

June 1, 2015

Angela Homewood  
Project Manager & EA Specialist  
Infrastructure, Planning & Environment  
PortsToronto  
60 Harbour Street  
Toronto ON M5J 1B7

**RE: Request for City of Toronto Comments on Environmental Assessment of Proposed Runway Extension and Introduction of Jets at Billy Bishop Toronto City Airport – Draft Study Design Report**

Dear Ms. Homewood:

The City of Toronto has reviewed the draft study design and scope for the Environmental Assessment of Proposed Runway Extension and Introduction of Jets at Billy Bishop Toronto City Airport. Enclosed are comments on the draft document dated April 2015. Please be advised that we expect that City staff will provide additional comments as the study unfolds, and will conduct a detailed review of the draft final report in the fall. City staff are available to discuss these comments further if required.

The April 1, 2 and 3, 2014 City Council decision provided clear direction on a negotiating framework for moving forward the review of the BBTCA expansion proposal. This framework outlined conditions precedent that included, amongst other items, agreement on a caps and phasing framework for BBTCA. It is the City's expectation that the studies being undertaken by PortsToronto will address the conditions adopted by City Council, including the caps and phasing framework.

Proposed EA Study Design and Scope:

- The City of Toronto has a strong interest in understanding the potential impacts of airport growth under existing and expanded (jet-powered aircraft and runway extensions) operations prior to any decision to amend the Tripartite Agreement. The City has raised concerns about current airport operations consistently during the review and requests that the EA include an assessment of existing conditions against the proposed scenarios.
- A "Do Nothing" scenario that assesses the continuation of existing conditions without any improvement to airside and groundside operations should be assessed as part of the EA. This scenario should incorporate current issues that have been raised by the City and the local community such as, but not limited to: groundside traffic, noise and air quality. These issues should be documented and assessed as part of the establishment of a base condition.

- The "Proposed Growth" scenario (which includes jet-power aircraft, runway extensions, and an increase in daily slots) is not consistent with the caps and phasing framework that was approved by City Council on April 1, 2 and 3, 2014. Staff are concerned that this growth scenario cannot be realistically accommodated given constraints imposed by airport and groundside facilities, and the context of the airport on Toronto's Central Waterfront.
- The EA scoping document should clearly describe the project and the project components (runway extension, landfill, navigational aides, etc.), in addition to the scenarios proposed under the 2012 permitted and 2015 proposed growth scenarios. The EA should be precise about the project design standards (i.e, TP312 version 4) in order to clarify the scope of the various scenarios.
- The Airport Master Plan update should be drafted and circulated in advance of the completion of the EA. Agreement on the vision and role of the BBTCA, the future volume of scheduled commercial and general aviation activities and passenger and flight forecasts should be finalized and assessed as part of the EA scenarios. Staff are particularly interested in the impact on general aviation users of the airport in a scenario with jet-powered aircraft, runway-extensions and an increase in daily slots for commercial scheduled aircraft and passenger volumes.

#### Transportation:

Transportation Planning staff have provided the following comments:

- The EA needs to clearly show how it is linked to other related studies such as the Bathurst Quay Neighbourhood Plan (BQNP) and the Airport Master Update. The BQNP has a different set of assumptions for airport growth based on the Council-approved caps and phasing framework.
- The caps and phasing framework approved by City Council is based on the vehicle capacity of the local road network around the airport. If the EA is going to examine scenarios beyond the caps and phasing framework, it must (i) acknowledge existing conditions, (ii) examine how the additional passengers and traffic will be accommodated, and (iii) demonstrate that there will be no greater impact on existing traffic conditions.
- The boundary of the transportation assessment should extend further north to include Fleet Street as the effect may have an impact on transit service along Fleet Street. In addition, Fleet Street should be assessed as part of the Bathurst/Lake Shore Boulevard intersection.

#### Toronto Public Health and Environment and Energy:

Toronto Public Health and Energy and Environment staff have provided the following comments:

##### 1. The Environmental Assessment:

Given repeated declarations (as in the Study Design document prepared for the EA) that an EA is not required by Provincial or Federal legislation (as in Section 2, as well as in Section 2.1 and in

Section 2.2 and also in Section 3 etc) – consider eliminating the repetitions or complement them. Clarifying why the EA is being followed; is it because City Council's approval for runway extensions and jets etc is required before their agreeing to consider changing their Tripartite Agreement? (which is stated once - as in Section 1.2)

#### The Proposed Study Area:

The proposed study area is limited to key receptors along the Waterfront – we recommend expanding the study area across the same large city areas (six Wards) as were examined by Golder Associates in 2013 or provide a detailed rationale as to why the previous study area is neither suitable nor necessary.

#### 2. Study Contents:

##### Modelling/Monitoring:

- Utilize City's AQ model data to establish the baseline across the same six Wards
  - EED has offered to make results of recent city wide modelling of 30 substances. available to establish the baseline (managed on Golder computer bank system)
  - This may be augmented by the chemistry of the AQ modelling undertaken by RWDI for Peel Region.
- Local and site specific sensitive receptor AQ monitoring be undertaken to verify and refine the AQ baseline modelled data.
- Related land vehicle traffic (and especially re taxis) be modeled -- including congestion and idling emission issues by location issues - and incorporated.
- RWDI model the AQ resulting from various "plane-and-runway" scenarios as a set of varying conditions that add to the base case.
- The existing monitoring data from the MOE & NAPS stations has limitations – e.g. the closest acrolein monitoring station is in Windsor – these data may not be representative of the site conditions and it may overestimate or underestimate potential impacts.

##### Comparison of results to health benchmarks:

- In addition to the Ontario AAQCs, evaluate the projected AQ impacts against health based carcinogenic and non-carcinogenic benchmarks, and the AQBAT risk coefficients to evaluate health risk from criteria air pollutants.
- Use of toxicity reference values (TRVs) that have been endorsed by TPH.
- In addition to evaluating chronic exposures, consider the evaluation of acute exposures if there are times during the day with more intense airport/associated traffic activity that would result in elevated emissions.

##### Climate change:

- In addition to emission respecting air quality, an inventory of all GHG emissions under both present and future proposed uses should be included.

## 3. Comments re: Appendix A (Air Quality):

- AQ and odours (fuel storage and unburnt fuel from planes)
  - we recommend include that in the scope of work, TPH has received a number of reports of fuel odours in the residential area adjacent to the BBTCA.
  - use the emission profile & associated odour thresholds of various substances to predict odour impacts at key locations.
- Assessment of deposited materials ("black soot") in the vicinity of BBTCA
  - TPH is aware of these concerns, together with the MOE we have taken samples of the "black soot" for lab analysis – has any consideration been given to taking actual samples?
- Assessing direct health impacts
  - As stated previously, we recommend the use of appropriate TRVs to quantify the impacts from both chronic and acute exposures; in addition, the use of AQBAT risk coefficients to assess impacts from criteria pollutants.

## 4. Comments re: Noise Assessment scope of work recommendations:

- Include noise measurements at key sensitive locations, this should entail an assessment of "short duration" noise from activities such as run up engine testing.
- Assess impacts of noise on indoor environments, this should include sensitive settings such as the waterfront school.
- Compare the noise modelling/measurements with health-based noise guidelines:

<b>Health Effect</b>	<b>Threshold/Guideline</b>	<b>Reference</b>
Environmental insomnia	42 $L_{Aeq, 8hr}$ (23-07 hr)	WHO. 2009
Sleep disturbance, outside bedrooms	45 $L_{Aeq, 8hr}$ (23-07 hr)	WHO. 1999b
Sleep disturbance, night noise guideline	40 $L_{Aeq, 8hr}$ (23-07 hr)	WHO, 2009
Sleep disturbance, interim target	55 $L_{Aeq, 8hr}$ (23-07 hr)	WHO, 2009
Hypertension	70 $L_{Aeq, 16hr}$ (06-22 hr)	Health Council of the Netherlands, 1999
Ischemic health disease	70 $L_{Aeq, 16hr}$ (06-22 hr)	Health Council of the Netherlands, 1999
Sleep pattern	< 60 $L_{Aeq, 8hr}$ (23-07 hr)	Passchier-Vermeer and Passchier, 2000
Subjective sleep quality	40 $L_{Aeq, 8hr}$ (23-07 hr)	Health Council of the Netherlands, 1999
Mood next day	< 60 $L_{Aeq, 8hr}$ (23-07 hr)	Health Council of the Netherlands, 1999
Increased avg. movement during sleep	42 $L_{Aeq, 8hr}$ (23-07 hr)	WHO, 2009
Self-reported sleep disturbance	42 $L_{Aeq, 8hr}$ (23-07 hr)	WHO, 2009
Use of sleep-aid drugs and sedatives	42 $L_{Aeq, 8hr}$ (23-07 hr)	WHO, 2009
Moderate annoyance, outdoor living area	50 $L_{Aeq, 16hr}$	WHO, 1999b
Serious annoyance, outdoor living area	55 $L_{Aeq, 16hr}$	WHO, 1999b

Annoyance, difference between baseline and project	>6.5% difference in %HA	Health Canada, 2010
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## References

- Health Canada. 2010. Useful Information for Environmental Assessments.  
 Health Council of the Netherlands. 1999. Public health impacts of large airports.  
 Passchier-Vermeer, W., Passchier, W.F. 2000. Noise exposure and public health. *Environmental Health Perspectives*, 108(1), 123-131.  
 WHO. 1999b. *Guideline for Community Noise*. Edited by B. Berglund, T. Lindvall and D.H. Schwela. Geneva.  
 WHO. 2009. *Night noise guidelines for Europe*.

### Heritage Preservation Services:

Heritage Preservation Services staff will review the Stage 1 Archaeological reports for both land and water areas and provide comments at that time.

If you have any questions, please contact Christopher Dunn, Waterfront Project Manager, at (416) 395-1211 or email [cdunn@toronto.ca](mailto:cdunn@toronto.ca).

Sincerely,



David Stonehouse, Director  
 Waterfront Secretariat

cc John Livey, Deputy City Manager, Cluster B  
 Nigel Tahair, Transportation Planning  
 Barbara Lachapelle, Toronto Public Health  
 Christopher Morgan, Energy & Environment Office  
 Susan Hughes, Heritage Preservation Services  
 Matthew Wheatley, Swerhun Facilitation