



## Corporation of the Township of Brock

### Staff Report to the Mayor and Members of Council

**From:** Sarah Jones

**Position:** Supervisor By-Law Enforcement and Animal Control

**Title / Subject:** Short Term Rental Final Report 2022

**Date of Report:** September 2, 2022

**Date of Meeting:** September 12, 2022

**Report No:** 2022-PS-013

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#### 1.0 Issue / Origin

The Supervisor of By-Law Enforcement and Animal Control was requested by Council to provide monthly updates on the Phase 1- Short Term Rental "STR" (pilot) enforcement program since the program commenced on May 19<sup>th</sup>, 2022. Updates on the program have been presented to Council at the Committee of the Whole Meetings held July 25<sup>th</sup>, and August 22<sup>nd</sup>. This report will update the final month of the Phase 1- Short Term Rental "STR" (pilot) enforcement program up to the date of the report submission. Further updates will have to be presented to Council at a future meeting to provide updates on court proceedings, additional charges and any additional financial numbers not yet available at the time of the submission of this report.

#### 2.0 Background and Analysis

The issues and concerns over short-term rentals increasing in number in the Township of Brock have been occurring for several years and was exasperated by the onset of the Covid-19 pandemic and resulting limitations for travel outside of Ontario and Canada. Real estate prices soared during this time due to low interest rates and available properties throughout Ontario, especially those with lakefront, river front or another unique landscape destination for fun and relaxation were quickly bought up and turned in to short-term rental properties. As well during the pandemic, stay at home orders and travel restrictions saw a huge influx of day tourists and short-term property renters from nearby large cities to cottage country and lake destinations further increasing the demand for short-term rental properties and as a result, causing further clashes with full time residents who have been adversely affected by short-term rentals due to the increasing number of them being used as "party houses" and a general lack of respect from some renters and some short-term rental hosts.

## **What is an STR or Short-Term Rental Property?**

An STR means any dwelling or part of a dwelling offered for overnight accommodation, for a set period and for a fee, to a person or persons who do not usually reside in the dwelling. Therefore, physically, an STR can be, for example, a single-family home, a bedroom within such a home, a basement within such a home, a townhouse or part of a townhouse, a condominium unit or part of a condominium unit. A short-term rental is the business of providing temporary accommodation for compensation for periods of up to 28-30 consecutive days.

The concept of renting out an entire dwelling or a portion of a dwelling is not a new concept, especially in areas boasting lakes, rivers and other destination spots. Historically, renting the family cottage typically included advertising in newspapers within the GTA, renting to family friends, or by word of mouth. In current times, the rental of family cottages is much easier and casts a broader geographical net with the use of several virtual platforms, such as but not limited to, Airbnb, Vrbo and HomeAway.

The virtual platform has increased significantly over the years and covers more than just renting dwellings or rooms, but in fact covers a wide range of goods and services known as the 'sharing economy'. The Province has defined the sharing economy as follows: "The 'sharing economy' refers to people using online platforms to sell or rent underutilized property, goods, or services and rating each other's trustworthiness through online reputation systems."

## **Advantages and Disadvantages of Short-Term Rentals in Brock**

Advantages of Short-Term Rentals in Brock:

1. Economic Development
2. Increase in Tourism
3. Increase in local business (i.e.: restaurants, shops, contractors, property maintenance etc.)
4. Increase in local recreation businesses (i.e. ice fishing, boating, beach front, sporting events, music festival, etc.).
5. Makes Brock attractive as destination site for events as they provide additional options for visitors of such events to stay within Brock Township – increasing number of places to stay within community – spin off benefits to local community businesses
6. Income for private Investors – increase income to offset cost of investment property or properties
7. Income for homeowners to offset cost of primary residence and create an income by renting part of such residence as a short-term rental.

Disadvantages of Short-Term Rentals in Brock:

1. Excessive Noise
2. Dangerous Use and/or use of Fire Works outside allowable dates and times as per by-laws.
3. Public Nuisance
4. Criminal Behaviour – Assaults, Drinking and Driving, Drinking and Boating etc., Drunk and Disorderly, Trespassing
5. Party Houses
6. Parking Violations
7. Garbage
8. Illegal Burning
9. General Disregard for local By-Laws and residents

It is important to note that the advantages and disadvantages do not relate to all short-term rental properties that are known to be operating within the Township of Brock.

### **Timelines - Response and Actions Township of Brock in addressing STRs**

Due to increased levels of complaints with regard to Short-Term Rental properties in 2020 and summer of 2021 from homeowners affected by short-term rental properties operating as “party houses” or short-term property renters and owners having a basic disregard for local by-laws and local residents who are no longer able to enjoy living at their homes, staff and Council determined that research should be conducted on the potential benefits or negatives of implementing a Short-Term Rental License By-Law or other options to address Short-Term Rentals to be ready for possible launch in late Spring of 2022.

In February of 2021 and August 2021 the Township of Brock had an open survey regarding Short-Term Rental Properties in Brock Township. The survey had a total number of 428 participating respondents. In addition to the survey, Council heard deputations and received correspondence from area residents on the issues surrounding STR’s and directed staff to put a plan in place and report back.

In the late summer and Fall of 2021, staff conducted research into those municipalities that have implemented a STR Licencing requirement or those who have chosen other types of enforcement options that have not involved the creation of a licensing system. Staff were able to identify a few key elements used within municipalities to address short-term rental properties. Some of these are as follows:

1. STRs addressed through Zoning By-Laws
2. STRs addressed through Business Licensing By-Laws
3. STRs addressed through Individual Short-Term Rental By-Laws and or Licensing By-Laws - application and fee process, a demerit system for licensed STR’s that infract municipal by-laws, special separation between STR’s, building and fire requirements, maximum occupancies, parking plans, and even the inclusion of noise monitoring hardware.
4. STRs addressed through enhancements to existing By-Laws and or creation of new bylaws to address some of the negative aspects of short-term rental properties or party houses. No specific by-law or licensing of STRs Used.
5. No action to address STRs – Wait and See Approach

On March 30<sup>th</sup>, 2022 a Public - Notice with respect to the proposed amendments to the Noise, Fireworks, and Burning By-laws as well as Notice with respect to the new proposed Public Nuisance By-law was given in accordance with the Township’s Public Notice Policy #AP6. The notice alerted the public to the 19<sup>th</sup> day of April, 2022 CoW meeting in which Council would be presented with a staff report to consider proposed amendments to the following by-laws:

By-law Number 2389-2011-PP - Noise By-law

By-law Number 2535-2014-PP - Firework By-law

By-law Number 2915-2019 - Burn By-law

And to consider the adoption of a new by-law:

Nuisance By-law 3117-2022

### **Purpose of Amendments & New By-Law**

**THE AMENDMENTS AND PROPOSED NEW BY-LAW** serve to address issues that have been brought forward to the municipality regarding short term and rental properties, party houses, and nuisances throughout the municipality.

At the April 19<sup>th</sup>, CoW meeting council was presented with staff report #2022-GG-007, entitled “Short-Term Rentals and Proposed By-laws”.

The report provided Council with the overall research staff had conducted to date regarding whether the Township of Brock should consider a Short Term-Rental Licensing By-Law or another option to address Short-Term Rentals for the upcoming peak rental season.

Highlights of the report included information obtained from other municipalities that currently have an STR licensing requirement, the common challenges that arose were the substantial increase in the administration of the STR licensing program as well as the increase in budgetary costs for enforcement and prosecution of non-compliant owners. The concept of ‘cost recovery’ with the STR licensing program is not net zero and often runs over budget. A great amount of cost, work and often hiring of 3<sup>rd</sup> party agencies to search for and manage and handled administration and or assist with enforcement of Short-Term Rental properties. The process is very complex and is handled in many ways throughout Ontario. Many municipalities have found is that the STR licensing program does not eliminate the ‘party house’ situations, which are the largest cause for concern and biggest nuisance for residents that live near these dwellings.

Having consideration for those concerns raised by residents, staff worked with the Township’s prosecutor to revise three of the current by-laws that most impactful not only for STR’s, but other situational occurrences that have raised related issues throughout the township. The areas of focus in amending the Noise By-law, Fireworks By-law and Burning By-law were to bring each of them into more current and relative vocabulary, the ability for enforcement officers to lay charges to persons on sight as well as owners who may not be on sight. In addition, staff and the prosecutor developed a new Nuisance By-law to add additional enforcement tools to deal with party houses and unruly short-term rentals.

Staff have had conversation with other agencies who also may or may not have legislation in place to assist with addressing short-term rental properties, such as Durham Region Public Health who confirmed that currently there is no requirement for STR’s to have inspections relating to drinking water systems or existing septic systems, other than when requested to test the drinking water system or when there is a failing septic system.

Staff’s discussion with Durham Region Police Services, North Division (DRPS), revolved around the proposed by-laws as well as the enhanced level of by-law enforcement. DRPS was encouraged and supportive of the staff proposal for the 2022 season and confirmed their

commitment in supporting our By-law Officers when called, dependent on priority dispatching.

The report asked that council consider for the 2022 summer season, an enhanced enforcement model for the Township of Brock by amendments to the Noise, Fireworks, and Burning By-Law and the adoption of a Public Nuisance By-Law.

At the April 19<sup>th</sup>, 2022 CoW meeting, report # 2022-GG-007, entitled “Short-Term Rentals and Proposed Bylaws”, was received; and Council directed the Clerk/Deputy CAO to prepare and present Public Nuisance By-law #3017-2022; Noise By-law #3018-2022; Fireworks By-law #3019-2022; and Burning By-law #3020-2022, attached as Appendix ‘1’, Appendix ‘2’, Appendix for consideration and adoption at the Council meeting to be held on April 25, 2022.

At the April 25<sup>th</sup>, 2022 CoW meeting, Public Nuisance By-law #3017-2022; Noise By-law #3018-2022; Fireworks By-law #3019-2022; and Burning By-law #3020-2022, were adopted.

Between April 25<sup>th</sup>, 2022 and May 19, 2022, the Township of Brock By-Law Enforcement and Animal Control Department and the Clerks Department worked both on the Public Communication plan, the hiring of a PT By-Law Officer for afternoons and weekends and two seasonal by-law officers to work late afternoon, evening and early morning shifts from Thursday to Sundays and only Holiday Mondays. In addition a training schedule, uniforms and on the job training had to be completed by the Supervisor and other FT and PT staff. Staff also worked out shared vehicle use with both the building and public works departments for use by seasonal officers.

The Public Communication Plan was immediately initiated and achieved as follows, with emphasis that the plan for communication focus not so much on enforcement, or the rules but more about how residents and visitors need to appreciate and respect the surrounding environment/community in a harmonious manner.

Public Communication Plan:

- 1) Enacted By-laws to be published on the Town’s website.
- 2) Communication letters with copies of the approved by-laws will sent to all Shoreline Residential property owners.
- 3) Information brochure or pamphlet on the respective by-laws will be included in the Township’s final tax bills.
- 4) Information brochures will be distributed to all known STR establishments as catalogued from the various virtual platforms. To ensure that owners of STR’s advise their tenants of the applicable by-laws.
- 5) Enforcement staff will continue to drop off education flyers and information as required in the field during enforcement patrols and/or investigations.

Please See Attached:

Appendix A- Breathe in the Summer Fun in Brock Letter to Shoreline residents

Appendix B- Website and Information Pamphlet on Strs and By-Law Amendments and New Nuisance By-Law

Appendix C- Sample Warning Letter to Known STR locations causing issues

During the Phase 1 enforcement project when staff have encountered frequent complaints or infractions, with repeating addresses, communication with the property owner has taken place to discuss the issues and how we can move forward to ensure that any future potential issues are diverted. In addition when encountering frequent complaints or infractions with repeating STR properties that are listed on virtual platforms, staff will be contacting the virtual platform when ownership or whether it is a property operating as an STR to inform them of the issues with the STR they are hosting.

On the 25<sup>th</sup> day of July 2022 CoW meeting, Council were presented with an update, within the Q2-report, # 2022-PS-007 on the Phase 1 – STR program for the months of May and June 2022 and at the August 22<sup>nd</sup>, CoW meeting staff updated on the Phase 1 – STR program for the month of July 2022. These reports/memos contained information on investigations, calls, emails and inquiries, or charges laid related to the Phase 1- STR program and previously mentioned by-laws for the month.

**Chart 1 – STR Specific Investigations – May 19<sup>th</sup> to September 05<sup>th</sup> 2022**

	NOISE	NUSIANCE	FIREWORKS	BURN
May (STR)	6	0	5	1
June (STR)	9	0	3	0
July (STR)	5	3	1	0
August (STR)	4	2	0	2
September (STR) *	1	0	0	0
Total # of cases	25	5	9	3

**Durham Regional Police Calls - May – July 2022 inclusive**

Noise Complaint Calls (specific to Brock Township) – 26

\*Comparing to the same time frame in 2021 this is a 28% decrease (from 36 calls in 2021)

Nuisance Complaint Calls (specific to Brock Township) – 0

Fireworks Complaint Calls (specific to Brock Township) – 0

Of the total number of noise complaints investigated by the DRPS, only 9 were related to properties that are known to be short-term rental or party houses. Eight of the complaints were noise related and

one coded as an on foot. No incidents resulted from these complaints and as such no charges or warnings were issued under the Municipal By-Laws by the DRPS. The police service is committed to continuing to support the Township of Brock By-Law Department regarding these types of incidents and to have an open line of communication for the purposes of reporting and enforcement.

Numbers of calls related to August and September have not yet been tabulated and received by DRPS but August results can be expected Mid September and September results Mid October.

#### Part 1, Part 2 (Parking), Part 3 Charges

July 30<sup>th</sup>, 2022 – Part 1 Charge for Noise was issued against a renter at a short-term rental (Thorah Pk Area) – Status: Waiting for First Appearance Date or Notice that fine has been paid

August 2022 – Part 3 Charges Laid against the owner of a short-term rental property (Thorah Pk Area). These charges are under the Nuisance By-Law and encompass the did between dates of May 2<sup>nd</sup>, 2022 and June 24<sup>th</sup>, 2022. Status: First Appearance Date November 2022

August 2022 – Part 3 Charges against owner of short-term rental property (Ethel Park Area) Noise and/or Nuisance Bylaws did between dates June 2022 – August 2022. Status: Awaiting Service

August 2022 – Part 3 Charges pending against owner of short-term rental property (Ethel Park Area) Noise Violation – Status: Awaiting Formalization of charges and evidence review

#### Part 2 – Parking Offences Charges

A total of 130 parking infraction notices were issued by the seasonal bylaw officers over the course of the Phase 1- STR enforcement program. Of these, more than 60% were due to either STR properties or party houses.

#### **Results and Findings – Phase 1 – STR enforcement (May 19<sup>th</sup> to Sept 11<sup>th</sup>, 2022 inclusive)**

The Phase 1 – STR enforcement began May 19<sup>th</sup> and operates until Sept 11<sup>th</sup>, 2022. Overall, the low amount of call volume received regarding Short-Term Rental properties or Party Houses was a surprise to staff. As discussed earlier, the Phase 1 – STR Enforcement centered around using four Township By- Laws; Noise By-law, Nuisance By-Law, Fireworks and Burn By-law which were all enhanced or written in order to assist By-Law Enforcement Officers by providing them tools to address by-law infractions related to and unrelated to short-term rental properties.

Not unexpectedly, there was an overall increase in the amount of calls to the By-Law Department in reference to the enhanced by-laws/new by-law and the amendments and new by-law have been proven to be effective Township wide, despite being created specifically to address short-term rental properties and party houses. Most calls are occurring in residential areas, not the lakefront but the tools and subsequent public education regarding the by-laws and increased enforcement has resulted in a positive impact Township wide and staff are happy to finally to be able to issue not only Part 3 charges but Part 1 fines at offending properties STR or not. It is important to note that of the STR properties that have been discovered to be operating in Brock, only 3-4 can be described as repeat offenders and owners or guests of those properties have either been warned, charged or fined as a result.

It would be fair to say that the Phase 1 – project also had a few other positive outcomes for the By-Law Department and the Township as a whole. The program clearly showed how effective having seasonal by-law officers working afternoons and evenings during the summer months had on effective

parking control, public liaisons and education. In addition residents were able to clearly see an increased level of enforcement by not only the result of quick response but, also, having officers out and about in the community in the opinion of staff made people start to rethink whether or not parties and other nuisance type activities should be avoided.

Parking enforcement and control received a huge boost from the seasonal officers and with the expected changes to the Traffic Control By-Law for the winter season and addition of permits for parking, seasonal officers would continue to be an asset to the Township of Brock. Staff recommend continuing this program and building upon the success of the Phase 1 – STR enforcement Township wide.

It is important also to recognize all Township of Brock staff who were instrumental in the success of the program, all staff from the Township of Brock By-Law Enforcement, Clerks Department, CAO, Fire Department, Public Works and Building. The program was not without challenges, especially in staffing levels as a PT By-Law Officer, hired in May to covering afternoons and early evenings on weekends left in June 2022 for alternative employment. This resulted in all By-Law Enforcement staff and Animal Control staff to fill a large void in coverage, a challenge at any time of year but especially challenging during the period of the year where staff vacations are most frequently taken. All staff in the Department collectively worked together to ensure that all promised hours were covered, and that backup would be provided should it be needed on weekends in all areas and back up for the evening and early morning shifts should one of the seasonal officer's call in. Pt staff should receive the most amount of praise as they were the most instrumental in training and in providing backup support to the seasonal officers and are a primary reason for the success of the Phase 1 – program. FT staff, and the Supervisor also contributed overtime hours and lieu to ensure program success. In addition, to help cover gaps of coverage, on weekends where there was no Statutory Holiday on Monday's, seasonal staff were permitted to begin shifts a few hours early to help support both regular By-Law staff and animal control staff when and where overwhelmed. This had a positive impact on call response and staff moral.

It is unknown why STR complaints are down or did not surface at the volume expected in the summer of 2022. Many reasons or guessing could be used to attempt and determine reasoning but, none would be based on fact and it is reasonable to conclude that this may have been an anomaly and a temporary reprieve. Some communities unlike Brock, saw a huge increase in short-term rental properties and the problems resulting during the same time period. Occupancy at known STR properties stayed steady according to data in Brock. It is possible the public education plan and presence of By-Law enforcement patrols worked in a positive way toward a below average summer of complaints regarding short-term rental or party house properties.

### **Further Research and Information to Consider Moving Forward**

As time permitted, Township staff were able to conduct proactive searches of potential STRs operating and advertising within the Township of Brock. Searches were conducted by reviewing different vacation rental platforms including but not limited to Airbnb, Vrbo, FlipKey etc. Identifying unlicensed properties is very time consuming given STR property addresses are not listed on the different rental platforms. Addresses are given once a booking has been made.

Since July of 2022 staff have only been able to officially identify less than 15 properties that are being used as short term rentals, though data obtained through research indicates a minimum of 56 active Short-Term Rental Properties in Brock. The properties staff have been able to officially identify as STR's have been verified by public complaint and through visits to properties verifying from renters



that they booked the rental through Airbnb or another booking site. No operator of a short-term rental has come forward and identified themselves officially to the Township of Brock, nor are they required to as there is no licensing platform in place addressing Short Term Rental Properties or licensing of such properties.

Of the known Short Term Rental properties, Clerks Department or By-Law Staff have contacted the property owners by telephone and/or registered letters to notify them of the amendments to the Noise, Fire Works, Burn By-Law and the implementation of a Nuisance By-Law aimed at addressing nuisance within the Township but also to address party houses and short term rental properties where such party houses or nuisance offences can occur. On more than one occasion registered letters are being returned unclaimed.

### **AirDNA Analytics**

The website AirDNA ([www.airdna.co](http://www.airdna.co)) provides STR data and analytics for towns and cities across the world. The two sources of data for AirDNA is scraped from Airbnb and Vrbo and also partner data from property managers and individual hosts.

According to AirDNA, Brock Township Ontario has 56 active STR listings. Active rentals are those that have had at least one reserved or available day in the last month. (July/August 2022) Of the type of rentals, 89% were entire house rentals. 80% of the rental channels used were with Airbnb, 11% on Vrbo and 9% on both platforms. The average type of size of the rental was 3.2 bedrooms / 7.6 guest upon average. The rental growth has been up 30% in the Q2 of 2022. Out of 5 points on Airbnb ratings, properties included these numbers averaged a score of 4.71 points, with over 83 percent rating the properties at or above 4.5

### **3.0 Related Policies / Procedures**

N/A

### **4.0 Financial / Budget Assessment**

Council had approved \$30,000 in the 2022 budget to cover the costs of two seasonal officers and any personal protective gear to outfit the officers. To date the actuals related to this budget are as follows:

- Seasonal Officer Salary (2 Officers) **\$25,259.96**
- Legal Costs **\$6040.98**  
(Note: Legal Costs associated with Township prosecutor for services rendered: amendments to the by-laws, creation of a new by-law and Short Form Wording. Expense covered in the Clerks Budget and considered a one time expenditure and not part of operating.)
- Cost of PPE Seasonal Officers **NIL**  
(Note: Staff were able to outfit seasonal officers with surplus By-Law clothing and surplus of a Personal Protective Vests or shared use of Protective Vest saved costs associated with PPE (shared vests are not ideal though and should not be used long term as they should be fitted to person using)
- Training Binders / Materials / Lunches **\$125.37**  
(seasonal officers commenced training a few days prior to the 19<sup>th</sup> of May 2022)
- Clothing/Uniforms/Officer Badges **\$587.84**

• Shoreline Communication Mail out	<b><u>\$726.80</u></b>
<b>Total</b>	<b>\$32,740.95</b>
<b>Total Operating</b>	<b>\$26,699.97</b>

Other payroll costs associated with this program with respect to non-seasonal officers such as Pt Staff and FT Staff can be calculated at a later date and incorporated into the 2023 budget.

Since implementing the program the Township prosecutor will be representing the Township of Brock in Court with regard to all Part 1 and Part 3 charges that are currently before the Courts and/or in the process of being issued and or all parties subpoenaed. It is important to note that additional expenses as they may relate to costs related to serving a summons, or costs related to court prosecutions, will also be subjective to the number of charges laid and the number of challenges to those charges. For Council's information the estimated cost to serve a person with a summons depends on geographic location and can range from no cost (owner lives in Brock and served by our Officers) to any where from \$70.00 to as much as \$250.00. With respect to estimated costs around prosecution and court trials the cost may vary depending on a number of factors, such as a Part 1 charge (set fine ticket) versus a Part 3 charge (summons to court). The other factors include if there is a request for an Early Resolution (ER) or the number of court dates required. These estimated costs can range anywhere between \$625.00 to \$1,175.00.

Though staff would be able to include the above costs within the body of this report, staff are not able to do so as these costs have not yet been made accessible or have been billed in their totality. Staff, with the approval of Council will ensure the full costs are presented in their entirety if fully known by the 2023 budget.

Staff can conclude that there will be court costs as the Part 1 and Subsequent Part 3 charges go before the entire court process, including prosecutors time, cost of service of subpoenas, number of court dates and whether there will be early resolution. As the court system is backed up, these full costs will likely not be fully realised for some time. Any potential revenue from issuing set fines is difficult to estimate at this point, as the total number of set fine tickets will be subjective to the number of complaints and non-compliant cases the officers will be dealing with this season.

Of note, other savings were made during the Phase 1 program. Though offered the use of works Department vehicles, staff only utilized these vehicles on very few occasions. Staff were able to adequately and effectively use the compliment of the By-Law pickup and Animal Control van to conduct the Phase 1 program without any disruption to regular duties etc. Keeping of the management and control of the vehicle use within the Department is expected to have had cost savings especially given the current compliment of by-law vehicles are not full size and thereby reducing cost of gas and reducing amount of wear and tear over multiple department vehicles.

**5.0 Climate Change Impacts**

N/A

**6.0 Communications**

Staff throughout the body of this report have identified the types of communications deployed in order to inform residents and operators of STRs of the Phase 1- STR enforcement program and of the newly

enhanced by-laws and new by-law implemented to help manage and control these types of rentals within Brock.

## **7.0 Conclusion**

Overall staff feel that the Phase 1 – STR enforcement program had a positive and effective result at managing STR properties, party houses and other issues found to be more prevalent in the summer months. It can be understood and concluded that the Township of Brock is not unique with respect to the issues surrounding STR's and the administration and enforcement surrounding Short-Term Rentals. Given the success of the program, staff will continue to actively research and will endeavour to find a delicate balance between regulations, compliance, and enforcement all while keeping the costs reasonable and managing existing capacity levels. The extensive work conducted to date, regarding any option to introduce a regulatory licensing framework will not be lost and will continue. With this report and with further follow up reports to follow as more financial information is obtained and results and updates from Court are obtained.

## **8.0 Recommendation**

BE IT RESOLVED THAT report # 2022-PS-13, entitled "Short-Term Rentals Final Report 2022 be received for information; and

THAT Council support the Seasonal Enhanced Enforcement program for 2023 season with staff incorporating the final operating costs in the proposed 2023 budget.