



Dear Minister Rodriguez:

Congratulations on your recent appointment as Minister of Transport. We wish you success in advancing the efficiency, sustainability, safety, and security of Canada's transportation system.

We are writing to request that you resolve a situation that has arisen in Ontario, concerning floating structures that are currently and erroneously classified by your Department as "vessels". In reality, these structures are designed and intended exclusively to be residences, not vessels. For this reason, we refer to them as "float homes" and strongly believe that they should be classified and regulated as such.

These floating structures pose a risk to the environment, safety, and navigation, but other Federal Ministries, (Environment/Parks Canada, Natural Resources), Provincial Ministries, (Environment and Natural Resources) nor municipalities are in a position to regulate them, since they currently fall under federal jurisdiction. Although Ontario municipalities do not have jurisdiction over these float homes, they are still expected to provide municipal services, including emergency services such as fire fighting and ambulance service. At the same time, such float homes pay no municipal property tax.

These structures are currently to be found near Port Severn, in the Kawarthas, and elsewhere in Ontario, but as we write, more are currently being built and marketed as floating residences to be deployed elsewhere in Ontario and beyond.

A solution to this growing problem rests exclusively with you, Minister. The solution we are seeking is for you and your Department to classify these structures as "float homes", thereby enabling the Province and municipalities to duly regulate their location, safety, and environmental conditions.

The good news is that your Department already does precisely this in British Columbia. In 2001, the BC provincial government asked Transport Canada to issue a document entitled "Standards for Float Homes and Live-Aboard Vessels in Victoria Harbour". With this step, the unregulated, growing problem of "vessels" being used as floating residences in Victoria was resolved. Over twenty years later, British Columbia enjoys a successful "float homes" sector, where these floating residences are located in designated locations in marinas, subject to electrical, sewage, environmental, safety and other provisions, and fall under municipal oversight. This is the exact solution that would resolve a growing problem in Ontario.

Unfortunately, our multiple appeals to your Department have fallen on deaf ears. We are told by your Ontario officials that the situation in BC differs from that in Ontario, in that the "float homes" in BC are permanently moored to shore, and have electrical and other utility hook-ups to shore, whereas the ones in Ontario do not. The historical context that your officials have overlooked is that the 500+ "float homes" in BC only have these features and controls because your Department, in their 2001 standards document, effectively forced them to do so.



In other words, your officials are unwilling to take the same steps to redress a growing problem in Ontario that they were willing to take in BC. They are unwilling to introduce national consistency.

As a signal to your ministry, the Minister of Natural Resources and Forestry Ontario has recently passed regulations governing float home mooring location and controls. Minister Graydon Smith has communicated to Ontario Mayors that his ministry is keen to partner with municipalities to manage and regulate Float Homes as soon as Transport Canada re-classifies them from vessels to Float Homes.

It bears noting that this situation has been reported widely in the press. Citizens, cottage associations, Members of Parliament and Ontario Mayors have written to your predecessor and to your Department, pleading for action. A series of Petitions have been submitted to the House of Commons. The Provincial and municipal governments stand ready to cooperate with Transport Canada in bringing this untenable situation to a pragmatic, sensible solution, in which float homes would fall under provincial and municipal oversight, thus allowing an orderly, safe, and environmentally responsible development of the float homes sector.

We thank you for considering our letter and respectfully ask for your support.

Sincerely,

Cheryl Elliot-Fraser
Co-Chair Float Homes Not Vessels Coalition

Stephen Sprague
Co-Chair Float Homes Not Vessels Coalition

cc

Minister of Environment and Climate Change, Steven Guilbeault
Minister of Energy and Natural Resources, Jonathan Wilkinson
Minister of Natural Resources and Forestry of Ontario, Graydon Smith
Minister of Environment, Conservation and Parks of Ontario, Andrea Khanjin
Shadow Minister for Transport, Mark Strahl