

November 21, 2013

Mr. John Livey
Deputy City Manager
City of Toronto
100 Queen Street West, 2nd Floor
Toronto, ON M5H 2N2

Sent via email
jlivey@toronto.ca

Dear Mr. Livey:

Re: Porter Airlines Proposal at Billy Bishop Toronto City Airport

Thank you for providing Toronto and Region Conservation Authority (TRCA) staff an opportunity to participate in the City of Toronto evaluation of the above proposal. Notwithstanding the participation of TRCA staff during this process, we would like to offer the following comments for further clarity.

It is our understanding that Porter Airlines has submitted a request to the City of Toronto to operate Bombardier CS100 aircraft (Jets) from Billy Bishop Toronto City Airport (BBTCA). As part of the proposal, the City has been asked to consider a runway extension. Approximately 200 metres of lakefilling at each end of the main runway would be necessary to accommodate the CS100 aircraft requirements for takeoff and landing.

TRCA staff has worked closely with the consulting team led by CH2M Hill Canada Ltd. to examine the aquatic and terrestrial environment in the immediate vicinity of the proposed runway extensions and to estimate the likely impacts of those extensions on coastal processes, aquatic and terrestrial habitat, flora and fauna. The aim of this investigation was not to recommend a course of action to the City of Toronto, but to present a factual outline of the existing conditions in the immediate vicinity of both ends of runway 08-26 and an estimate of the changes that may be caused by, and the regulatory requirements for the construction of, a 168m extension to both ends of runway 08-26. While there are many other elements to the Porter Proposal, TRCA will focus our comments on these two components.

The coastal conditions and the effects of the proposed runway extensions were assessed in support of a screening under the Canada Port Authority Environmental Assessment Regulations and the *Canadian Environmental Assessment Act*. The existing shoreline and coastal environmental assessment included bathymetry, water levels, wind, waves, currents, ice, coastal processes, fish and bird habitat, marine use and cultural heritage. The assessment was performed in a preliminary and cursory manner, and was based on information collected from key stakeholders and available in the public domain. Information gaps were filled, to the best of the ability of CH2M Hill, with assumptions based on sound engineering judgment and standard engineering practice.

Based on this assessment, it appears that the proposed runway extension will have a minimal and limited effect on the surrounding coastal environment. When additional information becomes available further detailed analysis will be required to fully understand the true impacts of this undertaking. TRCA supports the approach, analysis and conclusions of the CH2M Hill Canada Limited report.

Porter Airlines is a tenant of the Toronto Port Authority who is responsible for the maintenance and operation of BBTCA. It would therefore be the responsibility of the Toronto Port Authority, not Porter Airlines, to undertake the extension to the main runway to accommodate the new jets. It is important to note that the area where the works are to be undertaken is under the jurisdiction of the Toronto Port Authority and is exempt from TRCA's regulatory approval process. However, TRCA is very interested in providing guidance to the Toronto Port Authority through Aquatic Habitat Toronto (AHT). Aquatic Habitat Toronto is a group of regulatory agencies that meet on a regular basis to discuss all in-water work along the Toronto waterfront. Providing advice and timely review for undertakings is a primary directive of AHT. The Toronto Port Authority is encouraged to discuss the runway extensions and any required environmental assessments with Aquatic Habitat Toronto if the Porter Proposal moves forward to a planning stage.

Tommy Thompson Park (TTP), owned by TRCA, and jointly operated with the City of Toronto, is located approximately 3.6 km away from the east end of the main runway. TTP is a unique urban wilderness, minutes from downtown. The park is located on a man-made peninsula, formally known as the Leslie Street Spit, which extends five kilometres into Lake Ontario and is over 500 hectares in size. The park represents some of the largest existing natural habitat on the Toronto waterfront. Wildflower meadows, cottonwood forests, coastal marshes, cobble beaches and sand dunes are just some of the habitats found at TTP. Wildlife, especially birds, flourish at the park which provides one of the best nature watching areas in the GTA.

In 2000, Tommy Thompson Park/Leslie Street Spit was declared a Globally Significant Important Bird Area by BirdLife International. This designation was awarded to TTP due to the globally significant numbers of nesting colonial waterbirds; the nationally significant numbers of waterfowl during migration and over winter; and the large concentrations of songbirds during migration. TTP is an amazing spot to bird watch - over 300 species of birds have been recorded at the park, including at least 55 breeding species. The park is an important stopover during migration for many bird species that need to rest and refuel to continue their migration. In addition to many species of songbirds, other migrants include raptors, waterfowl and shorebirds.

As the land manager and steward of the bird colonies that utilize Tommy Thompson Park, TRCA is very concerned about the potential impact the introduction of jets to BBTCA may have on these important colonies. Given the substantial increase in the populations of some large flocking birds at TTP during the past few decades, and the increase in aircraft numbers and activity at BBTCA, it is inevitable that there will be an increased risk of bird strikes. Approximately 80% of all bird strikes take place in the landing or takeoff phases of flight. The public outcry, media focus and ongoing litigation that will inevitably result from a wildlife-caused jet-transport accident, motivates many airport operators to do whatever is necessary to avoid the experience including the development of wildlife management plans. Although Canadian law has no specific requirement for airports to establish wildlife-management programs, responsible organizations and individuals expose themselves to potential legal liability should they not introduce measures to reduce the numbers of hazardous birds and mammals at and near airports. It is anticipated that Transport Canada would require the Toronto Port Authority to have

a wildlife management plan in place as part of a comprehensive Master Plan process should the Porter Proposal advance. TRCA would be interested in participating in any dialogue regarding potential wildlife mitigation or management at the BBTCA and surrounding areas.

The *Aeronautics Act* contains airport zoning regulations (TP 1247E) that prohibit the use of land outside the airport boundary — if that use is deemed hazardous to aircraft operations. Managed and/or Supplemented Natural Habitats (Refuges, Sanctuaries) are not recommended for areas 3.2 km or less from the airport reference point. Peninsula A at Tommy Thompson Park is located approximately 3.6 km from the east end of the runway. Although not a formally designated sanctuary, Tommy Thompson Park provides the function of a wildlife sanctuary. TRCA is concerned that should the Porter Proposal advance, there will be significant impacts to the functionality of the lands and waters within Tommy Thompson Park, particularly its ability to support the diverse wildlife that use TTP as a migratory stopover or a permanent home.

If you require clarification or additional information please do not hesitate to contact the undersigned or Nancy Gaffney at 416-258-1409 or ngaffney@trca.on.ca.

Yours truly,

Sincerely,


Brian Denney, P.Eng.
Chief Executive Officer

cc. Fiona Chapman, Manager, Pedestrian Projects, Public Realm Section, Transportation Services, City of Toronto