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November 30, 2022

The Honourable Graydon Smith
Minister of Natural Resources and Forestry
Room 6630, 5th Floor
99 Wellesley St.
Toronto, ON
M7A 1W3

Dear Minister Smith,

We are writing to request that the Ministry of Natural Resources and Forestry (MNRF) take a lead role in resolving the floating accommodations issues in Ontario. Since this is a multi-jurisdictional matter, there is a need and an opportunity to take leadership. MNRF has already asked for public comment on the use of floating accommodations on waterways over Ontario's public lands and, as managers of crown land in Ontario, which includes the lakebed, is the logical lead government agency on this matter. Furthermore, as MPP for Parry-Sound Muskoka with knowledge of local concerns about floating accommodations, you are particularly well-placed to take on such a lead role.

The Georgian Bay Association (GBA) is an umbrella organization for 18 community associations along the east and north shores of Georgian Bay, representing approximately 3,000 families. We have been advocating on behalf of our land-owning members for over 100 years and estimate that we reach and influence around 30,000 residents of the Georgian Bay. Our mandate is to work with our water-based communities and other stakeholders to ensure the careful stewardship of the greater Georgian Bay environment.

In May 2022, GBA put together a strategic alliance (consisting of: Township of the Archipelago, Township of Georgian Bay, Township of Severn, Gloucester Pool Cottagers' Assoc., Federation of Ontario Cottagers' Assoc., and Great Lakes and St Lawrence Cities Initiative) to work together to advocate for proper regulation of floating accommodations.

Floating accommodations can take many forms, but the current focus is on converted shipping containers on rafts, which may or may not have: a small motor and retractable legs that can anchor to the lakebed.

Irrespective of the design, we submit that any floating accommodation, that is primarily designed as an accommodation unit and not as a vessel, should be regulated in the same way that floating accommodation structures are regulated in some of the other jurisdictions that have floating accommodations, such as Toronto and BC. In Ontario, the province should establish the regulations for municipal oversight and enforcement.

The regulations should require permanent mooring of all floating accommodations (homes) at a shoreline facility, with hook up to water, sewage, hydro etc. (as available) and access to municipal services such as garbage collection/disposal. They should not be permitted to moor anywhere they wish in Ontario lakes and rivers, for the reasons set out below.

Environmental Concerns:

- 1) Improper materials for construction such as old shipping containers and un-encapsulated polystyrene foam
- 2) Potential of pollution from improper disposal of black water, grey water and/or garbage
- 3) Disruption of sediment on the lakebed if “jacks”/pillars are used to anchor in place and consequent dispersal of heavy metals in the sediment, such as mercury

Safety Concerns:

- 4) Non-navigable, often requiring towing by another vessel, and consequent inability to avoid collisions with boats, shoals etc.
- 5) Improper manufacturing regulatory oversight of such issues as stability in rough weather/boat wakes, fire code and the consequent safety of those on board
- 6) Danger to boaters (day or night) from being immobile and blocking navigation channels etc.*

**Please note that the residences of 95% of our members are water access only, which greatly increases the extent of regularly used navigation channels on the east and north coasts of Georgian Bay, and exacerbates the safety concerns around any floating accommodations that might be located in this area.*

In order to put in place effective regulations, there are some jurisdictional issues that need to be addressed:

- These floating accommodations are being improperly licensed by Transport Canada as a vessel, which has resulted in no coherent provincial/municipal regulation and oversight, including no taxes paid
- Many government agencies need to work together to ensure proper regulation and oversight, including:
 - Transport Canada on the vessel licensing issue
 - Ministry of Municipal Affairs and Housing on municipal regulation and Municipal Property Assessment Corp on taxation
 - Support from the Ministry of Environment, Conservation & Parks and Environment and Climate Change Canada on the environmental issues
 - Support from the Department of Fisheries and Oceans on issues relating to use of the water and their lakebeds

There is also a need to develop safety and manufacturing standards for floating accommodations to ensure structural integrity.

As you know, Gloucester Pool Cottagers Association wrote to Premier Ford on this matter earlier this year (attached for reference purposes) and Great Lakes and St. Lawrence Cities Initiative passed a resolution on this matter and then wrote to both yourself and Transport Canada (also attached for reference purposes). These letters provide additional input and recommendations on how and why it is important to move to proper regulation of floating accommodations, which we support. For instance, Gloucester Pool Cottagers' Association has suggested the formation of a province-led municipal task force as the means of addressing the regulatory issues and providing the framework and guidelines municipalities will need.

We look forward to hearing from you, and would welcome the opportunity to discuss this matter further with you and the strategy group listed above.

Yours sincerely,

A handwritten signature in blue ink that reads "Rupert Kindersley". The signature is written in a cursive style with a horizontal line underneath the name.

Rupert Kindersley
Executive Director