



COUNTY OF HUMBOLDT

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June 24, 2025

The Honorable Matt Haney Chairman, Assembly Housing and Community Development Committee 1021 O St., Ste. 5740 Sacramento, CA 95814

RE: Oppose Unless Amended - AB 518 (Ward) Low-Impact Camping Areas

Dear Chairman Haney,

On behalf of the Humboldt County Board of Supervisors, I am writing to express our opposition unless amended to AB 518 concerning low-impact camping areas. Humboldt County supports the development of additional camping opportunities to enhance rural and farm-based tourism income and provide more low-cost recreational access. However, we are concerned about AB 518's lack of adequate water quality protection, public safety impacts and unintended conflicts with existing rural and working land uses and neighbors.

A primary concern is the allowance for unhosted camping sites where property owners can operate camping facilities without being present on-site, requiring only phone contact availability. This is inadequate for very remote properties that have poor or nonexistent cell phone coverage and limited emergency services access. When the "host" could be in another state or even another country, there is no meaningful on-site management to address emergencies, conflicts, or environmental and safety issues.

AB 518 also allows for up to nine separate camping sites on properties of ten acres or more. If passed as written, larger camping developments on agricultural and timber properties could generate substantial revenue from multiple glamping sites that could create conditions where it would be economically advantageous to develop prime agricultural soils in a way that could limit or replace crop production, livestock operations or timber production in favor of commercial camping enterprises. This could further limit access for farmers to available lands for cultivation, increasing the costs and viability. These changes could also contribute to neighbor conflicts, habitat fragmentation and threats to local drinking water sources from inadequate wastewater and garbage management.

While the bill proposes to only authorize camping where local governments "opt in," online platforms facilitating these arrangements often do not disclose specific addresses, making it difficult to verify compliance with local ordinances. This measure does not provide local governments with adequate tools to compel platforms to remove illegally operating

campgrounds, creating enforcement challenges that undermine local control. In addition, allowing for vastly different standards can create confusion among proprietors, users and the jurisdictions tasked with managing for environmental and public safety impacts.

In addition, many of our rural properties also lack adequate fire access roads and/or are not within fire districts, making emergency response very challenging. Given California's ongoing wildfire crisis, this bill's permissiveness around fire-prone areas is very concerning. This concern extends beyond our county boarders as wildfire doesn't respect jurisdictional boundaries. Ignition from a poorly managed site in an adjacent county with inadequate standards could threaten Humboldt County's residents, forests, and critical resources.

To address these concerns while supporting expanded camping opportunities, we recommend the following amendments to AB 518:

On-Site Management Requirements

- Require property owners or designated managers to be physically present on-site, or
- Require 24/7 on-site management with emergency communication capabilities

Infrastructure and Safety Standards

- Exclude high fire severity zones unless without fire-access roads and emergency response capabilities
- Establish minimum requirements for solid waste management, water supply and wastewater treatment systems appropriate for the number of campers

Agricultural and Timber Land Protections

- Require the protection of prime agricultural soils and clustering of camping sites to preserve farming viability
- Require timber and agricultural land use compatibility assessments for properties with more than two camping sites.

Enhanced Local Control

- Provide local governments with enforcement tools to compel online platforms to remove non-compliant camping operations
- Require disclosure of specific property addresses for verification of local compliance
- Require local ministerial permit or licenses be reflected in advertising

In summary, Humboldt County supports expanding camping opportunities but cannot support AB 518 in its current form. The bill lacks adequate safeguards for wastewater, garbage, and emergency access, and could encourage the conversion of productive agricultural and timber lands into commercial camping operations. Unhosted sites in remote areas pose unacceptable safety risks, especially in high fire-severity zones.

We're particularly concerned about wildfire threats. Fire does not stop at jurisdictional lines, and poor oversight elsewhere can have serious consequences for our communities and natural resources.

To be viable, AB 518 must include enforceable infrastructure requirements, on-site management, and strong tools for local governments to maintain land use integrity and public safety. We urge adoption of the amendments outlined above to ensure the bill supports recreation without compromising the well-being of rural counties like ours.

Respectfully, Michelle Bushnell, Chair Humboldt County Board of Supervisors

CC:

- Members of the Assembly Housing and Community Development Committee
- The Honorable Christopher M. Ward, California State Assemblymember
- California State Association of Counties (CSAC)
- Rural County Representatives of California