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Guest Commentary | The high impacts of so-called ‘Low Impact Camping Areas’

By [SANTA CRUZ SENTINEL](#)

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By David Rubin

A decade ago, Santa Cruz County faced pressure from the cannabis industry to commercialize rural properties for cannabis cultivation. The county conducted five years of review, relying on the C4 committee (local experts in cultivation and land use) and numerous public hearings.

In a May 10, 2016, county press release Supervisor Zach Friend said, “This is one of the largest land use changes that Santa Cruz County has ever undertaken, and there will be undeniable impacts on our environment. We need a thorough and comprehensive environmental review to ensure all impacts are analyzed.”

Now our county is facing pressure to literally commercialize our backyards by permitting “Low Impact” Camping Areas (LICAs). Despite the words “Low Impact” in the name, LICAs can have substantial impact on rural safety, neighborhoods, and wildlife; 1300 properties on 20,000 acres would be eligible. Larger LICAs could host 36 campers.

LICAs are a wildfire hazard. According to Scientific American (Nov. 1, 2023), recreation is the largest cause of wildfire in California. From 2000 to 2023, “recreational activities sparked nearly 5,000 wildfires resulting in almost 900,000 acres burned.” The proposed LICA ordinance prohibits campfires and smoking, but compliance is likely to be poor because campers want campfires. Without rangers to patrol LICAs — and no onsite manager — illegal campfires will be pervasive. And despite causing more wildfires than cannabis grows, LICAs aren’t required to store water for firefighting, as are cannabis grows (and new residences).

The staff report for the May 8 Planning Commission meeting contains conflicting statements regarding wildfire. Page 5 states: “Campsites must be located outside of ... fire hazard areas,” but a proposal to prohibit LICAs in hazardous areas was rejected (p.13): “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.” Evidently, maximizing the number of LICAs trumps fire safety.

Prioritizing commercialization over fire safety is an affront to our neighbors who lost their homes to the CZU fire and those who have had their homeowner's insurance cancelled. It is shameful that the county will even consider allowing commercial camping on properties that are so flammable that insurance companies won't insure them.

Risk of wildfires is not the only adverse impact of LICAs. The proposed ordinance allows daytime use of generators; a large LICA could have nine generators located only 50 feet from adjacent properties. The staff report claims that this is comparable to generator use allowed in State Parks, but State Parks are isolated — not dispersed throughout residential neighborhoods.

The proposed state law that would allow LICAs, SB620, requires that the county enforce nighttime quiet hours, but funds for enforcement costs will not be provided. Noise — including human voices — adversely affects wildlife. On Oct. 22, 2020, Dr. Wilmers of the Puma Project emailed the Coastal Commission and stated: "Research has shown that local carnivore species such as bobcats and the state threatened mountain lion are negatively impacted by human voices."

The proposed ordinance attempts to avoid a CEQA environmental review by relying on the "common sense" exemption that there is "no possibility" of significant environmental impact. In fact, the program has significant reasonably foreseeable impacts from the proposed camping, both on individual properties and cumulatively on the estimated 1,300 parcels that could receive permits.

The Rural Bonny Doon Association urges the county to follow the approach used for commercial cannabis: (1) wait until allowed by state law; (2) evaluate thoughtfully; (3) conduct a proper CEQA environmental review; (4) exclude high fire-hazard areas, the coastal zone, and areas mapped as priority conservation lands by Sempervirens and The Nature Conservancy; (5) prohibit generators; and (6) consider separate rules for farm stays on agricultural lands.

David Rubin is Board Chair of the Rural Bonny Doon Association.