

National Capital Authority – Seaplane Proposal submission

If introduced, the West Basin dual use as a seaplane landing / taxi way / take off and for non-motorised users (sailing, kayak, stand up paddle boards, Go Boats, electric boats, fishing (boat, kayak) windsurfing (foil, non-foil), kite boarding (foil, non-foil), wing boarding (foil, non-foil)) represents an unacceptable risk to all users and supervising organisations / committee members.

Detailed advice is required on incorporating a margin for error and adverse events to the plane (downdraft close to Black Mountain peninsular, sudden and severe wind direction change (up to 90 degrees), engine/mechanical failure, lack of physical separation between high and low speed users).

The unique topography incorporating Black Mountain, Sullivan's Creek, Black Mountain Peninsula and the islands generates localised winds. These changes are not shown on the Canberra Airport readings and official data held by the Bureau of Meteorology.

I am concerned about the seaplane operation because of my personal liability as a ANU Sailing Club Committee member, often as the Captain of Boats (vice / commodore). Senior committee members have a higher level of responsibility to manage risks. These risks are beyond our ability to understand, manage and mitigate.

The ANU sailing Club operates on an unsupervised basis. Trainees, having gained a basic sailing ability, are permitted to use the club any time, often on single person boats alone. It is understood that my legal responsibility, as a senior committee member, will operate even when I am at the ANU Sailing Club maintaining my personal boat. The seaplane proposal places unnecessary risk to me personally.

The ANU Sailing Club has significant committee turn over associated with students completing their studies. The committee is primarily students in the 17 to 22 age bracket. As such, it is very difficult to maintain corporate knowledge with the high turnover, and therefore maintain an appropriate risk management presence.

In West Lake, in particular, the risk of collision is high due to there being no physical separation on the water, and during the glide down and take off paths.

Additional issues include

- The islands block the ability of all users to have uninterrupted 360 degree view of their surroundings,
- Black Mountain Peninsula blocks the vision of the users of the seaplane during the glide down.
- Wind data available from the Bureau of Meteorology indicates there are differences in the 50 yr. and 30 yr. patterns, most likely occurring because of the recognised climate change (heating). This will impact planning of most likely landing directions.
- 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.
- All sailing boats have trouble taking urgent avoiding action in light to no wind conditions. That is, they cannot get out of the way.
- The lack of sufficient physical separation is likely to lead to the plane's propellor air wash adversely affecting boats, with sailors unable to anticipate its' impact, causing accidents and injuries.
- Inexperienced users, including children and trainees are unlikely to have pre-planned action plans to respond to the seaplane, and most likely will panic at such a close interaction.
- At times of multiple large sailing events with many interstate competitors, there may be more than 150 sailing boats on the water in West Basin. 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.
- Speed differences are significant between the various uses, and between foiling and non-foiling craft, which makes it difficult to judge movements. All foiling craft when stalled look the same as a non-foiling craft. They can quickly gain speed and become air bourne (on foils) and surprise the pilot.

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 sailing club has other risks.

- 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 Basin 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 Basin, 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.

I consider the safety risks associated with seaplane operations in West Basin to be significant.

A viable and safer alternative is the use of Central Basin where exclusive access can be controlled.

Grant Warner
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Sailor, paddler, sailboarder, sailing club committee member, sailing trainer