

NoJetsTO

Report on the Toronto Island Jet Airport Expansion

May 1, 2013

Summary of the Issues

NoJetsTO opposes the transformation of the Toronto Island (Billy Bishop City Centre) Airport into a mega-airport with jet aircraft flying across North America. This expansion will put at risk precious natural resources that we have inherited and risk the quality of life of all people in the City of Toronto.

If the use of jets is approved, large commercial jets will be flying out of our Waterfront. Robert Deluce hopes to continue his near monopoly of this publically owned facility by restricting the jets to CS100 planes, but this is highly unlikely. Once approval is given and the runways extended, all types of jets—large and small, quiet and loud—will use the airport. Robert Deluce already predicts 5 million passengers will use the airport, more than twice the number now, but it could be much more. The once sleepy Island Airport will disappear and transform into a mega-airport.

To achieve this goal Robert Deluce proposes filling parts of Toronto Harbour and Lake Ontario to lengthen the runways. This will be a threat to water quality, marine flora and fauna and the recreational facilities of our city. This will affect those who use the Island Park, sail boats, kayaks, canoes, those who go on boat tours and the millions who visit the Waterfront.

Toronto's Waterfront is being transformed into high density, live-work communities with billions of dollars in private/public investments. The film industry is one example of this. Many film companies, employing thousands of people, are located east of the Port Lands. They are very vulnerable to the noise of over flights. A busy jet airport on the Waterfront is incompatible with this sustainable redevelopment. Are we going to threaten the city's hope for the future so Robert Deluce can build an airline?

Already new neighbourhoods, representing billions of dollars of investment, have sprung up. Waterfront redevelopment in South Etobicoke, the new condos around Fort York, the Railway Lands, buildings along Queen's Quay, the Port Lands, the eastern Beaches and Scarborough as far east as the Rouge—all of these neighbourhoods represent the new Toronto, and all of them will be under threat with an expanded, busy jet airport.

Parks will be threatened. The Waterfront attracts 12.5 million visitors annually and has become Toronto's major tourist attraction. The Island Park, the jewel in the crown of the Toronto park system, draws 1.5 million people. All along the Waterfront new parks have been created. Who will want to visit a Waterfront park if its chief feature is jet planes taking off and landing every few minutes?

Excessive noise, air pollution and traffic are the inevitable outcome of a busy jet airport. There is controversy around the level of noise that will be produced by the CS100, but not even Robert Deluce is claiming it will be less than the Q400, and that aircraft produces noise in excess of the allowable limits of the Tripartite Agreement. Air pollution is a special threat that has adverse effects particularly for young people and the elderly. Traffic already is a very serious problem and with more passengers the traffic will only get worse—much worse.

All of these problems are significant threats to the Waterfront and the people of Toronto. They lead to the vital question: why do we need a second jet airport in Toronto when the city is more

than adequately served by Pearson? Why is it necessary to lengthen runways when we already have more than enough capacity at Pearson to meet our needs and the Union Station/Pearson rail link is being built to make it more accessible? And why should we put at risk the lake and harbour, priceless parks, Waterfront redevelopment and established neighbourhoods so Robert Deluce can try and fulfil his ambitions?

To approve the expansion of the Island Airport, and risk so much is short-sighted. We should try to build a city that is a world class city that we envision it to be. Where the quality of life is valued, pollution is tamed and the needs of people are our priority. That is Toronto's future and a busy airport on our Waterfront will not make a positive contribution to that future.

The Porter Proposal

Porter Airlines has proposed that the small Toronto Island Airport be expanded from an operation that allows only certain turboprop aircraft and small private planes, into an airport that can handle jet aircraft. These planes will be able to fly to destinations across North America from the Island. To make this possible Porter is requesting the Tripartite Agreement, that constrains airport expansion, be amended:

- To permit the use of jets at the Island Airport.
- To lengthen the main east-west runway 168 metres (or 551 feet) at either end of the runway for a total of 336 metres (or 1102 feet) in order to accommodate the jets. This would result in filling in parts of Toronto Harbour and Humber Bay in Lake Ontario.
- Porter will also certainly be requesting more slots, or take-offs and landings, at the Island Airport to accommodate new flights. The Globe and Mail on November 16, 2010 reported this:

“...But Mr. Deluce said the TPA isn't constrained by the existing cap, and could increase the total number of commercial slots available to 300 within three years, if a pedestrian tunnel is built by 2012 or so. It's very much dependent on improvements to infrastructure," he said after a presentation to Insight Information Co.'s airline investment conference in Toronto.

Porter has placed an order with Bombardier for 12 CS100 jets, conditional on the amendment of the Tripartite Agreement, and has an option for an additional 18 CS100 jets. The company now has twenty-five Q400 turboprop aircraft, and its order with Bombardier includes the purchase of an additional six Q400s.

NoJetsTO response to Porter's proposal

JETS AT THE ISLAND AIRPORT

Robert Deluce, the CEO of Porter Airlines, claims that the CS100 is a small jet and will not disturb the Waterfront. The aircraft is smaller than some other passenger jets, but it is still larger and weighs more than twice the Q400 turboprop, currently used by Porter. The Q400 carries 70 passengers while the CS100 will carry 125 passengers and fly them all over North America. Today 2 million passengers use the Island Airport a year. How many will use it in the future—five or ten million? We don't know, but it will be a substantial increase.

The "Open Skies" policy, that both Canada and the United States have adopted, provides reciprocal rights for all airlines. That means if a Canadian plane lands at a U.S. airport then an American plane has the right to land at a Canadian airport. We know that American airline companies want to fly into the Island Airport, but they have been discouraged because the Island will not allow jets. If the restriction on jets is lifted, American airline companies will fly into the Island, and they will use any aircraft of any size in their fleet. We will have very large jets landing on our Waterfront.

Robert Deluce has argued that because of its size, only the CS100 should be granted an exception to the jet ban at the Island Airport. We expect it would be rejected by politicians and courts of law because it would be a cynical attempt to continue Porter's near monopoly of the Island Airport. It is also unacceptable to community groups. The Tripartite Agreement specifically bans jet-powered aircraft - a ban that the City and the residents of the Waterfront communities have relied upon in building their communities..

It is claimed that the CS100 is made in Canada. That is only partly true. The fuselage is manufactured in China, much of the rest of the plane is made in Northern Ireland and it is assembled in Quebec. A very small part of this aircraft is made in Toronto.

THE WATERFRONT

The Waterfront is the largest urban project in North America creating new buildings, parks and recreational facilities. It is a public/private project involving all three levels of government: federal, provincial and municipal. There has been at least \$1 billion invested by the three levels of governments and by the time the project is complete the private sector investment will be several times that amount. http://www.waterfronttoronto.ca/our_waterfront_vision

When the Waterfront is completed there will be 100,000 people living along the Waterfront and another 100,000 working in the area. There will be magnificent parks and recreational facilities. It will be a mixed neighbourhood project with people of all income levels. The Waterfront will be the pride of Toronto and will be recognized across North America as the city that has made waterfront rejuvenation work.

Already 12.5 million people visit Toronto's Waterfront every year and when completed there will be far more. <http://www.harbourfrontcentre.com/35.cfm> Tourism employs more people in the city than any other industry, and the Waterfront has become Toronto's premier tourist destination. Queens Quay is being turned into a destination boulevard with a necklace of unique parks connected by promenades. Shops, restaurants, open air cafes and art venues will complete the scene.

One of Toronto's biggest employers is the film industry and many of these companies have located in the east end of the Waterfront. The film industry is very sensitive to noise interruptions. Over flights of airplanes can ruin takes and force relocation of shoots. The alignment of the main east-west runway means that all aircraft, except small private planes, will result in jets flying close to the major film production area when they take-off or land from the east. This will be a particular problem with the noise from jets.

A busy jet airport on Toronto's Waterfront threatens all of these plans and investments. Already we have heard real estate agents say that the fears of jets at the Island Airport are frightening buyers away. If the mere threat of jets on the Waterfront is frightening investors, then a decision to expand the Island Airport into a mega jetport will have far greater implications.

THE IMMEDIATE NEIGHBOURHOOD

If Toronto City Council votes to allow jets and expand the Island Airport, it will not be an incremental expansion of Porter's existing Q400 turboprop service. It will be a quantum leap that will create a major jet airport flying passengers all across North America. This is totally incompatible with the surrounding neighbourhoods, the Waterfront and the City of Toronto that values the quality of life.

- Immediately to the north of the airport is a high-density community of mixed income residents called Bathurst Quay Neighbourhood. Some of the coops and condos in this neighbourhood are within 200 metres of the main east-west runway.
- Along Queen's Quay west are a number of condominiums and more are planned in the future. Some, like the Arthur Erikson building at Kings Landing, are considered major architectural landmarks.
- There are several new high-rise towers surrounding Fort York and more are planned.
- The Railway Lands south of the CN railway tracks and west of Spadina are rapidly filling with housing.
- All along the Waterfront from south Etobicoke to the Beaches in the east, new buildings are going up, and thousands of people are coming to live and work on the Waterfront.

All of these neighbourhoods and the people who live in them will be threatened if a major jetport on the Waterfront is approved. Airport expansion is a threat to the entire city.

PARKS AND RECREATION

The greatest geographic feature of the City of Toronto is Lake Ontario - the Harbour, the Islands and the water's edge from Etobicoke to Scarborough Bluffs and the Rouge. Over decades the city has invested money and time to transform this environment into a spectacular system of parks and recreational facilities that benefit every Torontonians and visitor to our city. A busy jetport in the virtual centre of this paradise will degrade every one of these resources.

- Lake Ontario and the harbour are used by thousands of boaters from sail boats to power boats. Canoeists and kayakers increasingly use the harbour and the lagoons in Toronto Island. Harbour tour boats attract thousands every day in the summer.
- The 800 acre Toronto Island Park is the jewel in the crown of the Toronto's park system, as important to the people of this city as Central Park is to New Yorkers. Over 1.5 million people ride the ferry boats to the Island every year. The Island Airport is just across a chain linked fence from Hanlan's Point on the Island.
- The new marine park in south Etobicoke is under the flight path of planes taking off and landing from the Island Airport.

- The mouth of the Humber and Sunnyside Beach overlook the water and the airport.
- Ontario Place will be at the virtual end of the runway of the expanded airport – its future redevelopment would be seriously constrained.
- Confederation and Little Norway Parks are within 200 metres of the existing runways.
- Ireland Park, commemorating the thousands of Irish immigrants who died on their way to our City, is just east of the Airport ferry dock, and, sadly, has been closed to allow the Airport tunnel to be built.
- The exquisite Music Garden, on Queen’s Quay, is disturbed constantly by the flights of the Q400. Here’s a recent video that illustrates the airport’s impact:
<http://youtu.be/95FTLbZ9gkI>
- The free music concerts in the summer are often interrupted by flights. It will be much worse with jets and an increase in the number of flights.
- People using HtO Park, Harbourfront and Sugar Beach all will be disturbed by the expanded airport and more parks and waterside promenades are being planned for the East Bayfront and the Portlands.
- Today Queen’s Quay, the main street linking the central Waterfront, is undergoing a major renovation costing millions to turn it into a wonderful promenade for walkers, cyclists and all who want to enjoy the Waterfront.
- As the East Bayfront and the Port Lands are developed there will be even more parks and recreational facilities.
- Ashbridge’s Bay and the eastern Beaches are under the flight path of the planes taking off from the Island Airport.

To conclude that all of this is threatened by a busy jet airport on Toronto Island is no exaggeration. We are risking our greatest resources—our greatest gift—so one company can increase its profits and Robert Deluce can realize his ambition of a jet airline.

NOISE

Noise is a key issue in this debate. Robert Deluce says that the CS100 is a “whisper jet” that will make about the same level of noise as the Q400. The term “whisper jet” are his words - not even its manufacturer’s. It is likely that the CS100 is quieter than earlier generations of jets, but that does not mean it will be quieter or even as quiet as the Q400. We expect it will be louder.

What is being ignored in this debate is that the CS 100 will have a different noise contour than other aircraft. It is far heavier than the Q400 and that means on landing its reverse thrust must be far more intense. On take-off it will have to get up to higher speeds to get off the ground. That is the reason for the longer runways. The need for greater speed will mean more noise.

The point is at this stage we simply do not know. [Here](#)’s air industry writer Howard Slutsken:

The CS100s may be as quiet as the Q400s, thanks to their new-tech Pratt & Whitney PW1500G geared turbofans. Mr. Deluce kept coming back to that point in his press conference yesterday. But nobody really knows, because the CS100 hasn’t yet flown.

The CS100 engine has received Transport Canada certification. The first assembled aircraft is not due for actual flight tests until June of this year so no actual noise data based on field tests actually exist. And no one has examined the impact of the noise from these engines in conditions like the Island Airport.

In the meantime Robert Deluce is saying that this is a “whisper jet” and the impact of the CS100 planes will be no worse than the Q400. It is irresponsible of him to make these claims because there is absolutely no empirical evidence to support them. He is floating opinion as fact!

As well, the claim that the noise created by the Q400 planes is not affecting the Waterfront is simply not true. People who live along the Waterfront, particularly those who live in buildings west of York Street have complained about the noise from take-offs and landings as well as engine run-ups since Porter began operations in 2006. Those complaints have been increasing as more planes have been operating out of the Island.

The Toronto Port Authority and Robert Deluce claim they are good neighbours, and the same small number of people complain over and over again. What has happened is that most people have simply given up complaining to the Port Authority because nothing is ever done about the noise. To complain is an exercise in frustration so why bother? Only the dedicated have persisted in their noise complaints. See Appendix 1 for a summary of noise complaints in June 2008, and the TPA’s responses. It has only worsened since.

Let’s examine the technical side of the noise issue.

On April 17, 2013 the Toronto Port Authority was quoted in the Financial Post as saying it “believes the CS100 is the only jet-powered aircraft that meets the noise restrictions at the airport”. Is this true? What are the facts?

Noise at the Island Airport is constrained by

- a prohibition of aircraft generating excessive noise,
- maximum noise exposure forecast levels, that set the maximum number of landings and takeoffs – currently 202 per day. A report to City Council in October 2002 stated:

“In order to strictly comply with the Tripartite Agreement without the implementation of noise control measures, the number of turboprop aircraft movements at TCCA would be capped at either 114 or 116 per day (18 small, 96 – 98 large), depending on the mix of Dash 8-100 and Dash 8-Q400 aircraft.”

- restricting use of the Island Airport to a “ public airport available for general aviation (i.e. private planes), and ... limited commercial STOL service” (the Q400 is not STOL – short takeoff-and-landing)

These constraints are in the 1983 Tripartite Agreement, signed by Transport Canada, the City of Toronto and the predecessor of the Toronto Port Authority. They were relied on by the city to permit the development of Bathurst Quay, and by all those who moved to the Waterfront since they were put into place.. The Toronto Port Authority, however, has substantially refused to enforce them to date.

THE Q400 – NOT COMPLIANT

A February 2009 PowerPoint presentation by the TPA to a now-defunct community advisory committee meeting admits that even the Q400 (technically the Q402, flown by Porter and Air Canada) offends the Tripartite Agreement’s definition of aircraft generating excessive noise on two of the three limits. Breach of any one prohibits the aircraft. Here’s page 26 from that PowerPoint:

	<u>Q402</u>	<u>Tripartite</u>
Flyover	78	84
Lateral	84	83.5
Approach	93.1	92

Comparison of Q400 to Limits in Tripartite

TCCA Noise Management Study
Advisory Committee Meeting

26

JACOBS Consultancy

Even the Toronto Port Authority’s own study shows that noise from the Q400 violates the Tripartite Agreement. It also should be remembered that even a small increase in decibels means a significant increase in noise, as decibels are measure on a logarithmic scale. It is clear that to date, the TPA has failed its duty to the public to enforce that prohibition.

THE CS100

What are the stats for the CS100’s noise?

According to [Bombardier](#), the total of the three limits (255) is about the same as the Q400 (255.1).

The breakdown into the three components is not available, perhaps since the CS100 has not yet flown – its first flight is scheduled for June, 2013.

The “whisper jet” is just as noisy as the Q400 – on its maker’s figures.

THE TPA’S ATTEMPT TO USE “TRADE-OFFS”

How can Porter and the TPA say the CS100 and the Q400 “meet the noise restrictions at the airport”? They cannot – on the facts.

Instead, the TPA claims it can “trade-off” one breach with another’s compliance, borrowing from one parameter that is not breached to address a breach of another.

The “trade-off” concept does exist – but only to enable aircraft to meet the maximum noise levels fixed by the ICAO.

The concept of “trade-off” does not appear in the Tripartite Agreement. This is the relevant excerpt from the Tripartite Agreement:

aircraft generating excessive noise shall ... include [those] which generate a noise level in excess of 84.0 EPNdB on takeoff (flyover), or in excess of 83.5 EPNdB on sideline at takeoff (lateral)to the flight path) or in excess of 92.0 EPNdB on approach

The limits are the limits, and each stands alone.

The TPA has misapprehended the Tripartite Agreement requirement from the beginning.

ENGINE RUN-UPS

Regular maintenance procedures for aircraft engines require that they be operated for 10-20 minutes at high speed to ensure they are operable. Porter has conducted these engine run-ups at the Island Airport, generally on weekends, when the aircraft are not in demand. Often occurring early Sunday morning, they are a major source of irritation for residents and recreational users of the Waterfront.

Engine run-ups are not constrained by the Tripartite Agreement.

Robert Deluce and the TPA have been asked many times to carry out aircraft maintenance operations in another airport that is not located within a residential and recreational area. They have refused to do so.

On January 4, 2010, this letter was sent to the TPA:

“This caught our attention in the March 27, 2008 TPA board minutes:

The President and CEO reported on noise complaints at TCCA with regards to engine run-ups; indicated that TPA has worked with [Porter} on the issue which resulted in a significant reduction in complaints received on the issue; and that TPA would continue to monitor the item.

“What steps were taken? Run-ups remain a serious problem.”

No response was received, and Porter’s engine run-ups continue to plague our waterfront.

RUNWAY EXTENSIONS

One element of the Porter proposal is to lengthen the runways to allow jets to operate safely. Following safety requirements required for the operations of CS100 planes, 168 metres (551 feet) will have to be added to both ends of the east-west runway for a total lengthening of the runway 336 metres or 1102 feet. This is the length of about three football fields. If airport expansion is allowed, it will mean that thousands of trucks carrying fill will have to be brought to the Island Airport and dumped into both Toronto Harbour and Lake Ontario.

It is not only the runway lengthening to be considered, but marine safety requires that a “marine exclusion zone” for safety must be established well beyond the end of the runways to keep boats—especially those with tall masts—away from the end of the runways.

Robert Deluce claims that the runways can be lengthened and still stay within the marine exclusion zone that exists.

That makes no sense. If safety concerns requiring boats to stay away from the end of the runways are necessary when Q400 aircraft are operating, they will be essential when the faster, heavier CS100 jets, flying lower to the ground, are taking-off and landing at the Island Airport.

There is some confusion about runway lengthening. We have heard that filling the harbour will not be possible so all of the fill will have to go into Humber Bay in Lake Ontario. If that happens, the runways will almost reach Ontario Place and may make it impossible for boats to use the Western Gap.

Robert Deluce has also stated that Transport Canada intends to require a 150 meter extension of the main runway safety area on each end, concluding that only an additional 18 meters is required for his jets.

He has provided no facts for his statement. What we do know is this:

- Transport Canada was roundly [criticized](#) for its failure to impose runway safety areas on major airports, in the wake of the 2005 Air France runway overshoot at Pearson.

As the Transportation Safety Board noted, in its report on this overshoot,

In 1999, ICAO elevated the "Recommended Practice" of a runway end safety area (RESA) length of 295 feet (90 m) to the status of a standard and incorporated a recommended practice of a RESA length of 780 feet (240 m). As a result of the change in status in the ICAO specification, Canada filed the difference to ICAO in accordance with the contractual agreement within the Chicago Convention; therefore, a RESA is still not required in Canada.

The U.S. RESA standard requires a RESA of 1,000 feet (or 300 meters), or, where that is not possible, the use of an engineered material arresting system (EMAS) to provide a level of safety that is generally equivalent to a full RESA - a standard EMAS installation extends 600 feet (or 167 meters) from the end of a runway.

- The Island Airport's runway safety areas have always been deficient for massive commercial use - The RESAs for the runway used by Porter Airlines at the Toronto Island Airport are only 91 metres in the east and only 85 metres in the west.
- Extending even the runway safety areas is prohibited by the Tripartite Agreement, as part of the package of constraints intended to ensure the airport remains a "public airport available for general aviation (i.e. private planes), and ... limited commercial STOL service"
- Runway safety areas don't count as part of the required minimum runway length – Mr. Deluce can't use them to meet the basic runway length his CS100 requires.
- It is too convenient for safety issues to be raised now, when they have been ignored for the first seven years of Porter's operation

We conclude that Robert Deluce is misrepresenting the facts and misleading the public, the media and the boating community on runway extensions.

This massive expansion of the airport will be a significant threat to recreational boating. Thousands of Torontonians are involved in sail boating. In recent years kayaking and canoeing in Toronto Harbour has become very popular. Tour boat operators have developed successful businesses taking visitors and city people on excursions through the Islands and into the lake. All of that is threatened if the runways are lengthened.

Finally, it must be recognized that, if filling of the lake and harbour are allowed, it will become a permanent feature. Fill dumped into the water is difficult and prohibitively expensive to remove. The expanded runways will become permanent features of the lake, whether there is an airport or not.

TRAFFIC CONGESTION

Traffic congestion on Queen's Quay, Bathurst Street and Eireann Quay has significantly worsened as the number of passengers using Porter has risen to 2 million a year. If airport expansion is approved at the Island, allowing jets to fly to locations around North America, this will mean passenger numbers will climb to at least 5 million a year and possibly more. The resulting traffic problems will become horrendous.

Today taxis and cars rush down a narrow two-lane street - Eireann Quay - to drop off or pick up airport passengers. Parking is extremely scarce. Large buses and trucks maneuver their way through the congested streets and at times the residential streets become lined with parked vehicles. Already this has led to a very dangerous situation for the people who cross the Queen's Quay/Eireann Quay intersection.

There are an elementary school, a day care centre, an alternative school for high school students and a busy Harbourfront Community Centre on the south-east corner of Queen's Quay and Eireann Quay. Children and adults in the neighbourhood have to cross very busy streets to get to these facilities. Already parents have become so alarmed that they demonstrated with signs and banners to attempt to slow down the speed of the traffic.

Making matters worse, the Toronto Port Authority has refused to co-operate with the community to bring in measures to control and slow the traffic. The TPA has even gone so far as to stop the installation of speed bumps on Eireann Quay to slow traffic.

The City of Toronto has been forced to devote [considerable resources](#) to attempt to develop a strategy to address the serious traffic issues the Island Airport has created.

Robert Deluce has said that the new pedestrian tunnel will solve the problem of access to the Island Airport, but this will not solve the problem of traffic. In fact, the tunnel may well create even more serious problems as five million or more passengers rush down residential streets to this small, narrow access point to the airport.

Traffic has brought this residential neighbourhood of Bathurst Quay to the point of crisis today, and if airport expansion is allowed, traffic problems will become much, much worse.

Airport expansion is being forced into a waterfront community that has no ability to handle the traffic it generates.

AIR POLLUTION

Air pollution is something that is difficult to estimate for citizen coalitions, like ourselves, that do not have sophisticated air measuring devices and access to a lab to analyze samples, but this we know: the Waterfront already polluted from vehicles traveling on the Gardiner Expressway, Lakeshore Blvd, Bathurst Street, and Queen's Quay, as well as diesel trains. The take-offs, landings and engine run-ups at Island Airport contribute significantly to that air pollution.

Today there is often a smell of kerosene in the air in the Bathurst Quay Neighbourhood. That is the smell of jet fuel burned by the Q400. All jet planes, including the CS100 burn this type of fuel. Vastly increased traffic will mean vastly increased air pollution.

There is mounting evidence from studies in Europe and the United States that air pollution from airports is harmful to the health of all people, particularly the young and adults with respiratory problems.

For a discussion of air pollution visit the CommunityAIR website.

http://communityair.org/Issues/Air_Pollution/Air_Pollution.html

SAFETY

The island airport has an unusually large number of pilot cautions as listed in the Pilot Handbook issued by the Department of Transport. By comparison, Pearson International Airport lists no pilot cautions. For a list of the cautions at the Island Airport see.

http://www.communityair.org/Issues/Airport_Safety/Airport_Safety.html

Overshooting the runway is a very common reason for accidents at airports. The fear is that if an airplane overshoots the runway at the Island Airport it will end in the lake. That is a very serious safety risk because it will be very difficult to rescue people stranded on an airplane in the water.

High rise towers are being built all along the Waterfront increasing the risk of a devastating accident.

BIRD STRIKES

Bird Strikes are a special problem for the Island Airport because it is located on Lake Ontario. Virtually all bird strikes occur close to the ground when the aircraft are taking-off or landing. This is also the time when the aircraft is at maximum risk.

Lake Ontario and the lagoons of the Island are home to large water fowl such as cormorants, Canadian geese, swans, gulls and ducks that can do serious damage to jets. The shore of Lake Ontario has an estimated bird population of 100,000 shore birds. Toronto Island is also a major migratory route for birds in the spring and fall. About 100 metres from the end of the main east-west runway of the Island Airport is a bird sanctuary.

Porter has had problems with bird strikes since the company began flying out of the Island Airport in 2006. There were 107 reported bird strikes over the last three years at the Island

Airport and 35 in the last year alone¹. That is an exceptionally high number. To date, fortunately, there have been no accidents at the Island Airport as a result of bird strikes but the use of jets will substantially increase the risks.

In February 2009 Canadian geese flew into the jet intake of a U.S. Airways plane flying over New York City knocking out both engines and leading to the emergency called “Miracle on the Hudson.” Miraculously no one lost their lives but it was a wake-up call that clearly demonstrated the risks of bird strikes to jets.

The engines of jets have a series of fans that spin rapidly and provide the thrust needed to fly the plane. Those fans are very vulnerable to damage by large birds sucked into the large air intake openings of the jets. The air intake on the Q400 is relatively small, but the air intake for the CS100 jet engines is a [massive 73 inches](#) . That will make bird strikes all the more common and dangerous if these planes are allowed at the Island Airport.

To attempt to reduce the risk of bird strikes, the TPA frequently uses fireworks and shrieking noisemakers to scare off birds and causes exceptional stress on the bird population. That noise is not constrained by the Tripartite Agreement.

If permission is given to fly the CS100 out of the Island Airport, the evidence suggests that there is a grave threat of bird strikes that could well be a serious risk to passenger safety.

THE PEARSON ALTERNATIVE

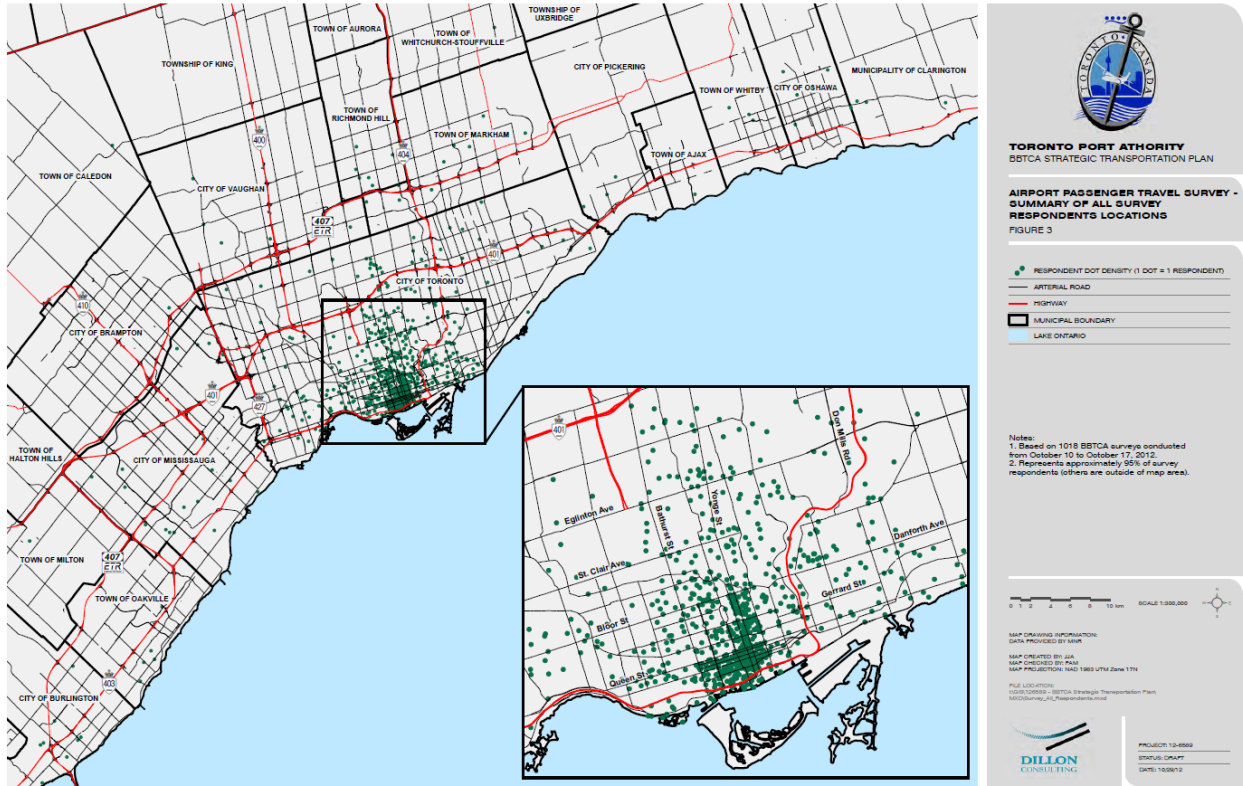
Allowing the Island Airport to expand and threaten the viability of the Waterfront and the quality of life of everyone in the city is particularly inappropriate when a viable jet airport already exists in Toronto.

Pearson International Airport has just completed an expansion and improvement of its facility costing \$6 billion. It now has the capacity to handle over 50 million passengers a year, but in 2012 Pearson only handled a little less than 35 million passengers. It can easily service the additional 2 million passengers from the Island Airport.

The Union Station/Pearson Airport Fixed Link is now under construction and will be completed in 2015 at an estimated cost of \$ 1.4 B (this doesn't include \$400 M for a 4th rail, made necessary by doing diesel first, then electric (they need a 4th track to be able to work around a working line while they electrify) or 440 M for electrification itself). . When it is finished passengers will be able to travel quickly, efficiently and in comfort to Pearson from the downtown business heart of the city.

The Union-Pearson link will serve the current Porter customers extremely well – the vast majority of Island Airport passengers come from Bay Street, as this chart demonstrates:

¹ Compiled from CADORS reports published by Transport Canada – see <http://wwwapps.tc.gc.ca/Saf-Sec-Sur/2/CADORS-SCREAO/q.aspx?lang=eng>



In rejecting the jet expansion at the Island Airport NoJetsTO, and the groups supporting it, are not asking Robert Deluce to close down Porter Airlines. All we are doing is making the sensible request that its use of jets be located at Pearson. That is eminently reasonable.

The vital question that begs to be asked is why do we need a second jet airport in Toronto when the city is more than adequately serviced by Pearson, a modern, sophisticated facility that can service all of the needs of the city and its vast passenger catchment area across Southern Ontario? Why is it necessary to go to the expense of lengthening runways when we already have more than enough capacity at Pearson to meet our needs? And why should we put at risk the lake and harbour, priceless parks, neighbourhoods along the Waterfront and the economic viability of other companies and industries?

To approve the expansion of the Island Airport, and risk so much, when we already have a jet airport is foolish in the extreme. We need to build a city where the quality of life is valued, pollution is tamed and the needs of people are our priority. That is Toronto's future.

Appendix 1

Noise Complaints – January to June 2008

In 2008, Waterfront communities were just beginning to experience the impact of a dramatically expanding Island Airport. The number of complaints was jumping month over month. This chart shows the increase in the number of complaints – and complainants - over the first six months of 2008:

Month	# Complaints filed	# Complainants
January	61	n/a
February	14	n/a
March	48	5
April	52	20
May	80	44
June	196	65

Source: TPA website http://www.torontoport.com/Airport_Nsummary.asp [no longer available]

The TPA was, at that time, posting each complaint and its response on its website. It ceased to do so shortly after these were published.

This is a selection of complaints made, and responses received in June, 2008, as reported on the TPA website:

June 3 Complaint:

“Was woken up by the loud noise of revving and idling airplane engines at 6:20 a.m. Please control your tenants. “

TPA Response: AFTNS tracked no aircraft activity at this time. No action taken

June 5 Complaint:

“I began dining with friends on my balcony on what could have been an enjoyable experience - for the next hour and twenty minutes we ended up recording the times of the noise as my guests could not believe the roar of various planes on landing. This is what we recorded, times may not be exact:

- 18:19 - Q400 landing (it was an all-encompassing noise)
- 18:23 - repeat
- 18:23 - 18:43 - 7 small engine planes take off
- 18:45 - a deafening helicopter
- 19:07 - Q400 take off (jet fuel fumes and noise)
- 19:23 - Q400 take off - as above
- 19:39 - another loud helicopter

We went inside after because it was too much noise and pollution - I m not sure I can entertain on the balcony or even want to sit out on it as this night was my first attempt at using my balcony since I moved there last Fall. This is not acceptable in terms of quality of life. “

TPA Response: AFTNS tracked the following aircraft activity at the times of complaint:
GA takeoffs at 1818h, 1849h, 1857h.
GA landings at 1832h, 1850h, 1859h.
Porter takeoffs at 1831h and 1926h.
Porter landings at 1827h and 1907h.
Within normal airport operating hours.

No action taken

June 5 Complaints:

1. “Unbelievable the noise. I was at the Alexandra Yacht Club at the BBQ and could not hear people speaking for the non stop noise of a plane waiting to take off. By the time it did another damn plane was revving its engine waiting to take off. By 9:35 it was relatively quiet again. Honestly, how do the people on the Waterfront stand it..... It is awful. “

TPA Response: AFTNS tracked unidentified GA taking off at 2125h, Porter taking off at 2126h, Porter landing at 2127h, and GA taking off at 2130h. Within normal airport operating hours. No action taken

2A. “Another plane landed after 11pm when the airport should be closed. Why aren’t these planes rerouted to Pearson as they are supposed to be? Shame on you for not respecting the rules or the community. “

2B. “I am surprised that after all the complaints you're receiving, planes are still landing after 11 pm in the night. Last night again we were woken up at 11. 10 by the noise of an airplane landing. When will it ever stop? It's summertime we would like to have our windows open but our sleep is constantly interrupted by this outrageous noise. I can see us being driven crazy by the end of summer.
Could you finally look into that? “

TPA Response: AFTNS tracked Porter land at 2308h. [Note: this is a clear breach of the curfew provisions in the tripartite agreement governing the airport: one of 17 documented breaches from March to June]

Action: Airline contacted

June 6 Complaint:

“GUN SHOTS, FLARES, GUN SHOTS, FLARES, GUN SHOTS LOUD, LOUD, LOUD, LOUD, LOUD, LOUD, LOUD, LOUD!!!!!!! “

TPA Response: Comment noted. Within normal airport operating hours. No action taken

June 7 Complaint:

1. "Very loud noise from Porter on the south runway - why can't engine cleaning be done at Halifax, Montréal, Ottawa where there are no RESIDENTS a block away from the runway!?!?"
2. "For several minutes at around 15:10, there was sustained very loud engine noise coming from the airport - this is not just a little bit of noise - this is so loud that it's difficult to hold a conversation outside of our house and we live a mile or more from the airport."

TPA Response: Engine maintenance conducted at designated area. No action taken

June 8 Complaints:

1. "Hot night. Windows open. Wanted to sleep this morning. It's usually quiet Sunday mornings. Closed windows after earlier landing and turned on a fan. So I shouldn't have heard any noise from outside.

Then, about 9:30, a.m., heard an unbelievably loud roar from airport. Had a pillow over my head. Thought it would stop. It didn't. The roar got louder and wouldn't stop. The closed windows, fan, and pillow over my ears didn't help.

It wouldn't stop, so I got up about 9:45 to hear thunderous Q400 engine revving. It got lower, and by 9:50 a.m., a Porter Q400 joined another one at the gate. Please give us some peace to sleep on Sunday mornings."

2. "This morning again the noise from the airport was intolerable. At 8:57 I started noting the obscenely loud engine noises... the ones that blast the air (usually engine warm-ups or taxiing) as opposed to the usual take-off and landing noises which are also very wearing.

The next loud noise was at 9:27 but the worst went on from 9:34 until after 9:42. This noise was so loud that my daughter could not hear what I was saying to her in the same room. I believe that this was one of the whisper quiet Q400s we keep hearing about - yet no one seems to be taking responsibility for the extremely loud engines they have.

Then again at 9:47 and 9:55.

Finally I left the house. This is outrageous. Friday was also horrific - the whole day. It is not possible to list all the times that I am bothered by the sound of the airport. We should be entitled to enjoy some peace in our homes and workplaces. It is wearing us down. We do not feel that you are taking any steps with the airport to keep them within their legal takeoff and landing times and no one seems to care how loud the engine noises are. They wake us up in the night and in the morning and then we are barraged all day long."

3. "A horrendous and sustained noise coming from the TCCA area woke up and severely startled an elderly relative visiting with us and disturbed the rest of us. Was this an engine test and why would you permit something like that, on a Sunday, when people are preparing to go to church?"

TPA Response: Engine maintenance conducted at designated area. No action taken

June 9 Complaints:

1. "Porter jet lands. Outrageously loud -- like a squadron of jetfighters just flew overhead! This is more than unacceptable, it s absolutely unbearable."

TPA Response: No unusual operations noted. No action taken

2. "Small plane idling on the runway -- LOUDER THAN THE PNEUMATIC DRILLING going on right outside my apartment. "

TPA Response: No unusual operations noted. No action taken