



Preserving redwood forests  
since 1900

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Gage Dayton, Ph.D., Chair  
Anthony R. Ambrose, Ph.D.  
Emily Burns, Ph.D.  
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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

May 7, 2024

Santa Cruz County Planning Commission

701 Street, 4<sup>th</sup> Floor

Santa Cruz CA 95060

Dear Chair and Commissioners:

Thank you for the opportunity to comment again 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 13,000 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 has played a key role establishing and expanding four State Parks in the Santa Cruz Mountains and continues to partner with State Parks to expand public access to these magnificent lands, we support the County's goal of promoting affordable access to the outdoors. As stated in our previous letter, we maintain that it is essential 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.

We appreciate that the current version of the ordinance acknowledges the environmentally sensitive areas that exist in the Santa Cruz Mountains and lays out an alternative, discretionary path for those property owners wishing to participate in commercial camping but who have sensitive habitat on their properties. This is a positive change, and we believe with additional modifications that the County can adequately protect these resources alongside hosted camping.

In our previous letter we outlined our general concerns and offered specific suggestions to mitigate those concerns to ensure protection of natural resources and protect public safety. We continue to support the suggested modifications that have yet to be addressed. Incorporating those outstanding suggestions from our previous letter provides one avenue to mitigate the impacts of the current ordinance as drafted.

However, we would like to suggest another path, and that is to simply cap the number of parcels that could be permitted for this use. Much of the concern with the current ordinance and its potential impacts is the sheer number of parcels that would be eligible for hosted camping. Currently that number is well over 1000 parcels that could have, depending on size, several tents and up to 36 people per parcel. However, if permits were capped at a reasonable level, as well as the number of campers per site, the impacts to natural resources and potential fire danger would be drastically reduced.



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A cap of 150 permits, spread throughout the County, with no more than 8 people per parcel seems like a more reasonable approach to a new use, as long as the program remains limited to 28 total days per year. Whether this approach is taken or not, the LICO program should be reevaluated on an annual basis to ensure compliance and to evaluate impacts.

Lastly, we continue to encourage the Commission to maintain the prohibition on campfires. We remain extremely concerned about fire safety in the Santa Cruz Mountains and strongly suggest that an onsite manager be required for every parcel. An onsite host ensures compliance with regulations, provides direct accountability for neighbors, and provides another layer of protection with regard to public safety and fire.

It is important to underscore that the LICO represents a completely new, legal commercial use in the Santa Cruz Mountains that will bring visitors, some who may be experienced campers and some who may be novices. As such, it is incumbent on the Commission and decision makers to take the greatest care, and time needed, to craft an ordinance that accounts for worst case scenarios. This is not alarmist but based on recent experience with the CZU fire and other recent natural disasters.

Thank you again for the opportunity to comment and for your service on the Commission. The work of your Commission is not simple or easy, and as this item progresses, we will remain available to partner with the County to help develop an ordinance that balances our shared goals of greater access to the outdoors while also providing for necessary habitat protection and public safety.

Sincerely,

Rachel Dann  
Director of Government Relations



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