



March 12, 2024

Santa Cruz County Planning Commission
701 Street, 4th Floor
Santa Cruz CA 95060

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Emily Burns, Ph.D.
David Freyberg, Ph.D.
Alan Launer, Ph.D.
Virginia Matzek, Ph.D.
Lisa Micheli, Ph.D.
Wallace J. Nichols, Ph.D.
Scott Stephens, Ph.D.
Chris Wilmers, Ph.D.

The Redwood Circle
Philippe Cohen, Ph.D.
Richard Conniff
Robert L. Katz
Fred Keeley
Elinor & Richard Mansfield
Dan Martin
Emily Thurber
Cole Wilbur

Dear Chair and Commissioners:

Thank you for the opportunity to comment on Santa Cruz County's draft Low Impact Camping Ordinance (LICO). Sempervirens Fund (SVF) has been working to preserve and protect redwood forests in the Santa Cruz Mountains for 124 years. Our organization owns conservation easements and fee title on over 10,000 acres of forest in the Santa Cruz Mountains. These are lands we actively steward to preserve and restore their ecological values, provide for public access, and help mitigate the impacts of climate change on our communities. As an organization that promotes the enjoyment of redwood forests and public access to these magnificent lands, we applaud the goal of promoting affordable access to the outdoors. It is essential, however, that this access be provided in a way that ensures visitor safety; responds to the concerns of neighbors and the surrounding community; and protects the natural resources the visitors are there to enjoy.

Drafting a regulatory system for a new use in the rural areas is an iterative process. Sempervirens appreciates the changes that have already been made in this version of the LICO, including the exclusion of certain parcels that contain sensitive habitat; the prohibition on campfires; and the plans to develop a ministerial process to allow camping or farm-stays on agricultural land that is already in commercial use. These are steps in the right direction, but additional changes are needed to strike the balance between meeting the needs of visitors and protecting our communities and the natural resources of this region.

As drafted, this ordinance could result in over 1,000 parcels, housing many campers, in rural and remote areas, every single day of the year. We encourage the Commission to take time to consult with various stakeholders, including public and private landowners and public safety officials, to better understand the implications of this policy before it moves forward. Sempervirens recommends consideration of the following additional protections:

- to ensure that riparian areas and other sensitive areas are not disturbed, there should be a 200' buffer, as there is for lands in active agricultural use, to provide better protection from human disturbance;
- signage and/or fencing should be required to remind visitors not to enter or disturb these buffer areas;
- restrictions on camping during periods of intense precipitation, high winds, or high fire risk;
- prohibition on smoking; requirements regarding where vehicles park to reduce the risk of ignition in dry grass; onsite water tanks to extinguish fire quickly;



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- exclusion of some parcels where ingress and egress are limited to ensure campers could be safely and quickly evacuated in the event of a wildfire or other emergency; and
- the CEQA exemption should be revisited, as recommended the exemption is too broad as drafted for the natural lands in the Santa Cruz Mountains, some commercial ag lands may be appropriate for such an exemption

This region has, unfortunately, had a master class over the last few years in how to prepare for, and respond to, natural disasters like the CZU Fire. A key lesson is that we must plan for public safety and emergency response when contemplating a program that will potentially bring many thousands of new visitors into the mountains on a given summer weekend.

As the draft moves through the County's process, we look forward to continuing to work with decision makers and staff to ensure we collectively meet the goals of greater access to the outdoors while taking into account habitat protection and public safety. Thank you again for the opportunity to comment on this item.

Sincerely,

Rachel Dann
Director of Government Relations