

National Capital Authority – Seaplane Proposal submission

YMCA of Canberra Sailing Club

West Lake is the busiest section of Lake Burley Griffin and is used for a range of recreational activities. These include sailing, rowing, swimming, sailboarding, kiteboarding, stand-up paddleboards, dragon boating, fishing, recreational electric boats and canoeing.



The above photograph was taken during the demonstration flight and is a view of the seaplane taking off over a fleet of Canberra Yacht Club sail training boats with children sailing them. This photograph was given to me at the time by a member of my sailing club who is an experienced pilot and engineer. He was deeply concerned regarding the lack of safety protocols observed, an engine failure on take-off could have had catastrophic consequences.

The YMCA of Canberra Sailing Club has sailing safety concerns regarding a seaplane operation in West Lake, in particular, the risk of collision with sailing boats.

- All sailing boats have trouble taking urgent avoiding action in light to no wind conditions. That is, they cannot get out of the way.
- When under sail, the boat skipper is facing and looking forward and will not be looking for a seaplane coming from behind, until the engine noise is heard. This may be too late to take avoiding action. The seaplane may need to undertake a low-level flight to alert lake users to the plane's intention to land.
- In heavy wind, the noise from the wind, the sails flapping and the water noise makes it difficult to hear anything else. There is a high probability that a seaplane will not be heard nor seen in high wind situations.
- At times of multiple large sailing events with many interstate competitors, there may be more than 150 sailing boats on the water in West Lake. The sailing boats will be focusing on sailing and avoiding collisions with other boats, rather than the potential danger of a seaplane being included in the mix.
- There is a large range of skill levels amongst sailors, ranging from learners through to novice then experienced sailors as well as some sailors having a mix of physical & mental disabilities. The risk of some sailors not having the necessary skill levels and experience to avoid a seaplane is high.
- Seaplane propeller (air)wash can be significant and may greatly affect close by sailing boats. Inexperienced sailors will be at high risk of unplanned capsize and potential injury.

The YMCA of Canberra Sailing Club understands the Australian Civil Aviation Safety Authority and the Australian Maritime Safety Authority may consider a suitable waterway as an uncontrolled aerodrome and thus, the seaplane must obey all regulations as if the seaplane is considered a motor vessel. These regulations should minimise risks to sailors and other lake users. The most significant regulation for sailors and the proposed seaplane venture is the following.

International Regulations For Preventing Collisions At Sea, 1972

Rule 18

Responsibilities between vessels

e) A seaplane on the water shall, in general, keep well clear of all vessels and avoid impeding their navigation.

The above regulation has the following meaning for giving way under the general principal of right of way boats.

Right of way

When the seaplane is taxiing slowly on the water it is considered a power-driven vessel and will give way accordingly.

When taking off and landing the seaplane is required to give way to all vessels.

Outside of the above identified safety risks, the YMCA of Canberra Sailing Club has other concerns.

- the potential for significant disruption to competitive events such as sailing regattas.
- the potential for disruption to school, after school and school holiday sail training and adventure programs.
- the potential for a reduction in the number of people utilising lake-based programs due to safety concerns.
- the inability of the club to undertake normal sail activity programming, with subsequent impacts on the financial viability of our club.
- seaplane services may not have long term financial viability, however by the time seaplane operations cease, our lake-based clubs may have folded.
- the proposal has the potential to prevent all Canberran's using West Lake due to high individual and entity risks.
- people who use the lake 2 or 3 times a year are not going to remember the potential for a seaplane being in West Lake, let alone landing times.

- Right of way rules must be stated at every water entry point and clearly understood by water users, irrespective of skill level. On Lake Burley Griffin, all powered vessels must give way to sailing and non-motorised vessels. There is a 2nd level of rights associated with the motorised vessel and a vessel with less ability to alter course. For example, a rowing boat is considered a powered vessel when being rowed, however, has less manoeuvring ability than a motorised vessel.

We consider the safety risks associated with seaplane operations in West Lake to be significant. A viable and safer alternative is the use of Central Basin as a take off and landing area for the seaplane, posing significantly less risk to sailors and other lake users. Sailing boats rarely visit Central Basin. The available water area in Central Basin is similar to the West Lake and the Black Mountain obstruction is less of a risk for the seaplane.

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