



RECREATIONAL ADVENTURES CO.

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February 16, 2012

The Honorable Mayor of Rapid City  
City Council Members  
Director, Community Planning and Development Services  
Planning Commission Chair

Re: Title 15:52 regarding Travel Parks

Dear People,

My name is Al Johnson and I am the Exec. V.P. of Recreational Adventures Co., the owner of the Rapid City KOA. In the past I have served as Chair of the Rapid City CVB, the Black Hills, Badlands & Lakes Assn., the Mount Rushmore Society, and the SD Campground Owners Association. I am currently the Chair of the committee of ARVC, the National Association of RV Parks and Campgrounds, that oversees governmental affairs and codes and standards for the industry.

I mention these in order to try to establish some credibility with you as you approach a second reading of an ordinance that affects RV Parks in the community. I have worked cooperatively and successfully with planners in the jurisdictions where our company has our 11 RV Parks. Usually I am able to provide insight from an RV Park operator's perspective well before planning proposals come up for a vote. In this case, I believe that none of the campground operators were invited to participate in the development of the ordinance and were only asked to review it once it was completed. I apologize to you all that I am so late in becoming aware of this effort. While I am aware that you are anxious to implement a whole section of code and don't want to get bogged down on the RV Park aspect of it. I am also convinced that you want quality more than speed.

I appreciate the effort to revise this code. I commend the Community Planning and Development Services Department for eliminating burdensome and archaic features from the old ordinance. In general, this is a better ordinance for the city and for the Travel Park businesses within it. There are some features of this that will discourage any new Travel Park

businesses from coming to Rapid City. They will instead be built outside of Rapid City's jurisdiction. Many travel parks have already gone out of business that used to exist in the City. Maybe that gives our company a more protected position as one of only three or four remaining parks with little threat of increased competition. The biggest threat might be that Rapid City really doesn't want travel parks in the community.

My core concern is that, because of a few features of the ordinance, it compromises our ability to modernize and react to the evolution of the industry over the coming years. Without that ability, the property will almost certainly decline (if it can't grow). A property in decline is no good for the city, the neighbors, or the property owner.

Please consider the following thoughts about the proposed ordinance. It is in the order of the clauses of the ordinance, not priority order of impact on our business. I hope you will consider allowing more work to be done on this ordinance before passing it in order to get it right the first time.

Thank you for your kind consideration. I would welcome the opportunity to discuss this matter with any of you. My direct line phone number is 605 574 3401.

Yours truly,

A handwritten signature in black ink, appearing to read "J. Alan Johnson". The signature is fluid and cursive, with a large initial "J" and "A".

J. Alan Johnson  
Executive Vice President

## Travel Park Ordinance Items for Consideration

15.52.020 – License Required- My only concern under this heading is that our fees will jump from \$147 annually to over \$500. Staff's response is that this is consistent with similar fees. I don't know what that means. We were annexed a couple of years ago. Prior to that we needed no annual license. All I am saying is that it seems like a huge jump and as far as I can see it is not tied to any actual cost to the city. Maybe the city needs the money more than we need profit.

15.52.080 Accessory Buildings and Structures- This section does not list accessory structures common to most, if not all, travel parks: registration offices, retail stores, picnic shelters, manager housing, and maintenance buildings. It does not allow for future auxiliary buildings as the industry evolves. This section was most likely copied from mobile home parks. Travel Parks are completely different.

15.52.100 Property Maintenance- The International Property Maintenance Code required by this section is a 41 page document with comprehensive requirements. It sells for around \$30 per copy. I found a version on-line that may or may not be the code referred to in the ordinance. While most of it seems reasonable, the proposed ordinance specifically states that it applies to self-contained units in Travel Parks. Very few trailers or camping cabins allowed in the ordinance would meet the space specifications imposed by this Code. In other words, the blanket adoption of this Code into the ordinance would make many of our guests' units and our own on-site accommodations non-compliant. Other sections of this Code might also pose hardships for this industry. When you vote on this paragraph, do you know what it specifically says? I don't.

15.52.140 Signage- I know that signage is an extremely hot button topic to the council right now, but the restriction on advertising signage within the park would be like telling a supermarket that they can't advertise to their customers within their store. We routinely advertise store specials, pancake breakfasts, s'more parties, and other items of interest to our guests. This kind of in-house advertising is not restricted by any other jurisdiction I have ever heard of. In regards to the directional signage, it would be better to simply require that we make our layout available to emergency services. In most locations, we provide layout maps to emergency services rather than signs on rows. It is generally more helpful to them to have the map because under this requirement, they would still need to seek out the rows.

15.52.170 Sewer and Water- I tried to find the Infrastructure Design Criteria Manual, the Master Utility Plan, and the City Standard Specifications for Public Works Construction on-line to see what Travel Parks are actually expected to comply with. I found a list of exceptions to the requirements but never really found the requirements. There is an ANSI code that applies to campgrounds and RV Parks. Does this replace or embellish that nationally accepted code? My concern is that campgrounds are designed much differently than Mobile Home Parks. For example, in most mobile home parks and subdivisions, the utilities are run in the streets with a drop to each house or lot. In RV Parks, utilities are run directly from one hook-up to the next.

It is easier and less disruptive to repair when the utilities are not in the streets. The camping units are by nature mobile and can be moved in minutes. Most campgrounds in our area are designed for summer use. Requiring utilities to be below frost is useless and adds to installation and repair costs depending on the business plan of the travel park owner.

15.52.180 Parking- This is another paragraph copied from the Mobile Home ordinance that has no use or meaning in a campground. It would have no value to guests but would be onerous to campground operators. A mobile home is a dwelling that is not easily moveable where the residents need a place to park their cars. A campsite is for the vehicle itself, either a tow vehicle or a mobile home. It needs no additional parking. This addresses a problem that doesn't exist. This really needs to be dropped.

15.52.200 Industrial Pre-Treatment- In addition to the sky-rocketed business license fee, this requires us to pay an additional \$265 annual Industrial Waste Permit. I hope you will carefully re-consider this paragraph. From what I could tell in the code, hotels and motels are not considered industrial waste producers. In another part, it looked like there was an exemption if over half of the waste was simply domestic waste. Campgrounds produce almost 100% domestic waste. It is people showering and using restrooms and very little else. Pre-treating this seems way beyond what the code tries to achieve for industrial users. Staff said that current code also requires this, but I can't find it in the current code. This is a very big deal, it seems to me, for the campground operator without providing a benefit that I can see to the city.

15.52.240 Expansion of Non-Conforming Travel Parks- This one could be re-titled "Elimination of Travel Parks in Rapid City". One of the biggest problems created by well-meaning language designed to improve the characteristics of the regulated business is this kind of language the makes it impossible to improve. If we wanted to add a few sites, or re-align sites to accommodate more modern RV designs, it would trigger a requirement to spend millions on paving, drainage, completely new utilities, etc. in order to comply with this clause. The business could never justify the expense because we wouldn't be adding business and the existing business would not pay rate increases to cover the cost. Our only option is to stay the way we are. Without the ability to change with the industry, we are on a slow course to obsolescence. Before we finally go out of business, we would be a blight. This needs a more thoughtful approach, like requiring any improvements to comply with the standards, but not the whole property.

To truly be knowledgeable about the impact of this ordinance, you and I would have to be familiar with many documents that are adopted by reference: the International Building Code (which to my knowledge doesn't deal with camping cabins which are specifically permitted by this ordinance), the International Property Maintenance Code (which doesn't really work for camping units), the Infrastructure Design Criteria Manual (which may also create conflicts with generally accepted campground design), the Master Utility Plan, and the City Standard Specifications for Public Works Construction. Please take the time to forge a workable long-term ordinance for this industry in the City of Rapid City.

**From:** campnelson [mailto:campnelson@lakeparkcampground.com]

**Sent:** Monday, February 20, 2012 5:05 PM

**To:** Kooiker Sam; Brown Gary; Laurenti Steve; Davis Dave; Mason Jordan; Petersen Bonny; Doyle Charity; Nordstrom Ritchie; Wright Jerry; Roberts John; Sasso Ron; Brewer John; Limbaugh Brett; Solon Brad

**Cc:** Al Johnson

**Subject:** Travel Park Ordinance

Dear City Council Members:

I am writing in reference to the proposed ordinance revision Title 15:52 which you will be considering this Tuesday evening. About two weeks ago I spoke with Brad Solon to try and determine what impact this would have on my park. We have operated Lake Park Campground and Cottages on Chapel Lane for the last twenty years. Basically at that time Brad didn't feel it would impact me since we would be grandfathered in. However, after further consideration and after reviewing some of Al Johnsons research, I do have some concerns.

As Al pointed out in his letter, the proposed ordinance may very well impede the upkeep and upgrading of our existing parks. Even though we have no room for expansion at Lake Park Campground, we do try to plan improvements that will make our property more desirable not only for our customers, but for the community in general. As an example, the next major improvement that we would like to do in the next 3 - 5 years would be to pave all of our roads. This would not allow us to charge more to our customers, but would make the property more aesthetically pleasing and would probably benefit the city when it comes to meeting air quality standards through decreased dust and particulate. If we were required to meet all the standards outlined in the new ordinance, it simply would not be possible.

Please consider Als' request to give this more thought for possible revisions. Al Johnson would be a valuable asset in developing a workable solution due to his many years of experience in governmental affairs with respect to our business.

Thank you.

Scott Nelson  
Lake Park Campground and Cottages  
2850 Chapel Ln  
Rapid City, SD 57702  
605-390-6973