bonny Doon Association) board has highlighted some of the specific concerns that merit serious consideration:

Legal Compliance: The proposed ordinance conflicts with current state law. It would be premature to adopt it until corresponding changes are made at the state level to allow such campgrounds.

Affordability Assurance: While the ordinance purports to provide access to low-income visitors, there must be measures in place to ensure that campsite prices are capped to genuinely offer a low-cost alternative.

Equal Regulatory Oversight: Construction on LICA parcels, including yurts and domes, should be subject to the same county review processes as on other parcels.

Environmental Impact Assessment: Rejecting the CEQA exemption is imperative. A comprehensive environmental review under CEQA must be conducted to assess the potential impacts of this proposal.

Alignment with County Plans: It is essential to demonstrate the ordinance's consistency with the County General Plan and the Local Coastal Plan.

Zoning Restrictions: LICAs should not be permitted on parcels zoned as residential, such as RA or RR.

Environmental Preservation: Despite the "low impact" designation, the ordinance appears to promote development versus minimizing environmental impacts in sensitive areas.

Coastal Zone Compliance: Campsites within the Coastal Zone must obtain a Coastal Development Permit.

On-Site Management Requirement: Given the safety concerns, noise disturbances, and issues with camper compliance, it is crucial to mandate on-site management during occupancy to enforce rules effectively.

Fee Structure: Permit fees should be substantial enough to address the increase in associated administrative and enforcement costs.

While I understand the goal of facilitating visits from individuals of all income levels, I urge the Planning Commission to vote against the proposed ordinance until it undergoes a thorough CEQA environmental review, aligns with the General Plan and Local Coastal Plan, and addresses all of the concerns outlined above.

Thank you for recognizing the importance of thoroughly assessing the ordinance's implications, especially concerning its compliance with state law, pricing regulations, environmental impact evaluations, and zoning constraints.

Sincerely,

Dr. Billie Jeanne Bensen Martin

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Dear Commissioners (and County Supervisors):

I've just now learned of the proposed resolution before the Planning Commission at our meeting tomorrow re: adding a section **to the county code (13.10.695) regulating low-impact camping areas in unincorporated areas of Sta Cruz County**. I'm unable to attend the meeting so I am hastily preparing these comments and questions.

While I am very sympathetic to the goals of both (a) enabling a diverse group of visitors of all income levels to enjoy the wonderful biodiversity of our county and (b) providing residents and homeowners with economic opportunities, I find the proposed change to the county code to be a highly flawed response. I am a 25 year resident of Sta Cruz county and have always lived in the unincorporated area of Bonny Doon. I'm aware of the context and the issues in the county's unincorporated areas. **I strongly urge the Planning Commission to vote "no" until the following questions and concerns are addressed:**

1. Evidence base: As I understand it, the proposed ordinance would not receive CEQA review, which is puzzling given its likely environmental impacts. I see in the background docs that concerns about environmental impacts have been raised but they seem to have been addressed in an ad hoc manner without comprehensive data. A solid ordinance, particularly one purporting to be "low impact" requires a thorough understanding of environmental impacts, lest it unwittingly damage the very biodiversity it seeks to champion. Further, I don't see evidence backing underlying assumptions behind the ordinance--e.g. how many properties would potentially be eligible? Where are the parcels located and what possible impacts on neighborhoods, fire safety, road maintenance, emergency infrastructure, etc, have been anticipated? What type of demand is anticipated? Without further data, it seems to me that the ordinance is built on unvalidated assumptions. At a minimum, **CEQA should be required** and a more comprehensive **analysis done** (unless I've missed it) **of potential breadth, risks and benefits** of the proposed code change.

2. Public engagement and alignment to the county general plan. It seems the development of this proposed change started on Dec 20. There have been 2 meetings for public comment--one at which all commissioners were not present and ordinance was not ready, so in essence only one meaningful discussion. The meetings were just 2 weeks apart. Given what's at stake, the process seems rushed and not sufficiently inclusive of public input. I've not seen significant engagement of residents from the unincorporated regions of the county, nor did I see mention re: how this proposed change would align to the county's general plan. Until the question of how this proposed change fits with the

general plan and until there is more engagement with the community, it seems premature to advance it.

3. Alignment to the state law: The background document notes that this change seeks to align to a proposed State Bill 620, which staff believe will be passed later this year. I suggest that the county hold off installing a new local code/regulation until state legal guidance is in place. It seems unwise to get out in front of the state. I don't understand the rationale for the haste. Should SB 620 not pass or if it doesn't pass for some time, this new local code would then be in conflict with state law.

4. Monitoring and enforcement capacity. Monitoring the implementation of county codes in the dispersed rural areas of the county is already a major burden for the county. In Bonny Doon, we experience violation after violation of codes in our rural residential neighbors. The county cannot keep up with these. Adding another burden on county staff and rural residents to monitor yet another commercial activity in rural areas and neighborhoods and to expect county services to respond to resulting needs seems unwise and inefficient.

5. Concerns re: being Low-cost and low impact: The proposed change talks about promoting **low income** and **low impact** camping, yet I see no meaningful definition or measures to ensure either of these goals are met.

Starting with "low income":

- How will the county ensure that "low-income" visitors benefit? Even if there are "caps" set on what one can charge (a) how will this be monitored and enforced?; and b) how will the county assess whether the "campers" are in fact the "low income" visitors that you seek to attract and benefit?

Re "low-impact" camping:

- What does "low impact" mean? How will it be monitored? Low impact to whom? ...wildlife? water resources? Plant life? Neighbors? Does low impact take into account the costs for country safety and emergency services that may be called out for health emergencies, noise complaints, fire or security issues? Is it "low impact" for the private road associations that assume the costs of traffic?
- The fact that the code change would allow for the construction of yurts, domes and structures as part of "low impact" camping is a major red flag. A common sense definition of "low impact" does not include new structures! Any construction of yurts, domes, structures must be subject to the same county requirements as for other zoned parcels.
- I did not see mention of requiring a coastal permit for camping sites in the protected coastal zone. If this were to proceed, that seems absolutely necessary

- How can this be gauged as "low impact" if CEQA has not been done (to assess possible impacts and set a baseline)?

6. Negative Residential impacts: The ordinance includes RA. Anything zoned "residential" should NOT be allowed to have commercial campgrounds. This is common sense. RA parcels are in residential neighborhoods. Agricultural activities are very distinct from camping. RA parcels are located in neighborhood communities. As a community we share risks related to fire, storms, emergencies, security etc. We already have problems with illegal campgrounds creating noise, fire risk, security problems-- I don't see this code change doing anything to regulate these but only creating more opportunities for abuse.

7. Weak supervision and safety It seems that the proposed change does not require the presence of an on-site manager, even when campers are present. If this is correct, this is a big mistake. Having people camping in rural areas w/out infrastructure or on-site support and supervision is fraught with risk and it shifts the burden of risk and monitoring from the owner to the community. Who will be responsible for monitoring that campers adhere to the rules? Simply providing a phone number to call, when cell phone and other services are often unreliable in the unincorporated areas of the county, is insufficient.

8) Cost-benefit: The financial model must be constructed to make this approach viable. Permit fees and fines for non compliance should be set at a high rate and monitoring of these must be enforced. I did not see mention of assumptions guiding the financial model.

If this code change were to proceed, I urge you to consider the questions above. BUT in sum, my stronger request is to not advance this change. The solution to the the lack of viable affordable camping options in Sta Cruz county is not -- I don't think -- via a dispersed, local, private property solution that will be unwieldy, risky, costly, and difficult to manage and monitor. To promote better access to nature and camping requires a public solution or a public-private partnership. Please, do not advance this code change, at least not without further data, consultation and community engagement.

Thank you for your efforts and your attention.

Kathy Toner
327 Sunlit Lane
Bonny Doon, CA

--

Kathy Toner (*she/her/ella*)
831 325 6685

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The below comments are in reference to the March 13 2024 agenda item 7 :

I have multiple concerns over the proposed shortcut through the county and coastal planning commission regulatory structure in relation to the camping ordinance being considered in the Bonny Doon area of Santa Cruz county.

Commercial campgrounds without on-site management, fire abatement, traffic, and potential environmental damage are all issues that may be mitigated by allowing existing regulation procedures to do their job.

Shortcutting of these existing regulatory processes is not only short sighted, but a path to actual disaster.

As a resident of Bonny Doon for over 20 years I stand with my neighbors in urging you to vote NO on this ordinance.

sincerely,

Sean Walker

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Dear Nicholas,

These comments are in reference to the March 13 Agenda item 7.

I believe that it is **inappropriate** to adopt the proposed ordinance now, as it is contrary to current state law. The ordinance should not be adopted until at least state law is changed to allow these campgrounds.

Construction of yurts, domes, and other structures on LICA parcels should require the same County review as on other parcels.

The CEQA exemption should be rejected. Meaningful CEQA (environmental) review must be conducted.

There is no evidence showing that the ordinance is consistent with the County General Plan or Local Coastal Plan.

Low Impact Camping Area (LICA) permits should not be allowed on parcels zoned residential, such as RA or RR.

Despite “low impact” in the acronym “LICA”, the proposed ordinance encourages development rather than minimizing impact in environmentally sensitive areas.

Under any circumstances, campsites in the Coastal Zone must receive a Coastal Development Permit.

Because of safety issues (including **fire hazard**), noise, impacts on neighbors, problems with campers not following occupancy limits or other rules, it is absolutely insufficient to have the campground manager located off-site. The property manager must be on-site whenever sites are occupied. Who else will make sure rules are followed? There is too great of a fire risk, not to mention noise and other impacts, for homeowners if campers do not following the safety or courtesy rules.

If the ordinance is approved, permit fees should be **significant**.

Although I am somewhat sympathetic with the goals of enabling visitors of all income levels to visit our County, I urge the Planning Commission to **vote “no”** on the proposed ordinance until the proposal receives adequate CEQA environmental review, the ordinance is determined to be consistent with the General Plan and LCP, and our other concerns are adequately addressed.

Sincerely,
Melissa
Resident of Bonny Doon

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I am writing to express my strong opposition to the proposed "Ordinance that would allow property owners in rural parts of the County to operate commercial "Low Impact Camping Areas" (LICAs) on parcels greater than 5 acres."

We currently have many public camping areas in the state that are not expensive and are available to meet the needs of low income residents who need or want to take advantage of those opportunities. With no oversight in these proposed rural camping sites, we will experience large areas that are filled with filth and debris, as we currently see around the city of Santa Cruz. This idea would create a horrible blight to our wilderness and should absolutely not be allowed.

I have significant issues and concerns with the fact these "campgrounds" would be exempt from CEQA (California Environmental Quality Act) environmental review. It is currently not allowed by state law, and even if it were to be, I would oppose such a change.

Construction of yurts, domes, and other structures on LICA parcels should absolutely require the same County review as on other parcels. The CEQA exemption should be rejected. Meaningful CEQA (environmental) review must be conducted. And there is no evidence showing that the ordinance is consistent with the County General Plan or Local Coastal Plan.

Low Impact Camping Area (LICA) permits should not be allowed on parcels zoned residential, such as RA or RR. Despite "low impact" in the acronym "LICA", the proposed ordinance encourages development rather than minimizing impact in environmentally sensitive areas.

Under any circumstances, campsites in the Coastal Zone must receive a Coastal Development Permit.

Because of safety issues (including fire hazard), noise, impacts on neighbors, problems with campers not following occupancy limits or other rules, it is insufficient to have the

campground manager located off-site. The property manager must be on-site whenever sites are occupied. Who else will make sure rules are followed?

If the ordinance is approved, permit fees should be significant.

I strongly urge the Planning Commission to vote “no” on this proposed ordinance.

Sincerely,

Shirley Treanor
270 Northwest Drive, Santa Cruz, CA 95060

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I am writing to express my concerns regarding the March 13 Planning Commission Agenda Item 7. I am a 35 year resident of Bonny Doon, and am concerned about commercial camping in rural areas such as Bonny Doon.

I am concerned that those who visit the area may not treat the environment like their own home. In particular, fire, noise, and damage to the environment are of my greatest concerns. I believe without an onsite manager, there will be no one to enforce regulations/rules that are intended to address these concerns. How quickly can an illegal campfire turn into a forest fire? (i.e. Martin fire). How can noise be addressed when it's a phone call away? How can you prevent soil erosion and runoff into drinking water? Most rural areas rely on well water. We are already seeing more damage to the forest from mountain bikers traveling on illegal trails without regard to the environment. Once damage is done, it takes years (decades) to recover. It's been 3 1/2 years since the fire, and we're still trying to recover. We may never see the forest return in our lifetime. A very sad situation. Let's not create a situation that we'll regret in the future.

Respectfully,

Terri Gomes

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I am in agreement with the Rural Bonny Doon Association Board Concerns. Having lived through the CZU fire, I am particularly worried about fire risks.

Thank you for your attention,
Joan Frey - 43 year Bonny Doon Resident

We believe that it is inappropriate to adopt the proposed ordinance now, as it is contrary to current state law. The ordinance should not be adopted until state law is changed to allow these campgrounds.

The proposed ordinance is purported to provide access to campsites for low-income visitors. The ordinance must set a cap on campsite prices to ensure that they are, in fact, a low-cost alternative.

Construction of yurts, domes, and other structures on LICA parcels should require the same County review as on other parcels.

The CEQA exemption should be rejected. Meaningful CEQA (environmental) review must be conducted.

There is no evidence showing that the ordinance is consistent with the County General Plan or Local Coastal Plan.

Low Impact Camping Area (LICA) permits should not be allowed on parcels zoned residential, such as RA or RR.

Despite “low impact” in the acronym “LICA”, the proposed ordinance encourages development rather than minimizing impact in environmentally sensitive areas.

Under any circumstances, campsites in the Coastal Zone must receive a Coastal Development Permit.

Because of safety issues (including fire hazard), noise, impacts on neighbors, problems with campers not following occupancy limits or other rules, it is insufficient to have the campground manager located off-site. The property manager must be on-site whenever sites are occupied. Who else will make sure rules are followed?

If the ordinance is approved, permit fees should be significant.

Although we are sympathetic with the goals of enabling visitors of all income levels to visit our County, we urge the Planning Commission to vote “no” on the proposed ordinance until the proposal receives adequate CEQA environmental review, the ordinance is determined to be consistent with the General Plan and LCP, and our other concerns are adequately addressed.

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Dear Mr. Brown,

I am submitting the following comments to the March 13 Agenda item 7 urging the county to not proceed with the proposed LICA ordinance.

We believe that it is inappropriate to adopt the proposed ordinance now, as it is contrary to current state law. The ordinance should not be adopted until state law is changed to allow these campgrounds.

The proposed ordinance is purported to provide access to campsites for low-income visitors. The ordinance must set a cap on campsite prices to ensure that they are, in fact, a low-cost alternative.

Construction of yurts, domes, and other structures on LICA parcels should require the same County review as on other parcels.

The CEQA exemption should be rejected. Meaningful CEQA (environmental) review must be conducted.

There is no evidence showing that the ordinance is consistent with the County General Plan or Local Coastal Plan.

Low Impact Camping Area (LICA) permits should not be allowed on parcels zoned residential, such as RA or RR.

Despite “low impact” in the acronym “LICA”, the proposed ordinance encourages development rather than minimizing impact in environmentally sensitive areas.

Under any circumstances, campsites in the Coastal Zone must receive a Coastal Development Permit.

Because of safety issues (including fire hazard), noise, impacts on neighbors, problems with campers not following occupancy limits or other rules, it is insufficient to have the campground manager located off-site. The property manager must be on-site whenever sites are occupied. Who else will make sure rules are followed?

If the ordinance is approved, permit fees should be significant.

Although we are sympathetic with the goals of enabling visitors of all income levels to visit our County, we urge the Planning Commission to vote “no” on the proposed ordinance until the proposal receives adequate CEQA environmental review, the ordinance is determined to be consistent with the General Plan and LCP, and our other concerns are adequately addressed.

Robert Arko | robarko@gmail.com
2 Thayer, Bonny Doon CA 95060

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There hasn't been nearly enough (any) publicity about this ordinance, which will have widespread impacts on the rural areas of our county. I don't understand why it is being rushed through when even the state law regarding it hasn't been passed.

The details of the proposal and its potential impacts on rural residents and neighborhoods needs to be more fully understood and considered. These impacts include increases in traffic, noise, numbers of people living on a parcel, fire danger, septic constraints and more.

Please postpone voting on this proposal until the people who will be affected by it understand what is being proposed and have a fair opportunity to comment on it.

Thank you,
Ted Benhari
Bonny Doon

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I am respectfully asking you to consider my objection to the Agenda item 7.

Aside from my overwhelming objection to Agenda item 7 completely, may I ask that before anymore taxpayers money is spent on this ludicrous concept, that the unresolved Great Whale biking issue, our rural road conditions...potholes and lack of drain culvert maintenance, excessive road speeds and roadside litter/dumping be given first priority over Agenda item 7. Introducing more people into our often neglected rural county neighborhoods seems actionable.

Sincerely,

Robert J. Fitch Jr

Sent from my iPhone

Rural Bonny Doon Association
P.O. Box 551
Felton, CA 95018
March 12, 2024

Dear Santa Cruz County Planning Commission,

I am writing to detail the Rural Bonny Doon Association's objections to the proposed Low Impact Camping Area (LICA) ordinance, Agenda item 7 for your March 13 meeting. RBDA is sympathetic to the goals of enabling visitors of all income levels to visit our County, but we urge the Planning Commission to vote "no" on the proposed ordinance until the proposal receives adequate CEQA environmental review, the ordinance is determined to be consistent with the County General Plan and Local Coastal Plan, guarantees for low-income visitor access are added, and our concerns about impacts to residential neighborhoods and environment are adequately addressed.

We believe that it is inappropriate to consider the proposed ordinance now, as it is contrary to current state law (State Special Occupancy Parks Act, SOPA). The ordinance should not be considered until state law is changed to allow these campgrounds (i.e., after SB620 is passed).

The proposed ordinance is purported to provide access to campsites for low-income visitors, but various details of the ordinance are inconsistent with this objective. The ordinance must set a cap on campsite prices to ensure that they are, in fact, low-cost. The ordinance includes a provision that exempts property owners from providing sanitation facilities for campsites that are restricted to self-contained recreational vehicles. This provision is counter to the stated goal of increasing access for low-income visitors because it selectively reduces development costs for campsites that are restricted to people who bring trailers or motor homes.

Electrical generators should be prohibited, whether within motor homes or as external units. Noise from generators degrades the back-to-nature experience that is being promoted, disturbs neighbors and wildlife, and prohibiting generators is unlikely to affect low-income campers.

The CEQA exemption should be rejected. Meaningful CEQA (environmental) review must be conducted.

There is no evidence showing that the ordinance is consistent with the County General Plan or Local Coastal Plan.

Low Impact Camping Area (LICA) permits should not be allowed on parcels zoned residential, such as RA or RR.

Construction of yurts, domes, and other structures on LICA parcels should require the same County review as on other parcels.

The proposed rules would prohibit pets from lands within 200 feet of CA properties. The rules must give equal protection to nearby residential properties.

Despite “low impact” in the acronym “LICA”, the proposed ordinance encourages development rather than minimizing impact in environmentally sensitive areas.

Under any circumstances, campsites in the Coastal Zone must receive a Coastal Development Permit.

The proposed fire-prevention and enforcement measures are grossly inadequate. Many campers are accustomed to having campfires, and although campfires are prohibited in LICA areas, there is no requirement that someone be present to enforce this rule. It is insufficient to have an off-site campground manager. The property manager must be on-site whenever campsites are occupied. Who

else will make sure fire rules are followed? Similarly, the campground manager must be on-site to ensure that campers follow rules on occupancy, noise, pets, and generators.

If the ordinance is approved, permit fees should be significant.

Respectfully Yours,

David M. Rubin
Chair, Rural Bonny Doon Association Executive Board
board@rbda.us

cc: BoardOfSupervisors@santacruzcountyca.gov

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Where was prior notice for residents? After going through hell to rebuild we have to live next to campgrounds? This is ridiculous and I'm angry as hell!
Sent from my iPad, Dennis and Denise Mozeleski

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Dear Supervisors of Santa Cruz County,

I am submitting the following comments to the March 13 Agenda item 7 urging the county to not proceed with the proposed LICA ordinance.

We believe that it is inappropriate to adopt the proposed ordinance now, as it is contrary to current state law. The ordinance should not be adopted until state law is changed to allow these campgrounds.

The proposed ordinance is purported to provide access to campsites for low-income visitors. The ordinance must set a cap on campsite prices to ensure that they are, in fact, a low-cost alternative.

Construction of yurts, domes, and other structures on LICA parcels should require the same County review as on other parcels.

The CEQA exemption should be rejected. Meaningful CEQA (environmental) review must be conducted.

There is no evidence showing that the ordinance is consistent with the County General Plan or Local Coastal Plan.

Low Impact Camping Area (LICA) permits should not be allowed on parcels zoned residential, such as RA or RR.

Despite “low impact” in the acronym “LICA”, the proposed ordinance encourages development rather than minimizing impact in environmentally sensitive areas.

Under any circumstances, campsites in the Coastal Zone must receive a Coastal Development Permit.

Because of safety issues (including fire hazard), noise, impacts on neighbors, problems with campers not following occupancy limits or other rules, it is insufficient to have the campground manager located off-site. The property manager must be on-site whenever sites are occupied. Who else will make sure rules are followed?

If the ordinance is approved, permit fees should be significant.

Although we are sympathetic with the goals of enabling visitors of all income levels to visit our County, we urge the Planning Commission to vote “no” on the proposed ordinance until the proposal receives adequate CEQA environmental review, the ordinance is determined to be consistent with the General Plan and LCP, and our other concerns are adequately addressed.

Robert Arko | robarko@gmail.com
2 Thayer, Bonny Doon CA 95060

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Thank you for your attention,
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There is no evidence showing that the ordinance is consistent with the County General Plan or Local Coastal Plan.

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insufficient to have the campground manager located off-site. The property manager must be on-site whenever sites are occupied. Who else will make sure rules are followed?

If the ordinance is approved, permit fees should be significant.

Although we are sympathetic with the goals of enabling visitors of all income levels to visit our County, we urge the Planning Commission to vote “no” on the proposed ordinance until the proposal receives adequate CEQA environmental review, the ordinance is determined to be consistent with the General Plan and LCP, and our other concerns are adequately addressed.

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March 13 Agenda item 7

Our family has lived in Bonny Doon since 1994. It is a rare bit of California to be treasured, reminding us of what California used to be. Sadly, in the last 15 years we have also been reminded that California as it used to be included fires raging out of control through redwood forests. We have been evacuated three times, first by the Martin fire, then the Lockheed fire and three years ago by the CZU fire.

The Martin and Lockheed fires were both started by campfires and that's what worries me most about Agenda item 7 which would allow property owners to set up campsites all around Bonny Doon. Even though campfires might not be allowed, it seems inevitable that some campers will have them anyway.

Then there is human waste. How are the property owners going to provide for that?

Anyway, I'm a member of the Rural Bonny Doon Association and agree with the list of concerns they have prepared. Here it is -- I hope you will read it and vote carefully.

Dave Deamer

We believe that it is inappropriate to adopt the proposed ordinance now, as it is contrary to current state law. The ordinance should not be adopted until state law is changed to allow these campgrounds.

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If the ordinance is approved, permit fees should be significant.

Although we are sympathetic with the goals of enabling visitors of all income levels to visit our County, we urge the Planning Commission to vote “no” on the proposed ordinance until the proposal receives adequate CEQA environmental review, the ordinance is determined to be consistent with the General Plan and LCP, and our other concerns are adequately addressed.

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Dear Board of Supervisors,

I am opposed to allowing private camp grounds in our neighborhood.

Two years ago my neighbor had illegal camping on his 25 acre property. We share an access road and we came home weekly to 10 airstream trailers with 80 people in and on the moon rocks. At the time, we filed a formal complaint with the county to have this stopped. Campers were lighting fires on the moon rocks to cook food. They were not respectful of the neighborhood or the fragile protected habitat in the dry lake bed. It completely changed our way of life.

Strangers were coming onto our property and we feared for our safety.

Please do not allow private camp grounds in our neighborhood. Life as we know it will cease to exist.

I have documented photos of the above events should you care to consider our request.

Sincerely,

Victoria Slama

Bob Goodenough

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I am writing in reference to the March 13 Agenda item 7.

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There is no evidence showing that the ordinance is consistent with the County General Plan or Local Coastal Plan.

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Despite “low impact” in the acronym “LICA”, the proposed ordinance encourages development rather than minimizing impact in environmentally sensitive areas.

Under any circumstances, campsites in the Coastal Zone must receive a Coastal Development Permit.

Because of safety issues (including fire hazard), noise, impacts on neighbors, problems with campers not following occupancy limits or other rules, it is insufficient to have the campground manager located off-site. The property manager must be on-site whenever sites are occupied. Who else will make sure rules are followed?

If the ordinance is approved, permit fees should be significant.

Although we are sympathetic with the goals of enabling visitors of all income levels to visit our County, we urge the Planning Commission to vote “no” on the proposed ordinance until the proposal receives adequate CEQA environmental review, the ordinance is determined to be consistent with the General Plan and LCP, and our other concerns are adequately addressed.

Thank you,
David Potratz
6015 Bonny Doon Road
Santa Cruz, CA. 95060

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I am writing to express my strong opposition to the proposed "Ordinance that would allow property owners in rural parts of the County to operate commercial "Low Impact Camping Areas" (LICAs) on parcels greater than 5 acres."

We currently have many public camping areas in the state that are not expensive and are available to meet the needs of low income residents who need or want to take advantage of those opportunities. With no oversight in these proposed rural camping sites, we will experience large areas that are filled with filth and debris, as we currently see around the city of Santa Cruz. This idea would create a horrible blight to our wilderness and should absolutely not be allowed.

I have significant issues and concerns with the fact these "campgrounds" would be exempt from CEQA (California Environmental Quality Act) environmental review. It is currently not allowed by state law, and even if it were to be, I would oppose such a change.

Construction of yurts, domes, and other structures on LICA parcels should absolutely require the same County review as on other parcels. The CEQA exemption should be rejected. Meaningful CEQA (environmental) review must be conducted. And there is no evidence showing that the ordinance is consistent with the County General Plan or Local Coastal Plan.

Low Impact Camping Area (LICA) permits should not be allowed on parcels zoned residential, such as RA or RR. Despite "low impact" in the acronym "LICA", the proposed ordinance encourages development rather than minimizing impact in environmentally sensitive areas.

Under any circumstances, campsites in the Coastal Zone must receive a Coastal Development Permit.

Because of safety issues (including fire hazard), noise, impacts on neighbors, problems with campers not following occupancy limits or other rules, it is insufficient to have the

campground manager located off-site. The property manager must be on-site whenever sites are occupied. Who else will make sure rules are followed?

If the ordinance is approved, permit fees should be significant.

I strongly urge the Planning Commission to vote “no” on this proposed ordinance.

Sincerely,

Shirley Treanor
270 Northwest Drive, Santa Cruz, CA 95060

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This is horrible for those of us who went through hell to rebuild to now live next to campgrounds.
Where was the notice for residents! I will attend this meeting and I'm angry as hell.
Sent from my iPad, Dennis and Denise Mozeleski

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Dear Mr. Brown,

I would like to provide some feedback on the low impact camping proposal.

We have 4.875 acres in south county. We have occasionally hosted RV or trailer campers (no tent camping) for guests who have found us on HipCamp. We are retired and we have enjoyed hosting mostly retired couples and International guests who are taking the trip of a life time exploring the US. People love being here in south county, and being walking distance to the beach.

We are highly supportive of the low impact camping proposal, but would like to urgently ask you to reconsider the following:

- please reduce the required acreage! We are just shy by a sliver. Or, please provide a process for exceptions to be approved.
- many of our guests have trailers longer than 25 feet. The longer rigs seem to be very popular with retirees. We have plenty of room to accommodate up to 38 foot rigs with no issue.

We love RVing ourselves, and love being able to share our special place. We are responsible and respectful, and we have been blessed by guests who have enjoyed being here. We are the highest rated HipCamp in the county and uniquely located near the beach. We serve a responsible camping community who have enriched our lives with their visits, and feedback from our guests reflects that they feel the same.

Please reconsider the acreage limitation and the length of the rig.

Thank you very much!

Robin Leidenthal

Sent from my iPad

To Whom It May Concern,

I am writing to express my extreme concern over the proposed ordinance on rural “low-impact”

camping areas (LICA) which is being considered by the Planning Commission.

In regard to allowing campsites on private property of unincorporated areas in Santa Cruz County, I have many concerns:

- Who will enforce the rules and regulations IF this ordinance is passed???
 - Who will enforce each individual property owner’s supervision of their own campsites in regards to SEWAGE DISPOSAL, WILDFIRE RISK, DISTURBANCE OF SOIL, VEGETATION AND WILDLIFE HABITAT, NOISE AND TRESPASSING COMPLAINTS FROM NEIGHBORS, TRASH PICKUP, LENGTH OF TENANT’S STAY, COMPLIANCE WITH THE ORDINANCE!
 - Where will the funds come from to inspect and determine whether impacts are high or low and to regulate them if they are high??
 - Campsites should NOT BE ALLOWED on steep slopes because of erosion/sedimentation and increased surface runoff that could cause flooding, fallen trees and increased street/road maintenance costs both County and private.
 - If separate individual campsites are allowed rather than one cluster, there will be MORE impacts from individual access roads.
 - Streams affected by wildfires are probably so damaged by sediment that no more pollution should be allowed... ESPECIALLY SINCE SANTA CRUZ RELIES ON MOORE CREEK FOR MUCH OF THEIR WATER SUPPLY!
 - A CEQA Notice of Exemption is not appropriate for adoption of the proposed ordinance since there are many foreseeable direct, indirect and cumulative environmental and socioeconomic impacts. If an ordinance is approved, the permitting process should not be ministerial. CEQA documentation and site-specific mitigation if needed should be required for each individual permit.
 - Given the above very real possibility, the liability costs would or could deter the incentive of potential private campground owners.
- Those are my immediate questions. And now I will add my personal concerns as a land owner and resident of Bonny Doon since 1978.
- I made Bonny Doon my home as I am a rural dweller. I want it to stay RURAL.
 - I completely oppose commercial enterprise in my community that is zoned as RURAL RESIDENTIAL.
 - The above questions outline my concerns in regards to the changes that approval of this ordinance would bring to my community.
 - I realize that many home/land owners in Bonny Doon rent ADUs or do Air BnB... no one disputes that but, this ordinance is unacceptable to me, it opens up my rural home to a

continuous,very sizable transient population without any regulation... it is unacceptable!

I appreciate my chance to send you my very sincere thoughts.

Very Respectfully,

Catherine Bayer

4727 Bonny Doon Rd

Santa Cruz, CA 95060

bayercathy@hotmail.com

Landline: 831-429-0180

Cell: 831-818-3588

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I am writing in reference to the March 13 Agenda item 7.

I believe that it is inappropriate to adopt the proposed ordinance now, as it is contrary to current state law. The ordinance should not be adopted until state law is changed to allow these campgrounds.

The proposed ordinance is purported to provide access to campsites for low-income visitors. The ordinance must set a cap on campsite prices to ensure that they are, in fact, a low-cost alternative.

Construction of yurts, domes, and other structures on LICA parcels should require the same County review as on other parcels.

The CEQA exemption should be rejected. Meaningful CEQA (environmental) review must be conducted.

There is no evidence showing that the ordinance is consistent with the County General Plan or Local Coastal Plan.

Low Impact Camping Area (LICA) permits should not be allowed on parcels zoned residential, such as RA or RR.

Despite “low impact” in the acronym “LICA”, the proposed ordinance encourages development rather than minimizing impact in environmentally sensitive areas.

Under any circumstances, campsites in the Coastal Zone must receive a Coastal Development Permit.

Because of safety issues (including fire hazard), noise, impacts on neighbors, problems with campers not following occupancy limits or other rules, it is insufficient to have the campground manager located off-site. The property manager must be on-site whenever sites are occupied. Who else will make sure rules are followed?

If the ordinance is approved, permit fees should be significant.

Although we are sympathetic with the goals of enabling visitors of all income levels to visit our County, we urge the Planning Commission to vote “no” on the proposed ordinance until the proposal receives adequate CEQA environmental review, the ordinance is determined to be consistent with the General Plan and LCP, and our other concerns are adequately addressed.

Thank you,
David Potratz
6015 Bonny Doon Road
Santa Cruz, CA. 95060

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Dear Chair Shepard and Santa Cruz County planning commissioners,

We are strong supporters of the LICA ordinance.

We own 16 acres of land in unincorporated Santa Cruz County (on Summit Road) with unparalleled panoramic views of Santa Cruz County and the Monterey bay.

We have been stewards of this land for 25 years. When the pandemic struck we designed campsites for people that were individually separated for people to get out safely. The real need for camping that would be completely private was definite.

We believed our sites were in compliance until county planning told us we were a organized camp and had to do a matrix calculation.

We wanted to continue operating the campsites and began the work of becoming compliant (designing a permitted campground) last year. We were then informed through County Planning and Swift Consultants that we did not have enough developable acreage for even one (1) campsite. We could, however, have three (3) dwelling units.

We put a lot of time and energy into becoming compliant. But ultimately we were told we could not operate without a variance hearing and had to withdraw our application. Since then our property has been for sale.

We were excited when the state passed legislation sb620 to allow low impact camping. And the good news continued as the local government proposed to adopt these changes. We thought we would be able to keep our property.

The first draft of the ordinance was acceptable and we were ready for the opportunity to revisit the venture.

This second draft has the addition of “no LICA permits allowed in the critical fire area” and no camp fires.

Being on Summit Road we have direct access to the evacuation route. We are in the critical fire area designation (according to the GIS).

We ask that line E #7b be amended to state that “those in a critical fire area may operate if they can provide 10,000 gallons of water, a hydrant, and the approval of the fire marshal”. Of course, it would be fine to strike it completely as well.

The original draft described the fire requirements and they were both reasonable and understandable. We can provide 10,000 gallons of water. We did not allow wood or charcoal fires of any kind. With the exception of propane.

We would be happy to pay TOT.

If this current ordinance passes we will continue to be selling our property.

Thank you for your consideration and continued service to the citizens of Santa Cruz County.

Noah Selman
Selmansc LLC

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Hello Nicholas,

Thank you for including my comments for consideration. I have detailed my situation in other comments along the way. Here is a recap.

I am a resident of and run a nonprofit at two different locations in unincorporated Santa Cruz County in Aptos and Watsonville. I live with my family on a beautiful 2.94 acre property in Aptos and run Farm Education programs on a 19 acre property in unincorporated Watsonville.

Please consider the following amendments to the proposed Ordinance:

- Allow low-impact camping on properties as small as 2 acres.
 - Our family property has a 1400 square foot house on almost 3 acres. There is plenty of space for several campsites and parking spaces without being anywhere near neighbors who all have similar size lots.
 - I suggest tying number of sites to property size allowing at least 1 campsite on 2 acres, 2 on 5, etc. acknowledging that more sites have a greater impact and may require more acreage.
- Allow fires.
 - There are several ways to have a more nuanced solution to this.
 - Fires could be required to be inside a fire pit (there are several state park campgrounds in similar settings in our county that allow fires in designated areas - similar rules would be the most equitable solution).
 - Hosting fires could be tied to water storage capacity requiring a minimum 5k storage to host a fire for instance.
 - Hosting fires could require a certain amount of clearance around the fire ring 20-50' for instance.
 - Allow fires if a camp site host is on site
 - Any of these suggestions could enable campers to have the beloved campfire without threatening the safety of such an activity. I no way should all of these be required to be met in order to have fires.
- Allowing camping in Agricultural zones - please add ag properties in current ag production. Many of the properties around our farm are zone A1A but not in Agricultural production.

Thank you for the opportunity to submit a public comment and communicate my support for the County's work on low impact camping (Item #7). I am excited to see Santa Cruz investing in compatible uses like camping that will create economic opportunities for

local landowners and increase visitor access to our county's natural resources in a sustainable way.

On the organic farm that houses our community-based food, farming and nature stewardship programs, we are eager to expand our educational offerings with low-impact camping opportunities that we know our clients are excited to access. We get requests during every season to provide space on the farm for campers.

Thank you for your consideration.

--

Jessica Ridgeway (*she | her | hers*)

Executive Director

Farm Discovery at Live Earth

Seed to Mouth, Farm to Fork, Child to Community Connections

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