Bill Summary: SB 620 would explicitly exclude a “low-impact camping area,” as defined, from the definition of a special occupancy park (SOP) that is licensed and regulated by the Department of Housing and Community Development (HCD).

Fiscal Impact:
- HCD estimates ongoing costs of approximately $1.14 million annually for 6.0 PY in staff time to handle an anticipated increase in requests for technical assistance from local jurisdictions regarding interpretation of the law to determine whether the estimated 1,530 existing sites and potential new sites are permitted by HCD or are exempt “low-impact camping areas.” HCD also anticipates workload for an increase in Mobilehome Assistance Center complaints, and an increase in requests for health and safety inspections. Staff assumes that requests for technical assistance would likely decline over several years. (General Fund)

Background: Existing law, the Mobilehome Parks Act (MPA) and Special Occupancy Parks Act (SOPA), specify requirements for the construction, maintenance, occupancy, use, and design of mobilehome parks and special occupancy parks (SOPs, such as RV parks). An SOP is any area of land or property that has at least two recreational vehicles, tents, camping cabins, and/or lots that are held out for rent or lease. HCD is responsible for developing regulations and enforcing statutory requirements to ensure the health and safety of residents of these occupancies. Minimum health and safety standards inside SOPs include regulations for construction, maintenance, occupancy, use, and design of SOPs, and are required to guarantee the safety of park occupants and ensure a decent environment for recreation or temporary occupancy. Enforcement actions include necessary inspections, permit issuance, and complaint response activities.

With HCD’s approval, a city or county can assume enforcement responsibilities of the MPA and SOPA, as well as related regulations, within its jurisdiction. Existing law authorizes a local enforcement authority to relinquish the responsibility for parks in its jurisdiction, and also specifies a process for HCD to cancel a local entity’s enforcement responsibilities if it is not effectively conducting its responsibilities, as specified. The processes for assuming, relinquishing, and cancelling local enforcement authority are specified in regulations.

Proposed Law: SB 620 would explicitly exclude “low-impact camping area” from the definition of a special occupancy park, thereby exempting this designation of private property for specified transit occupancy rental uses from the requirements of the SOPA. Specifically, this bill would define a “low-impact camping area” as any are of private
property that provides for the transient occupancy rental of a temporary sleeping accommodation for recreational purposes that is not a commercial lodging facility and meets all of the following requirements:

- Provides for the transient occupancy rental of a temporary sleeping accommodation, not exceeding 14 consecutive nights per camper and not exceeding 28 nights per calendar year per camper.
- Includes no more than nine temporary sleeping accommodations.
- Does not include a temporary sleeping accommodation that is rented out for permanent human occupancy.
- Does not allow for onstreet parking.
- Complies with applicable state and local fire safety requirements.
- Complies with applicable state and local tax requirements, including, but not limited to, the payment of local transient occupancy taxes.
- Complies with applicable local requirements for disposal of human waste, or in the absence of applicable local requirements, maintains sanitation facilities that are fully self-contained or connected to a permitted sewage disposal system serving the property.
- Complies with applicable local requirements for disposal of trash, or in the absence, requires all solid waste to be removed from the premises after each occupancy and onsite trash receptacles to abide by applicable animal-protection trash best practices or requirements.
- Complies with applicable local requirements for quiet hours, or in the absence, enforces quiet hours from 10 p.m. to 6 a.m.
- Complies with applicable local requirements relating to low-impact campsites, low-incident camping, or incidental camping.
- Designates an operator or property manager who is available by phone 24 hours a day, seven days a week.
- Is not located within a single-family residential zone.
- Is not located on a site that meets specified characteristics in an urbanized area or cluster, or that are adjoined to parcels developed for urban uses, as specified.
- Has not been used as an SOP for the previous five years, unless the area was an SOP before January 1, 2024 and it met the requirements to be designated as a "low-impact camping area on January 1, 2023.

The bill would specify that its provisions do not authorize an individual to access private property without the permission of the landowner. SB 620 would also authorize the county in which the low-impact camping area is located to enforce the minimum requirements specified above regarding the disposal of human waste and trash, as well as the enforcement of quiet hours, in the absence of applicable local requirements.

**Related Legislation:** SB 1307 (Rubio), Chap. 669/2022, included provisions requiring HCD to post an explanation of the process for a city, county, or city and county to assume the enforcement responsibilities pursuant to the MPA and SOPA, as specified.

SB 325 (O'Connell), Chap 434/2001, established the Special Occupancy Parks Act, separate from the MPA, under the jurisdiction and enforcement of HCD and local enforcement agencies, as specified.
Staff Comments: This bill would exempt “low-impact camping areas,” as defined, from the requirements of the SOPA, thereby exempting these transient occupancy sites from HCD’s direct regulatory and enforcement authority over the construction, maintenance, occupancy, use, and design of these areas, including provisions ensuring the health and safety of occupants. Staff assumes that oversight and enforcement of these sites would primarily shift to local code enforcement officers and law enforcement.

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