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*By James Feenan at 4:29 pm, Aug 14, 2024*

**From:** [Elk CSD](#)  
**To:** [pbscommissions](#)  
**Cc:** [Mo Mulheren](#); [Ted Williams](#); [ECSO Directors](#)  
**Subject:** Elk Fire Comments - Low Intensity Camping  
**Date:** Wednesday, August 14, 2024 1:42:18 PM

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To: Mendocino Planning Commission

Re: Proposed Section 20.176.20 Low Intensity Camping

The Board of Directors and Fire Chief of the Elk Community Services District are pleased to see this type of unregulated camping is being recognized and regulations proposed. That said, The Elk CSD and Elk Fire have important concerns with the new zoning proposal.

To help put this in perspective, our District consists of 57 square miles with a total population of ~450. Topography includes ocean front bluffs, steep canyons and ridgetops, streams, and is almost exclusively forestland. In other words, prime areas for the proposed campgrounds. If 5 campgrounds were authorized with allowable maximum occupancies, campers would exceed the current population of our District. This fact alone underscores need for our Agency's issues to be represented in the legislative process.

Included below is a partial list of areas that call for fire agency input in the approval process and with the establishment of minimum standards before specific this zoning proposal is adopted.

1) Elk CSD/Elk Fire must be involved in the approval process to including site evaluations to ensure:

- roadway address signage and campsite identifications
- unobstructed road access including horizontal and vertical clearances for fire and emergency vehicles, pullouts, turnarounds and road surfaces capable of supporting fire apparatus
- adequate accessible onsite water storage with fire department hookups
- site map
- specifications for campsite fire extinguishers

2) Provision that the landowner is responsible for vegetation management and clearing with the further caveat that the landowner is responsible for any negligent or illegal fires. While the proposed code prohibits "open flames," it's highly likely that not all campers will abide by this restriction.

3) An unstated expectation is that Fire/EMS services will be fully available, yet no provision to pay for these services is considered. Almost every local fire agency receives taxes based on permanent structures. These campsites will yield no corresponding revenues to pay a prorated share of costs. Overall, current campground TOT revenues to fire agencies typically cover much less than 10% of agency operating costs. Proposed new low intensity camping will likely significantly increase demands for our and other small agencies ... especially EMS functions.

Thank you for your consideration,

Ben MacMillan  
Elk Community Services District