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via email

The Honourable Omar Alghabra
Minister of Transport
330 Sparks Street
Ottawa, Ontario
K1A 0N5

Dear Minister Alghabra

Water Aerodromes

We are writing to request that your ministry tighten up the Canadian Aviation Act Regulations ("CARs") governing the construction of aerodromes on water and shorelines to ensure that such structures are subject to municipal planning regulations and provincial environmental impact assessment processes. Currently this is not the case, and the matter is causing concern, as evidenced by this petition: [Petition e-4364 - Petitions \(ourcommons.ca\)](#), which has the support of MP Scott Aitchison.

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.

It is problematic that waterfront property owners wishing to construct a water aerodrome are able to bypass the planning and environmental impact assessment processes, under the guise of the Aeronautics Act, that all others are required to follow for shoreline development projects.

In particular:

- Current regulations for water aerodromes fail to state that mixed-use docks and structures are not permitted;
- Current regulations do not require a property owner to inform or consult or be transparent with local authorities about their plans, or require that they provide a copy of the registration or certification documents;
- Registration and certification of water aerodromes are done without environmental impact assessments from provincial and municipal authorities; and
- Registration and certification of water aerodromes are done without safety assessments from local authorities.

There are recent examples of property owners exploiting this loophole on a lake in Sequin Township, and on 3 Mile Lake, where a pilot built a water aerodrome to use as a boathouse.

Under the current regulations, there appears to be a potential to build very large shoreline structures that are classified as water aerodromes. Since local municipalities and the residents on lakes throughout Canada go to great lengths to ensure that shoreline structures are built sustainably and have a limited impact on neighbourhoods, allowing such structures to be built outside of local processes should not be permitted.

In order to avoid this unintended consequence, all that appears to be needed is an amendment to the current regulations (CARS) specifying that:

1. Water aerodromes follow the same requirements as land aerodromes, making it mandatory for property owners to consult with local authorities prior to construction of a dock or structure; and
2. Mixed-use docks and structures will not be protected under federal jurisdiction.

We hope you agree that these are reasonable and responsible regulation changes that will help protect the environment on Canadian Lakes and maintain a level playing field for all shoreline construction.

We look forward to hearing from you on this request, and would welcome the opportunity to meet either virtually or in person to discuss this matter further. Thank you for your attention.

Yours sincerely,



Rupert Kindersley
Executive Director