

To Whom It May Concern:

I'm sympathetic to the goal of increasing the opportunities for camping, but the bill allowing so-called "Low-impact camping areas" (AB-518) is grossly deficient. Please do not pass this bill until the following deficiencies are corrected:

**Fire hazard**—As detailed in the Rural Bonny Doon report on LICAs (<https://rbda.us/wp-content/uploads/2025/02/RBDA-report-on-Foreseeable-LICA-impacts.pdf>), recreation is the single largest cause of wildfires in California (Scientific American, 12/1/23). Campgrounds should be prohibited on properties mapped by Cal Fire as "high fire hazard" or "very high fire hazard" and in neighborhoods where private insurance companies are denying insurance coverage. Campgrounds should be required to have the same water storage for fire-fighting as local residences. Fire safety should take priority over maximizing the number of campgrounds.

**Generators**—The ordinance must all prohibit generators use. Generators are a nuisance to neighbors, a fire hazard, and are counter to the objective of a natural camping experience. They are prohibited on the 47 permitted commercial cannabis cultivation sites in Santa Cruz County (except for emergency use), and they should be prohibited on all LICAs.

**Set-backs and noise**—Campgrounds must be set back far enough from neighboring residences that neighbors can enjoy quiet without having to retreat indoors. The bill's specified setback of 200 ft is unacceptably close. If generators are allowed, the setback should be a minimum 1000 ft from residences. If generators are prohibited, the setback should be 500 ft. AB-518 requires that quiet hours be enforced from 10:00PM to 6:00AM. The bill must specify who is responsible for enforcement and funding for enforcement.

**Building codes and sanitation**—AB-518 fails to recognize the extreme sanitation and building code violations that are common on LICAs. Although LICAs are not yet legal, many are already advertised on Hipcamp. The RBDA report (<https://rbda.us/wp-content/uploads/2025/02/RBDA-report-on-Foreseeable-LICA-impacts.pdf>) illustrates a sampling of non-compliant facilities advertised in Santa Cruz County, including pit toilets, dangling propane heaters, stovepipes protruding from tents, showers draining onto the ground. AB-518 must specify how campgrounds with these unsafe facilities will be shut down immediately.

**Protection of wildlife**—LICAs should be excluded from habitat for protected species identified as candidate, sensitive, or species of special status by State or federal agencies. Similarly, The Nature Conservancy and Sempervirens have mapped lands that they consider priorities for conservation. Campgrounds should be prohibited in these areas.

**Pilot program for farm stays**—Many of the problems with the proposed ordinances could be removed if LICAs were excluded from properties in high fire hazard areas in residential

neighborhoods. Why not start a pilot program for farm stays on Agricultural lands outside of hazardous fire areas and outside of residential areas?

Please reject AB-518 unless the deficiencies cited above are corrected.

Sincerely,

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