County of Santa Cruz

Department of Community Development and Infrastructure

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April 29, 2024

Agenda: May 8, 2024

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

SUBJECT: Public hearing to consider the proposed Low-Impact Camping Area Ordinance

RECOMMENDED ACTIONS:

1) Conduct a public hearing to review proposed amendments to the Santa Cruz County Code (SCCC) and Local Coastal Program that create new regulations related to low-impact camping areas;

2) Adopt the attached resolution (Exhibit A) recommending that the Board of Supervisors:
    a) Certify the California Environmental Quality Act (CEQA) Notice of Exemption;
    b) Adopt the proposed amendments to the County Code to create new SCCC section 13.10.695 Low-impact camping areas; and
    c) Direct staff to submit LCP amendment to the California Coastal Commission for certification.

EXECUTIVE SUMMARY

On November 14, 2023, the Board of Supervisors directed staff to draft a Low-Impact Camping Area (LICA) Ordinance to make it easier to establish small, low-impact campgrounds in rural areas of unincorporated Santa Cruz County. The ordinance would increase access to outdoor activities to residents of all income levels, expand opportunities for land preservation and stewardship, and provide additional Transient Occupancy Tax (TOT) to the County. The Planning Commission is requested to hold a public hearing and make a recommendation on the proposed ordinance to the Board of Supervisors.

DISCUSSION

Background

On November 14, 2023, the Community Development & Infrastructure Department (CDI) was directed by the Board of Supervisors to prepare a draft ordinance in rural areas of unincorporated Santa Cruz County. The Board originally directed staff to return with a draft ordinance for consideration at their February 27, 2024 meeting after presenting it to the Planning Commission for their recommendation. Staff requested a deferral to the April 9, 2024 Board meeting to allow additional time to draft the ordinance, including soliciting input from stakeholders and the Planning Commission, as directed. The Planning Commission held a public hearing on a proposed ordinance on March 13, 2024; the Planning Commission denied the ordinance and directed staff to return with changes (or explain why they can't be made) and to conduct an environmental analysis. Because the Planning Commission must make a recommendation to the Board of Supervisors in this case, staff is returning with changes and asking the Commission to make a recommendation for either approval or denial to the Board of Supervisors. Staff requested a second deferral to the public hearing before the Board of Supervisors and will return to the Board on June 25, 2024, with the Planning Commission's recommendation.

Stakeholders Meeting

In the process of preparing this ordinance, staff held internal meetings in December 2023, and January 2024, inviting feedback from staff from various departments and partner agencies, including the Development Review, Environmental Planning, and Public Works sections of CDI; County Parks; Environmental Health Services; the County Fire Marshal's Office; and the County Sheriff's Office. Staff also held a meeting with stakeholders identified by the Board of Supervisors on February 12, 2024 to obtain comments and input from those with existing involvement or potential interest in the ordinance at a State, regional, or local level, including representatives from the Land Trust of Santa Cruz County, Sempervirens Fund, Save the Redwoods League, Peninsula Open Space Trust, and California Certified Organic Farmers (CCOF).

During these meetings, staff received feedback to provide more clarity and suggested improvements to the draft ordinance, including the following topics:

- Protect the County's natural resources.
- Consider clustering campsites to minimize impacts related to water usage, access onto properties, and environmental disturbance.
- Establish a maximum number of overnight guests to maintain low impact and meet water system restrictions.
- Ensure adequate public safety measures are in place, particularly related to road, fire, and emergency response access.
- Minimize potential impacts to neighbors related to noise, traffic, and parking.
- Ensure adequate code enforcement authority within the ordinance.

Staff considered these recommendations and incorporated several additional provisions

in the draft ordinance to address many of these concerns.

APAC Meeting

On February 15, 2024, the Agricultural Policy Advisory Commission reviewed the draft ordinance to ensure consistency with County agricultural policies and had the following recommendations, which were incorporated into the proposed ordinance:

- Require a 200-foot setback buffer to adjacent CA land (Agricultural Resource Type Land).
- Prohibit pets within 200 feet of CA land (Agricultural Resource Type Land).
- Require a campsite property within 200 feet of CA land (Agricultural Resource Type Land) to record an Agricultural Acknowledgement.

Planning Commission Meetings

At the Planning Commission meeting held on February 28, 2024, the public hearing for the Low-Impact Camping Area Ordinance was opened. However, due to additional work needed on the ordinance, the item was continued to the March 13, 2024 meeting. The Planning Commission heard from members of the public with general support with clarifying questions and requests to reduce strict standards around fire protection requirements and setbacks.

At the Planning Commission meeting held on March 13, 2024, the public hearing on the LICA ordinance was continued from the February 28, 2024 meeting. Public comment was divided, including several members of the public who expressed general support for the ordinance, with some suggested improvements. Many local residents from the Bonny Doon area opposed the ordinance, expressing concern that low-impact camping areas could cause significant impacts to neighbors, public safety, and natural resources, particularly with no on-site manager requirement. Representatives from the Sempervirens Fund and Land Trust of Santa Cruz County also expressed concerns around potential impacts to the County's protected environmental resources and recommended bifurcating the ordinance to allow the proposed LICA permit process to proceed specifically for agricultural farm stays on properties with existing commercial uses. Written public comments on the item are included in Exhibit D.

The Planning Commission ultimately denied staff's recommendation to bring the draft ordinance to the Board as proposed, and asked staff to return to the Planning Commission with a number of modifications to the ordinance. A complete list of the modifications and staff's responses are detailed in the Analysis section below.

Analysis

LICA and State Law

Currently, low impact camping areas are subject to State law under the Special Occupancy Parks Act (SOPA), per Health and Safety Code section 18860 *et seq.* SOPA regulates all campgrounds with two or more campsites and requires a permit to operate issued by the State Department of Housing and Community Development (HCD), a

Conditional Use Permit, a noticed public hearing, and CEQA review. SOPA requires more stringent standards and infrastructure requirements than intended with the low-impact camping areas regulated under the proposed ordinance, and the discretionary process required would take much longer and be more costly than the ministerial process proposed in the LICA ordinance.

Senate Bill (SB) 620 is currently being considered at the State level and includes proposed language to exempt low-impact camping areas from SOPA by redefining a "special occupancy park" under Health and Safety Code section 18862.43. The bill is proposed to allow streamlined approval of minimal, less intensive campgrounds with nine or fewer campsites. SB 620 has not yet been adopted but is expected to be approved later this year. Therefore, staff is drafting the proposed ordinance to account for current conditions under SOPA as well as future conditions should SB 620 be passed.

Ordinance Provisions

The proposed low-impact camping area ordinance would create a new code section under Santa Cruz County Code (SCCC) Chapter 13.10, Part VI. Regulations for Special Uses, Article VIII. Visitor Accommodations/Recreational Uses, 13.10.695 Low impact camping areas. This new section would establish a definition, permit process, and regulations for "low-impact camping areas." Additionally, the proposed ordinance would create a framework of health and safety regulations for establishing low-impact camping areas in specified zoning districts in rural areas of unincorporated Santa Cruz County, including compliance with all noise, fire, trash, and sanitation requirements. The ordinance would also make low-impact camping areas subject to the County's TOT requirements, similar to all other visitor-serving accommodations.

Here are some key provisions of the proposed ordinance:

- **Definition of Low Impact Camping Area:** a small-scale, low-intensity campground rented out for short-term overnight recreational camping purposes (no more than 14 consecutive nights per camper and no more than 28 nights per calendar year per camper)
- **Maximum density/occupancy:** The ordinance establishes a maximum density of one campsite per acre, and provides separate occupancy maximums for both before and after SB 620 (or a similar bill) is approved, exempting LICA projects from state law under the SOPA:
    - If a LICA is subject to SOPA: maximum of one campsite per low-impact camping area that provides overnight accommodations for one group of up to four overnight guests.
    - If a LICA is not considered a special occupancy park: maximum of nine campsites with a maximum occupancy of four overnight guests per campsite or 36 overnight guests total for each low-impact camping area.
- **Streamlined Permit Process:** The LICA Ordinance establishes a ministerial permit process to allow low-impact camping. Currently, the organized camp and conference center regulations in SCCC section 13.10.692 provide a discretionary

permit process to create campgrounds of any size. The Conditional Use Permit required under that section must be approved at a public hearing before the Planning Commission and is subject to the rural density matrix, both of which would result in a more complicated, costly, and time-intensive process. The new LICA ordinance would streamline the process specifically for these small-scale, low-intensity campgrounds with ministerial planning review as a Zoning Clearance.

- **Site Requirements:** Properties must meet the following site requirements to be eligible to establish a LICA:
    - Minimum 5 acre parcel in rural areas of the county, located outside of the County's urban and rural service lines, and not located on a site wholly within a Census designated urban area, per SB620 provisions.
    - Low-impact camping would only be allowed within the following zone districts: Agriculture (A), Commercial Agriculture (CA), Residential Agriculture (RA), Timber Production (TP), Special Use (SU), Parks, Recreation and Open Space (PR), or Public and Community Facilities (PF). LICAs would also be required to be ancillary to the primary use on a property within all of these zone districts, except the PR and PF zoning districts where it may be permitted as the primary use.
    - LICA are incidental to agricultural activity and timber production and shall not displace any active agricultural or timber production uses.
    - Campsites must be located outside of sensitive habitat as well as flood and fire hazard areas.
- **Operating and Development Standards**: The ordinance establishes additional operating and development standards, including the following requirements:
    - Clustering campsites and implementing setbacks to reduce potential impacts to neighbors and protect natural resources: 50' setbacks from adjacent property lines, riparian corridors, and mapped sensitive habitat; 100' setback from coastal bluffs; 200' setback from any off-site residence, onsite or adjacent agricultural activity, or CA-zoned agricultural resource lands.
    - Reduce impacts to neighbors by prohibiting on-street parking, requiring property owners to comply with the County Noise Ordinance (SCCC 8.30), establishing regulations for pets, and clarifying that LICA permits do not authorize events, which require a separate permit process.
    - Proposed LICAs must meet all local fire, solid waste disposal, and sanitation requirements, and a prohibition on campfires was added to further ensure public safety.
    - Low-impact camping areas must have a designated operator or property manager who is available by phone 24 hours a day, seven days a week when sites are occupied.
    - To ensure adequate enforcement authority, LICA permit renewal is required one year after first approved and subsequently every three years. Additionally, the ordinance establishes a violations section under subsection J that would require penalties and potential revocation of a LICA permit if any provisions of this code section are violated.

- **Environmental Protection:** To ensure protection of special status species and habitat, an Environmental Clearance is required for every LICA permit, as outlined in SCCC Chapter 18.10. If potential impacts can be avoided, the LICA permit is processed ministerially as a Zoning Clearance, as defined in SCCC Chapter 18.10. If potential impacts cannot be avoided, the LICA permit is processed as a discretionary Administrative Use Permit, an environmental permit is required, and CEQA review is required. This detail is included in subsections (D)(2) and (E)(6) of the LICA ordinance, and the referenced permit processes are defined in SCCC Chapter 18.10 and SCCC Chapter 16.32. Further detail is also provided in the responses provided below.

Responses to PC Modifications

At the March 13, 2024, Planning Commission meeting, the Commissioners passed a motion to deny staff's recommendation to adopt the resolution recommending approval of the LICA Ordinance and asked staff to return with a revised ordinance reflecting the Commission's requested modifications or provide discussion regarding why items were not included. The following section includes a list of the Commission's requested modifications and staff's responses.

Original Motion by Gordin, seconded by Wynne

a. **Review applicability of allowing LICAS on three acres or more;**
Staff Response: No change to ordinance. The minimum five-acre site requirement is consistent with the Board of Supervisor's original direction; however, staff has provided some flexibility by allowing the minimum 5 acre size to apply to the premises, meaning a property owner with multiple, contiguous properties that added together meet the minimum 5 acres may be eligible for a LICA permit.

For reference, if the minimum acreage were reduced to 3 acres, approximately 2,500 additional parcels may be potentially eligible to establish a LICA on the property, on over 40,000 additional acres of land. However, this estimate is not definitive as there are number of site requirements that may render more or fewer parcels ineligible, including potential agricultural activity, timber operations, environmental or other protected resources identified on the property, and contiguous parcels with the same property owner whose premises may meet the five-acre minimum and are not currently accounted for.

b. **Clarify methodology and allowance of LICAS on parcels mapped with environmentally and biologically sensitive areas and provide a path for the public to understand what and where those areas are located;**
Staff Response: Updated ordinance. Policy staff worked with Environmental Planning staff to clarify the process for identifying potential impacts to sensitive habitat and other protected resources. An additional requirement for an Environmental Clearance (EC) was included in the LICA permit process to ensure adequate review of potential impacts to sensitive habitat and other protected

resources listed in the General Plan and SCCC Title 16. An EC is a ministerial administrative review to certify that the use of property conforms with the applicable requirements of the Santa Cruz County environmental resource protection regulations of Title 16 and would include a pre-site evaluation of the property and proposed project using the County GIS System (GISWeb) and any existing in-house knowledge of the particular site (including past development or building permits).

All protected resources are listed in SCCC Title 16, and the GISWeb includes several layers related to sensitive habitats under the “Biotic Resources” heading, as well as the potential riparian and/or wetlands areas identified with the streams layer under “Water Resources.” Additional resources are listed under “Land Use,” including agricultural and archaeologic resource areas as well as existing conservation easements. A review of these protected resource layers would be used to assist an environmental planner in their review. In addition, a site visit and/or biotic report may be required. If the EC determines there may be potential impacts to protected resources that require discretionary review and the application of conditions to minimize potential impacts, the LICA permit would be processed as an Administrative Use Permit (AUP) and subject to CEQA review and an environmental permit would be required per SCCC Chapters 18.10 and 16.32. There is also a nexus with this item, item h below, and the request to create a new AUP process for properties with identified potential habitat.

This new EC process is described in the following subsections:

- Under "Low-Impact Camping Area Permit and Approvals,” subsection (D)(2):

“(2) LICA permits shall require a Zoning Clearance and an Environmental Clearance, as defined in SCCC Chapter 18.10. The proposed disturbance area of a proposed LICA shall not be located within sensitive habitat or other protected resources, as identified in the General Plan ARC Element and/or SCCC Title 16. If an Environmental Clearance determines that the premises on which a LICA is proposed is within an area of biotic concern, issuance of a LICA Permit will be contingent upon receiving a biotic approval through the biotic review process outlined in SCCC Title 16.32.

(a) A ministerial LICA Permit may be issued upon demonstrating avoidance of any potential impacts to protected resources on the premises and shall be subject to conditions determined by the Environmental Coordinator during biotic review.

(b) A discretionary LICA permit is required when the proposed disturbance area of a LICA is within an area of biotic concern and there is no possible alternative location on the premises and the Environmental Coordinator determines that a discretionary environmental permit is required, per SCCC Chapters 16.32 and 18.10, to minimize potential

impacts to protected resources. In such case, the LICA permit shall be processed as an Administrative Use Permit (AUP), subject to conditions determined by the Environmental Coordinator during biotic review, and subject to environmental review under the California Environmental Quality Act (CEQA)."

- Under "Site Requirements," subsection (E)(6):

  "(6) Environmental Protection. The proposed disturbance area of a LICA shall not be located within sensitive habitat or other protected resources, as identified in the General Plan ARC Element and/or SCCC Title 16. If an Environmental Clearance process determines that the premises on which a LICA is proposed is within an area of biotic concern, issuance of a mLICA Permit will be contingent upon receiving a biotic approval through the biotic review process outlined in SCCC Title 16.32. The LICA shall be sited and conditioned to avoid and/or minimize potential impacts to protected resources, and an AUP may be required when the proposed disturbance area of a LICA is within an area of biotic concern and there is no possible alternative location on the premises. Signage requiring protection and avoidance of any identified sensitive habitat or other protected resource on the premises, consistent with sign policies and regulations in General Plan ARC Element and SCCC Chapter 13.10, shall be required. Additional Biotic Conditions of approval shall be determined by the Environmental Coordinator through the biotic review process."

c. Clearly identify conditions where properties are red-tagged and applicability of use of LICA without triggering renovations of red-tagged sites if that is possible;

Staff Response: No change to ordinance. Properties are red-tagged if they have been found, per the procedures set forth in SCCC Title 19, to violate any Federal, State, and local land use regulations as set forth in Federal, State statutes and regulations and in the County Code, including but not limited to provisions of the General Plan, building (Title 12), planning and zoning (Title 13), subdivision (Title 14) and environmental protection (Title 16) regulations, and related ordinances to protect the public health, safety, and welfare (other sections of the County Code, including Title 7).

The violations section (J) of the LICA ordinance requires consistency with the entire County Code and was included to ensure adequate code enforcement authority. The language in section J is also consistent with other visitor accommodations regulations, specifically the hosted and vacation rentals sections under SCCC 13.10.690 and 13.10.694, for which there have been a number of code

compliance issues in the past. This requested modification would conflict with that provision; therefore, it was not included in the ordinance.

d. **Clarify Item 6 C, regarding what is exactly needed in a plan and if plan is required to be done by a design professional, when and how;**
   Staff Response: Updated ordinance. This section, now located under (D)(9)(c), includes the list of items required to be included in the site plan for a LICA permit, and notes that it does not need to be drawn by a professional. The Improvements section (F)(11) was updated to clarify that any required building permits or other necessary permits associated with a LICA project would need to be obtained prior or concurrent to a LICA permit application and may require plans drawn by a professional.

e. **To incorporate a link of urbanized areas per Item E1B;**
   Staff Response: Updated ordinance and added reference to "Census designated urban area, as identified in the County GIS System" to clarify where the public and planners can find the Census designated urban areas. This language is consistent with similar references to layers on the County GISWeb included in code sections updated in the Sustainability Update. The GISWeb is available to the public online at https://gis.santacruzcounty.us/gisweb/ and the Census Urban Areas layer is listed under the heading, "Jurisdictional, Elections, Census."

f. **Clarify intensification of use per LICA and what requires review by Local Coastal Commission or is allowed under our Local Coastal Plan;**
   Staff Response: No change to ordinance. Per the Coastal Commission staff's request, the LICA ordinance has been updated to allow some flexibility for processing LICAs as "minor" CDPs, which also supports the goal of streamlining LICA permits. While proper authorization within the coastal zone will be required, there may be instances where a LICA may be considered "minor development" per SCCC 13.20.040. Minor CDPs may be processed administratively without a public hearing when the LICA project is consistent with the certified Local Coastal Program (LCP), requires no discretionary approvals (such as an AUP) other than a coastal development permit, and has no adverse effect either individually or cumulatively on coastal resources. Consistency with the LCP means the project is consistent with the policies of the General Plan/LCP and regulations included in the County Code (Local Coastal Implementation Plan or LCIP), which have been certified by the Coastal Commission.

g. **Review the ability for LICA to be closer than 50 feet to a property line under certain circumstances where the neighboring property does not have a building within 50 feet;**
   Staff Response: No change to ordinance. Original board direction includes requirement of a 50-foot setback from the property line, whether or not the adjacent property has an existing residence. Additionally, a 200-foot setback between LICA

and neighboring residences would be required, which in some cases may necessitate a LICA being placed even further than 50-feet from the property line. These setbacks help reduce potential impacts to neighboring properties and are appropriate given the ministerial approval process for most LICA projects, which require objective standards for projects that are intended to be "low impact" by definition.

h. **Clarify item F7, to explain what constitutes a discretionary permit and clarify when and if those are allowed;**

Staff Response: Updated ordinance. As defined in SCCC Chapter 18.10, a discretionary permit means: "a permit or project that requires the exercise of judgment or deliberation when the approving body decides to approve, conditionally approve, or deny the permit or project, as distinguished from ministerial permits or projects for which the decision to issue the permit or approve the project involves little or no personal judgment by a public official, but only determinations about whether there is conformity with applicable statutes, ordinances, or regulations. Discretionary permits or discretionary projects are subject to the California Environmental Quality Act (CEQA) and an environmental determination is required prior to action on the discretionary permit or project."

The LICA ordinance was updated to allow discretionary LICA permits in order to provide a path for more complicated LICA projects while ensuring protection of potential sensitive habitat and other protected resources. The initial EC, described above, is a ministerial review that would determine if there were any potential impacts to protected resources. If the EC concludes that potential impacts to protected resources can be avoided, either because the site contains no protected resources or because the proposed LICA can be adequately designed to ensure the disturbance area is located outside of protected resource areas, a ministerial LICA permit may be approved. If the EC concludes that potential impacts to protected resources cannot be avoided, the LICA permit would be processed as an AUP (as defined in SCCC Chapter 18.10), and would require a discretionary environmental permit (per SCCC Chapters 18.10 and 16.32) as well as CEQA review to ensure potential impacts are minimized. Discretionary review of the LICA permit may determine that potential impacts cannot be adequately avoided or minimized and result in the denial of the proposed LICA project.

There is also a nexus with this item, item b above, and the Planning Commission's request to create a new AUP process.

i. **Create alternate ideas around campfires, including fire proof zones, or gas fire pits, and fire protection around those, in lieu of a strict no campfire policy;**

Staff Response: Updated ordinance. Under "Fire Protection" (F)(12), added language that prohibits open fires within a low-impact camping area, including campfires and barbeques, but allows gas cooking stoves within campsites. These

standards are consistent with fire requirements on “red flag warning” days in other rural state and county park campgrounds when weather conditions could contribute to potential fire risk in a particular area. Establishing these standards for all LICAs is appropriate to ensure fire protection compliance for these ministerially approved campgrounds that are intended to be “low-impact” by definition and are not required to have an onsite property manager.

However, the Planning Commission could consider recommending alternative standards or allowing some exceptions to the proposed standards. For instance, open fires could be permitted for LICAs where an onsite manager or camp host is present to regulate the site, enforce fire safety measures, and monitor the “burn day status.” Per CALFIRE, “burn day status” refers to the daily assessment of weather and environmental conditions that affect the safety and feasibility of outdoor burning activities. On “red flag warning” days, open fires would be prohibited, and the onsite property manager(s) would be present to inform campers and ensure compliance. According to CALFIRE, burn day status information is provided by our local Air Pollution Control District, the Monterey Bay Air Resources District, which should have up-to-date information and guidance on whether outdoor burning is permitted on a given day. This option would require constant monitoring by the designated property manager.

Alternatively, the property manager could enforce a blanket prohibition of fires during certain months of the year when there is a potential elevated fire risk. Historically, California’s fire season is between April and October, but some recent wildfires have occurred outside of these months, including the Camp Fire in 2018, which occurred in November.

Another option is to require LICA property managers to request campers obtain Campfire permits from CALFIRE as part of their campsite rental agreement. These campfire permits are readily available on CALFIRE’s website and instruct applicants on the rules of responsible fire use and preventing wildfires. Required signage on fire safety rules onsite at the LICA could also be added to the LICA rules section of the ordinance. However, to ensure public safety, staff does not recommend allowing open fires on LICA properties that do not have an onsite property manager/camp host present while campsites are occupied.

j. Require that LICAs have a maintenance agreement for portable restrooms and review applicability and requirements of ADA restrooms;

Staff Response: Updated ordinance to require maintenance agreement for portable toilets as part of a LICA permit application under (D)(9)(d).

Staff could not identify any ADA requirements for privately owned campgrounds, including accessible restrooms, pathways, or campsites. However, most public lands have accessibility management programs to ensure that people with disabilities have equal access to camping and other recreational opportunities.

The Planning Commission could consider adding ADA standards to the proposed ordinance to ensure greater accessibility to low-impact camping areas, consistent with standards seen on federal, state, or other county public lands. For instance, all LICA could be required to provide one ADA accessible portable toilet. Or, this requirement could be triggered for LICA with five or more campsites. Alternatively, ADA requirements could be triggered when a building or discretionary permit is required for a LICA, including an ADA accessible campsite, an ADA accessible restroom, and a 2-5% graded path between the campsite and restroom.

k. Review and suggest ways that a transfer of a LICA is possible in the event that a property is reassessed, as opposed to needing to apply for a new permit for an existing site;

Staff Response: No change to ordinance. The proposed ordinance does not allow LICA permits to be transferred between owners or properties. Per subsection (H) Transfer of Property with LICA Permit, "When any property transfer triggers reassessment pursuant to the California Revenue and Taxation Code Section 60 *et seq.* as determined by the County Assessor, the LICA permit associated with the property shall expire and shall become nonrenewable at the time of property title transfer." These provisions are consistent with the original direction provided by the Board and consistent with other visitor accommodations regulations, specifically the hosted and vacation rentals sections under SCCC 13.10.690 and 13.10.694, respectively, for which there have been a number of code compliance issues in the past. These regulations, along with the permit renewal process, are appropriate to ensure adequate enforcement authority for these ministerial permits.

l. Add clarification and discussion around the maximum number of tents allowed, with allowances for groups, and youth group organizations;

Staff Response: Updated ordinance. Staff originally proposed no maximum number of tents to allow some flexibility within a single camping party, aligned with the Board's direction to provide "density options." However, staff has revised the ordinance per the Planning Commission's request, to allow a "Maximum of two tents, except no maximum number of tents is required for schools or other not-for-profit youth organizations" under subsection (F)(5) Types of Accommodations.

m. Add a regulation for allowable hours of generator use;

Staff Response: Updated ordinance. Rather than providing specific generator hours within the LICA ordinance itself, regulations for generator hours have been added by referring to the Noise Ordinance (SCCC 8.30) to ensure consistency should any provisions of that ordinance change in the future. Subsection (F)(16) of the LICA Ordinance has been modified to allow generators to be used two hours before or after the night hours shown the Noise Ordinance (SCCC 8.30). Night hours established in the Noise Ordinance are between 10:00 p.m. and 8:00 a.m. Therefore, generator use is allowed between 10:00 a.m. and 8:00 p.m. These hours

are consistent with generator use hours allowed in Santa Cruz County State Park campgrounds.

n. **Add a prohibition of smoking and signage around that;**
Staff Response: Updated ordinance to prohibit smoking in LICAs under the Fire Protection section (F)(12) and added signage requirements to the LICA Rules section (F)(19).

o. **Review the applicability of adopting ordinance that removes high fire severity hazard areas in certain areas, not just very high fire severity hazards areas, where fires are more prone in areas of the county.**
Staff Response: No change to ordinance. A significant portion of the county is located in the very high and high fire hazard severity zones (approximately 50% of the total county, largely in the rural area). Removing these areas would render most of the county ineligible to pursue a LICA permit.

p. **Strongly suggest requiring owner occupancy or on-site managers for parcels, and only allowing LICAs on parcels with legal and safe access;**
Staff Response: Updated ordinance. Added a requirement for an onsite property manager when cell service is not available on the property, under "Local Property Manager" subsection (F)(20)(b): "For properties with no cell service, a property owner, designated operator, or local property manager for a low-impact camping area shall be located onsite and available 24 hours a day when campsites are occupied. Permanent occupancy within a LICA is prohibited; property manager(s) may reside on the premises within a primary unit or accessory dwelling unit, including a tiny home on wheels per SCCC 13.10.680. A landline or other phone service is required to ensure access to emergency services."

Staff did not propose an onsite property manager requirement for all LICA properties due to potential complications with the proposed state bill SB620, which would not allow permanent occupancy within a low-impact camping area. Therefore, the property owner or other property managers may reside in a primary unit or accessory dwelling unit on the site.

Staff also added a new "Access" subsection created under (F)(9) with the following requirement: "Adequate driveway or road access for fire protection shall be provided and maintained in conformance with the adopted standards of State law, County Fire Code (SCCC Chapter 7.92), and local fire district ordinances. Existing means of ingress and egress to the proposed low-impact camping area shall be preferred over means that require new grading, development of roadways, or driveways."

q. **Consider bifurcating farm-stays from the LICA process;**
Staff Response: No change to ordinance. As an alternative to bifurcating the LICA permit process, LICA permits may now be processed as an AUP to provide a discretionary path for LICA projects with more complicated site conditions and/or

potential impacts. This discretionary path would also require CEQA review of the proposed LICA project. However, the Commission can consider bifurcating the LICA permit process in its recommendation to the Board of Supervisors. Nexus with Commissioner Barton's friendly amendment (b) below.

r. **Consider if it is possible to add a land line requirement in the absence of a cell phone;**

Staff Response: Updated ordinance. Staff was unable to confirm whether landlines can be landline required, so the ordinance was updated to allow flexibility under the "Local Property Manager" subsection (F)(20)(b): "A landline or other phone service is required to ensure access to emergency services." Other phone service may include access to Wi-Fi calling via satellite or other Internet access.

s. **Provide a little more confirmation and discussion around the CEQA exemption would be helpful.**

Staff Response: No change to ordinance. Staff determined the project is exempt from CEQA because the ordinance builds in protective environmental regulations and there are no actual LICA proposals to analyze. The updated ordinance now requires a ministerial Environmental Clearance for every LICA permit. If the EC determines there are no protected resources on the site or all potential impacts can be avoided, the LICA permit can be processed ministerially, subject to potential ministerial conditions and/or redesign, as allowed per SCCC Chapter 18.10. If, however, the EC determines potential impacts cannot be avoided, and a discretionary environmental permit may be necessary (per SCCC Chapter 18.10), a new discretionary permit path has been added for these more complex LICA projects that require further review and/or conditions to ensure potential impacts are adequately avoided and/or minimized. Discretionary LICA permits would be processed as an AUP and include conditions of approval, public notice, as well as project-level CEQA review, including mitigations if necessary.

t. **Conditions adding requirements regarding signage regarding biotic and environmental resources;**

Staff Response: Updated ordinance to require environmental protection signage, under the "Environmental Protection section" (E)(6) and under the "LICA Rules" section (F)(19).

u. **Incorporate feedback from fire departments in the unincorporated areas of the County;**

Staff Response: No change to ordinance. Staff reached out to unincorporated fire chiefs since the Planning Commission's last meeting. One letter was received from the Fire Chief of the Zayante Fire Station and is included in Exhibit D: Public Comments.

v. **Suggest community meeting(s) in the north county and south county areas that have the most properties, and provide proper noticing to reach the widest range of people;**

Staff Response: No change to ordinance. In order to return to the Planning Commission and provide a recommendation to the Board of Supervisors in a timely manner as directed, no additional community meetings were held. Staff notes that this ordinance will have had several opportunities for public input during at least 6 public hearings, including the 1 past and at least 1 upcoming at the Board of Supervisors, 3 at the Planning Commission, and 1 at APAC. Rather than create an entirely new forum for public input, and since the ordinance has already reached the public hearing process, staff is soliciting further input from the public within the existing forum of the upcoming public hearings. Staff has conducted additional public outreach for upcoming public hearings to ensure it reaches a wider number of people, including a press release, newspaper announcement, and social media posts. Staff also notes that with the new discretionary AUP process, public notice would be required for LICA projects with identified potential impacts. Neighbors would be able to provide input on proposed discretionary LICA projects at that time.

Friendly Amendments by Commissioner Barton

a. **Not come back until such time that the state authorized it (*not accepted by Commissioner Gordin; withdrawn by Barton*);**
b. **Consider a little more specificity to a standalone farm-stay proposal; That we consider a ministerial process to allow camping on farm stays and ag land that is already in commercial use; that staff consider returning with an ordinance to permit and regulate them in those areas (*accepted by Commissioner Gordin*);**

   Staff Response: No change to ordinance. As an alternative to bifurcating the LICA permit process, LICA permits may now be processed as an AUP to provide a discretionary path for LICA projects with more complicated site conditions and/or potential impacts. This discretionary path would also require CEQA review. However, the Commission can consider bifurcating the LICA permit process in its recommendation to the Board of Supervisors. Nexus with item q above.
c. **Would like to see a full CEQA analysis of proposed ordinance and as a minimum public notice, consultation of native American tribes, and consideration of possible cumulative impacts (*accepted by Commissioner Gordin*)**

   Staff Response: No change to ordinance. Staff determined the project is exempt from CEQA because the ordinance builds in protective environmental regulations and there are no actual LICA proposals to analyze. The updated ordinance now requires a ministerial EC for every LICA permit. In addition, a new discretionary

permit path was added for sites that may have certain conditions that require discretionary review, including potential impacts to environmental and other protected resources. In addition to discretionary review, conditions of approval, and public notice, a LICA permit processed at the AUP level would require CEQA review for these LICA projects. Nexus with item s above.

d. **Evidence supporting findings that the ordinance is consistent with the General Plan and Local Coastal Program; hope maps will be made public *(accepted by Commissioner Gordin)***

The LICA Ordinance provides the public with greater access to open space and low-intensity outdoor recreation and camping, while ensuring adequate protections for environmental resources, agricultural activity, timber operations, public safety, and neighboring properties and uses, consistent with the following General Plan/Local Coastal Program policies:

- **BE-5.1.6 (LCP) Avoid Impacts to Environmentally Sensitive Coastal Habitats.** Within coastal environmentally sensitive habitat areas, only allow resource-dependent development consistent with Coastal Act section 30240, such as trails, low-impact camping, educational signage and kiosks, research, and restoration projects.
- **PPF-1.2.1 (LCP) Parks, Recreation, and Open Space Uses (O-R).** The O-R designation shall characterize land intended for outdoor recreation and the provision of open space for the purpose of facilitating healthy communities and the community's enjoyment of the natural setting of the County, including commercial recreation, County, state and federal parks, campgrounds, recreational vehicle parks, preserves and biotic research stations. O-R is appropriate for:
  - Active recreation uses, such as golf courses, stables, swimming pools, sports courts, athletic fields, camping, picnicking areas, community centers, outdoor entertainment and historically themed parks that are compatible with rural and mountain settings and that provide expanded recreation opportunities to the public, provided that they are compatible with environmental resources.
  - Low-intensity passive uses that are compatible with the scenic values and natural setting of the County for open space lands.
- **PPF-2.2.17 Recreation Within Watershed Reserves.** Provide public opportunities for wilderness recreation experiences by allowing public access to major publicly owned domestic watershed reserves, where such use can be accomplished without harm to the watershed function of the areas. Develop trail systems, interpretive signing, and camping sites where feasible.

Additional information on LCP consistency is provided in the Local Coastal Program section below.

A link to the PDF of the March 13, 2024 presentation, which includes a map of eligible LICA parcels, was made available on the online Planning Agenda for that date and we will ensure subsequent presentations are available as well.

e. **Summary information of potential number of campsites, to have a good understanding of impact, density, and volume of campers (*accepted by Commissioner Gordin*);**

Staff Response: No change to ordinance. It is difficult to determine the potential number of campsites that may be established with the approval of the proposed LICA ordinance. Based on initial staff analysis, around 1,300 parcels may potentially be eligible to develop a LICA on their property, which includes approximately 20,000 acres. However, this estimate is not definitive as there are number of site requirements that may render more or fewer parcels ineligible, including potential environmental resources, agricultural activity, timber operations, and contiguous parcels with the same property owner whose premises may meet the five-acre minimum. Moreover, it is impossible to know how many property owners will apply for LICA permits, how many campsites each LICA would propose, or whether the proposed project would ultimately meet all the required elements of the draft ordinance.

Research on online venues such as Hipcamp indicate that a number of these types of campgrounds already exist unpermitted in the county, so the purpose of developing this ordinance is to establish new regulations and ensure adequate public safety measures, environmental protections, and code compliance for these existing and new uses. As of the date of this staff report, there were approximately 20 sites advertising on Hipcamp.

f. **Revised ordinance to have minimum campground area setback that is 200 feet from env protected habitat, riparian corridors, coastal bluffs, and sensitive habitats (*accepted by Commissioner Gordin*);**

Staff Response: No change to ordinance. This request conflicts with the Planning Commission's request to consider reducing 50-foot setbacks from the property line. The recommended 50-foot setback for sensitive habitat, including riparian corridors, is consistent with the maximum applicable setback required in SCCC Title 16. Policy staff confirmed with Environmental Planning staff that this setback is appropriate to ensure these resources are protected. Additionally, Coastal Commission staff recommended increasing setbacks from coastal bluffs to 100 feet to ensure no Geologic Hazard Assessment would be required, and the ordinance has been updated accordingly.

g. **Review low-cost accommodation for all campgrounds with five or more campsites to provide 20% low income, with detailed process and specificity for provision for low-income camping made to these families (*accepted as review item by Commissioner Gordin and agreed by Commissioner Barton*)**

Staff Response: No change to ordinance. Additional affordability provisions were not added to the ordinance because the Board specifically directed staff to address

affordable pricing options on public lands, which is included in the ordinance, and determined such affordability restrictions were not appropriate for private property. To provide some context, in the Santa Cruz County area, campsites on Hipcamp typically range in price from $30 to $140 per night. More expensive sites typically offer private and unique experiences, more amenities, and/or are set up to accommodate a larger number of people.

Friendly Amendments by Commissioner Shepard

a. Require LICA to require an MUP or AUP where there are mapped biotic resources (*accepted by Commissioner Gordin*)

Staff Response: Updated ordinance to provide a new AUP process for properties with potential sensitive habitat and other protected resources. The initial EC, described above, is a ministerial review that would determine potential impacts to protected resources. If the EC concludes that discretionary review is required to ensure potential impacts to protected resources are avoided and/or minimized, the LICA permit would be processed as an AUP. There is also a nexus with this item, item b above, and the Planning Commission's request to create a new AUP process. There is also a nexus with this item, items b and h in Commissioner Gordin's original motion, addressed above.

LOCAL COASTAL PROGRAM

The proposed Ordinance will require a Local Coastal Program Amendment because SCCC Chapter 13.10 is an implementing ordinance of the Santa Cruz County Local Coastal Program. As directed by the Board of Supervisors, the ordinance would take effect in areas outside of the Coastal Zone 31 days after the second reading by the Board of Supervisors and within the Coastal Zone upon certification by the Coastal Commission. Following adoption of the ordinance by the Board of Supervisors, staff would submit the adopted to the Coastal Commission for approval in the Coastal Zone.

Low-impact camping areas would provide additional camping opportunities in the Coastal Zone, which is consistent with the policies of the Coastal Act that support lower-cost visitor accommodations. County staff has reviewed the proposed LICA Ordinance with local Coastal Commission staff and incorporated their suggested edits in the current draft. These changes ensure the ordinance is in conformance with the LCP and include the following changes:

- Coastal staff's edits provide more flexibility for processing LICA permits in the coastal zone and allow for opportunities to process them as "minor" CDPs, which supports the goal of streamlining these projects.
- A Geologic Hazards Assessment (GHA) would be required if a project is located within 100 feet of a coastal bluff edge. A GHA would likely be an arduous task for a LICA, which overall is relatively minor development with few anticipated impacts. To address this, staff has added a 100-foot setback from a coastal bluff to satisfy established requirements and ensure no GHA would be required.

- Staff also incorporated additional language to promote a low impact camping area utilizing existing means of access, so as to reduce overall impacts of LICA development and added timberland protections throughout the draft code.

ENVIRONMENTAL REVIEW

The proposed County Code amendments are exempt from the California Environmental Quality Act ("CEQA") pursuant to CEQA Guidelines Section 15061(b)(3) because the amendments provide regulations for future camping areas and therefore do not present a reasonably foreseeable possibility of a significant impact on the environment.

Report Prepared By:

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Phone Number: (831) 454-3290
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Reviewed by:

Mark Connolly
Principal Planner

Exhibits:
A: Planning Commission Resolution
B: CEQA Notice of Exemption
C: Draft Low Impact Camping Ordinance (Strikethrough and Clean)
D: Public Comments

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BEFORE THE PLANNING COMMISSION
OF THE COUNTY OF SANTA CRUZ, STATE OF CALIFORNIA

RESOLUTION NO._____

On the motion of Commissioner
duly seconded by Commissioner
the following Resolution is adopted:

RESOLUTION OF THE PLANNING COMMISSION OF THE COUNTY OF SANTA CRUZ RECOMMENDING AMENDMENTS TO SANTA CRUZ COUNTY CODE SECTIONS 13.10.312, 13.10.322, 13.10.352, 13.10.362, AND 13.10.372; AND ADDING NEW SECTION 13.10.695, REGULATING LOW-IMPACT CAMPING AREAS IN THE UNINCORPORATED AREAS OF SANTA CRUZ COUNTY

WHEREAS, Santa Cruz County is an area with abundant natural beauty and recreational opportunities; and

WHEREAS, the County of Santa Cruz Board of Supervisors recognizes the need for additional camping opportunities, particularly low-impact and low-cost camping options, and directed County staff to prepare an ordinance to allow and regulate such camping sites; and

WHEREAS, the Planning Commission held a public hearing on February 28, March 13, and May 8, 2024, to consider an ordinance to allow low-impact camping areas in the unincorporated areas of Santa Cruz County; and

WHEREAS, staff has reviewed the ordinance for compliance with the California Environmental Quality Act and found that, with the required regulations proposed in the ordinance, there is no reasonably foreseeable significant impact on the environment, and staff has prepared a Notice of Exemption for the project.

NOW, THEREFORE, BE IT RESOLVED that the Planning Commission recommends that the Board of Supervisors confirm that a Notice of Exemption is appropriate under CEQA.

BE IT FURTHER RESOLVED that the Planning Commission recommends that the Board of Supervisors adopt the proposed ordinance amending sections 13.10.312, 13.10.322, 13.10.352, 13.10.362, and 13.10.372 of the Santa Cruz County Code, and adding new section 13.10.695, as presented on this date.

BE IT FURTHER RESOLVED that the Planning Commission finds the proposed amendments are internally consistent with the Santa Cruz County General Plan; and

BE IT FURTHER RESOLVED that the Planning Commission finds that the proposed amendments constitute part of the County's Local Coastal Implementation Plan and are consistent

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with the California Coastal Act, and recommends that the Board of Supervisors direct staff to submit the ordinance to the California Coastal Commission for certification.

PASSED AND ADOPTED by the Planning Commission of the County of Santa Cruz, State of California, this _____ day of _____by the following vote:

AYES: COMMISSIONERS:
NOES: COMMISSIONERS:
ABSENT: COMMISSIONERS:
ABSTAIN: COMMISSIONERS:

_____
Chairperson

ATTEST: _____
Secretary

APPROVED AS TO FORM:

DocuSigned by:
Justin Graham
40E85ACDEDAB42D...

_____
ASSISTANT COUNTY COUNSEL

cc: County Counsel
Community Development & Infrastructure Department

County of Santa Cruz

Department of Community Development and Infrastructure

701 Ocean Street, Fourth Floor, Santa Cruz, CA 95060
Planning (831) 454-2580 Public Works (831) 454-2160
sccoplanning.com dpw.co.santa-cruz.ca.us

NOTICE OF EXEMPTION

To: Clerk of the Board
Attn: Juliette Rezzato
701 Ocean Street, Room 500
Santa Cruz, CA 95060

Project Name: Low-Impact Camping Area Ordinance

Project Location: Countywide, outside urban and rural services lines

Assessor Parcel No.: N/A

Project Applicant: County of Santa Cruz

Project Description: Ordinance allowing and regulating low-impact camping areas within unincorporated county lands outside the urban and rural services lines. The ordinance would allow limited use of rural properties for short-term camping rental subject to regulations regarding property size, number of campsites, duration, number of campers, permits, sensitive area and habitat protection, water availability, wastewater disposal, and other regulations.

Agency Approving Project: County of Santa Cruz

County Contact: Natisha Williams **Telephone No.** (831)454-3290

Date Completed: 2-27-24

This is to advise that the County of Santa Cruz *(insert County decision-making body)* has approved the above described project on _____ (date) and found the project to be exempt from CEQA under the following criteria:

Exempt status: (*check one*)

☐ The proposed activity is not a project under CEQA Guidelines Section 15378.
☐ The proposed activity is not subject to CEQA as specified under CEQA Guidelines Section 15060 (c).
☒ The proposed activity is exempt from CEQA as specified under CEQA Guidelines Section 15061(b)(3).
☐ **Ministerial Project** involving only the use of fixed standards or objective measurements without personal judgment.
☐ **Statutory Exemption** other than a Ministerial Project (CEQA Guidelines Section 15260 to 15285).
Specify type:
☐ **Categorical Exemption**
Class 1

Reasons why the project is exempt:
The ordinance allows for a short-term use intended to be low-impact and provides for regulations that protect against environmental impacts, as noted in the Project Description. With the regulations in place, there is no reasonably foreseeable significant impact on the environment.

Signature: _____ Date: _____

Title: Environmental Coordinator

EXHIBIT B

ORDINANCE NO._____

AN ORDINANCE OF THE BOARD OF SUPERVISORS OF THE COUNTY OF SANTA CRUZ AMENDING SANTA CRUZ COUNTY CODE SECTIONS 13.10.312, 13.10.322, 13.10.352, 13.10.362, AND 13.10.372; AND ADDING NEW SECTION 13.10.695, REGULATING LOW-IMPACT CAMPING AREAS IN THE UNINCORPORATED AREAS OF SANTA CRUZ COUNTY

WHEREAS, Santa Cruz County is an area with abundant natural beauty and recreational opportunities; and

WHEREAS, the County of Santa Cruz Board of Supervisors recognizes the need for additional camping opportunities, particularly low-impact and low-cost camping options, and directed County staff to prepare an ordinance to allow and regulate such camping sites; and

WHEREAS, the Planning Commission held a public hearing on February 28 ~~and,~~ March 13, and May 8, 2024, to consider an ordinance amending sections 13.10.312, 13.10.322, 13.10.352, 13.10.362, AND 13.10.372 of the Santa Cruz County Code, and adopting new section 13.10.695 to allow low-impact camping areas in the unincorporated areas of Santa Cruz County; and

WHEREAS, the Board of Supervisors held a public hearing on ~~April 9~~ _____, 2024, to consider public input on the proposed Low-Impact Camping Area Ordinance.

NOW, THEREFORE, the Board of Supervisors of the County of Santa Cruz ordains as follows:

SECTION I

Table 13.10.312-1: Agricultural Uses Chart in Santa Cruz County Code subsection 13.10.312(D) is hereby amended by adding "Low-impact camping areas" as an allowed use under the heading "Visitor Accommodations" to read as follows:

USE	CA	A	REFERENCES AND NOTES
Low-impact camping area	ZC[A]/AUP[A]~~ZC~~[A]	ZC[A]/AUP[A]~~ZC~~[A]	See 13.10.695 for when AUP is required. Low-impact camping area permit required per 13.10.695

EXHIBIT C

SECTION II

Table 13.10.322-1: Residential Uses Chart in Santa Cruz County Code subsection 13.10.322(D) is hereby amended by adding "Low-impact camping area" as an allowed use under the heading "Visitor Accommodations" to read as follows:

USE	RA/SU	RR	R-1	RB	RM	RF	REFERENCES AND NOTES
Low-impact camping area	ZC[A]/AUP[A]~~C~~[A]	NA	NA	NA	NA	NA	See 13.10.695 for when AUP is required. Low-impact camping area permit required per 13.10.695

SECTION III

Table 13.10.352-1: Parks, Recreation and Open Space PR Uses Chart in Santa Cruz County Code subsection 13.10.352(D) is hereby amended by adding "Low-impact camping area" as an allowed use under the heading "Visitor Accommodation" to read as follows:

USE	Permit Required	REFERENCES & NOTES
Low-impact camping area	ZC/AUP~~ZC~~	See 13.10.695 for when AUP is required. Low-impact camping area permit required per 13.10.695

SECTION IV

Table 13.10.362-1: Public and Community Facilities Uses Chart in Santa Cruz County Code subsection 13.10.362(D) is hereby amended by adding "Low-impact camping area" as an allowed use under the heading "Residential Units-Commercial Uses (ancillary to residential use)" to read as follows:

USE	Permit Required	REFERENCES & NOTES
Low-impact camping area	ZC^{A}/AUP^{A}~~ZC~~	See 13.10.695 for when AUP is required. Low-impact camping area permit required per 13.10.695 ~~Does not require the use to be ancillary to a residential use.~~

SECTION V

Table 13.10.372-1: Timber Production TP Uses Chart in Santa Cruz County Code subsection 13.10.372(D) is hereby amended by adding "Low-impact camping area" as an allowed use under the heading "Recreation and Visitor Accommodation" to read as follows:

USE	Permit Required	REFERENCES & NOTES
Low-impact camping area	ZC^{A}^{A}/AUP^{A}	See 13.10.695 for when AUP is required. Low-impact camping area permit required per 13.10.695

SECTION VI

Section 13.10.695 of the Santa Cruz County Code is hereby added, to read as follows:

13.10.695 Low-impact camping areas.

(A) Purpose. The purpose of this section is to establish definitions and~~,~~ provide ~~for ministerial approval, and regulate~~regulations for rental of property for overnight recreational camping of a less intensive nature in rural areas of the County. Low-impact camping areas provide more public access to open space and generally have less need for infrastructure, generate

less traffic, and have less on-site development than organized camps (SCCC 13.10.692) and other Type B visitor accommodations (see SCCC 13.10.689).

(B) Applicability. This section applies to ~~ministerial approval of~~ low-impact camping areas proposed in the Commercial Agriculture (CA); Agriculture (A); Residential Agricultural (RA); Parks, Recreation, and Open Space (PR); Public and Community facilities (PF); Timber Production (TP); and Special Use (SU) zone districts. For camping in other zone districts or other types of commercial visitor accommodations, see SCCC 13.10.689. County Parks as defined in SCCC 10.04.020(F) are exempt from this section.

(C) Definitions. For the purposes of this section, the following words and phrases shall be defined as set forth in this section. In the event of any conflict between the definitions in this section and definitions of the same or similar terms in SCCC 13.10.700, the definitions herein shall prevail.

(1) "Campsite" means a single camping space within a low-impact camping area used for short-term outdoor sleeping accommodations for one camping party, and typically includes space for tents, recreational vehicles (as defined), yurts, domes, or other non-permanent structures intended for overnight recreational camping purposes.

(2) "Disturbance area" means a designation on a site plan indicating where campers will be permitted on the premises, including access roads, parking areas, campsites, bathroom areas, designated common space areas, trails, areas where vegetation will be removed and/or disturbed, and any other areas where campers will be permitted.

(3) "Low-impact camping area" means a small-scale, low-intensity campground rented out for short-term overnight recreational camping purposes (no more than 14 consecutive nights per camper and no more than 28 nights per calendar year per camper), unless further restricted by state law.

(4) "Premises" means one legal parcel or multiple contiguous parcels with the same landowner(s).

(D) Low-Impact Camping Area Permit and Approvals.

(1) Low-impact camping areas (LICAs) may be operated if the use is allowed in the applicable zone district and the required LICA Permit is obtained.

(2) LICA permits shall require a Zoning Clearance and an Environmental Clearance, as defined in SCCC Chapter 18.10. The proposed disturbance area of a proposed LICA shall not be located within sensitive habitat or other protected resources, as identified in the General Plan ARC Element and/or SCCC Title 16. If an Environmental Clearance determines that the premises on which a LICA is proposed is within an area of biotic concern, issuance of a LICA Permit will be contingent upon receiving a biotic approval through the biotic review process outlined in SCCC Title 16.32.

(a) A ministerial LICA Permit may be issued upon demonstrating avoidance of any potential impacts to protected resources on the premises and shall be subject to conditions determined by the Environmental Coordinator during biotic review.

(b) A discretionary LICA permit is required when the proposed disturbance area of

a LICA is within an area of biotic concern and there is no possible alternative location on the premises and the Environmental Coordinator determines that a discretionary environmental permit is required, per SCCC Chapters 16.32 and 18.10, to minimize potential impacts to protected resources. In such case, the LICA permit shall be processed as an Administrative Use Permit (AUP), subject to conditions determined by the Environmental Coordinator during biotic review, and subject to environmental review under the California Environmental Quality Act (CEQA).

(3) ~~Low-impact camping area (LICA)~~LICA permits are not subject to~~processed as a ministerial permit and are not subject to regulations that apply to discretionary permits in the rural area, including~~ the Rural Density Matrix per SCCC Chapter 13.14, Organized Camps and Conference Centers per SCCC 13.10.692, ~~or~~ or Commercial Visitor Accommodations per SCCC 13.10.689.~~.~~

~~(1)~~(4) All low-impact camping areas shall comply with the Special Occupancy Parks Act (SOPA) or other applicable State law.

~~(2)~~(5) Transient occupancy tax (TOT) registration shall be required for each low-impact camping area.

~~(3)~~(6) Approval of a LICA permit does not legalize any non-permitted use or structure or determine buildability of a lot.

~~(4)~~(7) LICA permits are issued to property owners for a specific property and are not transferable between owners or properties.

(8) LICA permits are subject to revocation as provided for in SCCC 18.10.136, and subject to the violation provisions of subsection (J) of this section.

~~(5)~~(9) Applicants for a new LICA permit shall provide the following to the Planning Division of the Community Development and Infrastructure Department:

(a) Completed application form.

(b) Nonrefundable application fee as established by the Board of Supervisors.

(c) Site plan, which does not need to be drawn by a professional, drawn to scale and showing parcel size and location of all property lines, existing buildings, nearby major roadways, proposed limits of disturbance area, proposed campsites, access to campsites, dimensioned on-site parking spaces, and location of water, sewage, and solid waste facilities, as applicable.

(d) Maintenance agreement for portable toilets or a c~~C~~ompleted Environmental Health Building Clearance Form certifying that the proposed project meets the regulations and requirements of the Environmental Health Division of the County Health Services Agency.

(e) Copy of County of Santa Cruz TOT certificate number, or proof of registry with a verified online platform that will collect and remit TOT on behalf of applicant.

(E) Site Requirements.

(1) Rural Properties. Low-impact camping areas are only allowed on rural properties that meet all of the following:

(a) Located outside of the Urban and Rural Service Lines; and

(b) Not on a site wholly within the boundaries of a Census designated~~n~~ urban~~ized~~ area ~~or urban cluster~~, as ~~designated by the United States Census Bureau~~identified in the County GIS System.~~; and~~

(2) Zone Districts. Low-impact camping areas may be located within the one of the following zone districts: Commercial Agriculture (CA); Agriculture (A); Residential Agricultural (RA); Parks, Recreation, and Open Space (PR); Public and Community Facilities (PF); Timber Production (TP); or Special Use (SU) zone districts.

~~(3) Special Occupancy Parks Act (SOPA). LICA shall not be located on a property that has been used as a special occupancy park for the last five years unless both of the following are true:~~

~~( ) The area was a special occupancy park before January 1, 2024; and~~

~~( ) The area met the requirements of this section on January 1, 2023.~~

~~(6)~~(3) Parcel Size. The minimum parcel size or premises shall be five acres.

(4) Agricultural Activity. For agricultural zone districts, low-impact camping areas shall be ancillary to a principal agricultural use on the property and shall not displace any active agricultural uses.

(5) Timber Production. For timber production zone districts, low-impact camping areas shall not displace any active timber production uses and must be sited on a non-timbered portion of the premise.

~~(7)~~(6) Environmental Protection. The proposed disturbance area of a LICA shall not be located within sensitive habitat or other protected resources, as identified in the General Plan ARC Element and/or SCCC Title 16. If an Environmental Clearance process determines that the premises on which a LICA is proposed is within an area of biotic concern, issuance of a LICA Permit will be contingent upon receiving a biotic approval through the biotic review process outlined in SCCC Title 16.32. The LICA shall be sited and conditioned to avoid and/or minimize potential impacts to protected resources, and an AUP may be required when the proposed disturbance area of a LICA is within an area of biotic concern and there is no possible alternative location on the premises. Signage requiring protection and avoidance of any identified sensitive habitat or other protected resource on the premises, consistent with sign policies and regulations in General Plan ARC Element and SCCC Chapter 13.10, shall be required. Additional Biotic Conditions of approval shall be determined by the Environmental Coordinator through the biotic review process. ~~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)~~

~~(a) Site-specific analysis, including a biotic assessment, may be required if disturbance area is located in areas of biotic concern, as defined in SCCC Chapter 16.32.~~

~~(8)~~(7) Hazard Areas. Campsites within a low-impact camping area shall not be located within any of the following areas:

(a) Within a floodway or 100-year flood zone as determined by maps prepared by the Federal Emergency Management Agency; or

(b) Within a very high fire hazard severity zone as indicated on maps adopted by the Department of Forestry and Fire Protection pursuant to Section 4202 of the Public Resources Code.

(8) Within Coastal Zone. Low-impact camping areas in the Coastal Zone shall be required to obtain the appropriate authorization for development within the coastal zone, pursuant to the requirements of SCCC Chapter 13.20.

~~(0) Within Coastal Zone. Low-impact camping areas in the Coastal Zone shall be required to obtain a Coastal Development Permit pursuant to the provisions of SCCC Chapter 13.20.~~

~~(G)~~(F) Operating and Development Standards. All low-impact camping areas shall comply with the following standards for their operations:

(1) LICA Permit. Prior to operating a low-impact camping area, a property owner shall obtain a ~~ministerial~~ LICA permit pursuant to this section.

(2) Maximum Per Premises. A maximum of one low-impact camping area is allowed per premises.

(3) Density. A low-impact camping area shall have a maximum density of one campsite per acre and the following maximum number of campsites:

(a) If a LICA is subject to the Special Occupancy Parks Act (SOPA) and would otherwise be classified as a "special occupancy park" under Health and Safety Code (HSC) section 18862.43, the maximum number of campsites in a LICA shall not exceed one campsite per low-impact camping area; or

(b) If a LICA would not be subject to SOPA (HSC §§ 18860 *et seq*.) and would not be classified as a "special occupancy park" under HSC section 18862.43, the maximum number of campsites shall not exceed nine campsites per low-impact camping area.

~~(3) Maximum Occupancy.~~

~~(d)~~(4) Number of Campers. Each low-impact camping area is allowed the following maximum number of overnight guests:

~~(i)~~(a) If LICA are considered a special occupancy park per HSC section 18862.43, a maximum of ~~10 overnight guests in~~one ~~one group~~camping party with up to four overnight guests per campsite; or

(b) If LICA are not considered a special occupancy park per HSC section 18862.43, a maximum ~~occupancy~~ of four overnight guests per campsite or up to 36 overnight guests total for each low-impact camping area ~~or 36 overnight guests total for each low-impact camping area~~.

(i) Water Service. For low-impact camping areas that provide potable water, the maximum occupancy is required to be below an average of 25 individuals daily for more than 60 days out of the year or otherwise below the threshold of a state small water system as defined in SCCC 7.71.025.

~~( )~~

~~(f)~~(5) Type of Accommodations. Each campsite within a low-impact camping area may include one of the following types of overnight sleeping accommodations:

~~(i)~~(a) ~~One or more~~Maximum of two tents, except no maximum number of tents is required for schools or other not-for-profit youth organizations;

~~(ii)~~(b) One recreational vehicle as defined in 13.10.700-R, maximum 24 feet in length (includes Class B and C motorhomes, van campers and conversions, and truck campers);

~~(iii)~~(c) One recreational travel trailer as defined in 13.10.700-R, maximum 20 feet in length (includes fifth-wheels and folding camping trailers); or

~~(iv)~~(d) One soft-sided, semi-permanent structure, including but not limited to canvas tents, yurts, and domes.

~~(g)~~(6) Maximum Nights per Camper. All low-impact camping areas shall be managed for short-term occupancy and shall not exceed 14 consecutive nights per camper and 28 nights per calendar year per camper. Permanent occupancy is prohibited.

~~( ) Water Service. For low-impact camping areas that provide potable water, the maximum occupancy is required to be below an average of 25 individuals daily for more than 60 days out of the year or otherwise below the threshold of a state small water system as defined in SCCC 7.71.025.~~

~~(5)~~(7) Setbacks. Campsites within low-impact camping areas shall meet the following setbacks:

(a) 50 feet from any property line, riparian corridor, mapped sensitive habitat;~~,~~

~~(a)~~(b) 100 feet from the edge of a ~~or~~ coastal bluff; and

~~(b)~~(c) 200 feet from any off-site residence, onsite or adjacent agricultural activity, or property line of Commercial Agriculture (CA) zoned agricultural resource lands (Type 1, Type 2, or Type 3).

(i) Parcels within 200 feet of agricultural resource lands shall record a statement of acknowledgment per SCCC section 16.50.090(B).

~~(6)~~(8) Clustering. Campsites in a low-impact camping area shall be clustered to minimize potential impacts. As feasible, low-impact camping areas should be located near existing structures and designed to achieve the following:

(a) To avoid removal of land from potential agricultural production;

(b) To retain natural resources;

(c) To avoid environmental impacts;

(d) To reduce the need for improvements;~~ and~~

(e) To preserve the rural character of the land; and.

(f) To minimize impacts to timber productions lands, siting all LICAs on a non-timbered portion of the premise.

(9) Access. Adequate driveway or road access for fire protection shall be provided and maintained in conformance with the adopted standards of State law, County Fire Code (SCCC Chapter 7.92), and local fire district ordinances. Existing means of ingress and egress to the proposed low-impact camping area shall be preferred over means that require new grading, development of roadways, or driveways.

~~(e)~~(10) Parking. A minimum of one off-street parking space for each campsite in the low-impact camping area is required to mitigate neighborhood parking impacts. No on-street parking shall be allowed.

~~(7)~~(11) Improvements. ~~No low-impact camping area shall include grading, development or expansion of roadways, driveways, utilities, or structures that requires discretionary review.~~ A LICA project that includes grading, development or expansion of roadways, driveways, utilities, or structures that requires a building permit or other ~~building permit or other ministerial review~~permit or approval, shall obtain the necessary permits prior to or concurrent with the LICA permit application, and may require plans drawn by a professional~~, shall meet all California Building Code, Fire Code, and County Design Criteria requirements, as applicable~~. A LICA project shall meet all California Building Code, Fire Code, and County Design Criteria requirements, as applicable, and improvements shall not remove viable agricultural soils from potential production or existing timber production lands from operation and shall avoid and/or minimize potential impacts to sensitive habitat or other protected resources. No low-impact camping ~~permit~~ area shall ~~take effect~~operate prior to issuance of required building permit or other necessary ~~ministerial~~ permits and approvals~~reviews~~.

~~(8)~~(12) Fire Protection. Smoking and open fires, including campfires and barbecues, are prohibited in low-impact camping areas. Portable propane or gas stoves are permitted for cooking only within designated campsites. ~~Campfires are prohibited in low-impact camping areas.~~ LICA projects shall conform to all requirements of the local fire district or County Fire Marshal as applicable, S~~s~~tate law, and County Fire Code (SCCC Chapter 7.92) ~~SCCC Chapter 7.92 – "Fire Code,"~~ to ensure adequate access, water availability, clearing buffers, and other conditions for fire protection.

~~(9)~~(13) Solid Waste Disposal. Centralized refuse collection and storage areas shall be provided in all low-impact camping areas. All outdoor centralized refuse storage and collection areas shall be designed to screen trash and garbage receptacles from public view and containers shall be covered.

~~(10)~~(14) Sanitation. Unless the low-impact camping area operator specifies that only self- contained recreational vehicles or travel trailers providing their own human waste disposal systems are permitted within the low-impact camping area, sanitation facilities shall be provided that are fully self-contained, such as portable toilets, or

connected to a permitted sewage disposal system that meets all regulations and requirements of the Environmental Health Division of the County Health Services Agency.

~~(11)~~(15) Neighborhood Impacts. No activities that produce dust, odor, lighting, or vibration detrimental to occupants of adjoining properties are allowed within the low-impact camping area.

(16) Noise. All low-impact camping areas shall comply with the standards of ~~SCCC Chapter 8.30 - "Noise."~~the County Noise Ordinance (SCCC Chapter 8.30). Generators shall not be used 2 hours before or after night hours shown therein.

~~(12) Parking. A minimum of one off-street parking space for each campsite in the low-impact camping area is required to mitigate neighborhood parking impacts. No on-street parking shall be allowed.~~

~~(13)~~(17) Pets. If allowed by the property owner, pets shall be secured on the premises and on leash at all times. No pets allowed within 200 feet from onsite or adjacent agricultural activity or from property line of Commercial Agriculture (CA) zoned agricultural resource lands (Type 1, Type 2, or Type 3). Continual nuisance barking by unattended pets is prohibited.

~~(14)~~(18) Events. LICA permits do not authorize the performance of weddings, the holding of outdoor parties, or similar activities.

~~(15)~~(19) LICA Rules. A LICA owner shall establish rules for the use of the LICA by guests. LICA rules shall be made available to all guests. The LICA rules shall include, but not necessarily be limited to, the following: number of guests allowed per campsite, noise limits and generator use hours, compliance with signage for sensitive habitat protection, rules for pets, location of campsites, demarcation of disturbance area, prohibition on events and outdoor parties, prohibition of illegal conduct and disturbances including an explicit statement that fireworks are illegal in Santa Cruz County, directions for trash management (e.g., trash to be kept in covered containers only), prohibition of ~~campfires~~smoking and open fires, and emergency evacuation instructions.

~~(16)~~(20) Local Property Manager. Low-impact camping areas shall have a designated operator or property manager who is available ~~by phone~~ 24 hours a day, seven days a week when campsites are occupied.

(a) For properties with cell service, ~~A~~all low-impact camping areas shall designate a local property manager~~,~~ who is available by phone 24 hours a day and located within 15 miles driving distance of the LICA~~location~~. The local property manager shall be available at all times ~~24 hours a day~~ to respond to camper and neighborhood questions or concerns. A property owner who lives within 15 miles driving distance of the low-impact camping areas may designate themself as the local property manager. A Local Property Manager's failure to respond within 60 minutes of being contacted, as verified

by County Code Compliance staff or the County Sheriff, shall constitute a significant violation and may constitute grounds for revocation of the LICA permit as determined at a public hearing by the Zoning Administrator.

~~(a)~~(b) For properties with no cell service, a property owner, designated operator, or local property manager for a low-impact camping area shall be located onsite and available 24 hours a day when campsites are occupied. Permanent occupancy within a LICA is prohibited; property manager(s) may reside on the premises within a primary unit or accessory dwelling unit, including a tiny home on wheels per SCCC 13.10.680. A landline or other phone service is required to ensure access to emergency services.

~~(b)~~(c) The applicant shall mail, deliver, or otherwise provide the name, address, telephone number(s) of the local property manager, and the beginning and expiration dates of the LICA permit, to the Planning Division, the local Sheriff substation, the Auditor-Controller-Treasurer Tax Collector, the main County Sheriff's Office, and the local fire agency, as well as to the property owners of all properties located within a 300-foot radius of the boundaries of the parcel on which the low-impact camping areas is located. Proof of mailing or delivery of the contact information to all of the above shall be submitted to the Planning Division within 30 days of permit approval, amendment, or renewal. The name, address and telephone number(s) of the local property manager shall be permanently posted at the low-impact camping area in a prominent location. Any change in the local property manager's address or telephone number shall be promptly furnished to the agencies and neighboring property owners as specified in this subsection.

~~(17)~~(21) Advertising. All advertising for low-impact camping areas shall include the LICA permit number in the first two lines of the advertisement text, and where photos are included, a photo containing the permit number shall be included, as well as a photo of the required signage that includes the 24-hour contact information for the designated operator or property manager. Advertising a low-impact camping area for a property without a LICA permit is a violation of this chapter and violators are subject to the penalties set forth in SCCC Chapter 19.01.

~~(18)~~(22) Non-Profit and Public Agency Usage Fees. LICA properties operated by public agencies or verified non-profit organizations subject to this section shall provide a minimum of 20% of campsites whichever number is greater, available at a nightly rate reduced by 50% for families qualifying for assistance under the state's CalWORKs program.

~~(H)~~(G) Transient Occupancy Tax. LICA properties that are not operated by a local government entity are transient occupancy facilities within the meaning of SCCC4.24.020(H) subject to transient occupancy tax. Operators and transient users of low-impact camping areas shall comply with the regulations and standards set forth in Chapter 4.24 SCCC, as administered

by the County Auditor-Controller-Treasurer Tax Collector, including all required payment of transient occupancy tax.

~~(I)~~(H) Transfer of Property with LICA Permit. When any property transfer triggers reassessment pursuant to the California Revenue and Taxation Code Section 60 *et seq*. as determined by the County Assessor, the LICA permit associated with the property shall expire and shall become nonrenewable at the time of property title transfer.

~~(J)~~(I) Renewal of LICA Permits. All LICA permits must be renewed initially one year from the date of permit issuance and subsequently every three years. An application to renew a LICA permit shall be submitted no sooner than 180 days before the expiration date of the existing permit, and no later than the date of expiration of that permit. Upon receipt of a complete application, the expiration of the existing permit shall be ~~tolled~~tolled, and the existing permit shall remain in force until final action is taken on the renewal application.

(1) Processing of renewal applications includes a review of any issued or pending building permits or other permits and review of all pertinent information specific to complaints, if any, that have been received about the subject low-impact camping area.

(2) Any County Code violation or violations of the provisions of this section, including but not limited to mis-advertising, citations for violation of the County Noise Ordinance (SCCC Chapter 8.30) ~~– "Noise",~~ , failure of the local property manager to timely respond to complaints, and/or other violations listed in subsection J, are all grounds for denial of a LICA permit renewal application.

~~(K)~~(J) Violation. It is unlawful for any person to use or allow the use of property in violation of the provisions of this section. The penalties for violation of this section are set forth in SCCC Chapter 19.01, Enforcement of Land Use Regulations.

(1) Operation of a LICA without a LICA permit shall be unlawful and shall constitute a violation of this section.

(2) A violation of any of the requirements to obtain a LICA permit may be grounds for denial of a new low-impact camping permit application. Further, violations of low impact camping regulations, or of any other provisions of the Santa Cruz County Code, may be grounds for denial of a renewal application or revocation of an existing LICA permit after consideration at a public hearing by the Zoning Administrator (or by the Planning Commission upon referral).

(3) If more than two significant violations occur on a property with a LICA permit within a 12-month period as documented by citations, written warnings, notices of violation, or other documentation, a public hearing shall be required by the Zoning Administrator to consider permit revocation. "Significant violations" include the following:

(a) Citations for violation of ~~SCCC Chapter 8.30 – "~~County Noise Ordinance (SCCC Chapter 8.30);~~"~~

(b) Violation of any specific conditions of approval associated with the permit;

~~(b)~~(c) Mis-advertising the capacity and limitations applicable to the low-impact

camping area;

~~(c)~~(d) Violations of federal, State, or County sensitive habitat protections;

~~(d)~~(e) Violations of State or County fire regulations;

~~(e)~~(f) Violations of State or County health regulations;

~~(f)~~(g) Non-compliance with a public health orders or emergency regulations issued by State or local authorities which limit use and occupancy of low-impact camping areas;

~~(g)~~(h) Delinquency in payment of TOT, fines, or penalties;

~~(h)~~(i) Non-responsive property management, including failure by the owner or local property manager (as defined in SCCC 13.10.695(D)(i)) to respond to calls within 60 minutes; and

~~(i)~~(j) Failure to maintain signage in compliance with this section.

(4) In the event a permit is revoked, the person or entity from whom the permit was revoked shall be barred from applying for a low-impact camping permit for the same parcel without prior consent of the Board of Supervisors.

(5) Operation of a LICA that includes rented structures without a permit may be subject to collection of illegal rents as specified in SCCC 1.12.070.A(3), based on the reasonable rental value average campsite rental fee for similar sites as determined by the Zoning Administrator or Hearing Officer.

SECTION VII

The Board of Supervisors finds and determines in its reasonable discretion on the basis of the entire record before it that the proposed amendments to the Santa Cruz County Code are consistent and compatible with and will not frustrate the objectives, policies, general land uses, and programs specified in the General Plan and Local Coastal Program.

SECTION VIII

The Board of Supervisors further finds that, with the required regulations within this ordinance, there is no reasonably foreseeable significant impact on the environment, and therefore this ordinance is exempt under the California Environmental Quality Act.

SECTION IX

Should any section, clause, or provision of this ordinance be declared by the courts to be invalid, the same shall not affect the validity of the ordinance as a whole, or parts thereof, other than the part so declared to be invalid**.**

SECTION X

This ordinance shall take effect on the 31st day following adoption outside the Coastal Zone and shall take effect upon final certification by the California Coastal Commission inside the Coastal Zone.

PASSED AND ADOPTED this _____ day of _____ 2024, by the Board of Supervisors of the County of Santa Cruz by the following vote:

AYES: SUPERVISORS
NOES: SUPERVISORS
ABSENT: SUPERVISORS
ABSTAIN: SUPERVISORS

_____
CHAIRPERSON, BOARD OF SUPERVISORS

ATTEST:_____
Clerk of the Board

APPROVED AS TO FORM:

_____
Office of the County Counsel

EXHIBIT C

ORDINANCE NO._____

AN ORDINANCE OF THE BOARD OF SUPERVISORS OF THE COUNTY OF SANTA CRUZ AMENDING SANTA CRUZ COUNTY CODE SECTIONS 13.10.312, 13.10.322, 13.10.352, 13.10.362, AND 13.10.372; AND ADDING NEW SECTION 13.10.695, REGULATING LOW-IMPACT CAMPING AREAS IN THE UNINCORPORATED AREAS OF SANTA CRUZ COUNTY

WHEREAS, Santa Cruz County is an area with abundant natural beauty and recreational opportunities; and

WHEREAS, the County of Santa Cruz Board of Supervisors recognizes the need for additional camping opportunities, particularly low-impact and low-cost camping options, and directed County staff to prepare an ordinance to allow and regulate such camping sites; and

WHEREAS, the Planning Commission held a public hearing on February 28, March 13, and May 8, 2024, to consider an ordinance amending sections 13.10.312, 13.10.322, 13.10.352, 13.10.362, AND 13.10.372 of the Santa Cruz County Code, and adopting new section 13.10.695 to allow low-impact camping areas in the unincorporated areas of Santa Cruz County; and

WHEREAS, the Board of Supervisors held a public hearing on _____, 2024, to consider public input on the proposed Low-Impact Camping Area Ordinance.

NOW, THEREFORE, the Board of Supervisors of the County of Santa Cruz ordains as follows:

SECTION I

Table 13.10.312-1: Agricultural Uses Chart in Santa Cruz County Code subsection 13.10.312(D) is hereby amended by adding "Low-impact camping areas" as an allowed use under the heading "Visitor Accommodations" to read as follows:

USE	CA	A	REFERENCES AND NOTES
Low-impact camping area	ZC[A]/AUP[A]	ZC[A]/AUP[A]	See 13.10.695 for when AUP is required. Low-impact camping area permit required per 13.10.695

EXHIBIT C

SECTION II

Table 13.10.322-1: Residential Uses Chart in Santa Cruz County Code subsection 13.10.322(D) is hereby amended by adding "Low-impact camping area" as an allowed use under the heading "Visitor Accommodations" to read as follows:

USE	RA/SU	RR	R-1	RB	RM	RF	REFERENCES AND NOTES
Low-impact camping area	ZC[A]/AUP[A]	NA	NA	NA	NA	NA	See 13.10.695 for when AUP is required. Low-impact camping area permit required per 13.10.695

SECTION III

Table 13.10.352-1: Parks, Recreation and Open Space PR Uses Chart in Santa Cruz County Code subsection 13.10.352(D) is hereby amended by adding "Low-impact camping area" as an allowed use under the heading "Visitor Accommodation" to read as follows:

USE	Permit Required	REFERENCES & NOTES
Low-impact camping area	ZC/AUP	See 13.10.695 for when AUP is required. Low-impact camping area permit required per 13.10.695

SECTION IV

Table 13.10.362-1: Public and Community Facilities Uses Chart in Santa Cruz County Code subsection 13.10.362(D) is hereby amended by adding "Low-impact camping area" as an allowed use under the heading "Residential Units-Commercial Uses (ancillary to residential use)" to read as follows:

USE	Permit Required	REFERENCES & NOTES
Low-impact camping area	ZC[A]/AUP[A]	See 13.10.695 for when AUP is required. Low-impact camping area permit required per 13.10.695

SECTION V

Table 13.10.372-1: Timber Production TP Uses Chart in Santa Cruz County Code subsection 13.10.372(D) is hereby amended by adding "Low-impact camping area" as an allowed use under the heading "Recreation and Visitor Accommodation" to read as follows:

USE	Permit Required	REFERENCES & NOTES
Low-impact camping area	ZC[A]/AUP[A]	See 13.10.695 for when AUP is required. Low-impact camping area permit required per 13.10.695

SECTION VI

Section 13.10.695 of the Santa Cruz County Code is hereby added, to read as follows:

13.10.695 Low-impact camping areas.

(A) Purpose. The purpose of this section is to establish definitions and provide regulations for rental of property for overnight recreational camping of a less intensive nature in rural areas of the County. Low-impact camping areas provide more public access to open space and generally have less need for infrastructure, generate less traffic, and have less on-site development than organized camps (SCCC 13.10.692) and other Type B visitor accommodations (see SCCC 13.10.689).

(B) Applicability. This section applies to low-impact camping areas proposed in the Commercial Agriculture (CA); Agriculture (A); Residential Agricultural (RA); Parks,

Recreation, and Open Space (PR); Public and Community facilities (PF); Timber Production (TP); and Special Use (SU) zone districts. For camping in other zone districts or other types of commercial visitor accommodations, see SCCC 13.10.689. County Parks as defined in SCCC 10.04.020(F) are exempt from this section.

(C) Definitions. For the purposes of this section, the following words and phrases shall be defined as set forth in this section. In the event of any conflict between the definitions in this section and definitions of the same or similar terms in SCCC 13.10.700, the definitions herein shall prevail.

(1) "Campsite" means a single camping space within a low-impact camping area used for short-term outdoor sleeping accommodations for one camping party, and typically includes space for tents, recreational vehicles (as defined), yurts, domes, or other non-permanent structures intended for overnight recreational camping purposes.

(2) "Disturbance area" means a designation on a site plan indicating where campers will be permitted on the premises, including access roads, parking areas, campsites, bathroom areas, designated common space areas, trails, areas where vegetation will be removed and/or disturbed, and any other areas where campers will be permitted.

(3) "Low-impact camping area" means a small-scale, low-intensity campground rented out for short-term overnight recreational camping purposes (no more than 14 consecutive nights per camper and no more than 28 nights per calendar year per camper), unless further restricted by state law.

(4) "Premises" means one legal parcel or multiple contiguous parcels with the same landowner(s).

(D) Low-Impact Camping Area Permit and Approvals.

(1) Low-impact camping areas (LICAs) may be operated if the use is allowed in the applicable zone district and the required LICA Permit is obtained.

(2) LICA permits shall require a Zoning Clearance and an Environmental Clearance, as defined in SCCC Chapter 18.10. The proposed disturbance area of a proposed LICA shall not be located within sensitive habitat or other protected resources, as identified in the General Plan ARC Element and/or SCCC Title 16. If an Environmental Clearance determines that the premises on which a LICA is proposed is within an area of biotic concern, issuance of a LICA Permit will be contingent upon receiving a biotic approval through the biotic review process outlined in SCCC Title 16.32.

(a) A ministerial LICA Permit may be issued upon demonstrating avoidance of any potential impacts to protected resources on the premises and shall be subject to conditions determined by the Environmental Coordinator during biotic review.

(b) A discretionary LICA permit is required when the proposed disturbance area of a LICA is within an area of biotic concern and there is no possible alternative location on the premises and the Environmental Coordinator determines that a discretionary environmental permit is required, per SCCC Chapters 16.32 and 18.10, to minimize potential impacts to protected resources. In such case, the

LICA permit shall be processed as an Administrative Use Permit (AUP), subject to conditions determined by the Environmental Coordinator during biotic review, and subject to environmental review under the California Environmental Quality Act (CEQA).

(3) LICA permits are not subject to the Rural Density Matrix per SCCC Chapter 13.14, Organized Camps and Conference Centers per SCCC 13.10.692, or Commercial Visitor Accommodations per SCCC 13.10.689.

(4) All low-impact camping areas shall comply with the Special Occupancy Parks Act (SOPA) or other applicable State law.

(5) Transient occupancy tax (TOT) registration shall be required for each low-impact camping area.

(6) Approval of a LICA permit does not legalize any non-permitted use or structure or determine buildability of a lot.

(7) LICA permits are issued to property owners for a specific property and are not transferable between owners or properties.

(8) LICA permits are subject to revocation as provided for in SCCC 18.10.136, and subject to the violation provisions of subsection (J) of this section.

(9) Applicants for a new LICA permit shall provide the following to the Planning Division of the Community Development and Infrastructure Department:

(a) Completed application form.

(b) Nonrefundable application fee as established by the Board of Supervisors.

(c) Site plan, which does not need to be drawn by a professional, drawn to scale and showing parcel size and location of all property lines, existing buildings, nearby major roadways, proposed limits of disturbance area, proposed campsites, access to campsites, dimensioned on-site parking spaces, and location of water, sewage, and solid waste facilities, as applicable.

(d) Maintenance agreement for portable toilets or a completed Environmental Health Building Clearance Form certifying that the proposed project meets the regulations and requirements of the Environmental Health Division of the County Health Services Agency.

(e) Copy of County of Santa Cruz TOT certificate number, or proof of registry with a verified online platform that will collect and remit TOT on behalf of applicant.

(E) Site Requirements.

(1) Rural Properties. Low-impact camping areas are only allowed on rural properties that meet all of the following:

(a) Located outside of the Urban and Rural Service Lines; and

(b) Not on a site wholly within the boundaries of a Census designated urban area, as identified in the County GIS System.

(2) Zone Districts. Low-impact camping areas may be located within the one of the following

zone districts: Commercial Agriculture (CA); Agriculture (A); Residential Agricultural (RA); Parks, Recreation, and Open Space (PR); Public and Community Facilities (PF); Timber Production (TP); or Special Use (SU) zone districts.

(3) Parcel Size. The minimum parcel size or premises shall be five acres.

(4) Agricultural Activity. For agricultural zone districts, low-impact camping areas shall be ancillary to a principal agricultural use on the property and shall not displace any active agricultural uses.

(5) Timber Production. For timber production zone districts, low-impact camping areas shall not displace any active timber production uses and must be sited on a non-timbered portion of the premise.

(6) Environmental Protection. The proposed disturbance area of a LICA shall not be located within sensitive habitat or other protected resources, as identified in the General Plan ARC Element and/or SCCC Title 16. If an Environmental Clearance process determines that the premises on which a LICA is proposed is within an area of biotic concern, issuance of a LICA Permit will be contingent upon receiving a biotic approval through the biotic review process outlined in SCCC Title 16.32. The LICA shall be sited and conditioned to avoid and/or minimize potential impacts to protected resources, and an AUP may be required when the proposed disturbance area of a LICA is within an area of biotic concern and there is no possible alternative location on the premises. Signage requiring protection and avoidance of any identified sensitive habitat or other protected resource on the premises, consistent with sign policies and regulations in General Plan ARC Element and SCCC Chapter 13.10, shall be required. Additional Biotic Conditions of approval shall be determined by the Environmental Coordinator through the biotic review process.

(7) Hazard Areas. Campsites within a low-impact camping area shall not be located within any of the following areas:

(a) Within a floodway or 100-year flood zone as determined by maps prepared by the Federal Emergency Management Agency; or

(b) Within a very high fire hazard severity zone as indicated on maps adopted by the Department of Forestry and Fire Protection pursuant to Section 4202 of the Public Resources Code.

(8) Within Coastal Zone. Low-impact camping areas in the Coastal Zone shall be required to obtain the appropriate authorization for development within the coastal zone, pursuant to the requirements of SCCC Chapter 13.20.

(F) Operating and Development Standards. All low-impact camping areas shall comply with the following standards for their operations:

(1) LICA Permit. Prior to operating a low-impact camping area, a property owner shall obtain a LICA permit pursuant to this section.

(2) Maximum Per Premises. A maximum of one low-impact camping area is allowed per premises.

(3) Density. A low-impact camping area shall have a maximum density of one campsite per acre and the following maximum number of campsites:

(a) If a LICA is subject to the Special Occupancy Parks Act (SOPA) and would otherwise be classified as a "special occupancy park" under Health and Safety Code (HSC) section 18862.43, the maximum number of campsites in a LICA shall not exceed one campsite per low-impact camping area; or

(b) If a LICA would not be subject to SOPA (HSC §§ 18860 *et seq*.) and would not be classified as a "special occupancy park" under HSC section 18862.43, the maximum number of campsites shall not exceed nine campsites per low-impact camping area.

(4) Number of Campers. Each low-impact camping area is allowed the following maximum number of overnight guests:

(a) If LICA are considered a special occupancy park per HSC section 18862.43, a maximum of one camping party with up to four overnight guests per campsite; or

(b) If LICA are not considered a special occupancy park per HSC section 18862.43, a maximum of four overnight guests per campsite or up to 36 overnight guests total for each low-impact camping area.

(i) Water Service. For low-impact camping areas that provide potable water, the maximum occupancy is required to be below an average of 25 individuals daily for more than 60 days out of the year or otherwise below the threshold of a state small water system as defined in SCCC 7.71.025.

(5) Type of Accommodations. Each campsite within a low-impact camping area may include one of the following types of overnight sleeping accommodations:

(a) Maximum of two tents, except no maximum number of tents is required for schools or other not-for-profit youth organizations;

(b) One recreational vehicle as defined in 13.10.700-R, maximum 24 feet in length (includes Class B and C motorhomes, van campers and conversions, and truck campers);

(c) One recreational travel trailer as defined in 13.10.700-R, maximum 20 feet in length (includes fifth-wheels and folding camping trailers); or

(d) One soft-sided, semi-permanent structure, including but not limited to canvas tents, yurts, and domes.

(6) Maximum Nights per Camper. All low-impact camping areas shall be managed for short-term occupancy and shall not exceed 14 consecutive nights per camper and 28 nights per calendar year per camper. Permanent occupancy is prohibited.

(7) Setbacks. Campsites within low-impact camping areas shall meet the following setbacks:

(a) 50 feet from any property line, riparian corridor, mapped sensitive habitat;

(b) 100 feet from the edge of a coastal bluff; and

(c) 200 feet from any off-site residence, onsite or adjacent agricultural activity, or property line of Commercial Agriculture (CA) zoned agricultural resource

lands (Type 1, Type 2, or Type 3).

(i) Parcels within 200 feet of agricultural resource lands shall record a statement of acknowledgment per SCCC section 16.50.090(B).

(8) Clustering. Campsites in a low-impact camping area shall be clustered to minimize potential impacts. As feasible, low-impact camping areas should be located near existing structures and designed to achieve the following:

(a) To avoid removal of land from potential agricultural production;

(b) To retain natural resources;

(c) To avoid environmental impacts;

(d) To reduce the need for improvements;

(e) To preserve the rural character of the land; and

(f) To minimize impacts to timber productions lands, siting all LICAs on a non-timbered portion of the premise.

(9) Access. Adequate driveway or road access for fire protection shall be provided and maintained in conformance with the adopted standards of State law, County Fire Code (SCCC Chapter 7.92), and local fire district ordinances. Existing means of ingress and egress to the proposed low-impact camping area shall be preferred over means that require new grading, development of roadways, or driveways.

(10) Parking. A minimum of one off-street parking space for each campsite in the low-impact camping area is required to mitigate neighborhood parking impacts. No on-street parking shall be allowed.

(11) Improvements. A LICA project that includes grading, development or expansion of roadways, driveways, utilities, or structures that requires a building permit or other permit or approval, shall obtain the necessary permits prior to or concurrent with the LICA permit application, and may require plans drawn by a professional. A LICA project shall meet all California Building Code, Fire Code, and County Design Criteria requirements, as applicable, and improvements shall not remove viable agricultural soils from potential production or existing timber production lands from operation and shall avoid and/or minimize potential impacts to sensitive habitat or other protected resources. No low-impact camping area shall operate prior to issuance of required building permit or other necessary permits and approvals.

(12) Fire Protection. Smoking and open fires, including campfires and barbecues, are prohibited in low-impact camping areas. Portable propane or gas stoves are permitted for cooking only within designated campsites. LICA projects shall conform to all requirements of the local fire district or County Fire Marshal as applicable, State law, and County Fire Code (SCCC Chapter 7.92) to ensure adequate access, water availability, clearing buffers, and other conditions for fire protection.

(13) Solid Waste Disposal. Centralized refuse collection and storage areas shall be provided in all low-impact camping areas. All outdoor centralized refuse storage and collection areas shall be designed to screen trash and garbage receptacles from public

view and containers shall be covered.

(14) Sanitation. Unless the low-impact camping area operator specifies that only self-contained recreational vehicles or travel trailers providing their own human waste disposal systems are permitted within the low-impact camping area, sanitation facilities shall be provided that are fully self-contained, such as portable toilets, or connected to a permitted sewage disposal system that meets all regulations and requirements of the Environmental Health Division of the County Health Services Agency.

(15) Neighborhood Impacts. No activities that produce dust, odor, lighting, or vibration detrimental to occupants of adjoining properties are allowed within the low-impact camping area.

(16) Noise. All low-impact camping areas shall comply with the standards of the County Noise Ordinance (SCCC Chapter 8.30). Generators shall not be used 2 hours before or after night hours shown therein.

(17) Pets. If allowed by the property owner, pets shall be secured on the premises and on leash at all times. No pets allowed within 200 feet from onsite or adjacent agricultural activity or from property line of Commercial Agriculture (CA) zoned agricultural resource lands (Type 1, Type 2, or Type 3). Continual nuisance barking by unattended pets is prohibited.

(18) Events. LICA permits do not authorize the performance of weddings, the holding of outdoor parties, or similar activities.

(19) LICA Rules. A LICA owner shall establish rules for the use of the LICA by guests. LICA rules shall be made available to all guests. The LICA rules shall include, but not necessarily be limited to, the following: number of guests allowed per campsite, noise limits and generator use hours, compliance with signage for sensitive habitat protection, rules for pets, location of campsites, demarcation of disturbance area, prohibition on events and outdoor parties, prohibition of illegal conduct and disturbances including an explicit statement that fireworks are illegal in Santa Cruz County, directions for trash management (e.g., trash to be kept in covered containers only), prohibition of smoking and open fires, and emergency evacuation instructions.

(20) Local Property Manager. Low-impact camping areas shall have a designated operator or property manager who is available 24 hours a day, seven days a week when campsites are occupied.

(a) For properties with cell service, all low-impact camping areas shall designate a local property manager who is available by phone 24 hours a day and located within 15 miles driving distance of the LICA. The local property manager shall be available at all times to respond to camper and neighborhood questions or concerns. A property owner who lives within 15 miles driving distance of the low-impact camping areas may designate themself as the local property manager. A Local Property Manager's failure to

respond within 60 minutes of being contacted, as verified by County Code Compliance staff or the County Sheriff, shall constitute a significant violation and may constitute grounds for revocation of the LICA permit as determined at a public hearing by the Zoning Administrator.

(b) For properties with no cell service, a property owner, designated operator, or local property manager for a low-impact camping area shall be located onsite and available 24 hours a day when campsites are occupied. Permanent occupancy within a LICA is prohibited; property manager(s) may reside on the premises within a primary unit or accessory dwelling unit, including a tiny home on wheels per SCCC 13.10.680. A landline or other phone service is required to ensure access to emergency services.

(c) The applicant shall mail, deliver, or otherwise provide the name, address, telephone number(s) of the local property manager, and the beginning and expiration dates of the LICA permit, to the Planning Division, the local Sheriff substation, the Auditor-Controller-Treasurer Tax Collector, the main County Sheriff's Office, and the local fire agency, as well as to the property owners of all properties located within a 300-foot radius of the boundaries of the parcel on which the low-impact camping areas is located. Proof of mailing or delivery of the contact information to all of the above shall be submitted to the Planning Division within 30 days of permit approval, amendment, or renewal. The name, address and telephone number(s) of the local property manager shall be permanently posted at the low-impact camping area in a prominent location. Any change in the local property manager's address or telephone number shall be promptly furnished to the agencies and neighboring property owners as specified in this subsection.

(21) Advertising. All advertising for low-impact camping areas shall include the LICA permit number in the first two lines of the advertisement text, and where photos are included, a photo containing the permit number shall be included, as well as a photo of the required signage that includes the 24-hour contact information for the designated operator or property manager. Advertising a low-impact camping area for a property without a LICA permit is a violation of this chapter and violators are subject to the penalties set forth in SCCC Chapter 19.01.

(22) Non-Profit and Public Agency Usage Fees. LICA properties operated by public agencies or verified non-profit organizations subject to this section shall provide a minimum of 20% of campsites whichever number is greater, available at a nightly rate reduced by 50% for families qualifying for assistance under the state's CalWORKs program.

(G) Transient Occupancy Tax. LICA properties that are not operated by a local government entity are transient occupancy facilities within the meaning of SCCC4.24.020(H) subject to transient occupancy tax. Operators and transient users of low-impact camping areas shall

comply with the regulations and standards set forth in Chapter 4.24 SCCC, as administered by the County Auditor-Controller-Treasurer Tax Collector, including all required payment of transient occupancy tax.

(H) Transfer of Property with LICA Permit. When any property transfer triggers reassessment pursuant to the California Revenue and Taxation Code Section 60 *et seq*. as determined by the County Assessor, the LICA permit associated with the property shall expire and shall become nonrenewable at the time of property title transfer.

(I) Renewal of LICA Permits. All LICA permits must be renewed initially one year from the date of permit issuance and subsequently every three years. An application to renew a LICA permit shall be submitted no sooner than 180 days before the expiration date of the existing permit, and no later than the date of expiration of that permit. Upon receipt of a complete application, the expiration of the existing permit shall be tolled, and the existing permit shall remain in force until final action is taken on the renewal application.

(1) Processing of renewal applications includes a review of any issued or pending building permits or other permits and review of all pertinent information specific to complaints, if any, that have been received about the subject low-impact camping area.

(2) Any County Code violation or violations of the provisions of this section, including but not limited to mis-advertising, citations for violation of the County Noise Ordinance (SCCC Chapter 8.30), failure of the local property manager to timely respond to complaints, and/or other violations listed in subsection J, are all grounds for denial of a LICA permit renewal application.

(J) Violation. It is unlawful for any person to use or allow the use of property in violation of the provisions of this section. The penalties for violation of this section are set forth in SCCC Chapter 19.01, Enforcement of Land Use Regulations.

(1) Operation of a LICA without a LICA permit shall be unlawful and shall constitute a violation of this section.

(2) A violation of any of the requirements to obtain a LICA permit may be grounds for denial of a new low-impact camping permit application. Further, violations of low impact camping regulations, or of any other provisions of the Santa Cruz County Code, may be grounds for denial of a renewal application or revocation of an existing LICA permit after consideration at a public hearing by the Zoning Administrator (or by the Planning Commission upon referral).

(3) If more than two significant violations occur on a property with a LICA permit within a 12-month period as documented by citations, written warnings, notices of violation, or other documentation, a public hearing shall be required by the Zoning Administrator to consider permit revocation. “Significant violations” include the following:

(a) Citations for violation of County Noise Ordinance (SCCC Chapter 8.30);

(b) Violation of any specific conditions of approval associated with the permit;

(c) Mis-advertising the capacity and limitations applicable to the low-impact

camping area;

(d) Violations of federal, State, or County sensitive habitat protections;

(e) Violations of State or County fire regulations;

(f) Violations of State or County health regulations;

(g) Non-compliance with a public health orders or emergency regulations issued by State or local authorities which limit use and occupancy of low-impact camping areas;

(h) Delinquency in payment of TOT, fines, or penalties;

(i) Non-responsive property management, including failure by the owner or local property manager (as defined in SCCC 13.10.695(D)(i)) to respond to calls within 60 minutes; and

(j) Failure to maintain signage in compliance with this section.

(4) In the event a permit is revoked, the person or entity from whom the permit was revoked shall be barred from applying for a low-impact camping permit for the same parcel without prior consent of the Board of Supervisors.

(5) Operation of a LICA that includes rented structures without a permit may be subject to collection of illegal rents as specified in SCCC 1.12.070.A(3), based on the reasonable rental value average campsite rental fee for similar sites as determined by the Zoning Administrator or Hearing Officer.

SECTION VII

The Board of Supervisors finds and determines in its reasonable discretion on the basis of the entire record before it that the proposed amendments to the Santa Cruz County Code are consistent and compatible with and will not frustrate the objectives, policies, general land uses, and programs specified in the General Plan and Local Coastal Program.

SECTION VIII

The Board of Supervisors further finds that, with the required regulations within this ordinance, there is no reasonably foreseeable significant impact on the environment, and therefore this ordinance is exempt under the California Environmental Quality Act.

SECTION IX

Should any section, clause, or provision of this ordinance be declared by the courts to be invalid, the same shall not affect the validity of the ordinance as a whole, or parts thereof, other than the part so declared to be invalid**.**

SECTION X

This ordinance shall take effect on the 31st day following adoption outside the Coastal Zone and shall take effect upon final certification by the California Coastal Commission inside the Coastal Zone.

PASSED AND ADOPTED this _____ day of _____ 2024, by the Board of Supervisors of the County of Santa Cruz by the following vote:

AYES: SUPERVISORS
NOES: SUPERVISORS
ABSENT: SUPERVISORS
ABSTAIN: SUPERVISORS

_____
CHAIRPERSON, BOARD OF SUPERVISORS

ATTEST:_____
Clerk of the Board

APPROVED AS TO FORM:

_____
Office of the County Counsel

EXHIBIT C

Subject: 2/28 Public Comment - Planning Commission Meeting Item #8

Dear Chair Shepherd and Santa Cruz County Planning Commissioners,

My name is Nora Immoor and I am a resident of unincorporated Santa Cruz County in **Watsonville/Corralitos area**. Thank you for the opportunity to submit a public comment and communicate my support for the County's work on low impact camping (Item #8). I am excited to see Santa Cruz investing in compatible uses like camping that will create economic opportunities for local landowners and increase visitor access to our county's natural resources in a sustainable way.

I live on approximately 15 acres, having been blessed to purchase what the prior owners used to be a cannabis farm in 2019. I do not grow cannabis as I prefer flowers, and have been slowly learning how to grow Dahlias and the land is so beautiful that it needs to be shared. I am a single mother supporting a child who suffered serious mental health issues following the epidemic- I am no longer able to work outside the home as my kid needs supervision to keep him safe and on track. We have spent the past three years in and out of hospitals and institutions across the country. Hosting recreational campers would allow me the extra income needed for the medical bills and more importantly the freedom to continue to work from home and give my kid the support he needs to heal and reinvest into the land the love and stewardship I long to give it.

Please consider updating the low impact camping ordinance to allow for these activities on smaller properties like ours. Hosting campers would enable us to earn supplemental income while offering an affordable option for visitors who want to travel to and experience our county. Did you know that one of the world's most famous Dahlia breeders is a Santa Cruz resident? I am learning from Kristine Albrecht and I dream of rows of beautiful dahlias and campers enjoying the beauty. I appreciate Santa Cruz's commitment to expanding economic opportunities for rural landowners like myself, and ask the Planning Commission to consider how the low impact camping ordinance can be more inclusive of smaller properties so that more residents and visitors can benefit from this.
I am very excited to see Santa Cruz working on low impact camping. Please support an ordinance that creates an accessible permit process and that enables us to share what we have!
Thank you,
Nora Immoor

Support for 3-Acre Minimum Parcel Size for Low-Impact Camping Areas

LH L Horst <latifhorst@gmail.com>
To Nicholas Brown
Retention Policy 60-day Delete (60 days) Expires 4/25/2024

Reply | Reply All | Forward
Sun 2/25/2024 4:21 PM

Dear Honorable Members of the Board of Supervisors,

I strongly support the proposed Low-Impact Camping Area Ordinance. However, I believe the minimum parcel size of 5 acres is unnecessarily restrictive. Allowing low-impact camping on parcels as small as 3 acres offers significant benefits to both landowners and the county, while responsibly addressing concerns that might drive a larger size requirement.
Here's why a 3-acre minimum is the better choice:

- **Ideal Suitability for Smaller Parcels:** Residential Agriculture and rural areas contain numerous properties between 3 and 5 acres that are perfect for low-impact camping. These sites offer natural buffers and privacy often lacking in more densely developed neighborhoods. Opening up this segment offers a greater selection of locations for a wider range of experiences.
- **Responsibly Addresses Density Concerns:** Low-impact camping, by definition, has minimal infrastructure and limited guest capacity. By focusing on suitable parcels and including strong operating standards, concerns about noise and neighborhood disturbance can be mitigated even on smaller sites. This offers a solution to valid concerns without unnecessarily limiting opportunities.
- **Land Stewardship and Economic Incentives:** Many smaller properties face greater difficulty generating traditional agricultural income. Low-impact camping provides an economically viable use that complements rural character, encourages land preservation, generates TOT revenue, and creates jobs for local residents without extensive infrastructure demands.
- **Increased Equity of Access:** Smaller land requirements open up participation to a broader range of property owners, including those who traditionally might not be able to provide such amenities. This widens the availability of affordable camping options across Santa Cruz County, making nature experiences accessible to more people regardless of economic standing.
- **Precedence and Alignment Goals:** A growing number of California counties, including those with significant rural character, successfully utilize smaller minimum parcel sizes for these types of camping areas. This aligns with the Board's expressed support for rural economies and agritourism.

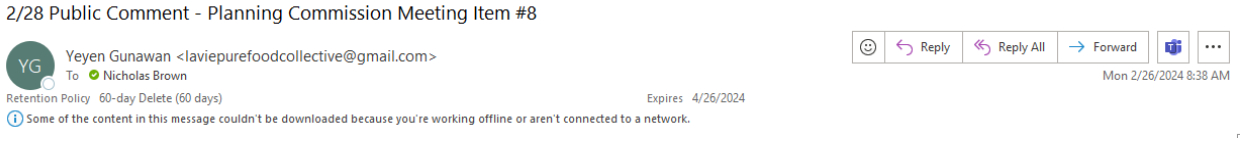
I encourage the Board to:

1. **Adopt a 3-acre minimum parcel size** to expand the benefits of low-impact camping within Santa Cruz County.
2. **Require strong operating standards** within the ordinance to guarantee responsible management and address any potential concerns regarding density and neighborhood impact.
3. **Request a detailed rationale for the initial 5-acre minimum,** including specific data or modeling used to justify this larger acreage cutoff.

With thoughtful implementation, allowing low-impact camping on 3-acre parcels would create a win-win for landowners, the county, and visitors seeking affordable outdoor experiences in the beautiful Santa Cruz region.
Respectfully,

L Horst 1st District

2/28 Public Comment - Planning Commission Meeting Item #8



My name is Ivy Brown and I am a resident of unincorporated Santa Cruz County in Watsonville, CA. Thank you for the opportunity to submit a public comment and communicate my support for the County's work on low impact camping (Item #8). I am excited to see Santa Cruz investing in compatible uses like camping that will create economic opportunities for local landowners and increase visitor access to our county's natural resources in a sustainable way.

I am a single mom living in a five acre property. Hosting recreational campers would help offset my property taxes and mortgage of $8100/month and would help enable us to invest in stewardship projects on our land. Please consider updating the low impact camping ordinance to allow for these activities on smaller properties like ours. Hosting campers would enable us to earn supplemental income while offering an affordable option for visitors who want to travel to and experience our county. I appreciate Santa Cruz's commitment to expanding economic opportunities for rural landowners like myself, and ask the Planning Commission to consider how the low impact camping ordinance can be more inclusive of smaller properties so that more residents and visitors can benefit from this.

I am very excited to see Santa Cruz working on low impact camping. Please support an ordinance that creates an accessible permit process and that enables us to share what we have!

Kindly,
Ivy Brown

-----Original Message-----
From: Robert <traveler11@charter.net>
Sent: Wednesday, February 21, 2024 2:37 PM
To: Natisha Williams <Natisha.Williams@santacruzcountyca.gov>
Subject: Camping ordinance

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

Hi Natisha , I was enlightened to the possibility of changes to the camping on private property yesterday. I looked over the proposal and am wondering mostly about 1 thing . The water requirements for fire . As most people that might be interested in having camping on their property, I see the stumbling block as the 10,000 gallons for fire . My property although not in the woods was built in the 60 s and water storage wasn't a requirement at that time . Fast forward today installing 10,000 gallons of storage costs approximately $20,000 . I checked with my well guy . If you are able to get $50 - $100 per night for campers , who is going to spend that kind of money . Unless you have it and then you are probably not going to have people camping on your property. .i think you understand my point. Am I reading this wrong?if not then most will be done before you have changed the ordinance. So I am wondering if there is anything else that can be done ? I personally have a 17 acre property that I would be interested in doing this but can't afford , the well upgrade.
Thanks
Sincerely
Robert
831-252-6670
Sent from my iPad

Subject: 2/28 Public Comment - Planning Commission Meeting Item #8

Dear Chair Shepherd and Santa Cruz County Planning Commissioners,

My name is Jessica Ridgeway and I am a resident of and run a nonprofit at two different locations in unincorporated Santa Cruz County in Aptos and Watsonville. Thank you for the opportunity to submit a public comment and communicate my support for the County's work on low impact camping (Item #8). I am excited to see Santa Cruz investing in compatible uses like camping that will create economic opportunities for local landowners and increase visitor access to our county's natural resources in a sustainable way.

I live with my family on a beautiful 2.94 acre property in Aptos and run Farm Education programs on a 19 acre property in unincorporated Watsonville. Hosting recreational campers would help offset our property taxes and would enable us to invest in stewardship projects on our land. This past winter we had a sizeable slide just after all that rain finally stopped in April. We are eager to take the advice of RDC and plant a living barrier of willows and native shrubbery to keep that slide from creeping towards our foundation. Low-impact camping also has the added benefit of allowing us to share our good fortune of a beautiful wooded hillside in the Aptos Hills with families and individuals eager to access the natural beauty our county has to offer.

On the organic farm that houses our community-based food, farming and nature stewardship programs, we are eager to help pay for our scholarship programs with low-impact camping opportunities that we know our clients are excited to access. We get requests during every season to provide space on the farm for campers. We have a beautiful spot that is about 20 feet from our property line, but hundreds of feet from any neighbor's structure.

Please consider updating the low impact camping ordinance to allow for these activities on smaller properties like ours. We could easily host one or two tents on our almost 3 acre property without parking in the street, or impacting our neighbors in any way. A factor of the proposal that would impact the nonprofit site is allowing the camp site to be within 20 feet of the property line when it will not impact neighbors.

Hosting campers would enable us to earn supplemental income while offering an affordable option for visitors who want to travel to and experience our county. I appreciate Santa Cruz's commitment to expanding economic opportunities for rural landowners, nonprofits and farmers like myself, and ask the Planning Commission to consider how the low impact camping ordinance can be more inclusive of smaller properties so that more residents and visitors can benefit from this.

I am very excited to see Santa Cruz working on low impact camping. Please support an ordinance that creates an accessible permit process and that enables us to share what we have!

Thank you,
Jessica Ridgeway

--
Jessica Ridgeway *(she | her | hers)*
Executive Director

Farm Discovery at Live Earth
Seed to Mouth, Farm to Fork, Child to Community Connections
831.728.2032
text "BOUNTY" to 44-321
resilience | stewardship | action
Give through paypal
Download the RaiseRight app: https://www.raiseright.com/
Raise money for Farm Discovery just by shopping online at www.GoodShop.com
Buy and Sell with eBay Giving Works to benefit Farm Discovery

Dear Chair Shepherd and Santa Cruz County Planning Commissioners,

My name is Daniel Mollner and I am a resident of unincorporated Santa Cruz County in Boulder Creek. Thank you for the opportunity to submit a public comment and communicate my support for the County's work on low impact camping (Item #8). I am excited to see Santa Cruz investing in compatible uses like camping that will create economic opportunities for local landowners and increase visitor access to our county's natural resources in a sustainable way.

I live with my family on a property off of Bear Creek. Hosting recreational campers would help offset our property taxes and would enable us to invest in stewardship projects on our land. Hosting campers would enable us to earn supplemental income while offering an affordable option for visitors who want to travel to and experience our county.

Whenever guests come to visit us they are always grateful for the opportunity to soak up the beauty of this special place. They say it “restores their soul” and I feel the same way…that’s why I live here and want to share the magic with others. For this reason, I am very excited to see Santa Cruz working on low impact camping. Please support an ordinance that creates an accessible permit process and that enables us to share what we have!

Thank you,
Daniel Mollner

CCOF
Advancing organic agriculture through certification, education, advocacy, and promotion.

Santa Cruz County Board of Supervisors
701 Ocean Street, Room 500
Santa Cruz, CA 95060

February 26, 2024

Subject: 2/28 Public Comment - Planning Commission Meeting Item #8
Send to: Nicholas.Brown@santacruzcountyca.gov

Dear Chair Shepherd and Santa Cruz County Planning Commissioners,

CCOF is a nonprofit organization based in Santa Cruz, California, that provides organic certification, education, grants, and advocacy to certified organic farms, ranches, and businesses.

CCOF applauds Santa Cruz County's commitment to expanding income diversification opportunities for rural landowners, especially the county's farmers by increasing visitor access to our region's working lands.

We strongly support an ordinance that creates an accessible process for landowners. We thank you for providing farmers with the flexibility they need to host small-scale camping areas without impacting their natural resource conservation practices, as required by the federal organic regulations.

CCOF represents a diversity farmers, including small producers who are often those most in need of new and sustainable supplemental revenue streams. With this in mind, we ask the Planning Commission to ensure development standards are proportional to the scale and intensity of use on the land, and requirements like setbacks do not inadvertently exclude landowners and farmers who may operate on smaller parcels.

We also ask the Planning Commission to consider an accessible permitting option for landowners on fewer than five acres. Development standards, such as density requirements, should mitigate any potential impacts of hosting campers on smaller parcels. For example, a one-site per acre requirement would mean that a landowners on two acres would not be able to host more than two individual campsites on their property without additional approval from the County.

CCOF would like to see a Low-Impact Camping Ordinance move forward. Let us know if there is anything we can do to help.

Thank you!

2155 Delaware Avenue, Suite 150, Santa Cruz, CA 95060 • (831) 423-2263 • fax (831) 423-4528 • ccof@ccof.org • www.ccof.org

Laetitia Benador
Senior Policy Advocate

Cc: Rebekah Weber, Policy Director

2155 Delaware Avenue, Suite 150, Santa Cruz, CA 95060 • (831) 423-2263 • fax (831) 423-4528 • ccof@ccof.org • www.ccof.org

Dear Chair Shepherd and Santa Cruz County Planning Commissioners,

My name is **Tori Koneya** and I am a resident of unincorporated Santa Cruz County in **Live Oak Neighborhood.** Thank you for the opportunity to submit a public comment and communicate my support for the County's work on low impact camping (Item #8). I am excited to see Santa Cruz investing in compatible uses like camping that will create economic opportunities for local landowners and increase visitor access to our county's natural resources in a sustainable way.

We would love to have opportunities to camp locally as our State Park fill up months in advance. Hosting campers would enable us to earn supplemental income while offering an affordable option for visitors who want to travel to and experience our county. I appreciate Santa Cruz's commitment to expanding economic opportunities for rural landowners like myself, and ask the Planning Commission to consider how the low impact camping ordinance can be more inclusive.

I am very excited to see Santa Cruz working on low impact camping. Please support an ordinance that creates an accessible permit process and that enables us to share what we have!

Thank you,

Tori Koneya

Sent from my iPhone

My name is Dawn Schipper, and I am a resident of unincorporated Santa Cruz County in La Selva Beach. Thank you for the opportunity to submit a public comment and communicate my support for the County's work on low impact camping (Item #8). I am excited to see Santa Cruz investing in compatible uses like camping that will create economic opportunities for local landowners and increase visitor access to our county's natural resources in a sustainable way.

My family lives on an agriculturally zoned parcel of 10 acres. We love the prospect of inviting visitors to share the natural beauty of our area, with low impact to the land. The income from sharing our property with short-term campers allows us to maintain the natural landscape and be better stewards of the land— the finds can be reinvested into clearing dead brush, maintaining healthy trees, and keeping the natural water pathways clear of debris. All of these efforts are more necessary with the yearly flooding and fires our area now experiences.

Thank you for considering the positive contributions outdoor recreation provides to our county. It is a low impact and joyful way to welcome visitors and generate tax funds.

I appreciate your commitment to good stewardship of our precious ecosystems, and am happy to work within the parameters of the permit process to allow short term camping on private property.

Sincerely,
Dawn Schipper

Sent from Yahoo Mail for iPhone

Farm Discovery at Live Earth
GROWING HEALTHY REALTIONSHIPS THROUGH
FOOD, FARMING AND NATURE
P.O. Box 3490, Freedom, CA 95019 | 831.728.2032 | admin@farmdiscovery.org | farmdiscovery.org

February 12, 2024

Farm Discovery at Live Earth
Jessica Ridgeway
(241) 728-2032
Director@farmdiscovery.org

Dear Natisha Williams and the Santa Cruz County Planning Commission,
Thank you for inviting comments on the Low-Impact Camping Ordinance. Farm Discovery appreciates Santa Cruz County's continued commitment to expanding opportunities for local agricultural operators. In that vein, I am writing to emphasize Farm Discovery's support for the inclusion of rural recreational uses like camping and to share feedback on the proposed development standards for those uses.

Farm Discovery is an education nonprofit empowering youth and families for health in food, farming, nature and community at Live Earth Farm in Watsonville. We work with
Live Earth Farm – to increase access to the outdoors, teach nutrition and environmental stewardship an strengthen our local food system. We are interested in working with Hipcamp to make our educational spaces available to a broader community and in new ways.

In Santa Cruz County, rural recreational activities like camping-based agritourism and farmstays are already a critical source of revenue for farmers and ranchers; we are excited to see the County invest in accessible permitting options for compatible, incidental uses on appropriate agricultural properties.

Farm Discovery recommends and supports the implementation of a tiered permitting process for rural recreational uses; it makes sense to create a process that is proportional to the intensity of use and development on the property, and that affords farmers and ranchers the flexibility needed to determine which uses work best for them. The following are suggestions that would make these uses more accessible, ensure smaller producers are included and able to benefit from this ordinance, and align with state policy priorities for access to recreational opportunities.

Setbacks: Please consider setback requirements for camping areas and rural recreational uses that are reasonable and flexible enough for landowners to be able to welcome visitors to the parts of their properties not currently in agricultural production. The proposed 100 foot setback from property lines would severely limit a farmer's ability to host campers, and would almost certainly exclude smaller producers and non-conventional farmers from being able to benefit from these activities at all. There are many properties in the more rural areas of our county without another building withing 100 feet of their own property line. Picture an out of the way corner of our farm right by the fence line. On the other side of the fence, there is no building or property use that would be impacted by a low impact camper for well over 200 feet.

Density Requirement and Parcel Size: If we agree that 1 campsite per acre, as proposed, is an appropriate density we would like to suggest we lower the minimum parcel size to 2 or 2.5 acres in order to be inclusive of small, operations or those whose operations depend on a mix of owned and leased parcels of smaller sizes. This

Terry Sebastian, *President*
Steve Van Zandt, *Treasurer*
Lisa Caras, *Secretary*
Thomas Broz
Luz Falcon-Toledo
Natasha Perry
Josh Rodriguez

EXHIBIT D

would consequently better include the smallest, most shoestring operations that could benefits most from the supplemental income. There are many properties of this size that fall with in the proposed allowed zones. These properties could still meet the setback requirements as well.

Fees and Intensity of use: Farm Discovery's preferred approach is one that differentiates between types of camping areas. This distinct category for "low-impact camping areas" that caps the number of sites and introduces density requirements proportional to the size of the property would enable agricultural operators to host small, lower-impact camping areas without requiring the permits, infrastructure, and development more suitable for a larger-scale commercial camping operation with more permanent accommodations. We therefore recommend the application and fee structure take into account the very tight budget most farmers operate on and not be overly burdensome. The consequence of a complicated application and/or outsized fee would be lack of access to smaller, more marginalized producers. This proposed model would encourage the creation of smaller camping areas with minimal environmental and community impacts.

These proposed changes would make rural recreation more accessible and advance the stated goals of the Low Impact Camping Ordinance. They would also align with Governor Newsom's "Outdoors for All Strategy" which communicates the state's intention to work with counties, planning departments, and landowners to expand opportunities for outdoor recreation and low-impact camping on private lands, particularly agricultural properties.

We look forward to hearing the County Planning Commission's and the Agricultural Policy Advisory Commission's feedback on these ideas and are happy to partner with County Staff and community stakeholders throughout this process. Thank you for your work on this topic, and more broadly.

Sincerely,

J. Ridgeway

Jessica Ridgeway
Executive Director
Farm Discovery at Live Earth

Terry Sebastian
President
Steve Van Zandt
Treasurer
Lisa Caras
Secretary
Thomas Broz
Luz Falcon-Toledo
Natasha Perry
Josh Rodriguez

EXHIBIT D

From: Sean Walker
To: Nicholas Brown
Cc: Board Of Supervisors
Subject: camping ordinance
Date: Tuesday, March 12, 2024 2:55:18 PM

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

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

I have multiple concerns over the proposed shortcut through the county and coastal planning commission regulatory structure in relation to the camping ordinance being considered in the Bonny Doon area of Santa Cruz county.
Commercial campgrounds without on-site management, fire abatement, traffic, and potential environmental damage are all issues that may be mitigated by allowing existing regulation procedures to do their job.
Shortcutting of these existing regulatory processes is not only short sighted, but a path to actual disaster.
As a resident of Bonny Doon for over 20 years I stand with my neighbors in urging you to vote NO on this ordinance.
sincerely,
Sean Walker

From: Laura Lancaster
To: Board Of Supervisors; Nicholas Brown
Subject: comment regarding LICA ordinance
Date: Tuesday, March 12, 2024 6:52:47 PM

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

To The Santa Cruz County Planning Commission in refernce to th March 13 Agenda item 7,

I own property and live in Bonny Doon and am strongly opposed to the proposed ordinance that would allow property owners in Bonny Doon to operate commercial "Low Impact Camping Areas" (LICAs) for the following reasons:

1. Fire danger. Campers would need to cook food. Would open flames be allowed? If not, who would insure that campers follow the rules? If allowed, who is monitoring what they do? As one of many who lost their home in the CZU fire, I am acutely aware of fire risk in this area.

2. Environmental impact. This ordinance would encourage further development in the environmentally sensive areas of Bonny Doon rather than minimizing human impact. There has already been a massive increase in illegal mountain bike riding in Boony Doon since the beginning of the pandemic, which includes ignoring and defacing closed-area signage, illegal parking, illegally crossing private land in order to access unsanctioned trails, as well as cutting new trails without any regard for potential environmental impact. Allowing commercial campgrounds on private land would likely lead to an increase in this destructive behavior.

3. Noise. Bonny Doon is quiet and noise really travels. A commercial campground with rowdy campers could negatively impact neighbors living miles from the site. At the very least, LICA permits should not be allowed on parcels zoned residential.

4. Oversite. Who would oversee the operation of these campsites? Does each property owner determine their own set of rules regarding noise, etc? Who would enforce the rules?

Thank you for considering my concerns, and I hope that this ordinance is not approved.

Sincerely,
Laura Lancaster
Boony Doon, CA

From: pam koch
To: Nicholas Brown; Board Of Supervisors
Cc: Lisa Schallop; Mike Wade
Subject: Comments in reference to the March 13 Agenda item 7 - LICO
Date: Tuesday, March 12, 2024 10:29:02 PM

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Dear Board of Supervisors and Planning Commission,

We are writing on behalf of the Redwood Meadows Ranch Homeowners Association located in Bonny Doon. We were very concerned to learn at the last minute about tomorrow's consideration of a Low Impact Camping Ordinance. We have major concerns about the proposed ordinance and share the list of concerns and questions below that are provided by the Rural Bonny Doon Association. They are as follows:

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

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

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

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

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

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

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

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

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

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

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

Please understand that our most significant concern is the increased risk of forest fire caused by camping, smoking, campfires/cooking fires, etc. that might lead to another devastating fire. As you know welll, over 80,000 acres burned and over 1000 homes were lost. Ours were barely saved by fierce firefighting provided by CalFire and the BLM fire crews along with multiple neighbors working together and built upon years of fire hazard reduction work. The CZU Fire was the third to impact Bonny Doon in the last 20 years. The Martin and Lockheed Fires were likely started by illegal campfires. We strongly urge that any ordinance require on-site 24-hour monitoring of the campgrounds along with forbidding campfires, cigarette and other smoking and that other fire hazard protections such as water supply onsite, means to call in a fire, road access for CalFire, etc. be required at all locations.

Thank you for hearing our strong opposition to moving forward with this proposition as is. The public needs to have a chance to have more time to provide input and much more rigorous safeguards for fire, neighbors and the environment need to be integrated into it.

Respectfully,

Lisa Schallop, Michael Wade and Pamela Koch
Redwood Meadows Ranch Board of Directors

From: emel@cruzio.com
To: Nicholas Brown; Board Of Supervisors
Subject: comments in reference to the March 13th agenda, item 7
Date: Tuesday, March 12, 2024 5:26:02 PM

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In reference to Agenda item 7 on March 13 2024:

I urge you to not allow camping on individually owned properties of 5 acres or more in the County. Neighbor's property and homes would be negatively impacted. Neighbors who live on such properties, are there for peace and quiet. Vacationing campers are there for fun and would likely be noisy, partiers. The beach neighborhoods of Santa Cruz County have been negatively impacted by airbnb vacationers. They are on vacation and have no respect for neighbors who need to work or otherwise enjoy a quiet neighborhood. On my property, I have been negatively impacted with airbnb clients of a neighbors, who come down my private driveway at all hours, not able to find the place they have rented. The property owner is not always available to direct their guests. It would be a terrible impact to have this multiplied if you allow campers as well as the restricted number of airbnb clients.

Who would be regulating this out of the public eye, in the woods, private property? I've had a neighbor who illegally set up long term camping on their property in the past, becoming 'housing', not limited recreational camping. This is not the way to ease the homeless situation. Campgrounds should be located in a more public area, specifically set up for camping with restroom facilities, water available and a manager onsite who could regulate any campfires.

Homes on property are restricted as to how many bedrooms/baths are allowed per septic system. I doubt that proper septic systems would be paid for and supplied, if campers were allowed. Many of the properties are watersheds for streams and eventually small water companies.

Thank you for your consideration,

Melissa Thompson

From: Jeanne LePage
To: Nicholas Brown; Board Of Supervisors
Subject: Comments regarding March 13 Agenda item 7
Date: Wednesday, March 13, 2024 8:24:57 AM

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Dear Planning Commission,

We recently learned that the Commission is considering an ordinance to allow "Low Impact Camping Areas" on rural parcels exceeding 5 acres. We have serious concerns about the appropriateness of this effort on many levels. After coming through a harrowing recovery from the CZU fire and watching my neighbors slowly rebuild it is especially painful to consider that this proposal does not require CEQA review. Folks that have lived here for decades and lost everything are being held to high planning rebuild requirements (as they should) and this endeavor allows others to hastily construct structures with little environmental oversight for recreational purposes.

Our neighborhood was heavily impacted by CZU – we lost almost a third of our homes. In the past couple of years a new neighbor on a large parcel installed the very camping situation described in the ordinance. It produced noise, fire hazard (open fires at night), bright lights – a mini Burning Man-- a stones throw from the Pineridge neighborhood. The noise and lights kept neighbors awake as did neighbors fear that a wildfire could result from so many 'campers' partying in a high fire risk neighborhood.

I read that the intended goal is to allow camping to people of diverse incomes and that is great but locating these areas adjacent to residential areas in high fire risk neighborhoods with little oversight seems dangerous. If the intent is to provide camping to low income visitors it would seem that our local parks could allocate a percentage of spaces to accommodate. And to have new camping facilities installed without adequate environmental review is perplexing.

I appreciate the desire to serve a more diverse group of campers but urge that this is not the method to do so. Please vote 'no' on this ordinance.

Thank you for the opportunity to comment.

Jeanne LePage and Gregory Lepore
[redacted]

From: Board Of Supervisors
To: Jesseka Rodriquez
Subject: FW:
Date: Monday, March 18, 2024 10:18:50 AM

From: Susan Mason [redacted]
Sent: Monday, March 18, 2024 9:32 AM
To: Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>
Cc: Andy Schiffrin <Andy.Schiffrin@santacruzcountyca.gov>; Trina Barton <Trina.Barton@santacruzcountyca.gov>; board@bdfsc.org; Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>
Subject:

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The Bonny Doon Firesafe Council's mission is the safety of our community, especially as regards fire danger and mitigation of that danger. Although as individuals we have many more concerns about the proposed camping ordinance, we will limit our official concerns to fire safety and public safety in our community.

Our community is still struggling to recover from the devastating CZU fire of 2020 and most residents are now extremely vigilant as to fire danger. It is completely unrealistic to expect visitors to our Mountain to exercise the same caution. Although the program specifies no fires, this is difficult to guarantee 100 percent. Particularly if the parcel owners are not on site.To allow unsupervised camping up here during fire season is a recipe for disaster.

And propane appliances, although somewhat safer, can and do start fires. We are in a high fire danger area and without the supervision as is common in established public campgrounds, there is no way to consistently monitor compliance. Let alone that large areas of Bonny Doon do not have cell signal; how do the campers call for help if something unfortunate develops? How do they call the "manager" if there is no cell service? How do they attempt self help with a fire if there is no water on site? A fire can grow a lot in the 15 minutes that is our typical fire response. And that is only if the call for help is timely and does not involve driving somewhere to get help.

The other facet of public safety involves calls for medical issues and rescues. (again the

cell phone issue is the elephant in the room, along with long response time). I think the public who would be visiting may not realize that they have put themselves into a potentially unsafe situation. This will result in more calls for service in a community that is currently underserved as regards fire and police assistance.

Will there be blackout windows for red flag fire conditions? Or major wind events that could cause injury?

As a group, the board of the Firesafe Council in Bonny Doon considers that this is being pushed through too quickly without enough study. A suggestion was made that a trial could be done in a safer part of the County (south) to see what unintended results surface.

Please address all the safety issues with this proposal. Thank you.

Susan Mason
Board Secretary
Bonny Doon Firesafe Council

From: Board Of Supervisors
To: Jesseka Rodriguez
Subject: FW: March 13th Agenda Item 7
Date: Friday, March 15, 2024 3:39:03 PM

-----Original Message-----
From: Jeanette Hoffman [redacted]
Sent: Friday, March 15, 2024 3:25 PM
To: Nicholas Brown <Nicholas.Brown@santacruzcountyca.gov>; Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>
Subject: March 13th Agenda Item 7

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Hello Mr. Brown and the Board of Supervisors,

I am writing as a homeowner and survivor of the CZU fire to express my concern for the proposed Agenda Item 7, LICA zoning on private parcels over 5 acres.

The stated basis for this proposal is providing equitable camping opportunities for low income residents. Everyone is already is served by the state and county campgrounds.

As a homeowner in a high fire risk area, the increase in fire risk from private camping operations makes me strongly oppose this proposal.

I am also concerned about the length of stay which is not typical for campers interested in outdoor activities but as a temporary housing location on these properties. It does not seem to serve those living in recreational vehicles.

Driving to access to the private camps will negatively impact roads and forestlands.

I know that my community on Braemoor Drive is drafting a unified letter opposing the proposal, but I wanted to immediately express my opposition to this proposal. This looks to be an avenue for the county to hide its unhoused population in the mountains and rural areas so that they are not in plain sight.

Thank you for your consideration,

Jeanette Hoffman
[redacted]
Santa Cruz, CA 95060

From: Robert Fitch
To: Board Of Supervisors
Subject: Fwd: Comments in reference to the March 13 Agenda item 7
Date: Tuesday, March 12, 2024 4:02:22 PM

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Sent from my iPhone

Begin forwarded message:

From: Robert Fitch [redacted]
Date: March 12, 2024 at 3:59:53 PM PDT
To: Nicholas.Brown@santacruzcountyca.gov
Subject: Comments in reference to the March 13 Agenda item 7

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

From: Jan Hilkert
To: Board Of Supervisors
Subject: LICA concerns
Date: Friday, March 15, 2024 11:11:34 AM

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I have read the proposed LICA ordinance, and I agree that everyone should have access to our natural world, especially as our cities get more built up. I believe that being in nature is essential to one's mental health. As an addition to LICA, I would encourage you to work with State Parks - they already have much of the infrastructure to expand their camping facilities, and this would provide more opportunities for low-income campers.

HOWEVER, I have concerns, in line with the Rural Bonny Doon Association (RBDA) letter to you.

- Camping often means campfires, and without a manager available on-site at all times, the chances of fires are great, although fires are prohibited. Bonny Doon has done much clearing since the CZU fire, but it is still a heavily wooded area, and we are all very sensitive to the fire risk. PLEASE REQUIRE AN ON-SITE MANAGER AT ALL TIMES THAT CAMPERS ARE PRESENT - ideally this would be the property owner.

- Do not lower the 5 acre minimum, and please limit the number of permits ! Or at least insure that neighbors can weigh in when permits are submitted for near-by properties. My neighbors and I are all on parcels of 5-10 acres, and if each of my 6 neighbors decided to do this, we could have 60 extra people on our small private road. This would be a disaster. We live in a rural area because we prize nature, and our privacy. PLEASE INSURE THERE IS A MECHANISM FOR LIMITING THE NUMBER OF LICA'S WITHIN A NEIGHBORHOOD.

Thank you for your consideration.

Jan Hilkert
[redacted] Bonny Doon, Santa Cruz, 95060

To Whom It May Concern,

I am writing to express my extreme concern over the proposed ordinance on rural “low-impact” camping areas (LICA) which is being considered by the Planning Commission.

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

- Who will enforce the rules and regulations IF this ordinance is passed???
- Who will enforce each individual property owner’s supervision of their own campsites in regards to SEWAGE DISPOSAL, WILDFIRE RISK, DISTURBANCE OF SOIL, VEGETATION AND WILDLIFE HABITAT, NOISE AND TRESPASSING COMPLAINTS FROM NEIGHBORS, TRASH PICKUP, LENGTH OF TENANT’S STAY, COMPLIANCE WITH THE ORDINANCE!
- Where will the funds come from to inspect and determine whether impacts are high or low and to regulate them if they are high??
- Campsites should NOT BE ALLOWED on steep slopes because of erosion/sedimentation and increased surface runoff that could cause flooding, fallen trees and increased street/road maintenance costs both County and private.
- If separate individual campsites are allowed rather than one cluster, there will be MORE impacts from individual access roads.
- Streams affected by wildfires are probably so damaged by sediment that no more pollution should be allowed… ESPECIALLY SINCE SANTA CRUZ RELIES ON MOORE CREEK FOR MUCH OF THEIR WATER SUPPLY!
- A CEQA Notice of Exemption is not appropriate for adoption of the proposed ordinance since there are many foreseeable direct, indirect and cumulative environmental and socioeconomic impacts. If an ordinance is approved, the permitting process should not be ministerial. CEQA documentation and site-specific mitigation if needed should be required for each individual permit.
- Given the above very real possibility, the liability costs would or could deter the incentive of potential private campground owners.

Those are my immediate questions. And now I will add my personal concerns as a land owner and resident of Bonny Doon since 1978.

- I made Bonny Doon my home as I am a rural dweller. I want it to stay RURAL.
- I completely oppose commercial enterprise in my community that is zoned as RURAL RESIDENTIAL.
- The above questions outline my concerns in regards to the changes that approval of this ordinance would bring to my community.
- I realize that many home/land owners in Bonny Doon rent ADUs or do Air BnB… no one disputes that but, this ordinance is unacceptable to me, it opens up my rural home to a continuous,very sizable transient population without any regulation… it is unacceptable!

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

Very Respectfully,

Catherine Bayer

[redacted]
Cruz, CA 95060
[redacted]

From: Karan Granda
To: Board Of Supervisors; Nicholas Brown
Subject: March 13 Agenda item 7 opposal
Date: Wednesday, March 13, 2024 8:35:04 AM

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

Dear Honorable Members of the Board of Supervisors,

Allow me to introduce myself. My name is Karan Granda. I have been a resident of Bonny Doon, CA for the last 20 years. I am writing to oppose the adoption of the ordinance proposed for property owners in rural parts of Santa Cruz County to operate commercial Low Impact Camping Areas (LICAs) regardless of parcel size (lower or greater than 5 acres).

Some of my concerns include the following:

This goes against current California State Law, who has not adopted this change. How would this improve conditions in Santa Cruz County?

Exemption from California Environmental Quality Act (CEQA) regulations is the opposite of what Santa Cruz County Unincorporated areas need to maintain an already impacted environment.

The proposed ordinance encourages development rather than minimizing the impact in already environmentally sensitive areas that have had multiple years of brutalization from significant environmental events over the last several years including but not limited to significant weather events of 2024, 2023, and the CZU Complex Fire of 2020. The residence, land, and environment are still attempting to recover from one or more of these events.

The Coastal Zone is charged with working within the guidelines set forth by the California Coastal Commission, which mandates "to protect, conserve, restore, and enhance" the state's coastal resources. According to The Coastal Act Section 30253, the California Coastal Commission also requires facilitation of transit services that minimize the use of our coastal access roads, providing non-automotive circulation and/or providing substitute means of serving the development with public transportation. Santa Cruz County has significantly reduced access to public transportation to unincorporated areas over the last few years.

Any construction of structures such as yurts, domes, or other buildings should require the same County review as other parcels, including meeting

Coastal Zone Development Permit requirements. Is there staffing, funding and support in place for this? If not, then where does that funding come from?

What agency would be charged with pricing to ensure that the "low-cost alternative" is maintained? Rather, this appears to be a cheaper, less supervised version of Airbnb that would have a significant impact on our already degraded environment due to the significant ecological events of 2024, 2023, and especially the 2020 CZU Complex Fire- all of which the Unincorporated areas of Santa Cruz are still struggling to recover from.

Why would Santa Cruz permit more occupancy of visitors in areas that were destroyed when victims of the 2020 CZU Complex Fire have struggled to meet requirements to merely rebuild and come back home? Would the Board of Supervisors actually support "the rights of visitors" over the basic needs of land and home owners?

Safety issues have not been adequately addressed in this ordinance. Who/what/how would these safety issues (fire hazard, noise, impact of neighbors, problems with visiting campers following limited rules, off-site management (?). Where are these resources going to come from? Cal Fire/County Fire is not adequately staffed to address some of these issues, nor is the Santa Cruz County Sheriff's Department.

While a goal of enabling more visitors to Santa Cruz County sounds good, this ordinance appears more like a way to move current unhoused residents out of the City of Santa Cruz proper, and into areas, that of which are inadequately restored from ecologically impacted events, and already inadequately serviced by local agencies.

I strongly urge a "**NO**" vote on this ordinance until:

1. Current displaced residences have been given the resources, accommodations, and are permitted to rebuild and move home.
2. Ordinance revisions are made and reviewed by all regulating agencies and have had adequate time for the public to review and respond.
3. Restoration to the land have been surveyed as adequate to accommodate the impacts visitors will have.
4. Local and State agencies have involvement to ensure any proposed plan is safe and not harmful to our limited resources.

Thank you for time, service, and dedication to our community.

Sincerely,

Karan Granda
[redacted]

(California Coastal Commission, 2019)

From: Melissa Hori
To: Board Of Supervisors
Subject: March 13 Agenda item 7: Low Impact Camping Area
Date: Tuesday, March 12, 2024 2:10:17 PM

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

Dear Board of Supervisors,

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

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

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

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

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

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

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

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

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

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

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

Sincerely,
Melissa

Resident of Bonny Doon

From:	KM Toner
To:	Nicholas Brown
Cc:	Justin Cummings; Board Of Supervisors
Subject:	March 13 Planning Commission meeting, public comment, agenda item #7
Date:	Tuesday, March 12, 2024 3:32:27 PM

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

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

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

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

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

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

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

5. **Concerns re: being Low-cost and low impact:** The proposed change talks about promoting ***low income*** and

low impact camping, yet I see no meaningful definition or measures to ensure either of these goals are met.

Starting with "low income":

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

Re "low-impact" camping:

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

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

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

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

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

Thank you for your efforts and your attention.

Kathy Toner
[redacted]

--
Kathy Toner *(she/her/ella)*
[redacted]

From:	Steve Homan
To:	Nicholas Brown
Cc:	drubin UCSC; Rural Bonny Doon Association; natalie@fairpricemovers.com; Sandy Brown; Board Of Supervisors; Justin Cummings; Monica Morales; Andrew Strader; Matt Machado; Carlos Palacios
Subject:	March 13th PC Mtg. Item 7 LICA
Date:	Wednesday, March 13, 2024 8:04:02 AM

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

Dear Mr. Brown,

This proposal is a fire danger, water pollution, noise pollution, and planning enforcement disaster for rural residents, the forested and chaparral covered lands, and flora and fauna.

If a person wants to operate an organized campground, let them obtain a Use Permit and follow all of the CA State Organized Camp operation laws, including laws on sanitation, solid waste, sewage disposal, fire protection, etc.

Does Cal Fire approve of this? The proposal does not require firefighting water storage in the amount needed. It does not require on-site supervision. It makes NO FIRES an honor system matter.

Propane powered fires and cooking devices does not mean that they have no heat or no flame.

Camping belongs in government regulated and recognized permitted organized campgrounds, not here and there on small parcels of land with no supervision.

The RBDA opposes this. I oppose this proposal.

This serious fire safety and environmental hazard does not deserve any sort of CEQA exemption.

Very truly,

Stephen D. Homan, REHS#3784, B.S.
Bonny Doon Resident since 1976

From: Billie Martin
To: Nicholas Brown; Board Of Supervisors
Subject: Re: March 13, 2024, Agenda item 7
Date: Tuesday, March 12, 2024 3:37:01 PM

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

Dear Planning Commission and Board of Supervisors,

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

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

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

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

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

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

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

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

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

On-Site Management Requirement: Given the safety concerns, noise disturbances, and

issues with camper compliance, it is crucial to mandate on-site management during occupancy to enforce rules effectively.

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

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

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

Sincerely,

Dr. Billie Jeanne Bensen Martin

From: Math Bishop
To: Board Of Supervisors
Subject: Thank you for your work on low impact camping!
Date: Thursday, March 14, 2024 12:48:51 PM

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

My name is Matt Bishop and I am a resident of Santa Cruz County in Aptos. Thank you for the opportunity to submit a public comment and communicate my support for the County's work on low-impact camping. I am excited to see Santa Cruz support compatible uses like camping that will create economic opportunities for rural landowners and increase visitor access to outdoor recreation and our county's natural resources in a sustainable way.

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 fantastic! 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 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. It has always been a dream of mine to live in Santa Cruz and it's truly a gift to call this place home for me and my family. We live on premise and can manage and facilitate the needs of any of our campers while ensuring they follow all of our rules and local laws. Below are a few comments made by our campers 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 campire 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.

Thank you again for all your hard work on this!

--
Matt Bishop

From: Board Of Supervisors
To: Jesseka Rodriguez
Subject: FW: Low Impact Camping Ordinance
Date: Tuesday, April 2, 2024 3:02:52 PM

-----Original Message-----
From: [redacted]
Sent: Monday, April 1, 2024 4:09 PM
To: Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>
Subject: Low Impact Camping Ordinance

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

Dear Santa Cruz County Board of Supervisors,

My name is Day Nguyen and I am a 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 access to our community in a low impact and responsible way.

A little bit about me & my situation:I am an artist. I am new to being an 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 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.
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. There are ways to address all of those issues. I can suggest some ways:

-Not allowing open flame, but allowing contained fire - within an outdoor fireplace.
-Stipulating water storage & hoses nearby -Encourage the use of composting toilets - to recycle waste back into compost.
-requiring property owners to either live on-site or have a living-on-site-manager. (See details below.)

I've lived in the mountains 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. To do that, we must share & educate people who do NOT live in the forest or this land, so that they TOO, can feel deeply connected, deeply engaged, and create a desire in them, to leave this place, better than before they came, and protect it for many more generations.
I find that exclusion and fear cause more fear. Not finding more ways to engage our visitors to become more vested in our land and natural resources, is a huge lost opportunity. As a home owner, we must no only be stewards of our homes, but stewards of the land. I find that the Low Impact Camping Ordinance allows us to spread that message to more people, in a way that is sustainable.

I live on-site, at my property. Stipulating that LIC 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 adherence to the rules that I set. (like NO open flames, 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 MORE 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.

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 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.

Day Nguyen
Property Owner,
Santa Cruz Mountains, Scotts Valley

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

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

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

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

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

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

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

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

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

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

Sincerely,

Shirley Treanor
270 Northwest Drive, Santa Cruz, CA 95060

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

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

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

Respectfully,

Terri Gomes

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

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

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

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

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

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

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

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

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

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

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

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

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

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Dear Mr. Brown,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Thank you,
Ted Benhari
Bonny Doon

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

Dear Santa Cruz County Planning Commission,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Respectfully Yours,

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

cc: BoardOfSupervisors@santacruzcountyca.gov

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

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March 13 Agenda item 7

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

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

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

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

Dave Deamer

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

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

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

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

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

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

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

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

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

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

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

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

Dear Board of Supervisors,
I am opposed to allowing private camp grounds in our neighborhood.
Two years ago my neighbor had illegal camping on his 25 acre property. We share an access road and we came home weekly to 10 airstream trailers with 80 people in and on the moon rocks. At the time, we filed a formal complaint with the county to have this stopped. Campers were lighting fires on the moon rocks to cook food. They were not respectful of the neighborhood or the fragile protected habitat in the dry lake bed. It completely changed our way of life.
Strangers were coming onto our property and we feared for our safety.
Please do not allow private camp grounds in our neighborhood. Life as we know it will cease to exist.
I have documented photos of the above events should you care to consider our request.

Sincerely,
Victoria Slama
Bob Goodenough

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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Dear Mr. Brown,

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

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

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

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

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

Please reconsider the acreage limitation and the length of the rig.
Thank you very much!
Robin Leidenthal

Sent from my iPad

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

Dear Chair Shepard and Santa Cruz County planning commissioners,

We are strong supporters of the LICA ordinance.
We own 16 acres of land in unincorporated Santa Cruz County (on Summit Road) with unparalleled panoramic views of Santa Cruz County and the Monterey bay.
We have been stewards of this land for 25 years. When the pandemic struck we designed campsites for people that were individually separated for people to get out safely. The real need for camping that would be completely private was definite.
We believed our sites were in compliance until county planning told us we were a organized camp and had to do a matrix calculation.
We wanted to continue operating the campsites and began the work of becoming compliant (designing a permitted campground) last year. We were then informed through County Planning and Swift Consultants that we did not have enough developable acreage for even one (1) campsite. We could, however, have three (3) dwelling units.

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

We were excited when the state passed legislation sb620 to allow low impact camping. And the good news continued as the local government proposed to adopt these changes. We thought we would be able to keep our property.
The first draft of the ordinance was acceptable and we were ready for the opportunity to revisit the venture.

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

Being on Summit Road we have direct access to the evacuation route. We are in the critical fire area designation (according to the GIS).
We ask that line E #7b be amended to state that “those in a critical fire area may operate if they can provide 10,000 gallons of water, a hydrant, and the approval of the fire marshal”. Of course, it would be fine to strike it completely as well.
The original draft described the fire requirements and they were both reasonable and understandable. We can provide 10,000 gallons of water. We did not allow wood or charcoal fires of any kind. With the exception of propane.

We would be happy to pay TOT.

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

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

Noah Selman
Selmansc LLC

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

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

Please consider the following amendments to the proposed Ordinance:

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

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

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

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

Thank you for your consideration.

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Jessica Ridgeway *(she | her | hers)*
Executive Director
Farm Discovery at Live Earth
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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 Commision 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