

## **PUBLIC COMMENT – ITEM 8 – PLANNING COMMISSION 5/8/2024**

-----Original Message-----

From: Denise Mozeleski <demozeleski@comcast.net>

Sent: Tuesday, May 7, 2024 7:57 AM

To: Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>

Subject: LICA

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To Nicholas Brown,

We are victims of the CZU Lightening fire and lost everything. We are strongly opposed to allowing camping in Bonny Doon. We moved here in 1979 for the peace and quiet and joy of a rural setting. We are in our mid seventies and could not go through such a horrific experience again. Both the Martin fire and Lockheed fire were caused by unattended campfires. I realize our fire was lightening caused but most people camping will want to make a fire whether allowed or not. The danger of it happening with campers here who have no skin in the game because they don't live here is incredibly high. I can't believe this would even be considered. If it goes through, we will all feel like we are being raked through the coals again after Cal Fire did not even come to save us and use all the water we had the first time. It is absolutely shameful to even consider this.

Denise and Dennis Mozeleski

Sent from my iPad

-----Original Message-----

From: Bernhard Knigge <bernhard.knigge@gmail.com>

Sent: Monday, May 6, 2024 11:07 PM

To: Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>

Subject: Fwd: Public hearing comments 5:00pm PT on Monday, May 6th

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> Hello

>

> I would love to be able to contact and connect with homeowners in the Santa Cruz mountains and then be able to camp on their property - certainly following their house rules and fire rules. All campgrounds in Big Basin are booked out years in advance. It's basically impossible to enjoy the redwoods. I also think many home owners would love to share their property and nature experience with like minded nature lovers.

>

> Regards,

> Bernhard

**From:** Pamela Dawn Schipper <pameladawn\_schipper@pvusd.net>

**Sent:** Monday, May 6, 2024 5:08 PM

**To:** Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>; Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>

**Subject:** Low Impact camping in our county

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Good evening,

I am writing in favor of low impact short term camping on private property in our county. I have lived in the unincorporated rural area of Santa Cruz County for over 20 years. The home I originally bought here was destroyed by fire when in escrow, due to a renter running a meth lab here.

My tenancy on my property has had a much more positive impact on the environment than the previous owner/renters. I am interested in providing short term camping on land that is now clean, due to my extensive efforts to be a good steward of the environment, and preserve a natural and thriving landscape for my family into future generations.

I am also a teacher in Pajaro Valley Unified School district. I work as a special education teacher, so I am not able to attend the board meeting held during my work hours. However, i would like to stress that my position is in high demand, and currently, many teachers are leaving the area because our salaries can not keep up with the cost of living in our county. In that regard, sharing my property with camping visitors supplements my income, and allows me to keep living and teaching in the area I really love.

I have been generating tax income for the county through short term camping for one year. I have met really lovely visitors to our community, without putting any strain on the housing deficit. As far as fire concern, I have followed county guidelines for seasonal fire bans. The Hipcamp platform is very easy to toggle on fire bans from June to September (or any time fire danger is high)

I believe there are many benefits to hosting short-term camping. As a property owner, I am very attentive to preserving a clean, natural habitat. It generates funds for clearing brush that poses fire and flooding hazards, keeping my family and nearby neighbors safer. I

generate tax revenue for the county without increasing demand on the fragile housing market. And, I am able to continue working in the county in the essential capacity as a special education teacher.

Please consider these benefits as you discuss your next steps toward permitting low-impact short-term camping on private property.

I appreciate your consideration,

Sincerely

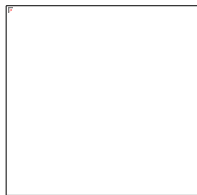
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Dawn Schipper

Resource Specialist

CCMS room P1-6

[pameladawn\\_schipper@pvusd.net](mailto:pameladawn_schipper@pvusd.net)



-----Original Message-----

From: Daniel Mollner <tropicalbreeze@icloud.com>

Sent: Monday, May 6, 2024 4:53 PM

To: Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>

Subject: 5/8 Public Comment - Planning Commission Meeting Item #8

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

Dear Nicholas Brown,

I got so excited a few months back when I heard there was positive movement on an ordinance that would be of significant benefit in a variety of ways. Whether environmental or economic I think the pros far outweigh the cons. Please support an ordinance that allows for "low impact camping areas" in Santa Cruz County and that creates an accessible approval process for local landowners who are interested in hosting small, low impact camping areas on private land.

I'm interested in getting more people outside and off their devices and screens. Things like this make getting out in nature much more accessible. Have you tried booking campsites through the state or fed? It's crazy, it's expensive, and things are often booked up so far in advance it's impossible to have a spontaneous adventure. Plus this kinda stuff helps local landowners find a way to help make ends meet. Times are getting tough financially and they ain't gonna improve any time soon, I'm afraid. This is the kind of thing that is needed now more than ever, in my opinion, and I hope you'll agree!

Sincerely,  
Daniel Mollner

**From:** Rebecca Zub <rebeccazub@gmail.com>

**Sent:** Monday, May 6, 2024 3:36 PM

**To:** Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>; Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>

**Cc:** Baber 🍁 <piotrab@gmail.com>

**Subject:** 5/8 Public Comment - Planning Commission Meeting Item #8 Low Impact Camping Ordinance

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To the members of the Santa Cruz Planning Commission,

We (Rebecca Zub and Piotr Butkiewicz) are long time travelers and campers, currently touring the US in our camper trailer. We are writing to express our heartfelt enthusiasm for the experiences of camping in general, as well as on unique properties such as through the Hipcamp network.

Camping allows us to reconnect with nature, unwind from the stressors of daily life, and create lasting memories with loved ones and new friends. The unique charm of Hipcamps, adds an extra layer of adventure and authenticity to the experience. We've had the opportunity to use Hipcamp in Asheville, NC, where we met a number of kind and generous people that share a love of the outdoors.

Daisy's campground offering is another unique option for folks like us to be able to experience a new natural climate at a very affordable rate. For us in particular, this was the first time visiting the Pacific Northwest where we got to spend time in person with the majestic Coast Redwoods and other local flora and fauna. It was truly an incredible learning experience!

While we do enjoy staying at more traditional established campgrounds along our journeys, they tend to often book up well in advance, which doesn't leave much room for spontaneity. Hipcamp options like Daisy's fill a much needed gap for travelers like us, who

love more spontaneous adventures and really enjoy the combination of a lovely natural campground setting paired with the opportunity to meet wonderful people like Daisy and the fantastic guests she attracts to her home. Small private camping opportunities like Daisy's also offer a sense of safety that is not found at more crowded campgrounds, due to the private home-like setting.

The overwhelming majority of travelers, nomads, and campers like us are deeply passionate about caring for and stewarding the natural places that we have the opportunity to explore and enjoy. We live by the motto "leave it better than you found it" which includes cleaning up after ourselves, cleaning up any refuse we may find accidentally left behind by others, and minimizing any ecological impact we may have on the places we visit so that they can be around for generations to come to see and enjoy as well.

We sincerely hope that Daisy and others like her can continue to offer their spaces for travelers like us in the future.

Sincerely,

Rebecca Zub and Piotr Butkiewicz

-----Original Message-----

From: ridgecrestfarm <njselman@gmail.com>

Sent: Monday, May 6, 2024 2:37 PM

To: Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>

Subject: 5/8 Public Comment - Planning Commission Meeting Item #8

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

Dear Planning Commission,

Thank you for taking public comment.

We have been consciously stewarding our land since 1999. I volunteered for our local fire department for 15 yrs.

We take pride in allowing campers to enjoy our panoramic views of the county.

Developing these sites during pandemic allowed us to survive financially and offer space for respite to families in need.

Allowing Camping on our property is also how we make a living to put food on the table for our family.

By not allowing camping in very high fire areas we will not be able to even keep our land. Let alone make a living with it.

The regulations set forth already restrict land owners by not allow open fires on LICA property's.

We feel we should be included in applicability because restrictions are in place to safeguard property's.

The one time a camper started an open fire on our property i quickly extinguished it and made sure the camper was not allowed to return. We also have signage stating no fires.

Two years ago the Estrada fire (a prescribed burn) in October got out of control and burned 83 acres.

That property is located in a high fire risk area but is mitigable by having 10000 gallons of water available and with Calfire sign off. Cal fire was on scene and tending the fire. I called it in because it was clearly out of control. Dispatch told me it was under control, My reply was please double check.

I feel we should be able to have the same rule apply because we would be aiding the ability of fire departments to extinguish any fire in our area.

In the past we have had multiple wild fires in our area (Croy, Summit and lightning strike) all originating in Santa Clara county and blowing over county line.

The CZU fire was started by lightning strikes.

Henry cowell redwoods state park allows open fires. If you look at the referred to GIS fire hazard map this area is in a very high risk fire area. Yet wood fires are allowed.

We don't allow open fires so we believe there should be a way to mitigate the risk to wild fires in very high fire areas set forth to be included in LICA.



Thank you for reading and understanding,

Noah Selman

**From:** Victoria Durkan <vdurkan1@gmail.com>

**Sent:** Monday, May 6, 2024 2:20 PM

**To:** Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>; Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>

**Subject:** 5/8 Public Comment-Planning Commission Meeting Item #8

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

To whom it may concern,

My name is Tori Durkan, and I wanted to share my experience with you regarding my travels and the ease to do so because of organizations like Hipcamp, reserve america, and airbnb.

I am on a mission to see all of the National Parks in America and California has 9, so I have been staying in Santa Cruz and Scotts Valley for the last month. I thought I may have something to share here:

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Given the crowding in the National Parks and the longevity of my stays, I use hipcamp and airbnb to connect with landowners looking to host campers. I am typically greeted with a well maintained site and house rules on how to best preserve the site and the surrounding wilderness. These landowners are stewards of their land and communities and provide safe spaces for people from all walks of life.

I have camped in National/State Parks and at low impact sites, and I can attest that the low impact camping allows homeowners the ability to rent their land sustainably, while preserving the more overcrowded public spaces nearby like Yosemite, Pinnacles, or Kings Canyon. In my experience, everyone that wants to camp at low impact sites respects the land and wants to leave it better than they found it.

As a female traveler, sites like hipcamp and airbnb allow me to explore in a more safe and sustainable way with minimal impact on the natural landscape. I hope Santa Cruz and surrounding communities will give more homeowners the ability to share their spaces with campers like me!

Thank you,

Tori Durkan

**From:** Annemarie Lecocq <frenchmima@gmail.com>

**Sent:** Monday, May 6, 2024 10:26 AM

**To:** Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>; Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>

**Subject:** Re: 5/8 Public Comment - Planning Commission Meeting Item #8

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I think this review from last weekend says it all:



Nicole V.recommends

April 23, 2024

Site 3 - Independence Way

### **One of my fave hipcamps so far!**

I've been on going to Hipcamp sites multiple times a year since 2020, and Mima's camp site was fantastic. From the reception to the execution, it's clear how much she cares about providing a beautiful and comfortable place for refuge in the redwoods. My husband and I spent our anniversary weekend there with our camper. We enjoyed the comforts of ample sites with good distance from neighboring campers and took advantage of the communal space to get to know our neighbors. We also took Mima up on the three course dinner, which was delicious and so well prepared and delivered. We ate chocolate mousse for dessert and for breakfast. Highly recommend this site and many of the local recommendations Mima shared ahead of time (especially Corralitos Brewing). Thanks, Mima! Five



On Sun, May 5, 2024 at 3:38 PM Annemarie Lecocq <[frenchmima@gmail.com](mailto:frenchmima@gmail.com)> wrote:

Dear Chair Violante, Santa Cruz County Planning Commissioners, and Board of Supervisors,

My name is Mima and my husband and I live in the mountains above Corralitos. We moved here 2 years ago and, frankly, we did not know what we were getting ourselves into. Our job salaries, mortgage, and general personal overhead were ostensibly going to be the same as in town but what we did not realize was that, for instance, a single t-Mobile bill for phone and Internet would in these parts require the addition of a landline AND a satellite carrier. Living on a private road requires contributions to road work (not to be underestimated in scope given the elements of nature). Living on 16 acres in the forest requires tree work, creating defensible space etc. I could go on about the exponential rise in our cost of living...

To get to the point, operating a Low Impact Campsite has saved us from insolvency! Were we to sell our place it is doubtful that we could remain in California where my 2 grown children are. We have come to LOVE this land and we are deeply committed to being good stewards of it, and even organize road clean-ups, cook for elderly neighbors, do yard work and burns with neighbors on other properties on the mountain just as they have tirelessly helped us since the day we moved in getting our bearings about us, giving us wood and tools and so much more! The demographics on this mountain are varied and the politics fractured but not a soul here has objected to what we do; if anything, many support it.

What our mountain neighbors know is that we are responsible and we count on the income from our 4 camp sites to stay here. They see that we don't allow people to walk off the property, rather giving them detailed directions to arrive here despite losing cell phone service. They see that one of us is ALWAYS on site when we have guests, They see the firepits in designated areas enclosed in rock structures with full watering cans, screens, and fire extinguishers at arm's length. They see that our portable toilet is regularly maintained and the space is pristine and that we insist on quiet with no amplified sound or more than talking voices after 10:00 p.m. No one has given us any grief to date!!

In addition to our 4 campsites I now cook for guests (my profession) and conduct cooking workshops. We love our guests and take great pride in the hospitality we provide. Moreover, they love coming here for the serenity, the lack of internet, the trees and plants and animals. You have but to look at our hipcamp reviews to note the 97% approval rate and the expressions of appreciation for us and the space (and food:). We are rated highly for the views and being "family friendly". Personally, I can never get enough of the children and teens who come and experience things they've never done or seen before: the squeals of joy upon finding eggs in the coop, the laughter as they play games, the campfire songs, the cooking in our common area,.. Then come the post-visit thank you's mentioning what memories families have made while here. I even provide guests with an extensive list of recommendations for every type of activity one could desire while in our area: wineries, kayaking, restaurants, hiking, museums, boutiques etc. so we are sharing the unique and wonderful in our area and supporting businesses as well.

This letter has been long-winded but I thank you for "listening" as I go through all the things about being a low impact campsite host that I am truly proud of, that I love doing with all my heart, that gives joy to others, and yes, make it possible to live on this beautiful mountain.

Please vote to pass this ordinance, albeit with cautions and regulations in place to ensure safety and respect for the environment (just like any other business) and allow for the mutually beneficial relationship of hosts and campers (who often prefer more intimate and affordable sites to State Parks or appreciate help with building a campfire or the use of something they've forgotten because they've never camped before). We are proof that this type of camping is safe, respectful, and appreciated!

Sincerely,

mima



**From:** Jonathan Wittwer <jonwitt@cruzio.com>

**Sent:** Tuesday, May 7, 2024 3:56 PM

**To:** Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>; Natisha Williams <Natisha.Williams@santacruzcountyca.gov>

**Cc:** Trina Barton <Trina.Barton@santacruzcountyca.gov>

**Subject:** FW: Proposed Low Impact Camping Area Ordinance - Planning Commission May 8, 2024 Agenda item 8

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**From:** Jonathan Wittwer [<mailto:jonwitt@cruzio.com>]

**Sent:** Monday, May 06, 2024 9:12 PM

Dear Nicholas Brown and Natisha Williams – The following Comments are in reference to the Planning Commission’s May 8, 2024 Agenda item 8. They are submitted on behalf of the Friends of the North Coast, a nonprofit corporation organized primarily to protect biotic species and habitat, coastal, natural, and scenic resources, and cultural, archeological, and paleontological resources in the North Coast area of the County of Santa Cruz. For that reason we will focus primarily on impacts which the adoption of the LICA Ordinance will cause to fish and wildlife and their habitat.

First, the CEQA Exemption proposed to be issued by the County will not withstand scrutiny. Adoption of an Ordinance such as this one is a “project” and the cumulative impacts of the result being authorized must be evaluated prior to adoption. This Ordinance will authorize, for the first time in several zone districts, creation and rental of commercial campsites. The Staff Report for 5/8/2024 estimates that “around 1,300 parcels may potentially be eligible to develop a LICA on their property, which includes approximately 20,000 acres.”



Instead of doing its best to evaluate the potential cumulative impacts of LICAs being developed on the eligible parcels, the County intends to conduct an “Environmental Clearance” only for each individual LICA “disturbance area” as it is applied for. And the Environmental Clearance only evaluates whether the disturbance area itself is within a sensitive habitat area and NOT whether the disturbance area use has the potential to adversely affect nearby sensitive habitat area. This piecemeal process will NOT pick up impacts to wildlife such as:

- (1) elimination or fragmentation of substantial area currently used as wildlife habitat in the vicinity;
- (2) sedimentation of streams serving as critical habitat for endangered salmonids; or
- (3) draw-down of such critical habitat streams resulting from additional use of water sources tapping underground stream flow to serve campsite users.

Thus, the reason given in the Notice of Exemption “why the project is exempt,” specifically that “[w]ith the regulations in place, there is no reasonably foreseeable significant impact on the environment” does not withstand scrutiny. Nor is there evidence and findings to support the Exemption determination.

County General Plan OBJECTIVE ARC-3.1 BIOLOGICAL DIVERSITY (LCP) establishes the objective “To maintain the biological diversity of the County through an integrated program that includes ... protection of plant habitat and wildlife corridors and habitats.” ARC-3.1.6 (LCP) requires as to Sensitive Habitat Areas that “***any proposed development within or adjacent to these areas must maintain or enhance the functional capacity of the habitat***. Reduce in scale, redesign, or, if no other alternative exists, ***deny*** any project which cannot sufficiently mitigate significant adverse impacts on sensitive habitats unless approval of a project is legally necessary to allow a reasonable use of the land [i.e., avoid a “taking”].

Wildlife corridors and habitats can be adversely affected by human voices a considerable distance away. On October 22, 2020, Dr. Wilmers sent an email to the Coastal Commission in which he states that “[o]ur research has shown that local carnivore species such as bobcats and the state threatened mountain lion are negatively impacted

by human voices.” The Environmental Assessment prepared by BLM for Cotoni-Coast Dairies informs the public about “[t]he Puma Project, ”describing it as “a well-known scientific research effort led by wildlife ecology expert, Chris Wilmers PhD, and colleagues from UC Santa Cruz that have been studying mountain lions and other wildlife for the last 12 years in this region ....” The comments [by Dr. Wilmers] cite numerous studies, including Smith et al (2017) to demonstrate mountain lions fear people, which results in mountain lions fleeing their kill sites when humans are nearby and possibly killing up to 50% more deer a year as a result of this reduced feeding time at kills (Smith, Wang & Wilmers 2015), and increasing the energetic expenditure of mountain lions (Wang, Smith & Wilmers 2017). The Puma Project research has also shown that mountain lions usually require a buffer of at least 600 meters from human activity to site nurseries to raise their kittens (Wilmers et al. 2013). .... Given the documented impacts of human activity on animal communities and the already substantial land area in the Santa Cruz Mountains devoted to recreation, special attention should be given to maintaining large tracts of land with at least a 600-meter buffer from human trails. Especially important will be maintaining drainage bottoms and ridges that wildlife use most for efficient movement on the landscape with large buffers from human activity.

The reference above to “state threatened mountain lion” are based on the April 16, 2020 the California Fish and Game Commission (Commission) notice that the Central Coast evolutionarily significant unit (ESU) of mountain lions (*Puma concolor*) is a candidate species under the California Endangered Species Act (CESA). However, the updated version of the LICA Ordinance removed the following language: “The proposed disturbance area of a LICA shall not be located within habitat for protected species identified as candidate, sensitive, or species of special status by State or federal agencies, fully protected species, or species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), or the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code).”

Additional relevant information can be found at the Wilmer’s Lab website <https://wildlife.ucsc.edu/publications/>, including studies finding that:

- (1) Habitat fragmentation reduces survival and drives source–sink dynamics for a large carnivore (2023);
- (2) Puma responses to unreliable human cues suggest an ecological trap in a fragmented landscape (2022); and

- (3) Road-crossings, vegetative cover, land use and poisons interact to influence corridor effectiveness.

In addition, Dr. Jacob Pollock has opined in his comments to BLM that “providing camping in disturbed areas, while creating less impact than in pristine areas will still have similar buffer zone avoidance effects on wildlife as trail use, if not greater.” The buffer areas ... are areas that wildlife will avoid. This is predictable. Based on the USDA conservation buffer guidelines (Bentrap, 2008), impacts from trail users are expected to be several hundred meters or more. The impacts stem from flight initiation distance (FID), the distance at which an animal will start to move away from an approaching threat such as a trail user. “FID has been recorded for a variety of species and these distances may serve as general guidelines for establishing buffers from critical wildlife areas. see Table 7.2” (Bentrap, 2008). Mule deer have an FID of 250 m and some hawks have an FID of almost 900 m. Additionally, (Bentrap, 2008) notes that FID is the distance in which an animal just begins to react and additional 50 m setback should be added to minimize wildlife disturbance. Comment Letter Ex. A Pollock Comments, p. 3,7.

Dr. Pollock also referenced to BLM a critical compendium prepared by the California Department of Fish & Wildlife of eight new scientific studies that explore in detail impacts of recreational uses on wildlife and habitats in natural areas. The articles were recently published in the California Fish and Wildlife Journal for the Conservation and Management of California’s Species and Ecosystems, Special Issue on “Effects of Non-consumptive Recreation on Wildlife in California” (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=178943&inline>). One of those studies, *Balancing conservation and recreation* by MILAN MITROVICH, COURTNEY L. LARSON, KATIE BARROWS, MICHAEL BECK, AND RON UNGER contains the following language:

“Despite these benefits [of relatively quiet, non-motorized recreational activities – camping included], the negative effects of recreation on wildlife can be profoundly damaging to species and their habitats and must be considered when planning for conservation areas (Hammitt et al. 2015). Trails lead to habitat degradation and fragmentation, which increase when visitors go off-trail and informal trails proliferate. Harassment of wildlife, though often unintended, occurs with increased visitation to an area. Less obvious impacts to wildlife, not easily measured, have been tied to noise, light pollution, trash, and other factors associated with recreation activities.

In general, it can be difficult to accept that recreation activities, especially quiet, nonmotorized activities like hiking and mountain biking, can have harmful effects on wildlife. Many types of recreation cause little physical habitat change. Perhaps as a result, recreation was widely assumed to be a “benign use” that is compatible with conservation goals (Knight and Gutzwiller 1995) and is permitted in the vast majority of protected areas worldwide (Eagles et al. 2002; IUCN and UNEP 2014). Many HCP/NCCPs include a general provision that allows for “low-impact nature trails” [emphasis added] without strongly defining what that means and what types and levels of use would be acceptable, given the species that are to be protected. The viewpoint that recreation is a benign use may be changing, however. In recent years, researchers have found evidence that a variety of recreation activities and intensities can have detrimental impacts on wildlife (Geffory et al. 2015; Larson et al. 2016; Samia et al. 2017).

As to sedimentation of critical habitat salmonid streams, the Ordinance does not mention sedimentation as a potential adverse impact. This is another impact which can occur outside of the premises or disturbed area and cause harm to an endangered species. Sedimentation is an important habitat feature for salmonids and affects turbidity per Dr. David Rubin . It needs to be addressed. Matt Hagemann, P.G., C.Hg, opined to BLM that in his “experience, no erosion control measure operates perfectly and a dirt road or trail will erode and emit some amount of sediment during rain events.” There is potential for campsites or trails to degrade, individually or cumulatively, the water quality of streams. This is particularly true where there are impacts from sediment already evident in the streams, as generally acknowledged in the BLM Environmental Assessment for San Vicente Creek, Liddell Creek and Laguna Creek. EA, pdf pp. 65 (“San Vicente Creek has generally high levels of sand and silt...”); 75 (“Generally high levels of sand and silt in [San Vicente] creek may create sub-optimal salmonid conditions, ...”); 75-76 (“All three branches of Liddell Creek are exposed to severe sedimentation, which appears to be the primary limiting factor in this watershed....”); 76 (fine substrate materials increase” in Laguna Creek as you move upstream).

The Central Coast RWQCB has adopted a turbidity standard that is applicable to streams providing that “Where natural turbidity is between 0 and 50 Jackson Turbidity Units (JTU), increases shall not exceed 20 percent.” Central Coast RWQCB Basin Plan, p. 30. Maps, in sufficient detail, to show any campsites, trails, slope contours, and stream alignments within 200 feet of a salmonid stream should be required in applications in order to determine project impacts and to mitigate resultant degradation of salmonid streams.

This Ordinance is not ready to be adopted by the Board of Supervisors. We request the Planning Commission to recommend that the Board decline to adopt it at this time.

Jonathan Wittwer, FONC President

c/o 1927 Smith Grade

Santa Cruz, CA 95060

T: 831.423.8265

Email: [jonwitt@cruzio.com](mailto:jonwitt@cruzio.com)

**From:** Mama Viking <vikingmama8@gmail.com>

**Sent:** Friday, May 3, 2024 9:37 PM

**To:** Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>; Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>

**Subject:** 5/8 Public Comment - Planning Commission Meeting Item #8

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*Dear Santa Cruz County Planning Commissioners and Board of Supervisors,*

*I am writing to encourage your support of a low impact camping ordinance in Santa Cruz County. I recently stayed at a HipCamp with my daughter, who is considering going to UC Santa Cruz. We loved the time we spent on a beautiful property just south of Santa Cruz. It was an affordable and enjoyable experience for us. As you know, staying in hotels is very expensive, and we love the camping options we found on Hipcamp. I can honestly say I would not visit my daughter very often at UCSC if I couldn't stay at one of these private, quiet properties. It is a win-win for landowners and campers. We've stayed at 4 Hipcamp sites along the 101 so far, from San Luis Obispo up to Ukiah, and all of them have been lovely. Please don't take this option away from people who enjoy staying on farms, ranches, and private properties. It is often hard to find a campsite in popular areas, and these campsites have been a wonderful option for my family.*

*Sincerely,*

*Karen Vikstrom*

*Davis, CA*



**From:** Annemarie Lecocq <frenchmima@gmail.com>

**Sent:** Sunday, May 5, 2024 3:38 PM

**To:** Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>; Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>

**Subject:** 5/8 Public Comment - Planning Commission Meeting Item #8

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Dear Chair Violante, Santa Cruz County Planning Commissioners, and Board of Supervisors,

My name is Mima and my husband and I live in the mountains above Corralitos. We moved here 2 years ago and, frankly, we did not know what we were getting ourselves into. Our job salaries, mortgage, and general personal overhead were ostensibly going to be the same as in town but what we did not realize was that, for instance, a single t-Mobile bill for phone and Internet would in these parts require the addition of a landline AND a satellite carrier. Living on a private road requires contributions to road work (not to be underestimated in scope given the elements of nature). Living on 16 acres in the forest requires tree work, creating defensible space etc. I could go on about the exponential rise in our cost of living...



To get to the point, operating a Low Impact Campsite has saved us from insolvency! Were we to sell our place it is doubtful that we could remain in California where my 2 grown children are. We have come to LOVE this land and we are deeply committed to being good stewards of it, and even organize road clean-ups, cook for elderly neighbors, do yard work and burns with neighbors on other properties on the mountain just as they have tirelessly helped us since the day we moved in getting our bearings about us, giving us wood and tools and so much more! The demographics on this mountain are varied and the politics fractured but not a soul here has objected to what we do; if anything, many support it.

What our mountain neighbors know is that we are responsible and we count on the income from our 4 camp sites to stay here. They see that we don't allow people to walk off the property, rather giving them detailed directions to arrive here despite losing cell phone service. They see that one of us is ALWAYS on site when we have guests, They see the firepits in designated areas enclosed in rock structures with full watering cans, screens, and fire extinguishers at arm's length. They see that our portable toilet is regularly maintained and the space is pristine and that we insist on quiet with no amplified sound or more than talking voices after 10:00 p.m. No one has given us any grief to date!!

In addition to our 4 campsites I now cook for guests (my profession) and conduct cooking workshops. We love our guests and take great pride in the hospitality we provide. Moreover, they love coming here for the serenity, the lack of internet, the trees and plants and animals. You have but to look at our hipcamp reviews to note the 97% approval rate and the expressions of appreciation for us and the space (and food:). We are rated highly for the views and being "family friendly". Personally, I can never get enough of the children and teens who come and experience things they've never done or seen before: the squeals of joy upon finding eggs in the coop, the laughter as they play games, the campfire songs, the cooking in our common area,.. Then come the post-visit thank you's mentioning what memories families have made while here. I even provide guests with an extensive list of recommendations for every type of activity one could desire while in our area: wineries, kayaking, restaurants, hiking, museums, boutiques etc. so we are sharing the unique and wonderful in our area and supporting businesses as well.

This letter has been long-winded but I thank you for "listening" as I go through all the things about being a low impact campsite host that I am truly proud of, that I love doing with all my heart, that gives joy to others, and yes, make it possible to live on this beautiful mountain.

Please vote to pass this ordinance, albeit with cautions and regulations in place to ensure safety and respect for the environment (just like any other business) and allow for the mutually beneficial relationship of hosts and campers (who often prefer more intimate and affordable sites to State Parks or appreciate help with building a campfire or the use of something they've forgotten because they've never camped before). We are proof that this type of camping is safe, respectful, and appreciated!

Sincerely,

mima



**From:** sherri mcquaide <lebeth58@yahoo.com>  
**Sent:** Saturday, May 4, 2024 3:22 PM  
**To:** Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>  
**Subject:** commercial campsites

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Dear Mr. Brown,

I am writing to express my utter dismay at the proposal to allow rural parts of the county to develop and rent commercial campsites. I can't even believe this would be under consideration. Is this a Santa Cruz County plan to reduce homelessness?

I don't know how long you have lived in this county but in 2020, over 900 homes were destroyed by fire. This was a huge percentage of homes since Boulder Creek and Bonny Doon have a low population base to begin with. Now there will be God knows who camping anywhere? Starting fires...like they have done several times in Pogonip?

It will certainly increase the amount off trash too. We already have trash all over Santa Cruz from the homeless. We're all familiar with it. We do not need to encourage more of it where we live. We pay outrageous fees for property tax and everything else. We don't deserve to have our regions destroyed by campers. There would be no way to control any of it.

Please reconsider.

Sincerely,

Sherri McQuaide

Bonny Doon

Sent from Yahoo Mail. [Get the app](#)

**From:** Helen mitchell <letlovebit@yahoo.com>  
**Sent:** Saturday, May 4, 2024 12:45 PM  
**To:** Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>  
**Subject:** From Helen

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Honestly, this sounds like a way for people to bring in income at the risk of others and negatively impact others. Do you know who came up with this idea? How about some public campsites/parks?

I live in Bonny Doon and agree with the concerns of the RBDA.

Sincerely, Helen Mitchell

**From:** Jonathan Wittwer <jonwitt@cruzio.com>

**Sent:** Tuesday, May 7, 2024 3:56 PM

**To:** Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>; Natisha Williams <Natisha.Williams@santacruzcountyca.gov>

**Cc:** Trina Barton <Trina.Barton@santacruzcountyca.gov>

**Subject:** FW: Proposed Low Impact Camping Area Ordinance - Planning Commission May 8, 2024 Agenda item 8

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**From:** Jonathan Wittwer [<mailto:jonwitt@cruzio.com>]

**Sent:** Monday, May 06, 2024 9:12 PM

Dear Nicholas Brown and Natisha Williams – The following Comments are in reference to the Planning Commission’s May 8, 2024 Agenda item 8. They are submitted on behalf of the Friends of the North Coast, a nonprofit corporation organized primarily to protect biotic species and habitat, coastal, natural, and scenic resources, and cultural, archeological, and paleontological resources in the North Coast area of the County of Santa Cruz. For that reason we will focus primarily on impacts which the adoption of the LICA Ordinance will cause to fish and wildlife and their habitat.

First, the CEQA Exemption proposed to be issued by the County will not withstand scrutiny. Adoption of an Ordinance such as this one is a “project” and the cumulative impacts of the result being authorized must be evaluated prior to adoption. This Ordinance will authorize, for the first time in several zone districts, creation and rental of commercial campsites. The Staff Report for 5/8/2024 estimates that “around 1,300 parcels may potentially be eligible to develop a LICA on their property, which includes approximately 20,000 acres.”

Instead of doing its best to evaluate the potential cumulative impacts of LICAs being developed on the eligible parcels, the County intends to conduct an “Environmental Clearance” only for each individual LICA “disturbance area” as it is applied for. And the Environmental Clearance only evaluates whether the disturbance area itself is within a sensitive habitat area and NOT whether the disturbance area use has the potential to adversely affect nearby sensitive habitat area. This piecemeal process will NOT pick up impacts to wildlife such as:

- (4) elimination or fragmentation of substantial area currently used as wildlife habitat in the vicinity;
- (5) sedimentation of streams serving as critical habitat for endangered salmonids; or
- (6) draw-down of such critical habitat streams resulting from additional use of water sources tapping underground stream flow to serve campsite users.

Thus, the reason given in the Notice of Exemption “why the project is exempt,” specifically that “[w]ith the regulations in place, there is no reasonably foreseeable significant impact on the environment” does not withstand scrutiny. Nor is there evidence and findings to support the Exemption determination.

County General Plan OBJECTIVE ARC-3.1 BIOLOGICAL DIVERSITY (LCP) establishes the objective “To maintain the biological diversity of the County through an integrated program that includes ... protection of plant habitat and wildlife corridors and habitats.” ARC-3.1.6 (LCP) requires as to Sensitive Habitat Areas that “***any proposed development within or adjacent to these areas must maintain or enhance the functional capacity of the habitat.*** Reduce in scale, redesign, or, if no other alternative exists, ***deny*** any project which cannot sufficiently mitigate significant adverse impacts on sensitive habitats unless approval of a project is legally necessary to allow a reasonable use of the land [i.e., avoid a “taking”].

Wildlife corridors and habitats can be adversely affected by human voices a considerable distance away. On October 22, 2020, Dr. Wilmers sent an email to the Coastal Commission in which he states that “[o]ur research has shown that local carnivore species such as bobcats and the state threatened mountain lion are negatively impacted

by human voices.” The Environmental Assessment prepared by BLM for Cotoni-Coast Dairies informs the public about “[t]he Puma Project, ”describing it as “a well-known scientific research effort led by wildlife ecology expert, Chris Wilmers PhD, and colleagues from UC Santa Cruz that have been studying mountain lions and other wildlife for the last 12 years in this region ....” The comments [by Dr. Wilmers] cite numerous studies, including Smith et al (2017) to demonstrate mountain lions fear people, which results in mountain lions fleeing their kill sites when humans are nearby and possibly killing up to 50% more deer a year as a result of this reduced feeding time at kills (Smith, Wang & Wilmers 2015), and increasing the energetic expenditure of mountain lions (Wang, Smith & Wilmers 2017). The Puma Project research has also shown that mountain lions usually require a buffer of at least 600 meters from human activity to site nurseries to raise their kittens (Wilmers et al. 2013). .... Given the documented impacts of human activity on animal communities and the already substantial land area in the Santa Cruz Mountains devoted to recreation, special attention should be given to maintaining large tracts of land with at least a 600-meter buffer from human trails. Especially important will be maintaining drainage bottoms and ridges that wildlife use most for efficient movement on the landscape with large buffers from human activity.

The reference above to “state threatened mountain lion” are based on the April 16, 2020 the California Fish and Game Commission (Commission) notice that the Central Coast evolutionarily significant unit (ESU) of mountain lions (*Puma concolor*) is a candidate species under the California Endangered Species Act (CESA). However, the updated version of the LICA Ordinance removed the following language: “The proposed disturbance area of a LICA shall not be located within habitat for protected species identified as candidate, sensitive, or species of special status by State or federal agencies, fully protected species, or species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), or the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code).”

Additional relevant information can be found at the Wilmer’s Lab website <https://wildlife.ucsc.edu/publications/>, including studies finding that:

- (4) Habitat fragmentation reduces survival and drives source–sink dynamics for a large carnivore (2023);
- (5) Puma responses to unreliable human cues suggest an ecological trap in a fragmented landscape (2022); and

- (6) Road-crossings, vegetative cover, land use and poisons interact to influence corridor effectiveness.

In addition, Dr. Jacob Pollock has opined in his comments to BLM that “providing camping in disturbed areas, while creating less impact than in pristine areas will still have similar buffer zone avoidance effects on wildlife as trail use, if not greater.” The buffer areas ... are areas that wildlife will avoid. This is predictable. Based on the USDA conservation buffer guidelines (Bentrap, 2008), impacts from trail users are expected to be several hundred meters or more. The impacts stem from flight initiation distance (FID), the distance at which an animal will start to move away from an approaching threat such as a trail user. “FID has been recorded for a variety of species and these distances may serve as general guidelines for establishing buffers from critical wildlife areas. see Table 7.2” (Bentrap, 2008). Mule deer have an FID of 250 m and some hawks have an FID of almost 900 m. Additionally, (Bentrap, 2008) notes that FID is the distance in which an animal just begins to react and additional 50 m setback should be added to minimize wildlife disturbance. Comment Letter Ex. A Pollock Comments, p. 3,7.

Dr. Pollock also referenced to BLM a critical compendium prepared by the California Department of Fish & Wildlife of eight new scientific studies that explore in detail impacts of recreational uses on wildlife and habitats in natural areas. The articles were recently published in the California Fish and Wildlife Journal for the Conservation and Management of California’s Species and Ecosystems, Special Issue on “Effects of Non-consumptive Recreation on Wildlife in California” (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=178943&inline>). One of those studies, *Balancing conservation and recreation* by MILAN MITROVICH, COURTNEY L. LARSON, KATIE BARROWS, MICHAEL BECK, AND RON UNGER contains the following language:

“Despite these benefits [of relatively quiet, non-motorized recreational activities – camping included], the negative effects of recreation on wildlife can be profoundly damaging to species and their habitats and must be considered when planning for conservation areas (Hammitt et al. 2015). Trails lead to habitat degradation and fragmentation, which increase when visitors go off-trail and informal trails proliferate. Harassment of wildlife, though often unintended, occurs with increased visitation to an area. Less obvious impacts to wildlife, not easily measured, have been tied to noise, light pollution, trash, and other factors associated with recreation activities.



In general, it can be difficult to accept that recreation activities, especially quiet, nonmotorized activities like hiking and mountain biking, can have harmful effects on wildlife. Many types of recreation cause little physical habitat change. Perhaps as a result, recreation was widely assumed to be a “benign use” that is compatible with conservation goals (Knight and Gutzwiller 1995) and is permitted in the vast majority of protected areas worldwide (Eagles et al. 2002; IUCN and UNEP 2014). Many HCP/NCCPs include a general provision that allows for “low-impact nature trails” [emphasis added] without strongly defining what that means and what types and levels of use would be acceptable, given the species that are to be protected. The viewpoint that recreation is a benign use may be changing, however. In recent years, researchers have found evidence that a variety of recreation activities and intensities can have detrimental impacts on wildlife (Geffory et al. 2015; Larson et al. 2016; Samia et al. 2017).

As to sedimentation of critical habitat salmonid streams, the Ordinance does not mention sedimentation as a potential adverse impact. This is another impact which can occur outside of the premises or disturbed area and cause harm to an endangered species. Sedimentation is an important habitat feature for salmonids and affects turbidity per Dr. David Rubin . It needs to be addressed. Matt Hagemann, P.G., C.Hg, opined to BLM that in his “experience, no erosion control measure operates perfectly and a dirt road or trail will erode and emit some amount of sediment during rain events.” There is potential for campsites or trails to degrade, individually or cumulatively, the water quality of streams. This is particularly true where there are impacts from sediment already evident in the streams, as generally acknowledged in the BLM Environmental Assessment for San Vicente Creek, Liddell Creek and Laguna Creek. EA, pdf pp. 65 (“San Vicente Creek has generally high levels of sand and silt...”); 75 (“Generally high levels of sand and silt in [San Vicente] creek may create sub-optimal salmonid conditions, ...”); 75-76 (“All three branches of Liddell Creek are exposed to severe sedimentation, which appears to be the primary limiting factor in this watershed....”); 76 (fine substrate materials increase” in Laguna Creek as you move upstream).

The Central Coast RWQCB has adopted a turbidity standard that is applicable to streams providing that “Where natural turbidity is between 0 and 50 Jackson Turbidity Units (JTU), increases shall not exceed 20 percent.” Central Coast RWQCB Basin Plan, p. 30. Maps, in sufficient detail, to show any campsites, trails, slope contours, and stream alignments within 200 feet of a salmonid stream should be required in applications in order to determine project impacts and to mitigate resultant degradation of salmonid streams.

This Ordinance is not ready to be adopted by the Board of Supervisors. We request the Planning Commission to recommend that the Board decline to adopt it at this time.

Jonathan Wittwer, FONC President

c/o 1927 Smith Grade

Santa Cruz, CA 95060

T: 831.423.8265

Email: [jonwitt@cruzio.com](mailto:jonwitt@cruzio.com)

**From:** Caitlin Fullam <fullam.caitlin@gmail.com>

**Sent:** Friday, May 3, 2024 9:52 AM

**To:** Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>; Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>

**Subject:** 5/8 Public Comment - Planning Commission Meeting Item #8

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Dear Santa Cruz County Planning Commission and Board of Supervisors,

My name is Caitlin Fullam and I live in Santa Cruz. Finding a campsite close to home is not easy, so I'm grateful that private landowners have hosted me on their properties and given me the opportunity to get outside and enjoy the redwoods in a deeper way than is possible on a day hike, and would otherwise be inaccessible to me.

Campsites on private lands increase access to the great outdoors. Please support a **low impact** camping ordinance in Santa Cruz County that allows landowners in our community to continue sharing their properties in a **safe and responsible way** with campers and outdoor enthusiasts like me. In my experience, the hosts I've met have been equally as grateful for the opportunity to share their land in a nondestructive way that allows them to also afford to continue living there.

Thank you for considering my point of view,

Caitlin

-----Original Message-----

From: patricia@coastroad.us <patricia@coastroad.us>

Sent: Thursday, May 2, 2024 1:49 PM

To: Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>

Subject: Proposed ordinance for commercial campsites in neighborhoods

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Greetings;

I am writing concerning the proposed changes to the County code to allow property owners in rural parts of the County to develop and rent commercial campsites, if/when that becomes allowed under State law.

I agree with many north coast and Bonny Doon residents that the ordinance that was proposed on March 13 includes many grossly unacceptable provisions, as summarized below. My biggest concern, shared with my neighbors, is fire.

(1) The ordinance that County Staff prepared 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 such campgrounds (i.e., after SB620 is passed).

(2) The ordinance would allow "Low Impact Camping Areas" (LICAs) on parcels 5 acres or greater, with one campsite per acre, 4 campers per site, to a maximum of 9 campsites and 36 campers per parcel. This seems excessive for 5-acre parcels with nearby residences.

(3) The ordinance has grossly inadequate fire protection measures. Many campers are accustomed to having campfires, and although campfires would be prohibited in LICA areas, there is no prohibition of gas stoves or gasoline generators. I believe generators should be prohibited to reduce both fire hazard and noise.

My biggest concern is that there is no requirement that anyone be present to enforce fire regulations. 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 (assuming such regulations are added).

(4) 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 preferentially reduces development costs for campsites that are restricted to people who bring trailers or motor homes.

(5) The proposal has not received adequate CEQA environmental review, and the ordinance has not been determined to be consistent with the County General Plan and Local Coastal Plan.

(6) Despite "low impact" in the acronym "LICA", the proposed ordinance encourages development rather than minimizing impact in environmentally sensitive areas.

(7) The proposed rules have inadequate setback and noise provisions.

(8) The proposed rules would prohibit pets from lands within 200 feet of CA properties. The rules must give equal protection to nearby residential properties (to reduce impact on neighbors and wildlife).

Thank you for your consideration of this feedback!

Sincerely,

Patricia Damron  
5510 Coast Road  
Santa Cruz, CA 95060

**From:** Cathy Ammenti <cathyammenti@gmail.com>  
**Sent:** Tuesday, April 30, 2024 4:41 PM  
**To:** Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>; Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>  
**Subject:** 5/8 Public Comment - Planning Commission Meeting Item #8

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*Dear Santa Cruz County Planning Commissioners and Board of Supervisors,*

*My name is Catherine Ammenti and I love camping in Santa Cruz County. **Finding a campsite in California is an almost impossible task**, but I'm lucky that private landowners have hosted me on their properties and given me the opportunity to experience Santa Cruz County's sandy beaches, redwood forests, and organic farms.*

*Campsites on private lands increase access to the great outdoors. Please support a low impact camping ordinance in Santa Cruz County that allows landowners to continue sharing their properties with campers like me.*

*Thank you,  
Catherine Ammenti*

Sent from my iPhone

**From:** Sara Swenson <sara.d.swenson@gmail.com>

**Sent:** Tuesday, April 30, 2024 2:08 PM

**To:** Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>; Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>

**Subject:** Low Impact Camping Support

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Dear Chair Violante, Santa Cruz County Planning Commissioners, and Board of Supervisors,

I am excited Santa Cruz is considering new ways for people to enjoy our beautiful community. With the state campgrounds usually full and Airbnbs and hotels expensive, camping is a great, affordable way to connect with nature and visit new places. They provide an opportunity for people to visit and have quiet and unique outdoor experiences, as well as increase access to popular and historically expensive areas.

An increasing interest in outdoor recreation has meant a huge increase in demand for camping across the country. I think I successfully booked New Brighton for a camping trip only once.

Allowing low-impact camping on private lands takes the pressure off our crowded state and federal lands. Giving rural landowners a chance to develop additional revenue streams hosting low-impact campsites can help conserve and protect our natural heritage by preventing increasing subdivisions and sell-offs and by de-risking financial investment in more sustainable land management practices. Open spaces, including private lands, are crucial to our regional wildlife habitat and local biodiversity.

With the new National Monument and our beautiful redwoods, Santa Cruz should expand options for sustainable, low-impact camping so that people can connect more with our county. As a Santa resident, I would love to move opportunities to explore the more rural

parts of our county with farm stays and camping on beautiful land in Aromas or up in the mountains.

As a Santa Cruz resident (District 1), avid camper, and rural land owner in California I strongly support both local and state bills to make it easier to have

Sara Swenson

[LinkedIn](#)

831-212-5106

[Schedule a meeting with me](#)



**From:** Jay Merz <jmerz671@sbcglobal.net>

**Sent:** Tuesday, April 30, 2024 8:39 AM

**To:** Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>; Nicholas Brown  
<Nicholas.Brown@santacruzcountyca.gov>

**Subject:** Hip camp

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Hello,

I understand that the planning commission is considering a ban on private camping (such as Hip Camp). I have personal experience with using Hip Camps. It is a low impact way to attract people to the area. It is a opportunity for visitors to learn about the area without using the already impacted state facilities. It seems to me that this type of camping is very appropriate for Santa Cruz County.

Regards, Jay Merz

831-207-7866

**From:** Daisy Nguyen <daisy@paxconnex.com>

**Sent:** Monday, April 29, 2024 3:20 PM

**To:** Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>; Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>

**Subject:** 5/8 Public Comment - Planning Commission Meeting Item #8

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Dear Santa Cruz County Board of Supervisors,

My name is Day Nguyen and I am a property owner/landowner in the Santa Cruz mountains, Scotts Valley. Thank you for your work on and support for low impact camping in Santa Cruz County. I am very excited that Santa Cruz is working on this! An affordable approval process for camping on private land will help rural landowners like myself make ends meet while increasing visitor education & access to our community in a low impact and responsible way.

A little bit about me & my situation:

I am an emerging artist. I am still trying to figure out how to work as an artist, AND make ends meet. I paint art & teach painting/craft classes during the week, out of my home. I thought that I would be able to AIRBNB my extra rooms out on the weekends, but due to county restrictions, I can not do that. I can't rent the rooms out to a full-time renter, either, as I need the space to be able to teach my classes during the week.

I own 4.5 acres in the Santa Cruz mountains. When I heard about the Low Impact Camping Ordinance in Santa Cruz, I felt like this was an answer to my prayers! Being on 4.5 acres, I have plenty of land to offer camping. I would love for you to consider not only allowing camping, but to consider reducing the land size allotment. 2-3 acres is a lot of space. Or, have a limit of how many campsites/people are allowed per acre of private land.

I understand the concerns of other citizens in the county, as I read through many of the objections and concerns. I, too, am concerned about fire, waste, natural resources, noise, traffic, etc. Property owners, like myself, who support LICO DO have these concerns at the forefront of how we want to operate, as we, too, live here. My support of LICO allows me to ask questions and find possible solutions that can address everyone's concerns. I have a few suggest - I would love to continue to be a part of this very important conversation:

- Requiring rules & regulations to minimize fire risk.
- Stipulating water storage, a fire extinguisher and hoses nearby

- Encourage the use of composting toilets - to recycle waste back into compost.
- Requiring property owners to either live on-site or have someone on-site to meet/educate campers as well as monitor adherence to the rules and regulations. (See details below.)
- Require owners to offer some sort of educational brochure that speaks about fire dangers, the land/natural resources > this serves to inform and engage visitors.

I've lived in the mountains of Santa Cruz now, for almost 4 years. Living here, being part of nature and the land - has changed me in so many ways. The biggest change has been in the deep connection I have to my land, and my huge desire to protect it for future generations. I believe to do that, we must engage the help of our visitors, not turn them away.

When I researched the causes of fire in the state of CA in 2020-2024 (available on CalFire, as well as on Wikipedia), the #1 cause of fire, has been from lightning strikes. During the CZU fires, which were also caused by lightning strikes, it was the community - the one beyond our county borders, that came to contribute time, money & resources, to help rebuild. I know of homeowners who's properties were decimated, and whom were without help financial from insurance, who had to rely on financial help from friends, families, and even strangers, who wanted to help the rebuild area. We have a responsibility to continue to engage people beyond our borders, to the plight we live, when we live in an area that is dry and prone to lightning strikes.

I live on-site, at my property. Stipulating that LICO needs to have an on-site property owner or a living-on-site-manager would also alleviate many concerns. When I have hosted campers, I find that my interaction, as a home owner, land owner, and steward of this land, has a huge impact on how others behave, how they respect and honor the land/natural resource/me, as well as their adherence to the posted rules that I set. (like NO fires, leave no trace (camp clean up), no noise after 10PM, no loud partying, etc.)

There are ways to solve problems and address concerns. We have an opportunity and a responsibility to train/educate people (visitors to our land) on how to respect the land, the earth, and our natural resources to become the stewards that we want for this land. Let your land owners do that through the LICO program. Spread that responsibility out over more people, so that we can have wider, deeper reach.

The LICO program is a great opportunity to do so many things. Increase education/engagement from visitors to respect/take care of/be responsible stewards of our land/natural resources, while helping the city collect more revenue in licensing fees & taxes, while helping folks like me, artists or those on the cusp of not being able to afford our homes, to be able to bring in a revenue stream that helps us to pay our property taxes, maintain our land, maintain our homes to the standards we all can be proud of.

I have hosted different kinds of people, at my home. From friends and families, to work exchanges. The folks that come to me through a work exchange program have given

me lots of ideas, as well as insight into how other counties, other states and other countries handle camping on private land, as most of them have used camping, as an affordable option for their travels. I plan to attend the meeting on Wednesday, May 8th, bring a friend, David Nguyen - he has camped/traveled the lower 48 states on his bicycle, he has special insight on traveling/campers/responsibility to land/the willingness of people to help/host. I also plan to bring letters from other folks I've hosted through different exchange programs, who use camping as a resource to affordable travel. I think it is important to see this issue from all sides.

I appreciate the Board's leadership on this topic and commitment to expanding camping opportunities for residents and visitors alike. Please keep up the great work and continue to support a low impact camping ordinance that creates an affordable process for landowners so that we can share what we have while earning the income that enables us to stay here.

Thank you,

*Daisy Le Nguyen*

homeowner, Scotts Valley

Cell: 612-889-3733

[daisy@paxconnex.com](mailto:daisy@paxconnex.com)



Dear Chair Violante, Santa Cruz County Planning Commissioners, and Board of Supervisors,

My name is Matthew Bishop and I am a resident of unincorporated Santa Cruz County in Aptos. Thank you for the opportunity to submit a public comment and communicate my support for the proposed low-impact camping ordinance (Item #8).

As a child growing up in Stockton, CA some of my most fond memories were camping with my family at Sunset SB every summer. Fast forward 25 years or so later we now live on 9 acres in Aptos and saw an opportunity to be able to share our little piece of paradise with others. We have been hosting campers for just over a year and the experience has been great! We have found that the overwhelming majority of campers have the utmost respect for nature and are very grateful to be able to camp on our land. We have met so many wonderful people and families that can create lifelong memories and enjoy all that Santa Cruz has to offer whilst not occupying what could be someone's long-term living space by booking on something like Airbnb or VRBO. It's been an absolute pleasure being able to recommend our favorite local places to eat, hike, and site see knowing that it's stimulating Santa Cruz's economy. Not only does this benefit our community, but it also benefits my growing family. As the cost of living continues to rise, hosting responsible campers has been a way that we can offset these expenses and see a sustainable future here. All that being said I also understand the concern for fire safety now more so than ever since hosting campers. But we can have peace of mind with precautions such as a clean burning propane fire pit, 5000 Gallons of water readily accessible within 10 feet of the fire pit, and a clearly marked fire extinguisher. As an added safety measure, we also never allow bookings unless we are present on the property. It has always been a dream of mine to live in Santa Cruz and it's truly a gift to be able to call this place home for my family and I. Below are a few comments made by our campers about staying at our campsite.

"Such a gorgeous location amidst redwoods and acorn woodpecker roosting grounds. The campsite was clean and well maintained. The views were beautiful. We slept well amidst the sounds of owls and nature galore. The host was so helpful, going out of his way to ensure we had everything we needed. We are looking forward to booking this site again we absolutely recommend it. We went with our 7yr old daughter and she is now hooked. Such a wonderful and perfect introduction to the wonders of camping. We will book for 2 nights next time!" - Sonia B.

"Slice of heaven! Matt is such a hospitable person, which made our stay all that much more enjoyable. The campsite was spectacular. My family and I were amazed with all the surrounding trees and had a great little adventure down the trail. The availability of a campfire was a big plus. We all wished we could've stayed longer and were sad to leave, but we know we'll be back here soon. I highly recommend

this spot and telling all your friends and family to come experience this beautiful place. Thanks again Matt for everything. Take care.” - Davey P.

“Matt is very lucky to have an exquisitely beautiful home. The camping spot behind his house is in a beautiful forest with many older redwoods and a view looking east to watch the sun rise. It is quiet, and very private. Matt is the perfect host! He is genuinely friendly, responsive to every need, and very helpful. For example, he helped me carry my camping gear coming and going (not easy because I have a lot of stuff!) and he filled my water jug with filtered water from his own filtering system. If you love watching and listening to birds, you are in for a treat. If you like hiking, or even strolling in Redwood forests, there are state parks close by - I recommend Henry Cowell, and the Forest of Nisene Marks is just a few minutes down the road. If you like hanging out at the beach, there are many choices- and you can ask Matt about surfing. I loved camping here, and would love to come back. It was difficult to leave such a peaceful, beautiful place!” - Sarah M.

Please support a low impact camping ordinance that makes it easy for rural landowners like me to host a small number of recreational campsites on my property, and that expands camping opportunities for Santa Cruz residents and visitors alike.

Thank you,

Matthew Bishop



# Santa Cruz County Fire Chiefs Association

President – Mark Bingham - Vice President – Jason Nee - Secretary – Rob Oatey

TO : Planning Commissioner, Renee Shepherd

April 24th, 2024

RE : Limited Access Camping Ordinance

Renee,

As our Planning Commission representative we implore you to consider the following comments in regards to the new proposed Limited Access Camping Ordinance.

Thank you for the opportunity to review the proposed Limited Access Camping Ordinance. We anticipate the proposed designated area by definition could easily impact multiple Fire Protection Districts and Fire Departments throughout the County of Santa Cruz.

In review of the Low Impact Camping Ordinance specifically related to fire protection and fire code impacts we have the following observations:

- The proposed ordinance makes no accommodation for campsite connectivity to report emergencies. This would be significant in the event of an escaped/out of control fire or a medical emergency.
- The proposed ordinance lacks site accountability when only requiring a responsible point of contact within 15 miles and 60 minutes to respond to issues on site.
- The proposed ordinance does refer to adhering to the Fire Code but should specify critical standards for adherence to 7.92.505.2 to road signage ; 503.7 – Gate standards ; 307.4.2 recreational fire standards
- The Ordinance does not require site mapping or pre plan documentation be provided to the fire authority of jurisdiction allowing responders to navigate to emergencies in these unimproved rural areas.
- The Ordinance specifies designated areas outside the Urban Services and Rural Services line, outside environmental resource areas, very high fire hazard severity zones and sensitive habitats. This should be better defined and mapped to provide clear delineation of acceptable development. Does this mean camps would not be allowed in the Watershed or on Timber Harvest Properties?
- Within section (IV) « accommodations » there is allowance for canvas tents, yurts and domes in combination with overnight stays ranging out to 14 days. It is easily conceivable that without oversight these accommodations drift from transitory to permanent populations. These structures also contribute to fire load without improved fire protection resources.
- As a reminder, campfires are prohibited under Chapter 7.92

In summary, our concerns are focused on a lack of site accountability, ensuring acceptable access, site mapping, signage and most importantly there is no prerequisite for camp sites to have the means to summon assistance from 911. We would be happy to meet with you or review future drafts of this ordinance to prevent conflict between fire codes and proposed ordinances.

Respectfully,

Mark Bingham  
SCCFCA President and Fire Chief







May 8, 2024

Santa Cruz County Planning Commission  
701 Ocean Street  
Santa Cruz, CA 95060

By email to [Nicholas.Brown@santacruzcountyca.gov](mailto:Nicholas.Brown@santacruzcountyca.gov)

**Re: Comment for May 8th, 2024 Planning Commission Meeting on Agenda Item 8**

Dear Chair Violante and Santa Cruz County Planning Commissioners,

Thank you for the opportunity to review and offer comments on Agenda Item 8, "Public hearing to consider the proposed Low-Impact Camping Area Ordinance."

We appreciate your attention to the benefits and impacts of rural recreation in Santa Cruz County, and the Community Development and Infrastructure Department's thorough review of stakeholder input, state regulations and policy priorities, community feedback, and recommended modifications.

**We ask that you support a Low-Impact Camping Area Ordinance that makes it easy for local landowners to host a small number of campsites on their properties, for the purpose of expanding access to the outdoors in Santa Cruz County and creating income diversification opportunities for rural residents.**

To date, Hipcamp has partnered with landowners to open access to nearly 5 million acres of private lands for public recreation. Our work is focused on increasing access to camping and dismantling the barriers that prevent people from enjoying the incredible benefits of time outside, including but not limited to a lack of public access, cost, or increased demand and competition for recreational opportunities on public lands.

In Santa Cruz County, Hipcamp is proud to partner with a community of landowners – from winery owners, farmers, and ranchers to small business owners, rural residents, and conservation organizations – who are invested in seeing the county support small-scale incidental camping on private property where appropriate. We have connected with numerous residents on this topic, many of whom have long been welcoming visitors to the community and rely on the income they earn hosting responsible campers to pay their property taxes, make mortgage payments, keep small farms economically viable, and invest in stewardship and sustainable land management practices on their properties. Hipcamp would like to see more landowners able to participate in and benefit from the LICA ordinance. To this end, we would be

supportive of a process that creates an approval pathway for incidental camping for residents on smaller properties and in overlay areas; hazard zones will change over time and it may be safer to be consistent and disallow open fires on all properties, rather than exclude residents in these zones from participating.

Private landowners have an important role to play in connecting people with nature and protecting landscapes and habitat, and the state of California agrees. That is why Governor Newsom's first-of-its-kind [Outdoors for All Strategy](#), aimed at increasing outdoor access across California, specifically recommends in Priority 1.10 (page 23) that local planning departments partner with private landowners **"to implement simple, clear, and accessible permitting pathways to allow for low-impact camping on private property...."** We applaud the county of Santa Cruz for aligning with this key state strategy to increase outdoor equity.

It is in the spirit of our shared goals and vision for outdoor access, rural economic development and land preservation and stewardship that we offer the above comments. Please consider Hipcamp and our local landowner community as partners in your work on this topic, and let us know if we can answer any questions or be supportive of this process in any way.

Thank you for your work.

Sincerely,

Cassandra Prenn-Vasilakis  
Senior Manager, Government and Community Relations, Hipcamp, Inc.  
[cassandra@hipcamp.com](mailto:cassandra@hipcamp.com)



May 2, 2024

Santa Cruz County Planning Commission  
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**Executive Director**  
Sarah Newkirk

Dear Commissioners,

As an organization committed to connecting all people to nature and sustaining our natural and working lands, the Land Trust of Santa Cruz County (Land Trust) supports the revised Low-Impact Camping Area (LICA) Ordinance on the May 8, 2024 agenda. We believe this ordinance will increase overnight access to the outdoors in a manner compatible with resource protection and environmental stewardship.

The changes made since the LICA ordinance was initially heard at the February 28 Planning Commission meeting represent significant improvements. In particular, we appreciate the revision requiring all LICA permit seekers to obtain an Environmental Clearance. This will ensure that proposed camping in areas containing sensitive habitat or special status species is reviewed appropriately.

The Land Trust does not currently operate or have plans to operate paid overnight accommodations. Our review of this ordinance is focused on environmental and natural resource protection. This letter reflects our supportive position for the revised ordinance, especially in light of the strengthened environmental protections and the importance of improving access to the outdoors in Santa Cruz County.

The Land Trust of Santa Cruz County is a nonprofit, accredited land trust. Since 1978, our organization has protected, cared for, and connected all people to the vibrant natural and working lands that are essential for our community and nature to thrive together for generations to come. Our team thanks the Planning Commission for the opportunity to comment on this item, and for the County's work to improve access to nature.

Sincerely,

A handwritten signature in dark ink, appearing to read "Sarah Newkirk", with a large, flowing loop at the end.

Sarah Newkirk, Executive Director

# THE RURAL BONNY DOON ASSOCIATION

Advocating for a natural, safe, and sustainable future since 1957

Rural Bonny Doon Association  
P.O. Box 551  
Felton, CA 95018  
May 6, 2024

Dear Santa Cruz County Planning Commission,

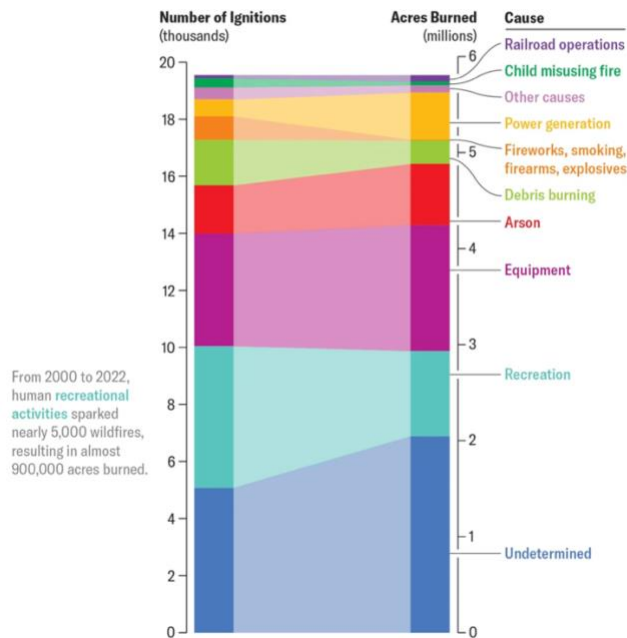
RBDA previously commented on the proposed Low Impact Camping Area (LICA) ordinance for your March 13 meeting. This letter contains more detailed comments regarding wildfires and noise; our original comments are repeated at the end of the letter.

## Wildfire

Campfires are a serious problem. According to Scientific American (11/1/2023; <https://www.scientificamerican.com/article/the-worst-wildfires-are-started-by-people-heres-how/>), recreation was the largest cause of wildfire in California from 2000 to 2023. The article reported that during this time “human recreational activities sparked nearly 5,000 wildfires resulting in almost 900,000 acres burned.”

### How We Start Wildfires

The chart shows the number and size of wildfires ignited by humans on U.S. Forest Service land in California from 2000 to 2022, by cause.



Specific deficiencies with the proposed fire regulations are:

(1) The proposed LICA regulations assume that campers will comply with regulations. This assumption is false. On August 30, 2020, the LA Times reported on the problem of illegal campfires (<https://www.latimes.com/environment/story/2020-08-30/illegal-campfires-spark-fear-of-wildfire-in-southern-california-forests>). The photo below shows rangers searching for illegal campfires; the article reported that rangers found 11 one night, and “At sunrise the following morning, they smothered a few dozen more.”



Forest service law enforcement officer Tyler Smith looks for evidence of illegal camping and campfires while on patrol. (Brian van der Brug/Los Angeles Times)

If campers disobey fire regulations even when rangers perform nighttime inspections (as detailed by the LA Times), it is ludicrous to rely on campers to follow the rules when there are no rangers.

(2) The proposed regulations are inadequate—even if campers followed them. The LA Times article described a group that was camping with a propane fire:

The good news: They had a permit to use a propane-powered fire pit filled with lava rocks that they brought to provide a smoke-free semblance of a wood-fueled campfire. The bad news: the device was sitting on a thick bed of highly flammable pine needles.

No fires whatsoever should be allowed on LICAs in forested lands.

(3) Water storage tanks must be onsite for fire-fighting. Water storage is required for commercial cannabis cultivation in our County, and LICAs are arguably a greater fire hazard because campers expect to have campfires.

(4) If fires are to be allowed, campsite managers must be onsite, and they must have a means to call for emergency assistance—preferably a landline. Campers with no communication other than cell phones will not be able to call during emergencies in many rural parts of the County (such as Bonny Doon).

#### Noise

Despite “Low Impact” in the acronym LICA, hosting dozens of campers on a residential property can have a high negative impact on neighbors. State campgrounds commonly prohibit generators—or

restrict generators to daytime hours—to reduce noise. County regulations prohibit generators on commercial cannabis operations. Similarly, neighbors of LICAs should be protected from generator noise.

Generators are not the only source of noise from campers. I live next door to a property that is used almost exclusively to host parties, with guests staying overnight in buildings and tents. The noise of yelling and cheering can be so loud that we can hear it in our house, even with double-pane windows closed. Although people are allowed to have parties on their private property, property owners in residential neighborhoods should not be granted permits to annoy neighbors with noise. The regulations should include setbacks from property lines and, more importantly, should detail an enforcement procedure that neighbors can use to have noisy campgrounds shut down immediately.

#### Similarities to Commercial Cannabis

In some regards, the impact of LICAs resembles commercial cannabis operations: both are potential fire hazards as well as sources of noise, traffic, and impact on neighborhoods and wildlife; both require adequate access and supervision. The County previously spent several years addressing these issues for commercial cannabis operations, and many of the requirements would be equally suitable for LICAs (for example, requiring water storage for fire-fighting; requiring a legal dwelling onsite for communication in case of emergency; requiring setback requirements to reduce impact on neighbors; prohibitions on generator use; excluding the Coastal Zone + 1 mile; and facilitating LICAs in agricultural regions of the County rather than forested areas). The RBDA urges the Planning Commission and Board of Supervisors to develop a LICA ordinance that is equally protective of rural neighborhoods and environments, perhaps using the commercial cannabis regulations as a starting point.

#### The comments below were submitted for the March 13 Planning Commission 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.

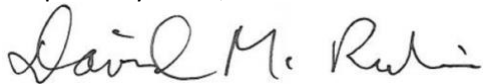
Despite "low impact" in the acronym "LICA", the proposed ordinance encourages development rather than minimizing impact in environmentally sensitive areas.

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,

A handwritten signature in black ink, appearing to read "David M. Rubin". The signature is fluid and cursive, with the first name "David" being more prominent.

David M. Rubin  
Chair, Rural Bonny Doon Association Executive Board  
[board@rbda.us](mailto:board@rbda.us)

cc: [BoardOfSupervisors@santacruzcountycalifornia.gov](mailto:BoardOfSupervisors@santacruzcountycalifornia.gov)