

# Does Toronto need two airports?

Questions the City of Toronto should ask about the island airport  
and its future



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## **Executive Summary**

Ports Toronto (“PT”) has asked to amend the Tripartite Agreement (“TA”) governing the island airport (also known as Billy Bishop Toronto City Airport or BBTCA) to extend the existence of the airport past the TA’s expiry in 2033. That means the island airport would continue to exist for perhaps a further 50 years (until 2083) instead of closing.

PT also asks to build Runway End Safety Areas (RESAs), required by recent aviation safety amendments. The cost could be up to a \$130 million, according to PT (and could be higher), in view of the runway’s unusual setting surrounded by water.

Because Toronto’s major airport, Pearson International Airport, is only about 20 kilometres from the island airport, the decision facing the City is really whether it needs two airports, one small, for several more generations.

While airports are normally a matter of federal jurisdiction, in this case the City, as part owner of the land and a party to the TA, gets to decide whether it wants one airport or two. Now is the time for the City to explore the benefits and costs of the various options.

Closing the island airport in practice means that Porter Airlines would simply move to Pearson (as it’s already doing). So City Council has a once-in-lifetime chance to decide in effect if it prefers consolidating aviation at one airport. This would free the current island airport lands for other uses perhaps more appropriate to the unique setting of Toronto Island, close to the downtown core and waterfront.

It is our understanding that City Staff are currently preparing a Report for the meeting of Executive Committee of City Council on December 5, 2023. The Staff Report will make recommendations as to what process should be followed, and what studies need be done, before Council can respond to or decide on PT’s request.

This paper outlines the apparent options, and poses questions that we believe the City should study as part of this process.

The City should invest significant resources in evaluating and investigating the benefits and downsides of the options.

This process must include robust public consultation and dialogue. PT should of course participate in this process, but should not run it. Asking PT if the City needs a second airport like asking a barber if you need a haircut.

In particular, the City should study who if anyone really wants two airports. Who benefits? Do the downsides outweigh any benefits?

Downtown airports are rare. The City should investigate why.

This is a historic opportunity for the City and the people of Toronto to have an important dialogue about the future development and evolution of the waterfront and downtown core.

### **Background: the TA and PT's Request**

The TA permits the island airport to exist. It expires in 2033 with no provision for renewal or extension. The TA, signed in 1983, restricts noise levels but not the number of take-offs and landings, except as constrained by noise levels. It prohibits jets. The TA is in effect the lease on the airport lands.

The City of Toronto, as owner of 20% of the airport lands, is a party to the TA, along with the Government of Canada and Ports Toronto. The City must agree to any amendment to or extension of the TA.

The island airport is owned and administered by PT, a port authority under the federal *Canada Marine Act*. Under 28 of the *Act*, a port authority must engage in “port activities related to shipping, navigation, transportation of passengers and goods, to the extent those activities are specified in the letters patent to be necessary to support port operations.” The *Act* requires a port authority to be financially self-sufficient. That is, PT's priority by law must be its own financial survival, not the public interest.

PT owns specified lands on the Toronto waterfront including 78.5% of the airport lands as well as some other smaller properties around the waterfront.

PT's powers have been expanded by letters patent issued by the federal cabinet over the years to include activities that are not necessarily port-related such as running an airport. In addition to the airport, PT operates the Port of Toronto and a marina, and rents out land for a film studio and storage.

By far the largest portion of PT's revenues comes from the island airport. PT wants to extend the TA and keep the airport running to keep this revenue coming as long as possible.

PT can declare land it owns "surplus", then sell it, and keep the money rather than turning the proceeds over to the federal treasury. The amounts can be large; for example, PT sold its old headquarters and the surrounding lot at 30 Bay Street in 2017 for \$96 million.<sup>i</sup> It kept the money.

PT has requested that the City agree to extend the TA past 2033, presumably for a further 50 years (it has not yet specified the length of the extension it seeks).

PT has also proposed amendments to the TP allowing it to build Runway End Safety Areas (RESAs), extensions to the runway at both ends to allow more space in the event of emergencies. This is required at all airports above a certain size by amendments to the Canadian Aviation Regulations,<sup>ii</sup> published in December 2021. The island airport must comply by January 2027.

There are three possible options for complying with the RESA amendments:

Option 1: Revise the length of the "declared distances", that is, reduce the official length of the runway by 44 metres;

Option 2: install an Engineered Materials Arrestor System (EMAS) within the existing land mass;

Option 3: Land mass expansion, that is, lakefill at either end of the runway. This seems to be the option preferred by PT.<sup>iii</sup>

The cost of compliance with RESA was estimated by PT at \$50 million to \$130 million in 2021. That is likely not financially feasible unless amortized over many decades.

Permitting RESAs in some form, or not, is therefore intertwined with the question whether the TA should be extended.

### **Planning status of the island airport**

A City Staff Report "Request to Amend the Tripartite Agreement for Billy Bishop Toronto City Airport", November 21, 2013,<sup>iv</sup> summarizes the airport's planning

status as follows: “The extensive discussion of Toronto’s waterfront in the [Official Plan] signals its importance as a City-wide asset and regeneration area. Within this framework, the airport is designated *Park*.” [Italics in the original.] (p.18).

The 2013 Staff Report continues: “The OP does not specifically address BBTCA in the general text or secondary plan for the central waterfront. It only addresses BBTCA specifically through an area-specific policy, Site and Area Specific Policy (SASP) 194, which, while supportive of the continued use of the airport lands for aviation purposes, requires that the airport operate in accordance with the lease arrangement between the City, the TPA, and the Government of Canada (the Tripartite Agreement); *that the lands revert to a park or a mix of park and residential uses should the airport close*; and that revisions to the Tripartite Agreement ‘may be undertaken, provided that the City is satisfied that *improvements to airport facilities and operations can be made without adverse effects on the surrounding residential and recreational environment.*’” [Italics added] (p. 18).

Ultimately, the question facing the City is: would it rather have two airports or one? Closing the island airport would make possible the alternative uses mentioned in the City’s planning documents, “park” or “a mix of park and residential uses.”

If the TA were revised as PT Toronto requests, is the City satisfied this could be done “without adverse effects on the surrounding residential and recreational environment?”

The City must examine these questions now in order for Council to make an informed decision. The analysis must include a full exploration of alternative options in order to be meaningful.

### **Importance of Public Consultation**

City Council should be informed in this decision-process by extensive public consultation. Decisions about collective public assets are more likely to respond to public needs if they are informed by robust public discussion. Public consultation has been an integral part of the thirty year process of waterfront revitalization in Toronto. This decision is perhaps more fundamental than any previous one in the history of our waterfront.

An effective public consultation will ask:

1. What is the decision at hand, and when does it need to be made?
2. Who has the mandate to decide and who has an interest in informing the decision?
3. What are the issues and opportunities?
4. What are the options?
5. What are the reasons behind different points of view?<sup>v</sup>

It is particularly the fourth question, “what are the options” which has received inadequate attention so far, and where background work is most required. The City not PT should run the process.

Resources should be devoted to defining and weighing the pros and cons of the options, including, and perhaps especially, the option of maintaining duplication of airport facilities. Only then can Council and the people of Toronto fully explore the issues and opportunities.

In general terms, the options appear to be as follows:

1. Maintain airport duplication as requested by PT, extend TA, with amendments necessary to authorize RESA in one of the three ways outlined above;
2. One airport at Pearson; the 78.5% of the airport lands owned by PT at the island would continue to be owned by PT but repurposed for non-airport activities consistent with the *Canada Marine Act* (port facilities, storage, marina, film studio etc);
3. One airport at Pearson; the 78.5% of the airport lands owned by PT would be divested by PT on some reasonable basis negotiated between the City and the federal government, the ultimate owner of PT. Those lands would be combined with the 20% owned by the City, and repurposed to become a park, likely containing large-scale amenities/attractions;
4. One airport at Pearson; the 78.5% of the airport lands owned by PT would be divested by PT on some reasonable basis and transferred to the City, Waterfront Toronto or one or more other agencies or private entities, and repurposed as a mixture of park and residential uses.

There may be other options, depending on what PT requests. On October 16, 2023 it proposed “to modernize other elements in the current agreement” but has not yet clarified what other elements it seeks to modernize. It might propose amendments to the TA allowing expansion of the island airport to allow jets or to make other substantial changes to the status quo.

### **The PT request: continue duplication of airport facilities by extending the TA, and building RESA**

This option requires compliance with the RESA amendments. Therefore, to begin with, information is of course required as to which of the three possible types of RESA-compliance PT proposes.

What will the proposed RESA build-outlook like? How long will it take to build? If lakefill is proposed, what environmental effects will it have on water quality, fish habitat, air quality, livability for nearby residents and visitors, climate change etc? Will it change or enlarge the Transport Canada object limitation surfaces (OLS, defined areas in the sky near the runway that must be free of obstructions)? What are its pros and cons compared with the other RESA options?

How much will it cost? How will it be financed? Assuming airport users or taxpayers will directly or indirectly finance it, what will its effect be on the cost of travel at the island airport in future? What will be the resulting effect on the business viability of the island airport, compared with Pearson or other nearby competing airports?

We know that the expense of compliance with the recent Transport Canada RESA amendments is far higher at the island airport than at any other affected airport in Canada. The island airport is surrounded on three sides by water; RESA could require expensive landfill.

Is the high cost of compliance with the RESA regulations at the island airport a symptom of a larger problem: in the long term, as safety regulations become more stringent, will shoehorning an airport into the available limited space on the harbour become more difficult and ultimately untenable as population density and waterfront revitalization evolves?

The City should investigate this.

## **Aviation safety concerns; what is the long-term picture?**

The island airport is unique among Canadian airports in being surrounded by water, and located close to residential buildings, not far from Canada's tallest buildings. It does not have the buffers (empty grassland, low-lying industrial buildings) that would normally surround an airport of its size.

Even if RESA were built, is the island airport safe in the long run? What further regulation-mandated changes may be on the horizon, and what might their effect be on the city and harbour in future? Aviation safety rules tend to become more stringent over time.

It is our understanding that the island airport at the present time would not comply with international safety norms such as US Federal Aviation Administration (FAA) requirements, or European equivalents, due to its proximity to obstructions such as tall buildings, water and bird nesting areas (a potential source of bird strikes).

Are we correct in this belief? If yes, does it matter?

If the airport is to continue to exist for decades to come, might Canadian law or international treaties governing air travel now or in the foreseeable future require that the island airport be upgraded and changed to comply with FAA or other evolving safety standards? Why do US carriers not use the island airport now?

If intrusive build-out and changes will eventually be required, what are the implications for the surrounding City, harbour, parkland etc?

For example, might the requirements at some point include approach lighting, structures extending hundreds of metres into the lake at both ends of the runway?

Aviation regulations are complex; the City will require independent aviation engineering advice to evaluate and understand this. The City should not rely on PT's experts and consultants, but should initiate a peer review process or some equivalent to investigate for itself.

Note that safety-related requirements of the 2013 jet proposal, such as the need for obtrusive jet blast barriers and sound walls in the middle of the harbour if jets were allowed, were not disclosed initially by the applicant Porter. These problematic



features only came to light when questions were raised by local resident groups such as the Greater Waterfront Coalition.

If the airport is indeed below US safety standards, is that safety profile (a) unacceptable for Canadian travellers and (b) a protectionist measure contrary to Canada treaty obligations. If so, does all this imply that extensive modernization and intrusive new build-out will sooner or later be required?

This is the time to investigate the long-term likely trajectory of such changes, rather than responding to new regulatory requirements on a piecemeal in future years as they may arise. Such changes may at some point become unworkable and impractical given the unusual and sensitive location of the island airport.

### **Transportation efficiency concerns: Duplication of airport infrastructure**

The island airport is located about 20 kilometres from Pearson International Airport, which unlike the island airport, is readily reachable by series 400 highways as well as the UP Express. The Crosstown TTC line will in due course connect with Pearson.

By contrast, the island airport is reachable only by one neighbourhood road, which has a community centre, a public school and playground on one side and a much-used public park on the other. There is no room to widen the road.

The island airport is not served by a dedicated rail link. As traffic and density on the waterfront increase, it will become more difficult to get to the Island airport from most parts of the City.

A transportation efficiency study is needed so that City Council can understand the implications of this airport infrastructure duplication. How many people benefit to what extent from the supposed “convenience” of having a second small airport on the waterfront?

What percentage of the GTA population saves time by going to the island airport versus going to Pearson, to what extent? Is this benefit confined to an elite group already living in the downtown core, and already well-served by the UP Express? At what cost to the local neighbourhood and waterfront revitalization is this “convenience”, when downside impacts, monetizable or otherwise, are taken into account?

A tiny percentage, 4% of island airport travellers, get there by bike, i.e. there is an “intermodal mix”. What percentage of the GTA population can feasibly do this? PT’s own figures are that only about a quarter of visitors don’t use a car to get there.<sup>vi</sup> That’s a lot of car-users going to the island airport that might take the UP Express if Toronto only had one airport!

Particularly in light of the UP Express, traffic and transportation efficiency studies should be done to measure the transportation efficiency, if any, created by the existence of the island airport, both in terms of travel within the city (compare the time taken to get to the island airport vs getting to Pearson from various points in the city), and air travel to other destinations (do travellers reach air destinations quicker flying from the island airport versus from Pearson?)

The island airport is limited in its ability to grow by its surroundings and proximity to the downtown core. As the 2013 Staff Report stated, “BBTCA’s downtown location in the heart of an active waterfront limits the growth of both the airport and its carrier’s travel distances...” (p. 9).

### **Lost Opportunity Costs**

There should also be an economic study of the lost opportunity costs of keeping the island airport open. Assuming that finite resources to spend on aviation infrastructure are available, are those resources best spent at the island airport, compared with Pearson or elsewhere where the same dollar investment may, by expanding capacity, benefit more travellers?

Are there opportunity costs to the City in lost tax revenue, or loss of recreational land for parks, if the alternative options in its planning documents, namely, “park” or “a mix of park and residential uses” are not pursued?

### **Long term viability of the island airport and its tenants**

How likely is the island airport to turn into a white elephant?

In other words, do the people of Toronto actually want it? The viability of Ports Toronto and of Porter Airlines both seem shaky and should be explored by the City.

### (a) Viability of Ports Toronto

PT, seemingly concerned about its own long-term financial viability, in 2021 sought a “partner” willing to inject capital, that is, it effectively put itself up for sale (RFI no. 2021-200-01). There were no takers. The City should investigate why not.

If the island airport is troubled and in danger of going out of business, does this imply there’s not much downside to closing it?

Revenues and passenger numbers should be examined. They may not have recovered to pre-pandemic levels at the island airport. Does this suggest long term decline? For example, PT’s 2022 financials appear to show that PT’s \$9 million in net earning in 2022 would have been a loss but for a one-time \$20 million windfall for the sale of the Parliament Slip to Waterfront Toronto (Canada Lands Agency around the same time sold a similar-sized water lot near the Canada Malting Towers to the City for one dollar; its mandate, quite properly, is the public interest, not maximizing its own revenues).

There won’t always be legacy land on hand for PT to sell to finance its operations. PT didn’t buy the land it now sells at high prices to other levels of government; the land was transferred to it for free by its predecessor Toronto Harbour Commissioners which in turn got the land for free when it was created by landfill early in the early twentieth century.

### (b) Viability of Porter

Porter Airlines had to abandon an initial public offering in 2010; there was no demand for the shares as it reported accumulated losses as of March 31, 2010 of \$44,505,000.

Porter’s correspondence, made public in recent litigation, says it costs around three times more to operate out of the island airport compared with Pearson, and as a result it doesn’t make money. Porter threatens to leave the island airport:

...the cost of Porter operating from BBTCA is now 173% (or ~\$50.9 million dollars per year) more expensive in 2018 than what identical operations at Pearson will cost. Furthermore, if Nieuport continues to implement the maximum allowable fees, this cost disparity will grow to 219% (or ~\$68.6 millions dollars per year) by 2022;...

*If Porter were to leave BBTCA, there appears to be no viable alternative for the [island] airport. There are only two other Q400 operators in Canada that could operate from BBTCA: Air Canada and WestJet. No other airline in North America (other than Horizon who operates only on the West Coast) has aircraft that are operating from BBTCA. Moreover, given that the cost of operating from BBTCA is almost 3 times that of Pearson, we do not think it is likely that either Air Canada or West Jet would significantly expand operations to fill the gap that would be left if Porter exited the market, and, in any event, the acquisition of sufficient aircraft (especially in light of the uncertainty surrounding future production of the Q400) and the training of flight crew to do so would take many years. [Italics added.]<sup>vii</sup>*

Porter has been clear that the excessive cost of operating at BBTCA is not viable and in the absence of a near term realistic solution, Porter intends to reduce its slot allocation to zero for the period starting May 1, 2020.<sup>viii</sup>

Porter has now begun operating out of Pearson. It is using the island airport less. There's been a significant decrease in the number of its flights into or out of the island airport in 2023 compared with 2022. Based on our analysis of public sources, Porter used 47% fewer slots on October 16, 2023, so far as we know a typical day, versus a year earlier.

Another letter from Mr. Deluce states:

With BBTCA costs now almost three times higher than Pearson, Porter will incur over \$50M of incremental costs in 2019 as compared to an identical operation at Pearson. But for this substantial differential in airport costs, Porter would be profitable. Instead, we forecast a 2019 net loss of ~\$35M.

Porter shareholders are not prepared to continue to fund a business without the prospect of financial viability.<sup>ix</sup>

Porter was unprofitable even before the pandemic. Is that still the case? The City should investigate.

Is it correct that demand for the island airport is dropping, and the cost of operating there is prohibitive? Will the cost of RESA make it worse?

What if Porter leaves the island airport altogether (as it has threatened), fails, or merely continues to reduce its operations at the island airport? How would each of these scenarios affect the long term feasibility of the island airport?

Historically, many airlines operating out of the island airport have failed. The issue arises: in the long term, is the island airport economically tenable? Is it a viable use of a limited valuable resource, namely land on the lake near downtown Toronto?

Are fares cheaper at the island airport, as has sometimes been claimed? If so, will this still be the case if \$50 to 130 million or more is spent on RESA, with the cost presumably spread among a relatively small number of passengers? Will this additional capital cost lead to a vicious spiral in which higher costs and lower revenues cause prices to go up, chasing away more users and so on?

Do airlines compete adequately on price now at Pearson? Are operational and sunk costs, per passenger, higher or lower at the island airport compared with Pearson? If higher at the island airport, as the letters above seem to indicate, is the island airport essentially a boutique facility serving an elite few?

What revenue does “general aviation” such as flight schools and recreational flying generate, and to what extent can those activities cover the operational costs of the island airport?

Those advocating continued duplication of airport facilities should bear the onus of establishing to the City’s satisfaction that the island airport is viable, despite financial troubles that seem to be getting worse, and will not turn into a white elephant if extension is granted.

### **How feasible is consolidation of airline operations at Pearson?**

While the City does not regulate aviation, a federal concern, it has control over whether the island airport should carry on, as a landowner and signatory of the TA. It has the right and in fact a duty to assess for itself whether Toronto needs or wants a second airport, to weigh the negative impacts, and look at the options

City should investigate the practicalities of consolidation of airport operations at Pearson. It should of course talk to Pearson's administrators and the federal aviation authorities. But ultimately, this is a decision it must make for itself.

Only two airlines operate at the island airport, Porter Airlines and Air Canada. Both already operate at Pearson as well. Air Canada has only a small number of slots at the island airport and flies only to and from Montreal. It flies out of the island airport only because Porter is there.

Operating at the island airport is about three times as expensive as operating at Pearson. As well, Pearson is free of the restriction on jets in the TA that Porter has long complained about and tried unsuccessfully to change.

Is there any obstacle to Porter simply moving entirely to Pearson, as it has threatened to do? Its operations would be only a small increase in the flight activities at Pearson, so this seems feasible.

City Staff should investigate and report on this before City Council decides.

### **Economic benefits**

The City must examine critically claims of economic benefits arising from the island airport. Do these benefits exist if there was only Pearson?

Does the island airport merely divert some visitors from Pearson who would come anyway if the island airport didn't exist?

Is there any proof that there are additive city visitors that come through the island airport, who wouldn't come if the island airport weren't there?

Similarly, to what extent does having two airports increase employment? If airport operations were consolidated, to what extent would airport employment also be consolidated at Pearson?

If employees at the island airport turn out to be surplus in the event of consolidation, and couldn't get a job at Pearson, does this imply that airport duplication may be economically inefficient?

The 2013 Staff Report stated: “BBTCA is one of the few downtown area airports in the world...” (p. 2). Is there an economic reason why downtown airports are so rare? Are there cities that are hurt or compromised for lack of a downtown airport? City Staff should fully explore these questions before Council makes a decision.

### **Tax base issues**

The City owns 20% of the 205 acre island airport site (40 plus acres). It earns no rent on this land, and minimal tax revenue. The 2013 Staff Report referred to “unresolved issues between TPA and the City including noise, traffic, and Payment in Lieu of Taxes (PILTS).” (p. 14)

The PILTs arrangement means that the City receives far less in taxes that it would from a commercial business. The amount of the City’s forgone taxes should be fully explored by the City, and made transparent to the public. If the City is in effect subsidizing the travel of a small elite of downtown travellers, it should be transparent with taxpayers and voters that it is doing so.

The financial impact of the various options on the City’s financial situation and tax base should be weighed as part of a careful study of all the options.

### **Some general comments on the “airport consolidation” options**

The pros and cons of each of the options should be investigated and weighed before the City makes a decision. Some preliminary observations about the options other than extending the TA are as follows:

If airline operations were consolidated, must Ports Toronto necessarily continue to hold the 78.2% of the airport lands it now holds? Would the federal government direct that land be transferred on a reasonable basis to the City or other appropriate party? This should be investigated through negotiation between the City and the federal government, the owner of PT.

While Ports Toronto has a long history of selling legacy lands for top dollar and keeping the money, is that appropriate in this case? That would seem to amount to a huge windfall for a government agency lacking a clear role; the Port of Toronto is one of the least active port authorities under the *Canada Marine Act* in terms of shipping tonnage.

The City should investigate the position of the federal government on the long-term ability of PT to keep proceeds from windfall land sales. This affects not only the island airport but also the cost to the city of waterfront revitalization in general.

The value of city parks is well known. No one disputes that downtown Toronto has a lack of parks. Consolidation of airport facilities represents an opportunity to make a large area on the lake near downtown available to the public for parks and recreational uses, reachable by tunnel from the mainland.

Possibilities might include playing fields, nature preserves but also amenities modelled on successful tourist attractions and draws such as Granville Island in Vancouver, Navy Pier in Chicago, the Distillery District etc. The public should be asked for ideas. One or more design competitions may be appropriate, perhaps administered by Waterfront Toronto, which has long experience in such matters.

The need for residential housing in Toronto is obviously urgent. Villiers Island and the surrounding areas are examples of mixed park and residential uses on the waterfront. As discussed above, this option is in the City planning documents for the island airport lands should the island airport close, yet it has received almost no attention or study as yet.

The City should explore the possibilities of a mix of park and residential uses at least on a preliminary basis now, ten years before the TA is due to expire.

To ensure it has time to adequately study the question, the City should not be driven by any deadline not of its own choosing.

This is the time for the City to have a once-in-a-lifetime dialogue about the possibilities.

### **Effect on livability and waterfront revitalization**

The harbour is vastly different from 1983, when the TA was signed. Waterfront revitalization had not then begun. Since then, billions have been spent. The waterfront has been transformed. More improvements are coming.

The 2013 Staff Report noted the population of the central waterfront area had increased by over 100% in the five years up to 2011 alone (p. 11). Density has



obviously increased much more in the decade since. Tall buildings appear constantly in downtown Toronto, some approaching a hundred stories in height. New cultural amenities constantly appear nearby. Future growth is likely to be equally rapid or more so.

In addition to the multi-billion investment by three levels of government in revitalization of Toronto waterfront, the City has made a large investment in the Bathurst Quay Neighbourhood Plan immediately beside the island airport and city side terminal, involving updating the Canada Malting silos, constructing a new park (Bathurst Quay Commons) and leasing a city-owned building on the site to Ireland Park Foundation who are renovating it into a cultural centre.

Is the value of this large public investment in the waterfront going forward enhanced or reduced by the continued existence of the island airport?

At what point does waterfront revitalization, and its related population and infrastructure growth, become inconsistent with the presence of a secondary, duplicative and financially troubled airport occupying over 200 acres of prime land by the lake?

The 2013 Staff Report concluded: “BBTCA’s operations currently have negative impacts, principally related to traffic congestion, noise and lessened enjoyment of the City’s waterfront.” (p. 28) Is that still true? Has the situation improved? The 2013 Staff Report expressed concerns about the island airport’s “fit within the central waterfront” (p. 27). That is still a key question the City should address.

What reasonable predictions can be made as to the effect of the island airport on the central waterfront and Bathurst Quay Neighbourhood in particular over a period of 60 years? Is the City satisfied that the benefits if any from the island airport will outweigh the costs and restrictions on future growth and livability on the waterfront that its presence would impose?

This is the time for the City to explore these questions.

### **Noise concerns**

The 2013 Staff Report states: “In Canada, the metric of Noise Exposure Forecast (NEF) Contours is used to represent noise exposure with a single number rating of overall aircraft noise, and the Agreement requires the TPA [Toronto Port

Authority, that is, PT] to regulate overall frequency of aircraft movements in order to contain the NEF Contour to within established parameters.” (p. 15)

The Staff Report continues: “Reliance on NEF contours has several limitations in terms of capturing the full impact of aircraft noise on surrounding communities... The NEF Contours contained within the Tripartite Agreement were established in the 1970s based on an airport fleet mix that was in operation at that time. It is appropriate to remodel the airport’s NEF contours based on the current aircraft fleet operating at the airport to determine the new standards for noise containment. *... Also, there is the possibility that a physical expansion of the airport will be required at BBTCA to satisfy Runway End Safety Area (RESA) requirements regardless of whether jet aircraft are approved. In that case, an updated NEF Contour should be established.*” [Italics added] (p.16).

Is the Staff Report correct that RESA makes changes to the NEF Contours in the TA necessary? This must be investigated.

Noise is an important impact and has health effects on the surrounding neighbourhood. The City should fully investigate and weigh the noise issues at the island airport when deciding which option to chose.

As well, this is the time to investigate what changes regarding noise are needed in the TA or any successor document in the event that the City opts to continue airport duplication, and keep the island airport.

Extensive work by Hal Beck, engineer, and the Noise Management Subcommittee of the PT Community Liaison Committee, has highlighted the problems with the NEF Contours as a method for measuring and controlling noise at the island airport.

The NEF Contour methodology is insufficient and perhaps inappropriate at the island airport location because it fails to take into account the effect of lake water between the runway and nearby residential buildings and public amenities. Noise may increase as it travels over water in certain circumstances.

As well, NEF Contours measure noise generated only while an aircraft is in transit in the air, approaching the runway, or climbing. They do not measure the noise an airplane makes while stationary or taxiing on the ground. Yet it is exactly such airplane movements on the ground that create the noise problems at the island airport.

Unlike almost all other airports, the island airport is NOT surrounded by empty buffer land, as Pearson is for example. It is close to a school and neighbourhoods where people live, and surrounded by water. Methods of controlling or monitoring noise that work elsewhere may not be appropriate at the island airport.

As part of its study of the options, the City must use appropriate experts to assess whether noise at the island airport can be kept within reasonable levels. It must arrive at a workable method for measuring noise and limiting it, and incorporate that regime in the TA or its successor document if the island airport is to be kept, despite the noise and other problems.

What are the noise impacts on the health and the well-being of local residents and waterfront users over the next sixty years, as density increases? Do the benefits if any outweigh such impacts?

This requires investigation before the City makes a decision.

### **Health impacts of the island airport**

The 2013 Staff Report noted at p. that Toronto Public Health (TPH) had retained Golder Associates Ltd. to conduct a Health Impact Assessment, which examined the potential health implications of BBTCA's existing operations, as well as the potential expansion for jets then under discussion.

TPH said the island airport even without jets is "an important contributor" to risk of air pollution causing respiratory, cardiovascular and cancer-related illness in Toronto, that it increased some adverse noise effects, and traffic conditions around the airport increase the risk of injuries especially to vulnerable pedestrians including children.

That report should be updated. The health impacts of the island airport existing for an additional 60 years must be compared versus a scenario where airport operations are consolidated at Pearson. Climate change impacts of the different options must also be compared.

An Air Quality Study by the University of Toronto is nearing final form, measuring the particulate matter emitted by the airplanes at the island airport, and resulting impact on public health. That work must be considered when the City

evaluates the health impacts of continuing airport infrastructure duplication on the waterfront.

### **Migratory birds**

Continued existence of the island airport will affect migratory bird flight patterns. As noted in the 2013 Staff Report at p. 22, “In 2000, Tommy Thompson Park/Leslie Street Slip was declared a Globally Significant Important Bird Area by BirdLife International in recognition of the globally significant numbers of colonial waterbirds that nest there.” This was of course long after the 1983 TA was signed.

Conservation measures by Toronto Region Conservation Authority and others, together with the gradual greening of the Leslie Street Split, have probably resulted in many more migratory birds on Toronto Island, Tommy Thompson Park and surrounding waterfront than there were in 1983.

Study is required of the continued effect of the island airport on migratory and other birds over the next 50 years, compared with a scenario where airport operations are consolidated at Pearson, and the island airport does not exist.

### **Traffic**

Study is required of the continued effect of the island airport on traffic over the next 60 years, compared with a scenario where the island airport does not exist and airline operations are in effect consolidated at Pearson.

The single road accessing the island airport cannot be widened; on the contrary it may get narrower. The City owns land along Eireann Quay, and nearby, which it rents for a dollar a year to PT. That City land widens road access to the island airport, and is the site of a parking lot used by PT. The City may soon devote this land to other uses.

If so, road access to and parking near the island airport, already limited, would be further reduced. The consequences in terms of congestion and parking problems near the island airport should be taken into account by the City before it decides whether the duplication of airport facilities in this waterfront location makes sense in the long run.

## **Emergency preparedness**

The recent disarray and confusion caused by a recent bomb scare alarmed the local community and highlighted problems with emergency preparedness at the island airport.

Inadequate emergency preparedness at the island airport was also identified as a concern in the 2013 Staff Report (p. 21).

In March 1983, a lengthy report by “The Intergovernmental Staff Committee of Alternative Access Options to the Island Airport for Emergency Response Services” concluded that “the present means of access [a ferry] *cannot meet* the necessary emergency response access requirements for the island airport,” [Italics added].

The report recommended a moveable bridge to allow access for emergency vehicles. This was never built. The island airport tunnel built years later is only for pedestrians, and not usable by emergency vehicles. Does this mean unsafe situation identified all those years ago was never addressed?

The City must revisit emergency preparedness in evaluating the options. Access by emergency vehicles is presumably easier and quicker at Pearson than it is on an island without a bridge. Should this factor weigh in favour of the City limiting itself to one airport, presumably well-served by emergency vehicles?

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- <sup>i</sup> Ports Toronto, its role on the waterfront, and its sale of the Toronto Harbour Commissioners building and lot at 30 Bay is discussed here:  
[https://d3n8a8pro7vhmx.cloudfront.net/waterfrontforall/pages/89/attachments/original/1613507523/181112\\_Submission\\_of\\_Waterfront\\_for\\_All\\_re\\_Ports\\_Modernization\\_Review.pdf?1613507523](https://d3n8a8pro7vhmx.cloudfront.net/waterfrontforall/pages/89/attachments/original/1613507523/181112_Submission_of_Waterfront_for_All_re_Ports_Modernization_Review.pdf?1613507523)
- <sup>ii</sup> <https://www.gazette.gc.ca/rp-pr/p2/2022/2022-01-05/html/sor-dors269-eng.html>.
- <sup>iii</sup> According to a letter from Ports Toronto to Transport Canada dated August 12, 2016.
- <sup>iv</sup> <https://www.toronto.ca/legdocs/mmis/2013/ex/bgrd/backgroundfile-64318.pdf>
- <sup>v</sup> “How Do We talk About the Future of the Island Airport?”, Nicole Swerhun, Third Party Public December 13, 2022. Deck for Waterfront for All Speaker Series, # 8:  
[https://assets.nationbuilder.com/waterfrontforall/pages/136/attachments/original/1694632144/Final\\_Presentation\\_-\\_W4A.pdf?1694632144](https://assets.nationbuilder.com/waterfrontforall/pages/136/attachments/original/1694632144/Final_Presentation_-_W4A.pdf?1694632144)
- <sup>vi</sup> Toronto’s Airport, A Powerful Economic Asset in the City’s Urban Core, Richard Florida and the Creative Class Group, January 2023, pp. 12, 13.
- <sup>vii</sup> Letter, Robert Deluce, President & CEO, Porter Airlines, December 21, 2018, to Mr. Neil Pakey, President & CEO, Nieuport Aviation Infrastructure Partners GP.
- <sup>viii</sup> Letter, Michael Deluce, President & CEO, Porter Airlines, May 15, 2019, to Mr. Neil Pakey, President & CEO, Nieuport Aviation Infrastructure Partners GP.
- <sup>ix</sup> Letter, Michael Deluce, President & CEO, Porter Airlines, May 3, 2019, to Mr. Neil Pakey, President & CEO, Nieuport Aviation Infrastructure Partners GP.