



## **CALIFORNIA ASSOCIATION OF RV PARKS AND CAMPGROUNDS LEGISLATIVE REPORT**

By Don Gilbert, Mike Robson, Trent Smith, and Jason Ikerd  
January 30, 2018

The Legislature reconvened on January 3 for the second year of the 2017-2018 Legislative Session. Upon reconvening, business in Sacramento quickly heated up. January also saw the opening of budget negotiations with the release of Governor Brown's final Proposed Budget.

Governor Brown proposed a \$190 billion budget. Having started his third term as Governor at the end of the recession, Governor Brown has seen the state go from having a \$27 billion budget deficit in 2011 to \$19 billion surplus in the current budget year. As has been the case in previous years, his proposed budget urges caution and avoids new long-term spending obligations. It instead emphasizes saving in the state's rainy-day fund, reduction of state liabilities, and investment in the Governor's championed school funding formula.

Of interest to CalARVC members is an \$80 million investment in the State Parks System (Park System). The State Parks budget has largely followed the fortunes of the state's overall finances. At the height of the state's budget woes, the park system faced drastic budget cuts and closure of parks across the state. Since then, the Park System has relied on one-time appropriations for operation. Among other things, the Governor's 2018-2019 Budget proposes ongoing funding of \$26.6 million plus the establishment of an \$8.5 million reserve. In addition, the budget proposes a \$42 million appropriation and supports 364 positions to improve park services and infrastructure maintenance.

As the Legislature begins its work in 2018, our firm is still working to protect many of your parks from regulation by the state's Regional Water Quality Control Boards (Regional Boards). The use of chemical deodorants containing formaldehyde in RV blackwater tanks has been a persistent problem for the RV park industry for many years. Not only do these chemicals disrupt the natural biology of septic systems, potentially leading to their failure, but they pose a regulatory risk as the presence of formaldehyde in septic systems puts parks on the radar of the Regional Boards. The Boards have authority to require parks to invest in costly treatment/filtration infrastructure to prevent formaldehyde contamination of groundwater.

CalARVC has faced this threat before and beat it ten years ago. However, this issue raised its head again in late April 2017 when the Central Coast Regional Water Quality Control Board distributed letters to all RV parks in their jurisdiction requesting information that would be used to regulate parks, potentially requiring permit fees and other costs of tens of thousands of dollars. Since then, our firm has engaged in the Capitol to elevate this issue to the attention of lawmakers.

In particular, we have worked with Assemblymembers Caballero and Grayson who have applied considerable pressure to the State and Regional Boards not to do anything to hurt small business owners. These efforts have included the introduction of AB 852 which would make it easier for the state to ban products containing formaldehyde while restricting the Water Board's authority to regulate RV parks. While we hope to resolve this issue without legislation, AB 852 is a major shot across the Water Board's bow.

We continue to work with both Assemblymembers to limit the Regional Board's activities and reach a positive final resolution for CalARVC. To that end, we recently scheduled a meeting with the Assemblymembers, CalARVC, and CalEPA Secretary Matt Rodriguez. As CalEPA has purview over all the activities of the State and Regional Water Boards as well as the Department of Toxic Substances Control, they are well positioned to address this issue. The goal of the meeting, which is scheduled for late February, is to work with Assemblymembers Caballero and Grayson to apply serious pressure to Secretary Rodriguez to resolve this issue. We will keep you apprised of further developments following the meeting.