

From: [REDACTED]
To: [Seaplanes](#)
Subject: Seaplane Proposal personal submission - Eric Hines
Date: Tuesday, 22 June 2021 2:41:07 PM

Eric Hines personal response to Seaplanes on LBG discussion paper.

Mr Andrew Smith, Chief Planner, NCA,
Dear Andrew,

Thank you for the opportunity to comment on the Seaplanes on Lake Burley Griffin discussion paper. I have competitively sailed and instructed both sailing and powerboat handling on the lake since 1975 and held memberships of the ANU and YMCA sailing clubs. While I have no problem with the basic concept, and the heritage and environmental aspects seem well covered, I believe that the safety implications have not been adequately recognised or considered in this document. I recommend that this proposal not proceed without significant changes to ensure the safety of the seaplane pilot and passengers, other users of the lake, and the general public. Specific problems with this proposal include but are not limited to...

Seaplane Manoeuvrability

The NCA paper stated that "...seaplanes are about as manoeuvrable as other power boats..." but the NSW Government Transport RMS publication "Rose Bay - safety guidelines for seaplanes and vessels" states quite clearly that "Neither seaplanes, nor sailing boats can reverse or manoeuvre quickly, especially in confined areas. For instance, in strong winds, seaplanes have difficulty turning downwind...". Of these contradictory statements the NCA paper is in error in my experience.

Staying Clear

The proposal is for seaplane take-off and landing in West Basin which has been the main yacht racing course on the lake since I started yachting here; and possibly the only viable area on this small lake for this sport. Again, the NSW guidelines are explicit in stating that seaplanes are to "Stay clear of established yacht race areas...". I assure you that the NSW guidelines were not established out of politeness but from decades of experience of trying to solve the safety aspects of mixing seaplanes with racing yachts on Sydney Harbour, where I sailed from 1968 to 1975.

Unsafe Local Weather Anomalies

Seaplanes in the Sydney area operate mainly in coastal waters with relatively constant winds. Wind velocity in inland waters like Canberra have an accepted variability of +/- 40%. In Canberra the northwest is a common wind direction which seaplanes will have to take-off and land into. In this locality the wind oscillates either side of Black Mountain and the gusts exceed the +/- 40% variability already advised. The seaplane would have to safely negotiate take-off and landing in, e.g., a 10 kt westerly which changes in less than one second into a 30 kt northerly. A tripling of wind speed with a 90-degree wind shift almost

instantly. Independent advice should be gathered on the safety of seaplane take-off and landing in these conditions before risking pilots, passengers and other lake users.

Landing Maximum Wind Speed

The proposal states that seaplanes will land at Canberra Airport if the wind speed exceeds 30 kts. This is fine for the airport where real time accurate wind speed measurements are available. As these measurements are not available for the lake and allowing for the previously mentioned wind variability, the maximum wind speed should read 21 kts for the greater part of the lake and a lesser average speed for take-off and landing into Black Mountain. A local area meteorological study should give a level of certainty to this recommendation.

Seaplane Jetty

The proposal recommends an extension to the existing jetty at the National Museum of Australia to include "A floating pontoon and walkway... ideally be 10m x 10m." for temporary mooring. The seaplane will be serviced from a refuelling trailer on this jetty, should that be necessary. This jetty is also the permanent mooring of the museum's Paddle Steamer "Enterprise" which regularly steams the lake in summer. No mention is made of the safety aspects of the interaction between the seaplanes and this 50-tonne vessel. I suggest that pumping Avgas into a seaplane within 10m of a woodfired steam boiler may not pass OHSE requirements.

Demonstration Flight Take-off

As noted in the YMCA Sailing Club response, this take-off appeared to be aimed towards and directly over a group of children partaking in a CYC Sailing School program who could not avoid the plane due to lack of wind. I have asked the Civil Aviation Safety Authority for advice on this action (ENQ-21-122856) and, as I do not expect to receive a reply before the closing date for this submission, shall inform you of any response of relevance to this proposal.

Thank you for your consideration of my response. I am available to discuss any aspects of this proposal,

Eric Hines

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22 June 2021



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