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August 14, 2023

**City of Twentynine Palms  
Planning Commission**

*By email to [dolsen@29palms.org](mailto:dolsen@29palms.org), [kgardner@29palms.org](mailto:kgardner@29palms.org)*

**Subject: Comment for August 15, 2023 Planning Commission Meeting - Agenda Item 5**

Dear Twentynine Palms Planning Commission,

Thank you for the opportunity to offer comments on Agenda Item 5, the discussion on proposed edits to the “Mobile Homes and Special Occupancy Parks” code section. We are glad to see Twentynine Palms working to update camping and recreational vehicle regulations, and are always happy to serve as subject matter experts on recreation and camping policy as is useful.

As you may have heard, the California legislature is also considering new camping policies that would set a new definition - low impact camping areas - at the state level. This bill came out of the recognition that large, developed commercial campgrounds often require a different level of regulation and built environments than smaller, low-impact camping areas. Currently, the California Department of Housing and Community Development requires a state permit for all camping areas with 2 or more campsites under the Special Occupancy Parks Act (SOPA). However, if [Senate Bill 620](#) passes, it will set a new definition for low-impact camping areas (LICAs) and exempt them from SOPA permitting and requirements while reasserting local control over their regulation. I’ve attached a few factsheets for your review that explain more about the legislation. Of note, so far Senate Bill 620 has passed unanimously through the State Senate with bipartisan support and zero formal opposition.

With SB 620 in mind, if Twentynine Palms is reviewing its camping policies, it may be helpful to consider this new definition for incorporation into your camping regulations to stay in alignment with state language regarding SOPA.

Below are details of what a LICA policy for Twentynine Palms could look like, one that aligns with the updated guidelines the planning commission is reviewing for traditional campgrounds and RV parks. This new LICA category of camping would help differentiate between “primitive” style camping on private lands and more commercial and developed campgrounds that may require additional amenities and oversight.

**Low impact camping areas:**

- a. *Low impact camping areas shall comply with standards specified below:*
  - i. **Acreage requirements: 2 acres<sup>1</sup>**
  - ii. **Maximum density: 1 site per acre<sup>2</sup>**
  - iii. **Maximum number of sites: 9 sites<sup>3</sup>**
  - iv. **Setbacks:** *each individual campsite shall be located a minimum of fifty (50 feet) from all property lines*
  - v. **Parking requirements:** *no on-street parking allowed*
  - vi. **Restrooms:** *all human waste shall be removed from the property (allowing for screened porta potty use and not requiring built structures on undeveloped properties)*
  - vii. **Length of stay:** *length of stay shall not exceed thirty (30) days in any 180-day period*
  - viii. **Public and environmental safety:** *Campsites shall comply with all local noise, fire, safety, and related ordinances*

As the planning commission has discussed in recent meetings, camping is an extremely popular and limited amenity in Twentynine Palms and around Joshua Tree National Park. By creating a new code definition and standards for LICAs, the city has the opportunity to provide additional low-impact camping options for visitors while also supporting secondary revenue streams for local landowners of all sizes - not just those who own large parcels. LICAs are a great option for Twentynine Palms to meet the demand for additional camping in the area while benefiting from the economic benefits therein, and establishing options for landowners to host overnight visitors without using buildings that could otherwise be used for long-term housing.

If the planning commission, however, decides not to establish a new definition of camping, we would recommend the following in regards to the proposed campgrounds and RV parks policy proposal:

- **Removing the requirements for laundry services.** In the service of conserving the area's undeveloped landscapes and water resources, we'd recommend giving landowners the opportunity to decide if laundry facilities make the most sense for their campers (or not).
- **Setting a minimum acreage requirement of 2 acres with a density requirement of 1 site per acre.** This ensures smaller landowners can also benefit from low-density camping as an income stream and will create more options for campers, while ensuring minimal neighborhood impacts.

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<sup>1</sup> This is in line with a proposed amendment to SB 620 that would set a 2 acre minimum for LICAs

<sup>2</sup> This is in line with a proposed amendment to SB 620

<sup>3</sup> According to SB 620, LICA status only applies to campgrounds with 9 or fewer sites

I would be happy to discuss these policy options with your planning commission in more detail; please let me know if it would be helpful to do a presentation on what other local governments in California are doing to explore code options that create safe, accessible, and affordable options for local landowners to host conservation-minded low-impact camping.

Thank you for your attention to this topic.

Sincerely,

A handwritten signature in black ink, appearing to read 'MR', with a long horizontal line extending to the right.

Michal Rosenoer  
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Hipcamp Inc.