

December 11, 2023

Transport Canada
Tower C, Place de Ville
330 Sparks Street
Ottawa, ON K1A 0N5

Attention: Honey Walsh, Manager – Office of Boating Safety and National CMAC Secretariat

**Re: Consultation on modernizing the Vessel Operation Restriction Regulations –
Process for Requesting and Implementing Restrictions**

The Muskoka Lakes Association (MLA) would like to provide our comments on Transport Canada's proposal to modernize the process for requesting and implementing restrictions under the Vessel Operation Restriction Regulations (VORR).

The MLA represents over 11,500 people who are lakefront property owners and users in the District of Muskoka. Our mission is to promote the responsible use, enjoyment and conservation of the unique Muskoka environment. Our activities are extensive ranging from water quality testing to advocating for responsible government, fair taxation and responsible land use policies. The MLA is Canada's oldest lake association and has been active in the region since 1894.

In our membership survey conducted in May 2021, 62% of respondents identified an 'increase in boat wakes' as something they worry about for the future of Muskoka. In addition to the manifold risks to human safety of uncontrolled boat wakes, we firmly believe the preservation of shorelines in Muskoka is absolutely crucial to the long-term health of both the local environment and the regional economy. As such, the MLA strongly supports the proposed changes which would allow the Minister of Transport to:

- Use "Incorporation by Reference" to modify the VORR schedules more quickly
- Issue Ministerial Orders for implementing restrictions on pleasure craft activities not currently listed in the VORR, before going through the full regulatory process

We appreciate that these changes will reduce the time for implementation of a new VORR and allow municipalities to request new restrictions which are not currently allowed. However, these changes will not address streamlining the process for municipalities to propose a restriction. The current process for municipalities is long and cumbersome, thereby demanding significant time, effort, and expense. For smaller, rural municipalities such as those in the District of Muskoka, this proves to be a barrier to addressing significant concerns unique to local waterways.

The MLA would like to thank Transport Canada for proposing these changes to the VORR and bringing this to the public consultation stage of regulatory change. We encourage Transport Canada to review and modernize the application process for municipalities seeking to develop a restriction specific to their local waterways. We also encourage you to move your relatively straightforward proposed amendment through the process as quickly as possible to make our lakes safer and to protect the shoreline and water quality for all.

Sincerely,

A handwritten signature in black ink, appearing to read 'Susan Eplett', with a large, sweeping flourish at the end.

Susan Eplett
President
Muskoka Lakes Association