

March 24, 2014

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Toronto M4W 3C8

Kelly McCarthy, Committee Administrator
City of Toronto Executive Committee
City Hall
100 Queen Street West
Toronto M5H 2N2

Dear Mayor Ford and Members of City Council, Re: EX 40.1

You will soon have the opportunity to make a 100 year decision about the future of Toronto's waterfront. There is a lot at stake so we believe that it is essential for you to fully understand the implications of permitting passenger jet service to operate from an expanded Billy Bishop Toronto City Airport (BBTCA). If you get it right, you will create a waterfront of exceptional quality and beauty. If you get it wrong, you will forever be known as the Council that made an irreversible mistake.

Our concerns focus on the inappropriate scale of operations, a loss of land use balance and quality of life in addition to the lack of compliance with Transport Canada safety requirements for the operation of jet aircraft in a water based urban environment. We strongly believe that a decision to grant any type of conditional approval would result in Council losing control over the future of the waterfront. Here is why.

FIRST, the current annual passenger volume of 2.3 million has already produced intolerable vehicular congestion and has generated safety concerns for school children attending the Harbourfront School and Community Centre. According to your own consultant reports, more than doubling this volume up to a maximum of 4.8 million annual passengers would require a total redesign of the road system at an unknown expense and the construction of new parking and taxi facilities. Unacceptable measures such as extending Dan Leckie Way south of Queen's Quay via land fill of the Portland slip to Eireann Quay have been discussed. This would drastically alter the character of the waterfront and is totally contrary to the adopted transit oriented policies of the Official Plan and Central Waterfront Plan. Porter has offered to address these concerns by imposing voluntary caps to limit the number of flights until infrastructure improvements can be made. Council should not be seduced by this as voluntary caps are meaningless and can be changed once permission for jet operation is achieved. How will Council enforce caps if the market demanded increase jet passenger service?

The answer to this question is most important given the following commitment the TPA made in their 2009 Annual Report. "The TPA has no intention of seeking amendments to the Tripartite Agreement to allow commercial jet aircraft to use the BBTCA, as we believe they are incompatible with a densely populated mixed-use community surrounded by recreational and cultural amenities".

If jets were incompatible in 2009, how have they become desirable in 2014 when the population has increased and is still growing, more businesses have developed, recreational boating has expanded and substantial public investment has been made to improve waterfront the public realm?

SECOND, the successful transformation of our waterfront is based on the balance of residential, commercial, cultural, entertainment and recreational land uses. It is Toronto's front porch and is a very special place for residents and tourists to experience the water. Over the past ten years, all three levels of government have invested \$1.26 billion in the public realm to reinforce this important balance of activities. This public investment generated \$ 2.6 billion of private sector investment and produced \$3.2 billion in output for the Canadian economy.

The proposed expansion of BBTCA could result in a jet plane landing or taking off every three minutes. This would overpower the quality of life for existing and future users of the waterfront and would dominate all other activities. As the attached diagram illustrates, the longer flight approach path over the Port Lands required for jets has negative implications on land value and the timing of future development of these lands by the City. Uncertainty over the long three phase process recommended by the Deputy City Manager would require Waterfront Toronto to place planning on hold until all conditions were met. Ironically, the City would be hurting their own redevelopment goals for the Lower Don and Port Lands by allowing jet passenger service and would further frustrate the aspirations of private land owners.

THIRD, the uncertainty over compliance with Transport Canada and Nav Canada normal safety requirements for approach lighting is most disturbing. We have been advised by the Toronto Port Authority (TPA) that normal approach lighting standards associated with airports providing passenger jet service would not be required but we have not been given any rationale for this exemption. Porter Airlines position is that the runway extension can take place without material change to the existing Marine Exclusion Zones (MEZs). This is a critical issue which has major safety and liability implications. Canadian airports with passenger jet service require full light approaches. Other land-based, but beside water, airports in first world countries all require mandatory full light approach systems. They include such airports as San Francisco, Oakland, New York La Guardia, Washington, Boston, New Orleans, Liverpool, Hong Kong, and London City.

It is also not certain whether Transport Canada would impose non-precision (good weather) or precision (all weather) standards for the expanded runway operation at BBTCA to accommodate jet passenger service. This will have a huge impact as the attached drawing illustrates. Under non-precision requirements, the light approaches over water and the marine exclusion zones would extend into the inner harbour as far east as Simcoe Street and into Lake Ontario as far west as the proposed new Ontario Place Waterfront Park. If precision standards are imposed for the expanded runway, approach lights would extend 720 metres from the runway threshold with an additional 60 metre buffer. This would extend the light approach and marine exclusion zone to as

far as Bay Street to the east and as far west to beyond the Ontario Place Marina entrance.

The western gap would be almost completely cut off to marine navigation and virtually half of the inner harbour would be out of bounds to marine navigation. This would have devastating impacts on the Toronto Island ferry service to Hanlan's and all pleasure craft that would have to detour around the extended marine exclusion zones. These restrictions would also prevent ships and tour boat operators from using the Western Gap to enter and exit the harbour as the navigable waterway would be restricted to a 15 metre wide distance.

Runway expansion could also expose boaters to dangerous jet blast conditions that could capsize small centreboard boats. To mitigate against this danger jet blast deflector walls may need to be constructed at both ends of the runway. The City's own consultant report prepared by Urban Strategies dated November 25, 2013 states "the runway expansion should not be approved if there is a risk that Transport Canada will require changes to the MEZs or the construction of jet blast protection areas".

Why is it likely that Transport Canada or Nav Canada would impose such safety requirements? On February 21, 2013, Transport Canada advised us that "they have not received a Plan of Construction Operations from the airport operator regarding a runway extension at BBTCA. Consequently, Transport Canada cannot speculate regarding any specific future plans. Billy Bishop Toronto City Airport is subject to the same runway lighting requirements as other land-based airports". If jet service is permitted in an urban marine environment which is subject to inclement weather, insurance companies for existing and other potential air carriers would almost certainly require such enhanced light approach systems to be installed before they would be allowed to fly jets to BBTCA.

City Council must ask the TPA and Porter for the rationale for exempting BBTCA when all other airports must comply with such standards. If Council grants conditional approval with a long list of unanswered questions, will Council also be prepared to assume the ongoing liability risk?

In summary, given all the inherent risks and downsides and how little is known about potential negative impacts we firmly believe that it would be foolhardy and irresponsible to make a yes decision even with conditions. The list of pre-conditions demonstrates the deep conflicts between the City's adopted waterfront goals and the proposed airport expansion. Instead of committing future Councils, a simpler, more honest and straightforward approach would be to refuse the request to expand the BBTCA. OpEd's from us that appeared in the Globe and Star are attached for your further information.

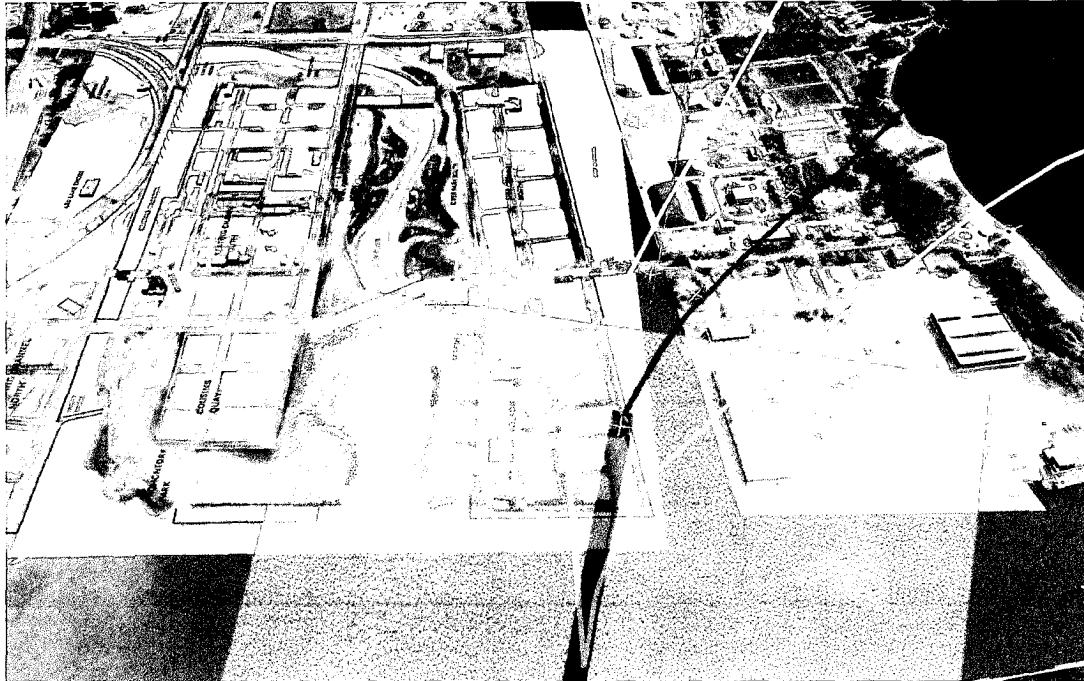
Yours respectfully,

Paul Bedford, David Crombie, Jack Diamond, Anne Golden, Ken Greenberg

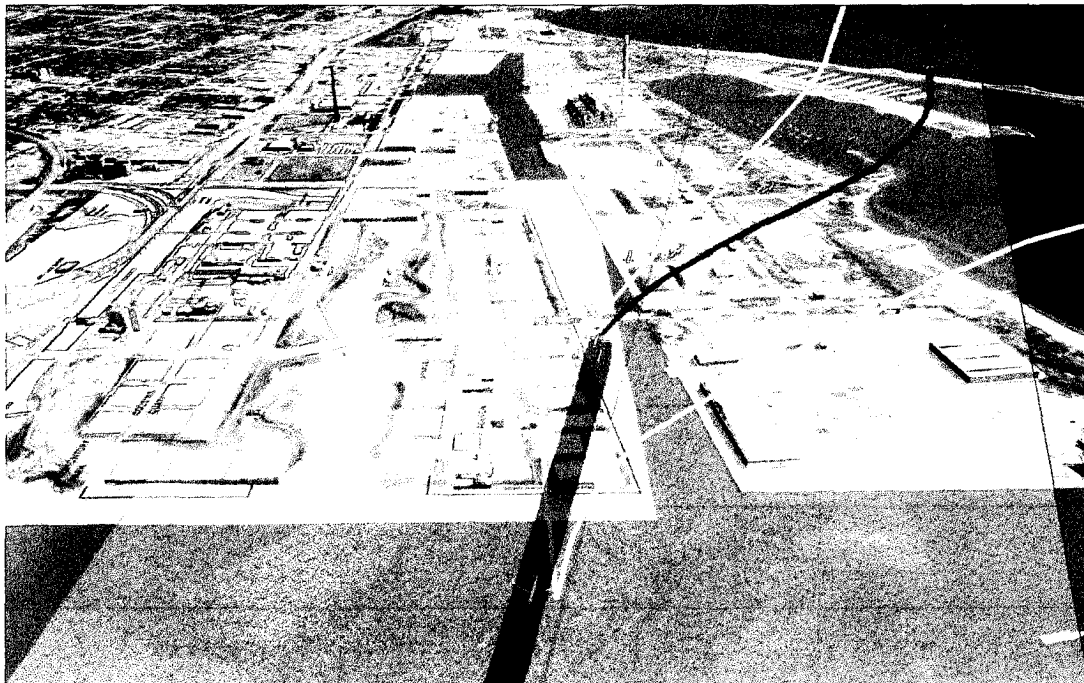
APPENDIX

1. Illustration of how Airport Expansion Will Encroach on Port Lands
2. Implications of a Code 3 Runway (Jets)
3. "Toronto's waterfront is for people, not planes", The Globe and Mail, Jan. 29, 2014
4. "Island airport expansion is a change in kind not a change in degree. Allowing jets at Billy Bishop would change the nature of airport and compromise all of Toronto's waterfront", Toronto Star, Feb. 09, 2014
5. "The self-serving case for expanding Billy Bishop", The Globe and Mail, Mar. 12, 2014

AIRPORT EXPANSION WILL ENCROACH ON PORT LANDS



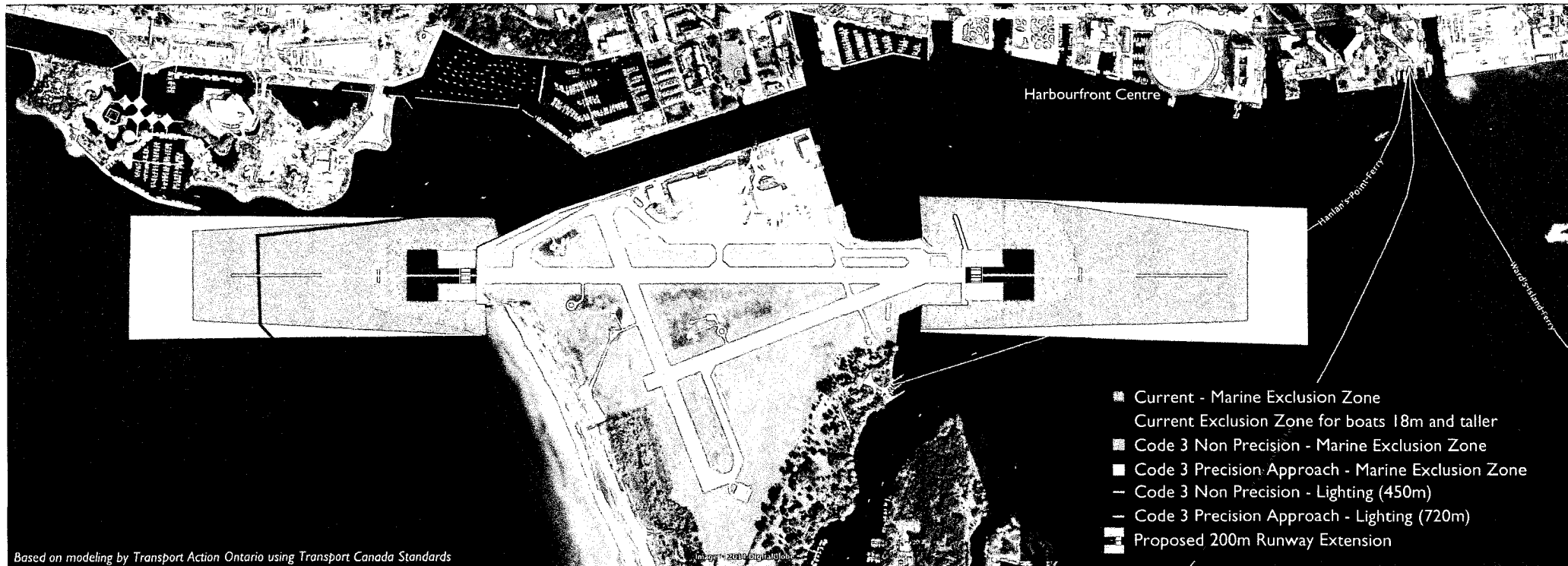
CODE 3 / NON-PRECISION APPROACH



CODE 3 / PRECISION APPROACH (possible outcome)

A large portion of the yet-to-be developed Port Lands would be dominated by low-flying jets. Future plans to develop the Port Lands would be compromised as would control over airspace.

IMPLICATIONS of a CODE 3 RUNWAY (JETS)



The full impact of Transport Canada regulations is shown here illustrating the two options of Precision and Non-Precision approach requirements. The Western Shipping Channel would be severely compromised for boat navigation. Much of the harbour would be off limits. The current Marine Exclusion zones are seen in red.

Toronto's waterfront is for people, not planes

Paul Bedford, David Crombie, Jack Diamond, Anne Golden and Ken Greenberg

Contributed to The Globe and Mail

Published Wednesday, Jan. 29 2014, 7:48 AM EST

Toronto City Council is about to decide the future of Toronto's waterfront. What is being proposed is nothing less than the transformation of a small, inner city airport to a major international one. This decision is not about Porter Airlines, whose service and convenience are widely appreciated by many. It is not about a little airport. It is not about a limited expansion.

Porter is seeking approval to grow the annual passenger volume from the current 2.3-million travellers to 4.8-million. That is about the same passenger volume as the Ottawa International Airport – Canada's sixth-largest. If council chooses to permit the expansion of the Billy Bishop Toronto City Airport to allow jet service, a series of negative consequences will be unleashed that will change the waterfront forever. Here's why:

First, jet service to the airport requires an extension of the runway by up to 200 metres in each direction into the harbour and into Lake Ontario. The existing marine buoys at either end of the runway may need to be extended to accommodate safety requirements. We will be left with a smaller, more congested harbour. To minimize the jet blast on small boats, a high and obtrusive jet blast deflector wall would be constructed across the entire width of the runway at both ends. On the west side, the new Ontario Place water's edge park would be a mere 300 metres from the end of the runway.

Second, traffic congestion will intensify. Adding more cars and taxis – the predominant travel option – to Lower Bathurst St., Queen's Quay and Lakeshore Blvd. will only add more chaos to an area that is already on the edge of failure during peak periods.

Traffic consultants retained by the city have concluded that there is no way the current road network could handle the proposed expansion of passenger volume. It is not clear how the \$100-million sought from the federal and provincial governments for ground infrastructure improvements would address this problem.

The expansion would cater to the vacation traveller, instead of the commuter business community. This will result in totally different and escalating demands for longer-term parking, luggage and ground support operations. Conflicts between vehicular traffic and the safety of elementary school children have already resulted in suggestions to consider relocating the existing Waterfront School and Harbourfront Community Centre.

Third, Torontonians currently enjoy a range of waterfront activities, including recreation and culture. This is a core issue. If the airport doubles in passenger volume with the planned runway expansions, it could mean, over time, a gradual increase of up to 30-36 aircraft movements per peak hour. This means a jet could land or take off every two minutes. Air Canada and WestJet have already indicated their desire to operate jet service out of an expanded Island Airport. Such continued growth would choke the neighbourhood and its services. Offering jet service to such distant destinations as Vancouver, California, Florida and the Caribbean would tip the balance. The airport would dominate the waterfront rather than being part of a range of human-scale activities for citizens and tourists.

The effects of airport growth to this point on the Bathurst Quay community are already considerable, and would worsen under an expansion. In warmer months, residents have experienced a residue from aircraft fuel on their windows, balconies and furniture.

The Toronto Medical Officer of Health has documented the health impact of the airport and its expansion. This led to the unanimous rejection of the proposed airport expansion by the Board of Health.

In 1999, the people of Toronto celebrated when the federal, provincial and municipal governments came together to establish Waterfront Toronto. This corporation has invested more than \$1.5-billion of public money in the visible revitalization of our entire waterfront, 47 kilometres spanning the amalgamated City of Toronto from Scarborough to Etobicoke. This civic renewal has improved the quality of life for a public who now have access to their

waterfront. Toronto's Official Plan also requires that airport operations comply with the 1983 Tripartite Agreement and that improvements to the airport's facilities have no adverse impacts on the surrounding community.

The scale and scope of the airport expansion and introduction of jets are simply not compatible with this vision – and council policies. There is no such thing as a “little big airline” or a “little big airport.” Those are clever words masking private gain and public loss. We cannot allow it to replace a highly valued public vision for our waterfront. We only have one waterfront and it belongs to everyone.

Paul Bedford was the chief planner of Toronto from 1996-2004; David Crombie is a former mayor of Toronto; Jack Diamond is Toronto-based international architect; Anne Golden is the chair of the Transit Investment Advisory Panel; Ken Greenberg is the former head of urban design in the Toronto planning department.

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Toronto Star Sun Feb 09 2014

Island airport expansion is a change in kind not a change in degree Allowing jets at Billy Bishop would change the nature of airport and compromise all of Toronto's waterfront.

By: Ken Greenberg Anne Golden David Crombie Jack Diamond Paul Bedford

It has been suggested that there should be a “compromise” to resolve the dispute over Toronto’s island airport. After all, this is the Canadian way. Some well-meaning voices say: “I am for state-of-the-art ‘quiet’ jets but against any substantial increase in service; can’t we just limit the volume of flights to protect the livability of the waterfront and surrounding neighbourhoods?” But that option is not on the table. The proposal is to double the size of Billy Bishop Toronto City Airport to equal the capacity of Ottawa’s International Airport serving between 4.3 and 4.8 million passengers a year.

Picture runway extensions the length of two football fields at both ends into Toronto Harbour and into the Western Gap, with enlarged exclusion zones to keep boat traffic away. Picture rows of light approach towers extending up to 700 metres beyond the runways as mandated by Transport Canada to accommodate planes landing and taking off every two minutes.

Add to that high and obtrusive walls lining the runways to shield small boats from jet thrust. And on the land side, doubled volumes of traffic carrying passengers, jet fuel, services and supplies overwhelm the already impossibly congested five-point intersection at Bathurst, Lake Shore and Fleet. This on top of noise concerns, impacts on air quality and habitat.

This is not a change in degree; it is a profound change in kind. We are talking about a different kind of airport.

Both the city’s medical officer of health and the board of Waterfront Toronto have sounded the alarm. If an application were made today for a new airport the size of the Ottawa International Airport on the Toronto waterfront, the incompatibility would be perfectly obvious. This doubling (and change in kind) is being rushed through as though it were an incremental modification with no clear applicant, no environmental assessment, no completed master plan, no jet planes certified, no business plan, no infrastructure plan and no funds to implement.

The justifications for the rush to judgment to approve this massive shift are convenience for some business travellers and a purported economic advantage. Both are specious. The net benefits in either case, given the opening of the air-rail link next year, are likely marginal. Much more important is what would be sacrificed.

It is our waterfront. From south Etobicoke to the Scarborough Bluffs and beyond, what is emerging all along the Toronto waterfront is one of the most remarkable transformations of its kind anywhere. The revitalization of these strategically located, obsolescent lands is providing new and improved places for the public to enjoy: parks and trails, a linked series of neighbourhoods, places to live and work, and places of recreation, repose and natural beauty.

It’s “cottage country” in the heart of the city.

The waterfront is where Toronto is reinventing itself for the 21st century, adjusting to the city’s new southern face. Our waterfront is materializing as the collective work of generations of Torontonians, supported by investments of all three levels of government and the private sector.

Its future contours are just becoming visible as the many pieces fall into place — from the promise of a revived Ontario Place/Exhibition Place, including the newly announced park, to the music garden shaped by Yo-Yo Ma and the Queens Quay Greenway currently under construction, to Sugar Beach and Sherbourne Common in the heart of the new East Bayfront neighbourhood, with George Brown College and \$2.6 billion of private investment in progress — making it one of the largest such revitalization efforts in the world.

The problem is that this entire band of waterfront is on the flight path of and bisected by the overburdened “land path” leading to Billy Bishop airport. And unlike the other cities where a close-by airport is somewhat removed

from the core, Billy Bishop sits right on Toronto Harbour, the heart and focal point of this entire endeavour, the gateway to our unique treasure, the Toronto Islands.

The key to the waterfront's future success is that one activity not be allowed to dominate the others. This equilibrium breaks down when a single element is overscaled to the point that its impacts impair other uses and activities. That is what the proposed expansion of the airport would do.

This is not about Porter Airlines. The proposed expansion of the island airport would inevitably open it to major carriers like Air Canada, WestJet and United, which have already declared their intentions.

The existing airport is an accepted fact. Its continued presence has been based on the understanding set out in the 1983 tripartite agreement that allows only turboprop passenger service at Billy Bishop airport with additional expansion capacity. That is the compromise that was already reached and should be honoured.

***Ken Greenberg** is the former head of urban design in the Toronto planning department; **Anne Golden** is chair of the Transit Investment Advisory Panel; **David Crombie** is a former mayor of Toronto; **Jack Diamond** is a Toronto-based international architect; **Paul Bedford** was the chief planner of Toronto.*

The self-serving case for expanding Billy Bishop

Paul Bedford, David Crombie, Jack Diamond, Anne Golden, Ken Greenberg

Contributed to The Globe and Mail

Published Wednesday, Mar. 12 2014, 10:00 AM EDT

The debate over the proposed expansion of Billy Bishop, Toronto's island airport, is gaining momentum. The proposal will be considered at a special meeting of the City Council's executive committee on March 25.

Torontonians have heard a great deal about the supposed economic benefits that will accompany the airport's expansion. We are writing to dispel these self-serving projections. Let's look at the facts:

First: The island airport is a proven asset. We all agree that airports generally boost the economies of the cities where they are located, and that the island airport plays an important regional role in connecting Toronto to other cities, such as Ottawa, New York, Boston and Washington. But these benefits of convenience and connectedness already exist. It is hard to see how the proposed expansion – with a focus on long-haul flights and leisure destinations – will measurably add to the economic benefits realized through the airport's current strategy.

Moreover, the island airport's existing facilities are not yet even close to being maximized. Billy Bishop served a total of 2.3 million passengers in 2013. It has the capacity to serve as many as 3.8 million passengers without expanding the runway or introducing jets, as Porter Airlines has requested. So there is ample opportunity to ramp up business-related traffic, if demand requires, without transforming it into a major international airport. Of course, such an expansion would invite competition for slots, which could be accommodated only by demands for even further expansion. Porter's competitors have already publicly declared their intentions in this regard.

Second: The promoted estimate that the airport generates \$1.9-billion in annual economic output is not based on a valid measure of economic benefit. The number counts gross revenue from all goods and services and double counts products bought and sold between firms in the supply chain. A more relevant measure of economic output would be net value added.

The numbers matter because estimates of additional impact are based on the measure of output. If the inflated number is used, all growth estimates will be inflated. Moreover, a more careful analysis of economic and employment projections needs to be done; the promoted figures discount or ignore the impact of the Union Station-Pearson International Airport rail link opening next year, as well as possible alternative expenditures on kindred public assets, such as transit.

Third: A recent and far-fetched argument to appear is that fare reductions to some destinations constitute an economic justification for expansion of the island airport. Lower fares are the result of Porter's entrance into the market, not that the flights originate and land at the island. To support a mammoth expansion of the airport to facilitate more competition on long-haul flights while ignoring major economic, social and environmental costs is absurd.

Fourth: Whatever economic benefits do accrue will not be enough to offset expansion's negative consequences on waterfront infrastructure, communities and planning. These expected adverse effects have been well documented: intrusive runway extensions into the harbour; health and environment issues; enormous traffic increases in an already congested area; and erosion of investment in existing public assets such as parks, education and community facilities.

The key to the successful revitalization under way on Toronto's waterfront is that one activity isn't allowed to dominate the others. To put at risk this huge effort and investment, public and private, would be counterproductive and unwarranted. Dubious economic claims must not be allowed to trump the realization of an outstanding, livable, multiuse waterfront for all Torontonians.

Paul Bedford was chief planner of Toronto from 1996 to 2004. David Crombie is a former mayor of Toronto. Jack Diamond is a Toronto-based international architect. Anne Golden is chair of the Transit Investment Advisory Panel. Ken Greenberg is former head of urban design in the Toronto planning department.