



FEDERATION OF
METRO TENANTS'
ASSOCIATIONS

RE: HL34.4 - Public Health Role in Indoor Air Quality

The Federation of Metro Tenants' Associations ("FMTA") opposes the proposed expansion of the Billy Bishop Toronto City Airport ("BBTCA") and any associated land expropriations, runway extensions, or policy changes that would undermine housing development, housing affordability, and the health of other rights of Toronto tenants.

At a time when Toronto faces an unprecedented housing affordability and homelessness crisis, scarce urban land and public resources must be directed toward housing people, not increasing aviation capacity. The importance of this is underscored by the Ontario Superior Court of Justice's recent statements in *The Regional Municipality of Waterloo v. Named Respondents and Persons Unknown*, affirming housing as a human right.

The proposed airport expansion raises profound concerns regarding environmental impacts and democratic accountability, housing justice, displacement, affordability, and the City's ability to meet its housing obligations to current and future residents. The FMTA wishes to draw the City's attention to the following concerns:

1. *Housing infrastructure.* As stated in City Planning's [Report](#) to the Planning and Housing Committee on May 28th, 2026, the housing and transportation impacts of the proposed BBTCA expansion would put considerable pressure "[i]n an already constrained and built-up environment [...] Any proposed changes to the runway, instrument flight procedures, or Airport Zoning Regulations would need to be considered in relation to surrounding development."

While approximately 86,000 residential units are planned within the area near the proposed expansion, a proposed westward extension of the BBTCA would modify and expand this area. While this *may* result in 8,200 new housing units currently in the development pipeline, the report clearly cautions "it is equally important to consider effects on the overall livability and quality of life that could impact the viability and desirability of future development."

Currently, tens of thousands of households remain on affordable housing waitlists, and homelessness continues to rise while increasing numbers of renters are facing displacement due to unaffordable rents and redevelopment pressures. City-owned lands ought to be used towards the housing supply and housing affordability policy initiatives that the City of Toronto has rightly

identified as priorities. Waterfront land also serves a vital function as extended backyards for many tenants.

As such, there remains insufficient information regarding the full implications of provincial acquisition of City-owned lands for the airport expansion, as per the legislation advanced by the Ford government.

2. *Unequal distribution of housing harms.* Low-income tenants, newcomers, racialized tenants, seniors, disabled tenants, and women and non-binary people already experience the most severe consequences of Toronto's housing shortage. Tenants of these groups are unable to absorb additional housing cost pressures arising from land scarcity, redevelopment pressures, or public investments that prioritize economic development over housing needs.
3. *Air quality concerns.* For many tenants, particularly those living in apartment towers, indoor environmental conditions are not within the realm of their personal control. Low-income tenants, newcomers, racialized tenants, seniors, disabled tenants, and women and non-binary people are the most vulnerable to the impacts of high heat temperatures and other air quality concerns related to climate change and poor ventilation in older buildings. We expect existing, heat-and ventilation-related air quality concerns will be exacerbated if the airport is expanded, because aircraft operations generate ultrafine particles that can infiltrate indoor environments through building ventilation systems and other pathways.

The FMTA is especially concerned about the interaction between air pollution and extreme heat. During heat events, tenants are frequently advised to keep windows closed and remain indoors to maintain safe temperatures. However, where outdoor air quality deteriorates, tenants without access to adequate ventilation will be forced into an impossible position: Opening windows to address overheating and thereby increasing exposure to outdoor pollution, or keeping windows closed in inadequately cooled units. Again, the most marginalized tenant groups will be most impacted by this double bind.

In November 2013, the Board of Health was provided a [report](#) by then-Medical Officer of Health Dr. David McKeown on the health impacts associated with the then-proposed BBTCA expansion. This report concluded:

"The current vision in the City's Official Plan for the Central Waterfront as a densely populated, vibrant area that celebrates and provides connections to the lakefront aligns with the characteristics of a Healthy City. Optimal protection and enhancement of the health of Central Waterfront residents and the city as a whole calls for a

reduction of current and future airport impacts.”

In view of the 2013 Toronto Public Health report, the Board recommended that the then-proposed expansion of and the introduction of jets be rejected in its entirety (Item [HL27.3](#), December 9, 2013).

In this scenario, tenants, who are already pushed to the margins under the current legislation, will be among the most impacted by the BBTCA expansion. We call on the Toronto Public Health to update their 2013 report with the latest scientific research, including comprehensive and independent assessments on the impacts of indoor air quality, ventilation systems, tenant health, and cumulative climate-related effects.

4. *The City's duty to defend democratic planning.* The FMTA urges the City of Toronto to ensure that Toronto tenants are consulted in the decision-making process surrounding the proposed airport expansion, especially as such infrastructure implementation will be life altering to tenants in the areas of health and community cohesion at inter-generational scales.

The economic gains associated with increased aviation activity, higher land values, and intensified development opportunities almost wholly services the private interests of developers, wealth-holding institutions, and landlords. Tenants are excluded from the economic benefits associated with the proposed airport expansion. Moreover, tenants will subsidize these economic gains through bearing the costs of housing pressures, diminished public land availability, environmental impacts, and the prioritization of growth-oriented infrastructure over affordable housing needs.

Meaningful participation of tenants is a cornerstone of housing justice. This is because the relationship between those who profit from land and those who depend upon housing is already characterized by inequitable distribution of wealth, bargaining power, and economic-based political influence. Therefore, the City must be cautious to ensure the policies advanced are not exacerbating existing inequitable concentrations of social, economic, and political resources. For this, tenant participation in the decision-making process is vital.

5. *The City has a duty to consult the Mississaugas of the Credit First Nation.* The lands and waters affected by the proposed airport expansion exist on sacred lands of the Mississaugas of New Credit First Nation. This relationship between the lands and waters predates both the City of Toronto and the airport itself. Any decision concerning the future use of these lands must respect

Indigenous rights. The FMTA stands in solidarity with the Nation's right to participation meaningfully in decisions that may affect their interests, lands, and waters.

Recommendations:

We call on the Board of Health to direct the Medical Officer of Health to:

1. Update the November 25, 2013 Report from the Medical Officer of Health, and take the impact of tenants into consideration when assessing current information and guidance on the health impacts of PM2.5 fine particulate matter and ultrafine particles (UFPs). This includes developing comprehensive and independent assessments on the impacts of indoor air quality, ventilation systems, tenant health, and cumulative climate-related effects, in addition to using existing information by Health Canada and the World Health Organization.
2. Assess the impacts on health and quality of life– and in particular, the impact on tenants and the unhoused population–in the vicinity of the BBTCA expansion. These impacts should be measured using the scenarios identified in the City Planning May 28, 2026 report to the Planning and Housing Committee and the [Toronto Port Authority's 2017 Environmental Assessment](#), in addition to other publicly available information.
3. Engage with tenants, the unhoused and relevant stakeholders and community partners, including communities near the Billy Bishop Toronto City Airport, who will be the most affected by the flight path of jet traffic to and from the Airport. Other community stakeholders should also include communities across the city that make use of the Central Waterfront for access to Lake Ontario.
4. Report back to the Board of Health no later than Q4 2026.

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