



RIVERWOOD PARK 78 Riverwood Park Road, Lindsay, ON K9V 0K2

October 6, 2021

Joseph Aguanno
Licensing Enforcement Officer,
Municipal Law Enforcement & Licensing
City of Kawartha Lakes
37 Lindsay Street South
Lindsay, Ontario
K9V 2L9

Re: Municipal Licensing Proposal

Thank you for taking the time to read over our sector's concerns. It was recently brought to our attention that the City of Kawartha Lakes proposed new requirements for campgrounds to comply with if they wish to receive a Seasonal Trailer Parks License. Upon review of the amendments to the Seasonal Trailer Park By-Law 2013-148, a few issues were realized. The following outlines the issues that must be addressed should your government wish to proceed with the new requirements responsibly.

We are cognizant of the City of Kawartha Lakes' goals in ensuring campgrounds are operating safely and within their infrastructural limits. We encourage proactive engagement from municipal governments to work alongside campground owners in taking meaningful strides to improve the sector and its interactions with government.

However, upon reading this proposal, our sector is concerned about the implications of such policies around Environment Compliance Approval (ECA) requirements, the price hike for the license itself, and the small time frame given to provide response to this proposal.

Our primary concerns regarding the requirement of an ECA to acquire a license is alarming. ECA requirements for campgrounds is an extremely complicated matter at the provincial level and we know that enforcing a mandatory ECA requirement on campgrounds will not meet the goals in which the policy is targeting.

As it stands, what has been proposed means that any campground that does not currently hold an ECA will now be closed for, at least, 6 months to eight years. We ask for clear definitions around the requirements criteria as it is unclear what the City of Kawartha Lakes is looking for specifically.

We believe the City of Kawartha Lakes is underestimating the process and difficulty in which campgrounds experience to acquire an ECA. The topic of wastewater management policies in Ontario is deeper and more intricate than the city may realize. **This policy may result in 30+ campgrounds failing to qualify for the Seasonal Trailer Park License.** We do not believe that the City of Kawartha Lakes wishes to shut down and block 10,000+ tourists from accessing their community for the next three to eight years. While we respect policies aimed at protecting the environment, this forces campgrounds to spend millions of dollars on infrastructure they may or may not need. It needs to be abundantly clear that this policy will be closing businesses indefinitely.



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We suggest that the City of Kawartha Lakes require alternative types of paperwork for meeting environmental compliance. Separate paperwork criteria may look like, Certificate of Approvals (CA) or a permit to take water. All can be required with equal validity to a ECA and would permit the majority of campgrounds to qualify each year while avoiding liabilities for the City of Kawartha Lakes. If the campground has none of the suggested documents, a realistic timeline should be provided for the owners to collect the paperwork necessary.

Additionally, the Ministry of Environment, Conservation and Parks continues to monitor, enforce, and penalize bad actors in the preservation of the environment. They have the authority to issue "Stop Orders" on any business that threatens the sustainability and protection of the environment. This license fee increase will make the City of Kawartha Lakes' additional inspectors redundant as they compete with provincial enforcement authorities. We recommend lowering the proposed license fee for the next few years while campgrounds adjust to the new criteria.

Finally, for campgrounds and constituents to be given eight days to provide feedback is not adequate. Given that this is the closing weekend for most of the sector, we would like to formally request an extension of this deadline and an extension of Council's vote so the City of Kawartha Lakes can address our concerns, refocus policy ideas, and properly define criteria in the proposal to amend the Seasonal Trailer Park By-Law 2013-148. Stakeholders and City of Kawartha Lakes officials need more time to get these policies corrected to achieve harmony between both the city and campground owners.

Thank you again for taking the time to listen to our sector. We are happy to discuss further should you need clarification in a less official manner on any of the above points. Please reach my office at (705) 324-1655, or contact Penny Wagstaff at pwagstaff@hotmail.com.

Sincerely,

Penny & Scott Wagstaff
Riverwood Park