

# Hal Beck

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Transport Canada  
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**Re: Toronto Port Authority  
Port Modernization Review**

This submission is with respect to the document posted to Transport Canada website on 2018-05-08 entitled: "*Ports Modernization Review: Discussion Paper*". The discussion paper focused on marine port services.

This submission is focussed on the Toronto Port Authority (rebranded as Ports Toronto). The primary activity of this port is the operation of the Toronto Island Airport (rebranded as Billy Bishop Toronto City Airport).

## *About the Writer*

I am a professional engineer active in the land development consulting industry and formerly a transportation planning engineer. I have been a resident of Toronto's waterfront for 23 years, living directly opposite the Toronto Island Airport with direct line of sight over a majority of airport air and ground support activities. I have represented York Quay Neighbourhood Association since 2008 on various Toronto Port Authority committees. I have also represented Bathurst Quay Neighbourhood Association on the Port Authority tunnel construction committee and the City of Toronto Eireann Quay Steering Committee. I have a good working relationship with airport decision makers. My professional interests include sustainable transportation facilities and responsible community development. My key values include accountability, integrity, and fairness.

## **Summary**

In speaking to the questions posed in the Discussion Paper, this submission discusses several suggestions with respect to Ports Modernization including the following.

- Ports must be required to obtain certifications from licensed professional engineers when relying on reports that fall within the practice of professional engineering. This is legally required to address societal protection requirements and to help avoid unsubstantiated and arbitrary decision making by the port. This should be a standard terms of reference requirement for port infrastructure studies.
- Support by Transport Canada is definitely needed with respect to noise envelope flight capacity compliance assessments in a marine environment. Significant additional considerations are required to avoid significant under-estimation of impacts, over-estimation of remaining growth capacity, and

unwarranted infrastructure spending. Airport decision makers are not knowledgeable in matters pertaining to NEF calculations and software output in general, nor the fundamental requirements of the NEF evaluation process in the first instance.

- Ports must commission regular community Health Impact Assessments and review cumulative effects together with ultimate environmental limits. Impact thresholds and assessment criteria must be established in advance and not justified after the fact.
- Ports must complete fulsome EA processes and transparent cumulative effects assessments that meet standard requirements. These must be accompanied by effective public information and input processes. This has not been the case to date. Several recent examples have been detailed in community submissions of concern.
- Ports should establish effective complaints management systems which are at arm's length and which are designed to result in mutual learning and complaints avoidance. As the port serves at the Minister's pleasure, the government is ultimately responsible.

## **Introduction**

An evidence-driven review is currently underway of Canadian Port Authorities. Based on the Discussion Paper, the review is being carried out in 5 key streams. Some questions were posed under each of the streams for consideration when providing input to this review. This submission focusses only on the following streams and the sub-set of posed questions which are bolded below.

- Port Governance (Stream 5)
- Innovation and Trade Logistics (Stream 1)
- Sustainability and Port Communities (Stream 3)

## **Port Governance (Review Stream 5)**

- **Q12. Does the current governance model enable Canada Port Authorities to effectively manage their assets, support economic development and deliver their regulatory duties?**

Additional checks by Transport Canada in the current governance model appear required with respect to managing assets and regulatory duties.

### *Engineering Certifications*

The approval of the current total flight capacity of the Toronto Island airport, which is said to be based on noise energy compliance assessments, is reliant on reports which have never actually been certified or sealed by any professional engineer.

Only a professional engineer can take responsibility for engineering work that affects public health and safety. Port Authorities need to be transparent and accountable when completing and relying on work which is legally defined as 'professional engineering'. The port decision makers must be clear on any technical work they are relying on which involves the application of engineering principles and the safeguarding of: life, health, property, economic interests, the public welfare, and the environment. Toronto Island Airport decision makers are not clear with respect to their obligations.

For example, the current approved operating capacity of total flights and flight mix at Toronto Island Airport (including 202 slots per day of Q400 aircraft) is currently relying on an incomplete Noise Impact Assessment report dated Nov 2010 which contains obvious errors and omissions to such an extent that no engineer felt comfortable signing or sealing the report. The report was posted on the Port Authority website for a number of years as proof of due diligence. It is the writer's belief that insufficient time and budget provided by the Port Authority to the engineering consultant may have contributed significantly to the uncertifiable status of the draft report on which the port and public are currently relying.

Ports should include a generic requirement in its consultant terms of reference with respect to the preparation of infrastructure studies. Staff training is currently needed so they are aware of what a professional seal actually looks like. The governance model needs to impose penalties or more effective restrictions on Ports for routinely not insisting on a professional seal being affixed on engineering work, as required for purposes of societal protection and the well-being of stakeholders (which includes the middle class taxpayer). This must be effective even under circumstances when the implications of affixing a professional seal may not favour a proposed port expansion project. This will help avoid circumstances of arbitrary decision-making by the port with respect to infrastructure financing costs or risks, which are potentially being backstopped or insured by the federal government.

- **Q14. Do Canada Port Authorities have the tools and partnerships they need to respond to an evolving maritime sector?**

#### *Noise Envelope Flight Capacity Compliance in a Marine Environment*

For decades, the decision makers at the Toronto Island Airport have been relying on NEF contour compliance reports which purport that the projected noise of approved total flights and flight mix will be contained within the Office Control Contour (noise envelope) established for the Island Airport. The Control Contour for the aptly described Island Airport is geographically located on the water surface of Toronto harbour.

The Noise Exposure Forecast (NEF) process was developed for application at typical land based suburban airports. The proto-typical suburban airport is surrounded by open space buffers, a commercial belt, and low rise residential beyond the commercial. (These land uses do not exist at the Island Airport. ) The Control Contour (ultimate noise envelope) established for an airport defines the geographical location from where the noise sensitive residential can be planned by lower tier governments.

NEF noise contour maps are generated from calculations using **EPNL noise energy data** for a given flight mix. The EPNL data used for NEF modelling does not account for marine impacts including noise propagation along reflective water surfaces and meteorological conditions. The resulting NEF noise contour map therefore under-estimates the noise energy that will actually be experienced at a given location along the waterfront.

Further to this, Island Airport decision makers to date are also not able to respond to questions concerning the **ground noise attenuation algorithm** contained within the NEF software. This algorithm lowers the modelled NEF noise value based on assumed noise absorption by the ground surface during a fly-by event. When takeoffs and landings occur directly above the water surface roughly 600m offset from a tall residential tower corridor at mid tower height, not only is noise not absorbed by the ground, it is reflected and propagates to greater distances due to meteorological conditions. Aircraft fly-by noise is not attenuated by the non-existent ground surfaces surrounding the Island Airport. This modelling algorithm results in further under-estimation of the noise energy that will actually be experienced at a given location along the waterfront, from what is shown on an NEF noise contour map.

Finally, based on available documentation, Island Airport decision makers remain unaware of the unique properties of an urban waterfront, whereby the **ambient or background noise** on the water side of a building is lower than on the city side of the same building. Noise impact assessment reports prepared by the Toronto Port Authority to date have assumed an excessively high ambient noise level along the water face of buildings. In this way, noise impacts due to the marine environment continue to be discounted on paper by Island Airport decision makers, resulting in anticipatable outrage by residents.

Island Airport decision makers, including Transport Canada staff active on the file to date, are not aware of all the above marine noise issues that result in under-estimation of noise effect. They continue to assume that NEF noise maps generated using NEF software can be applied to water surfaces without any additional review and calibration scenarios. The decision makers continue to base the approved number of flights and flight mix at Toronto Island Airport on unsubstantiated assumption.

In response to the question posed, it must be stated that Canada Ports currently do not have the tools and partnerships they need to respond to the maritime noise energy compliance issues.

#### *Fly-by Noise Assessment Requirements*

When discussing noise impacts with Island Airport decision makers, it has become clear there is confusion with respect to continuous fly-by noise being modelled using NEF software, and the single fly-by noise events which dominate at the Island Airport.

The NEF modelling results are not directly applicable with respect to impact assessment of the fly-by noise at the Island Airport. Noise impact assessment at Island Airport needs to review flight capacity from the perspectives of both continuous fly-by and single event fly-by noise events. To date, only uncalibrated NEF modeling results have been produced.

Canada Ports currently do not have the tools and partnerships they need. The port is operating at the pleasure of the Minister. It is understood that Transport Canada is ultimately responsible for training and advising the decision makers surrounding airports with respect to the NEF software outputs and noise energy compliance assessments requirements. This includes assessment of single fly-by noise events.

*Noise Impact Assessment is a Fundamental NEF Process Requirement*

Island Airport decision makers are apparently not aware that confirmation of noise envelope flight capacity compliance actually requires the completion of a noise impact assessment study as per normal engineering protocols and as established in the NEF evaluation process.

For example, attached is a recent presentation to the Community Liaison Committee on Nov 27, 2018 regarding the ongoing Master Plan update study. Page 4 of the presentation suggests that the Demand/Capacity Assessment of the airport (Phase 2 of the Master Plan Process shown on page 3) can be finalized without first completing the noise impact assessment. Per the established NEF evaluation process, the noise impact assessment study component is actually a fundamental requirement to confirming the airport noise envelope flight capacity compliance of the projected demand. This requirement is currently being viewed in a cavalier manner. Canada Ports currently do not have the tools and partnerships they need.

The infrastructure spending projects recommended in the previous 2012 Master Plan and the ongoing Master Plan are currently relying on an incomplete noise envelope flight capacity compliance assessment. The development concepts generated under Phase 3 of the ongoing Master Plan process are once again based on uncalibrated NEF modelled results alone, which ignore the marine environment and thereby under-estimate the noise effects generated and over-estimate the theoretical flight capacity remaining within the Control Contour noise envelope.

**Innovation and trade logistics (Review Stream 1)**

- **Q2. Do ports have the appropriate infrastructure and supply chain integration in place to support future demand for transportation services?**

*Unsubstantiated Airport Infrastructure Spending to Date*

A 3-Year Airfield Rehabilitation project has just been completed in Fall 2018 at the Toronto Island Airport. In addition, a 22% expansion of the airport terminal building is also coming to conclusion.

The approvals for this airport infrastructure spending (including enlarged apron, terminal, runway and taxiway, storm improvements) was based solely on the efficacy of NEF modelling results. NEF modelling in 2009 yielded the currently approved flight mix, which includes for 202 slots per day of Q400 aircraft.

To reprise discussion contained herein under Port Governance (Review Stream 5), the NEF process is intended to confirm noise envelope flight capacity compliance. This is done by comparing the total fly-by noise energy generated from the approved total number of flights and flight mix, with the Control Contour noise energy envelope that was established for the Island Airport in the late 1970s. The noise envelope flight capacity compliance of the assumed demand has actually not yet been assessed or certified. Stationary source noise impacts (ie. roar from airport grounds) has never been fulsomely assessed, nor have single fly-by noise event impacts.

The NEF processes completed by the Port Authority to date consist of modelling uncalibrated noise data which ignores the existence of the water surface and marine environment surrounding the Toronto Island Airport.

As a result, the assumed impacts are being systematically under-estimated, resulting in over-estimation of remaining unused noise energy flight capacity at the airport. The infrastructure spending in the recent past at the Island Airport has been to address the needs of this over-estimated remaining flight capacity.

Based on the established NEF evaluation process, the noise envelope flight capacity compliance will be confirmed once a Noise Impact Assessment can be certified and sealed by a professional engineer. Based on extensive log of negative community experiences to date including rattling windows, regular speech interference, and sleep deprivation, it is probability that the noise impact assessment will focus on the Q400 aircraft activity at the Toronto Island Airport, among the largest size of the aircraft operating.

Accordingly, at this time, there is more than sufficient infrastructure available to the Toronto Port Authority to meet ultimate demand requirements and capacity constraints of the Toronto Island Airport.

### **Sustainability and Port Communities (Review Stream 3)**

- **Q8. How can Canada Port Authorities contribute to building healthier communities?**

#### *Community Health Impact Assessments*

Based on community experience and observation over the past 4 decades, an increasing source of pollution on Toronto waterfront is the Island Airport, especially noise and air quality. The pollution concerns have increased in line with the expansion of airport activity over the past decade.

The Port Authority has to date deemed the quantification and assessment of cumulative airport impacts as being under purview of the City of Toronto. In response to the 2013 Porter Jet Proposal, a Health Impact Assessment was hastily prepared in a 2 month window by the City of Toronto Public Health to meet an unrealistic decision deadline set by the administration of former Mayor Rob Ford, which was never met. The Port Authority is still referring to this City led and scoped study in responding to community concerns about airport related impacts.

There is no reason why communities should be financially supporting Port operations through absorption of environmental effects. For example, an anticipatable wake up resulting from a regular noise standard exceedance is an involuntary financial contribution made by that individual to the Port's operation. This is both unacceptable and unprofessional. There is no rationale (other than financial) why communities should not be protected by our government.

Port Authorities need to take ownership of their effects and prepare regular community health impact assessments which are certified to meet previously established standards applicable to the various port activities under cumulative assessment. The ultimate environmental impact limits of activity need to be established in advance and clearly understood by all parties contributing to the cumulative effects.

- **Q9. What mechanisms could be put in place to increase Canada Port Authority transparency relating to their environmental performance?**

#### *Complaint Management processes*

A few years ago, the Toronto Port Authority established a 'Noise Management Office'. The community appreciated that the Port Authority acknowledged that noise exists and must be managed. The community has since requested that this office be renamed to 'Noise Complaints Management Office' to better align it with activities to date.

Reporting and action on noise complaints to date has led to community outrage. For an overview of current status of the complaints management, attached is a recent community submission concerning the "Annual Noise Management Report 2017" issued earlier this year by the Toronto Port Authority, which has not been responded to yet. It is not reasonable for a port to force communities to log the same complaint for years with respect to an anticipatable exceedance of standards to which the community was constructed.

Complaint management systems should be established and not managed by the port itself, as the port is operating at the pleasure of the Minister. The complaints should be managed by an arm's length consultant and should be able to identify failings of the government in meeting applicable standards. What needs to accompany such an initiative, are targeted outcomes for staff learning and complaints avoidance. The annual reports of the complaints should be structured to give informed input to both port decision makers, stakeholders, and the public. The processes should not be ambiguously named or sensationalized, and should be set up with focussed outcomes which promote mutual learning leading to complaints avoidance.

#### *EA Processes and Cumulative Effects Assessments*

Despite the airport being among the Top 10 busiest in Canada, a cumulative assessment of local air quality, noise impacts, or traffic management has never been fully completed for the Toronto Island Airport by the Toronto Port Authority. Unlike at other major airports, there has never been a Comprehensive Environmental Assessment Study completed at the Toronto Island Airport. The improvements made at the Island Airport over the past decade have been incrementally staged to avoid flagging a major review. The cumulative effects resulting from all infrastructure capacity constructed since 1978, when the noise envelope for the airport was established and the now-existent communities were being planned for, have never been comprehensively assessed. In the past decade, Toronto Port Authority has narrowly redefined environmental cumulative effects to include only the combination of all local area construction-only impacts combined.

The real purpose of why environmental assessment processes exist should be clear and transparent to both port staff steering the project and the public. These processes are precious to all Canadians, and inform both technical work and political decision making. The public should receive fulsome information on what environmental processes were considered, what is being applied to a proposed improvement, and why a more fulsome process is not required for the given circumstance. This is especially important in light of recent refinements to CEAA. There is no reason for decision makers to not be clear on their fiduciary obligations.

Port Authorities at some point in time need to prepare studies which effectively address all typical EA requirements, whether or not the study is officially titled an 'Environmental Assessment'. Port Authorities

need to complete studies in a manner which gives a fulsome account of the cumulative effects in the given study horizon year from all sources combined, including sources outside port responsibility.

*Effective Public Information Center Processes*

Community experiences over the past decade are such that the EA related processes have been viewed by the port as an administrative headache or red tape, where public meeting processes warrant only the last minute issuance of very preliminary draft material containing significant omissions. It should also not be too much to ask that notices of project commencement and project completion should be disclosed in committee meetings.

A recent example of a completely insufficient and ineffective public process was PIC #2 for the ongoing Master Plan process. See attached fulsome community submission of concerns regarding the presentations. Other examples available.

Thank you for this opportunity to input into this review.

Yours Truly,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Hal Beck, P.Eng.

Attachment #1: Status Update to Community Liaison Committee, Airport Master Plan, November 27, 2018

Attachment #2: YQNA Concerns with "Annual Noise Management Report 2017", July 2018

Attachment #3: Feedback on 2018 Master Plan PIC #2 Presentations, June 2018



**Attachment #1**

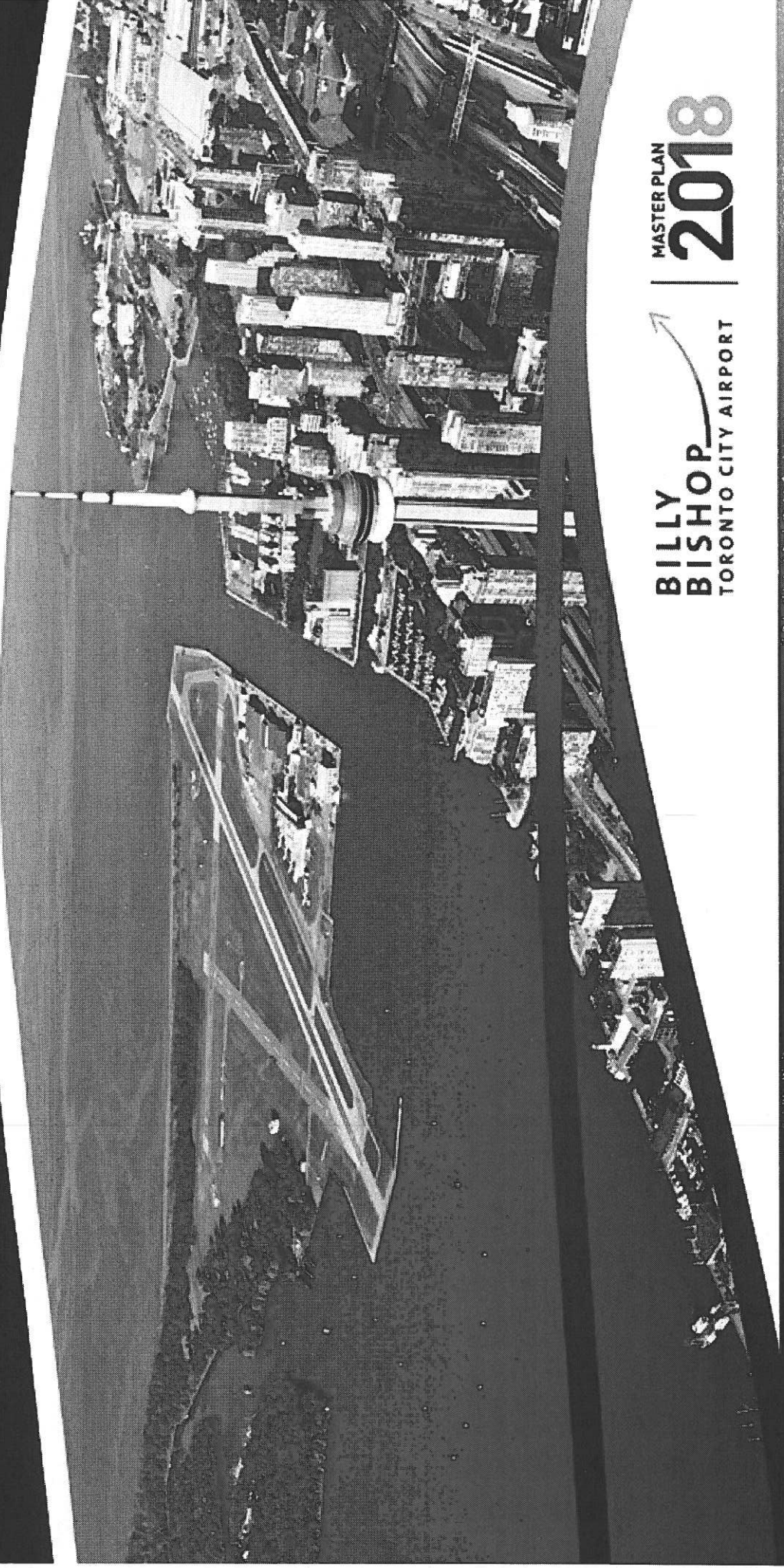
**Status Update to Airport Community Liaison Committee  
Airport Master Plan  
November 27, 2018**

**By Toronto Port Authority**

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# Status Update to Airport Community Liaison Committee

November 27, 2018



**BILLY  
BISHOP**  
TORONTO CITY AIRPORT

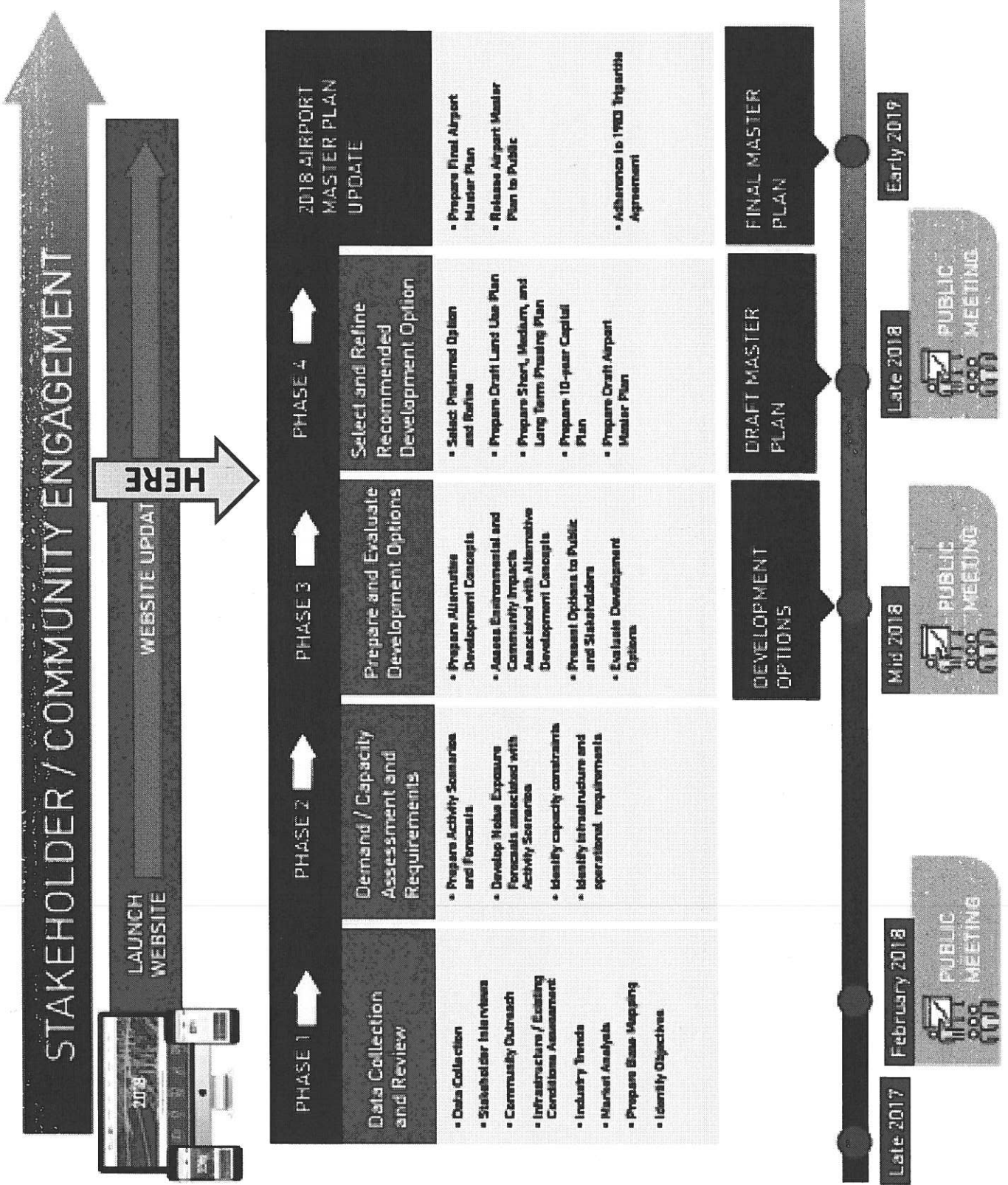
MASTER PLAN  
**2018**



## Status Update

- To date we have held over 65 meetings with airport stakeholders, community groups, politicians, agencies, including first nation with territorial treaty rights which has resulted in consultation with over 500 individuals representing various interests.
- Our next meeting is scheduled on Monday December 3 with the Toronto Council of Commodores, which represents all clubs along the GTA waterfront. This will be a good opportunity to receive input from current and in coming Commodores at this turnover meeting.
- As we wrap up Phase 3 of the Airport Master Plan, the discussions and feedback we have received to date will provide us good insight from all interested individuals and stakeholders.

# Our Master Planning Process





## Status Update

- WSP has been working on the technical assessment work which includes:
  - Review NEF Modelling of Activity Scenarios based on current and planned movements
  - Proposed Preferred Airport Development Plan and Land Use Plan
  - Reviewing Dillon Traffic Study once finalized
  - Reviewing COPA Survey Results
  - Reviewing additional inputs from City initiatives and reports
  - Preparation of a draft Airport Master
- Additional technical studies to be undertaken after the Master Plan is finalized:
  - Noise Study Assessment Review, which will be discussed with the Noise Sub Committee
  - Glycol and Storm Water Management Assessment Report



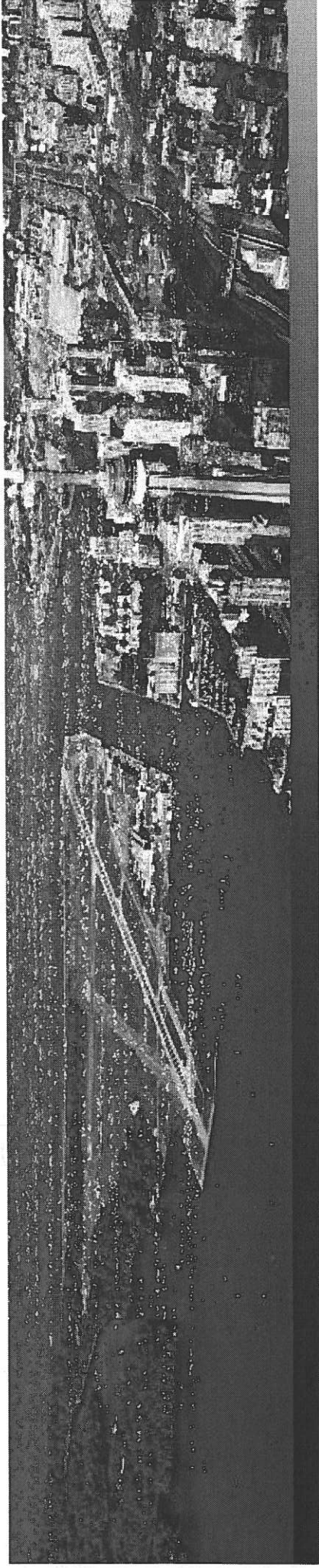
## What the Airport Master Plan will provide

At public meeting #3, the draft airport Master Plan will include:

- Preferred Airport Development Plan and Land Use Plan
- Preferred Activity Scenario
- Description of RESA Design options which will comply with regulatory changes

Understanding what is in scope:

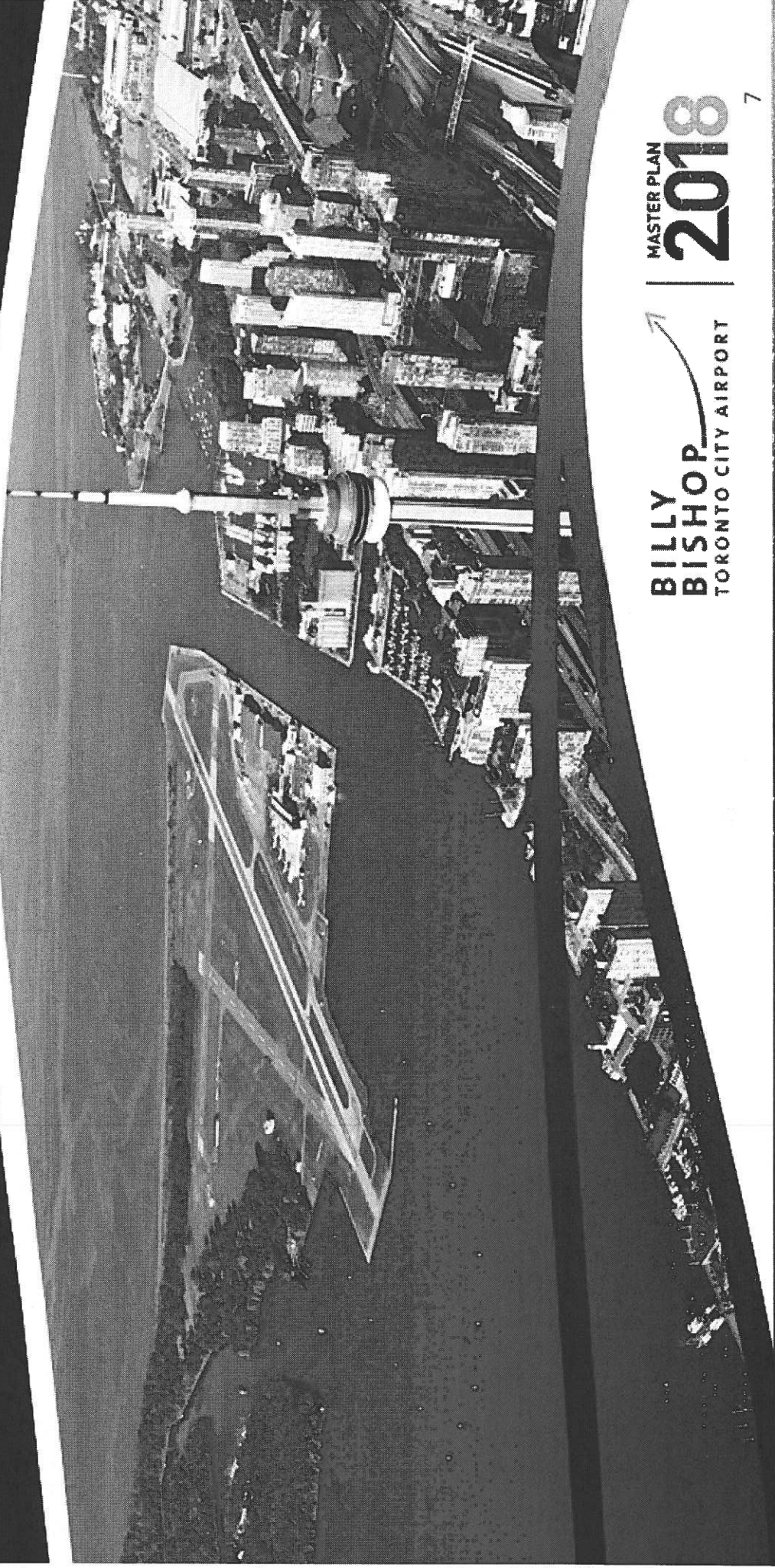
- Development concepts are in keeping with Tripartite Agreement
- Runway expansion is not considered
- Terminal expansion is not considered
- Existing hangar development on north side of the airport to remain
- Proposed activity scenarios for future movements will take into consideration all impacts



## Next Steps

- Upon reviewing the technical assessment work, we will be working towards preparation of a draft Master Plan.
- We will be planning on holding Public Meeting #3 Q1 of 2019 at a local venue in the community. A public meeting notice will be shared 1 month prior to the meeting date and will be shared widely through social media, posted on the project website sent to the CLC and Noise Sub Committee, to ensure all stakeholders and interested parties are notified.
- A draft master plan will be posted for a 30 day review period after the public meeting and finalized once all comments have been reviewed and considered.

Thank You



MASTER PLAN  
**2018**

**BILLY  
BISHOP**  
TORONTO CITY AIRPORT



**Attachment #2**

**Concerns with “Annual Noise Management Report 2017”  
to Toronto Port Authority  
July 2018**

**By H. Beck, YQNA Liaison**

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## **YQNA Concerns with the “Annual Noise Management Report 2017” posted by Toronto Port Authority**

### **Introduction**

A “2017 Noise Management Summary” was presented at committee meeting CLC 29; whereas, an “Annual Noise Management Report 2017” was not presented to CLC. The Annual Report was distributed and posted to the Ports Toronto website.

YQNA has concerns with the content and purpose of both these documents discussed separately below.

Concerns with the noise complaint process in general have been described by members as follows:

- Incorrect or misleading statements in the noise complaint summaries
- Outstanding unresolved noise impacts which are unnecessarily triggering the need for repeat noise complaints in the first instance.
- Ineffectual staff responses to complaints. Poor learning outcomes for airport staff.

YQNA residents would like to know how many complaints on a routine excessive noise issue are required in order to eliminate the need to file more complaints.

- Complaint fatigue should NOT be shown in an annual report to suggest improved noise containment by the airport.
- There have been sufficient complaints already logged in prior years to allow staff to identify specific concerns and their probability based on meteorological conditions in the urban marine environment.
- For example, the Ground Runup Enclosure (GRE) was first proposed in 2009 by Jacobs Consultancy to address complaints and was opened April 19, 2017. From this, community members logged complaints for more than 8 years about excessive Power Run noise impacts. In 2016, engine run ups made up 15% of total noise complaints. The complaints were avoidable as the maintenance Power Runs could have been done in a different municipality in the first instance.

## Concerns with the “Annual Noise Management Report 2017”

(not presented at CLC 29)

The following redline concerns are with respect to the above report which was posted on website.

### Overall Visual Language of the Report

There are 3 large arrows pointing downward on Pages 3 and 5 with captions stating reductions in certain noise complaint statistics. It was observed there is no larger arrow shown on Page 1 pointing upward with caption stating the total number of complaints have increased.

- Please do not use large arrows in graphics to sensationalize what should be a working technical report on complaints to assist mutual understanding of all stakeholders.

There are scientific looking sinusoidal waves with bars and numbers superimposed on pages 2, 5, and 6 that look like there is actual noise data printed with small font size.

- Please remove the sound wave graphics as these (along with the name of the report) give the reader a false impression that noise emissions themselves are the subject of the report and that these are actually being managed.
- YQNA residents have been requesting for some time that the unacceptable noise levels received by them actually be comprehensively monitored in field and the noise exceedances be documented fulsomely and resolved so that few complaints are required in the first instance.

### Technical concerns

Can as much of the complaint data as possible be shown on a rolling 10-year basis, starting with 2007?

The CLC presentation contained data should have been incorporated or appended to this Annual Report.

- Please incorporate the technical data information shown in the CLC presentation with the official ‘Annual Noise Management Report 2017’.

Page 3

The noise complaint location map currently shows only 2 complaints filed by YQNA members, which is definitely incorrect.

- Can the actual correct number of complaints filed by YQNA members be shown instead?
- Could the boundaries of the neighbourhood associations be shown on map?
- Could additional information be incorporated showing at what elevations, storeys or floor numbers the complaints were filed? Eg. how many complaints filed were with respect to noise at ground elevation?

There is a graph showing 5-year decline of 46% in complaints since 2013.

- Please add footnotes to show to what extent did the following activities contribute to the annual complaint numbers:  
2013 Porter Jet Proposal,  
2015 Master Plan process,

Oct 2015 federal election with promise to alter Port Authority Board function, 2016-2018 terminal and airfield construction.

- Can this graph be revised to show rolling 10 year complaint data starting in 2007? Note that complaints were not being responded to by Port Authority for approximately one year in 2010, however, it was noted in past that those complaints filed were not destroyed.

Can a table be added to the report comparing the 10-year rolling total annual complaints to annual number of movements?

Page 2

Can a table listing all the communities mentioned and not mentioned on page 2 and their associated total number complaints over 10 years be included?

It is stated there was an increase in 5,100 additional movements last year. This equates to an average additional 14 single fly-by events per day.  $[5100 \div 365 = 14]$

- Based on CLC 29 presentation data on Slide 2, this equates to a 4% increase in the total movements or single fly-by events which impact residents. Therefore, this 4% increase in fly-bys triggered a 10% increase in Total Aircraft-related Complaints shown on Slide 7. This relationship is not readily available from the report.
- The data in the presentation contradicts verbiage on page 2 of the Annual Report posted, as the numbers are in fact NOT indicative that the noise program is keeping pace with growth. Please revise or remove wording.

It is stated that construction resulted in more idling aircraft noise with an apology from the Port Authority for this disruption.

- The recent increased idling concerns were triggered by having more than 2 planes idling at end of runways during on-going terminal and airfield construction scheduled to end in Fall 2018.
- Please clarify to readers of the annual report this level of idling is well within the impacts envisioned by the airport decision makers when they approved a 202 slot per day commercial operation with Q400 aircraft in 2011.
- The 2011 approved flight capacity as envisioned will actually result in an even higher number of idling aircraft than experienced in 2017. See attached figure from Jacobs Slot Capacity report dated Feb 2010 (**Attachment #1**) showing 10 planes idling at east end of runway, which was relied on by airport decision makers in 2011 when they subsequently approved ultimate flight capacity.

Page 5

It is proudly stated that only one runup complaint was received since the GRE opened April 19, 2017.

- This one complaint appears to have been submitted by me and identified 2 different concerns with the noise complaint system.
- Firstly, the complaint concerned an unscheduled run up. The unscheduled run up could not be confirmed by staff and the complaint remains open. See attached email chain dated Dec 22, 2017 at 932am (**Attachment #2**).

- Secondly, the complaint web page is not working properly. On Dec 18, 2017 within a couple minutes of 9pm, I had submitted: (a) a blank complaint involuntarily, (b) then my first complaint about the poor functioning of the noise complaint web page, and then finally (c) my real noise complaint on the runup noted above. See **Attachment #3** showing the content of my first complaint on Dec 18, 2017 extracted from my own records, which I had filed regarding the webpage. Immediately following on this attachment is the staff email dated Dec 22, 2017 which was attempting to reconcile the discrepancy between the system time log of the second complaint I had filed on the runup versus the actual time of the complaint filing.

Page 7

The airport was a winner of the Environment Achievement Award for 'Noise Mitigation Program' in 2017.

- This is in stark contrast with the vibrating windows, speech interference, and sleep interruption incurred by residents on regularly basis every week.
- Please forward or present details to CLC of the purpose of this Award.

Page 8

It is not clear how the traffic management information on this page is related to the overall increase in noise complaints. Please clarify or remove from the report.

It is not clear how waterfront tourist use of the Bike Share rack at intersection of Bathurst/ Eireann Quay is related to the increase in airport noise complaints. Please clarify or remove from the report.

Page 9

Many residents are concerned that the flight tracking information on WebTrak is not factual.

- Area resident Jim Panou presented to residents over a year ago that he has observed and photographically documented that flights landing do not follow the certified steep landing glide slope for each of the runways, but instead land close to the 3 degree slope common at other airports. The flatter flight path would increase noise impacts above what is assumed.

It is incorrectly stated that there is a "limit on total daily flight activity" at the airport.

- The limit is actually defined by average hour noise energy and other environmental constraints. Please clarify or remove.

It is incorrectly stated that the Island Airport is "one of the most noise restricted airports in North America, operating with a NEF of 25".

- The NEF 25 Control Contour is not a requirement of the Tripartite Agreement. In fact, it is the standard of both the federal and provincial governments.
- Please revise to state that NEF 25 is the limit recommended for federal airports in Canada with respect to noise sensitive land use. See TP1247 Section 6.1.
- Please revise to state that NEF 25 is the provincial standard for noise sensitive land use. See NPC-300 Section C2.1.

It is stated that the that "Specific noise parameters are also placed on the type of aircraft the can fly to and from the airport." Left as-is, this statement incorrectly implies that there are additional burdens placed on the Island Airport.

- Add to the end of this sentence "... as are placed at all other airports in Canada to meet the local NEF Control Contour requirements."

Please add that the current rate per curfew violation is a \$10,000 fine amount.

Can a table showing 10 year rolling curfew violation data be incorporated into the annual report.

It is incorrectly stated that flight paths over water reduce noise disturbances on Toronto waterfront residents.

- Please revise to state that because the flights are landing and taking off directly over the reflective water surface, immediately beside and at mid height of the residential tower corridor, the waterfront residents are subjected to at least double the sound pressure they otherwise would have been subjected to had the reflective lake water surface and marine environment surrounding the Island Airport not existed.

### **Concerns with the "2017 Noise Management Summary"**

(presented at CLC 29)

The following redline concerns are with respect to the above noted presentation to CLC.

Can the information in this presentation be incorporated or appended to the "Annual Noise Management Report 2017"?

The data in this entire presentation is hard to follow and can be presented more concisely in tables with smaller font size. In addition, the data only looks back one year.

- Can the rolling 10-year data be presented whenever possible starting with 2007?
- Can this presentation be repackaged to show all information in separate tables?

For example:

- Number of complaints by year each type
- Yearly increases/ decreases in the complaint numbers each type.
- Percentage breakdowns of complaints by type each year.

Slide 5

An increase in 35 Total Complaints is noted. This is a 15% increase, not 13% as noted on the Slide.

#### Slide 7

An increase in Total Aircraft Related Complaints of 10% is shown. The explanatory notes stated that: "This increase is attributed to new commercial operations over Toronto Islands and aircraft waiting for gates."

- This contradicts Slide 6 which shows the number of commercial complaints actually dropped by 2 complaints.
- Please clarify the explanatory note.

#### Slide 8

A decrease in Total Run up Complaints of 28 was noted as being due to the GRE opening on April 19, 2017. Most residents are not aware of the term 'runup' or that there are 5 types of runups which can occur at airport site. Therefore, the runup complaints can therefore be assumed to be related to the extreme 'Power Runs' only.

- There was a corresponding higher increase in 'General Complaints' by 38 shown on Slide 6.
- A corresponding observation could be that the runups other than 'Power Runs' are causing complaints. (During the presentation the example given of a 'General complaint' was: 'The airport is noisy today'.)

The GRE was approved for an operation involving less than one Power Run noise event per day and roughly 15% of the time wind conditions will force future growth Power Runs to occur unmitigated as in past.

- Can 10 year rolling 'Power Run' complaint data be shown starting in 2007.

#### Slide 9

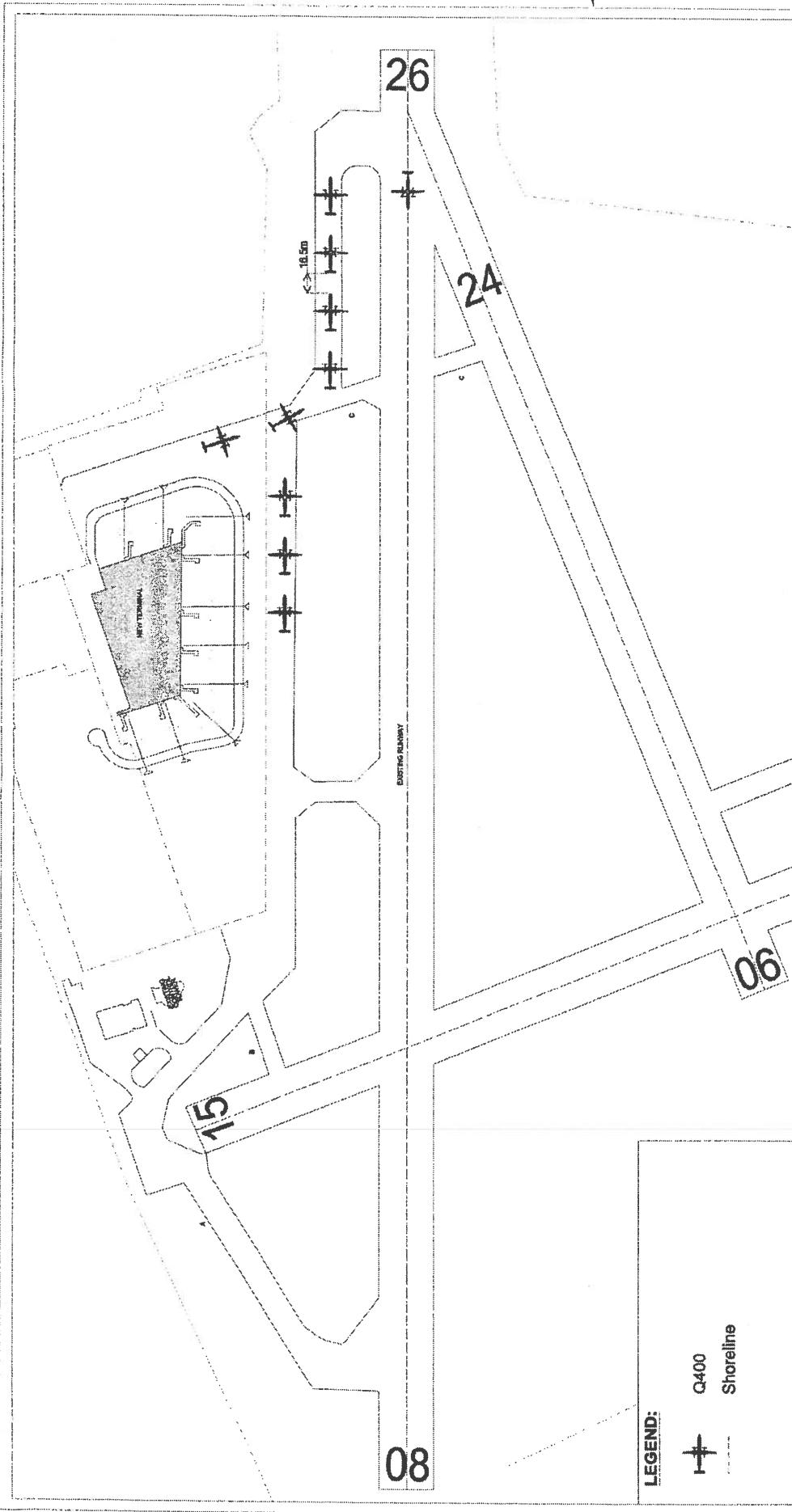
Can the location of the south field where aircraft are to hold for gates be shown on a plan?

#### Slide 10

It is stated that 5 working days are needed to respond to complaints.

- Based on information on Slide 5, there were 271 complaints in 2017. This equates to an average of 5 complaints per 7 days **OR** less than one complaint filed per day.
- Response time improvement appears possible. Please shorten response times on complaints.
- Can a table be added which shows the number of responses by number of days to respond?
- Can data be added showing the number of open and unresolved complaints?

# ATTACHMENT # 1



Drawing Title <b>Q400 Queuing- Runway 26 Operations</b>	Revision <b>1</b>	Exhibit <b>Exhibit 3, Departure Queue Potential in AM Peak</b>
Project Title <b>Billy Bishop Toronto City Airport Capacity and Slot/Schedule Management</b>	Consultant <b>JACOBS Consultancy</b>	Scale <b>1:3000</b>
Project Title <b>Billy Bishop Toronto City Airport Capacity and Slot/Schedule Management</b>		Consultant <b>JACOBS Consultancy</b>
Drawing Title <b>Q400 Queuing- Runway 26 Operations</b>		Revision <b>1</b>
Date <b>NOV. 23, 2009</b>		Scenario <b>Scenario 1</b>
Scale <b>1:3000</b>		Exhibit <b>Exhibit 3, Departure Queue Potential in AM Peak</b>



## ATTACHMENT # 2

**Hal Beck**

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**Subject:** FW: Noise Inquiry -Dec 18, 2017 859pm runup  
**Attachments:** Hal Beck Complaint.jpg

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**From:** Gary Colwell [<mailto:GColwell@portstoronto.com>]  
**Sent:** Friday, December 22, 2017 09:32  
**To:** [hal.beck@hotmail.com](mailto:hal.beck@hotmail.com)  
**Subject:** Re: Noise Inquiry

Dear Hal,

I am currently investigating this occurrence. At present we did have a scheduled maintenance run that took place at 20:00 for 10 minutes in the Run-up enclosure, however this would not explain the noise at the time of your complaint. The wind at the time you indicated was 10 knots out of the south west ( see attached). Once I determine if there was an unscheduled engine run I will advise

Gary Colwell

Noise Management Office

Billy Bishop Toronto City Airport

On 2017-12-18 18:16:05, [hal.beck@hotmail.com](mailto:hal.beck@hotmail.com) wrote:

A loud engine runup roar just ended at approx 8:59pm. (a) In what specific location on the airport site was this plane located? (b) None of the web complaint form drop down options include "engine runup -not scheduled service". Was this runup indeed scheduled? (c) Please confirm there is currently no wind speed at the time of the incident.

# ATTACHMENT # 3

**Hal Beck**

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**From:** Hal Beck <hal.beck@hotmail.com>  
**To:** Hal Beck  
**Subject:** RE: Noise Inquiry -Dec 18, 2017 9:00pm complaint system time log error

1ST COMPLAINT FILED DEC 18, 2017:

Tuesday, December 18, 2017 9pm

When submitting a noise complaint and using the auto fill function of personal address information, if you accidentally click return twice on a given line, the complaint is immediately submitted with your confirmation, without the content of the complaint having been entered yet. This was a problem over a half year ago. Has anyone at airport tested the noise complaint web form? If so, why does the problem exist? For example, see my empty complaint attempt submitted just now on Dec 18 at 9pm.

**Hal Beck**

Tel: 416 260 6028  
hal.beck@hotmail.com

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**From:** Gary Colwell [<mailto:GColwell@portstoronto.com>]  
**Sent:** Friday, December 22, 2017 10:14  
**To:** [hal.beck@hotmail.com](mailto:hal.beck@hotmail.com)  
**Subject:** Re: Noise Inquiry

Hi Hal,

Could you just confirm the date and time of the disturbance as the time we received the complaint and the time of the complaint do not coincide

Thanks!

Gary

2ND COMPLAINT FILED DEC 18, 2017:

On 2017-12-18 18:16:05, [hal.beck@hotmail.com](mailto:hal.beck@hotmail.com) wrote:

A loud engine runup roar just ended at approx 8:59pm. (a) In what specific location on the airport site was this plane located? (b) None of the web complaint form drop down options include "engine runup -not scheduled service". Was this runup indeed scheduled? (c) Please confirm there is currently no wind speed at the time of the incident.

**Attachment #3**

**Feedback on 2018 Master Plan PIC #2 Presentations  
to Toronto Port Authority  
June 2018**

**By H. Beck, YQNA Liaison**

## **Feedback on 2018 Master Plan PIC #2 Presentations June 25, 2018**

The comments below are with respect to the 3 presentations in the sequence in which these were attended. Additional comments are added below about the Open House itself as per the Feedback form distributed.

1. City Led Initiatives
2. Development Concepts
3. RESA
4. Open House

### **City Led Initiatives presentation**

Page 4

Given the approved takeoff and landing times, the Tripartite Signatories including the City do not want residents to be able to get 8 hours of sleep. In addition, the airport noise begins and ends before and after the approved takeoff and landing times, further reducing sleeping time available. What was the rationale underlying this approval? Please address in Master Plan process.

Stationary Source Noise requirements (ie. roar from airport site) are covered under Section 16 of Tripartite Agreement and requirement of municipal land development approvals since the 1970s. Why was this not specifically stated on this slide, along with NEF fly-by noise control contour constraint? Please address in Master Plan process.

This slide contains confusing or incomplete information concerning how NEF Contours relate to the Tripartite Agreement.

- Contrary to what is noted in the slide, the Tripartite Agreement is not needed to cover the preparation of NEF contours. The NEF Control Contour at an airport is prepared for CMHC and takes precedent over the local Tripartite Agreement at Island Airport.
- The Tripartite Agreement does allow the City to request that 'compliance contours' be prepared using NEF software to check compliance if ongoing fly-by noise is being contained within the established permanent Control Contour limit, beyond which residential towers were subsequently approved by the City.
- The subsequent modelling of compliance contours using NEF software (to demonstrate that airport fly-by noise is still being contained at the established geographical location of the Control Contour) is a required regular work task at all airports to ensure public health and safety and the work task is not unique to Island Airport.

This slide also contains a confusing or incomplete definition of NEF contours, which are described as a 'land planning tool'. In a Master Plan context, NEF contours are actually used as a flight capacity decision making tool.

To clarify, noise contour mapping at an airport is generated by NEF software to show the noise environment that is projected to result from a given flight mix (ie. aircraft types and number of flights). Accordingly, noise contours can serve purposes other than just land planning, to include interim noise compliance checks as well as reviews of alternative growth scenarios under a Master Plan process.

- When planning a new airport, a range of flight mix scenarios are modelled to generate the ultimate noise energy contour map, referred to as the Official Noise Map. Based on federal requirements, the NEF 25 contour line is typically extracted from the Official Noise Map. At the Island Airport, this contour line was designated as the Control Contour (or noise envelope) for the airport. The upper noise energy level ever to be received from the airport at the geographical location of the Control Contour is established by its NEF value.
- The lands located outside the geographical location of a Control Contour can then subsequently be zoned and developed for noise sensitive land uses with City approval. Only in this instance, is the NEF software a 'land use planning tool'.
- The Tripartite Agreement discusses regular compliance reviews to ensure that the 25 NEF contour line generated by the NEF software for a then prevailing flight mix is still being contained within the ultimate 25 NEF Control Contour line shown on the Official Noise Map. In this instance, the NEF software is a 'noise envelope compliance tool'.
- During the Master Plan process, noise contours are generated for alternative flight mix growth scenarios and reviewed to ensure the 25 NEF contour line generated for these flight mixes is still contained within the 25 NEF Control Contour line. In this instance, the NEF software is a 'flight capacity decision making tool' which informs the infrastructure needs to support the number of flights modelled.
- Noise contour mapping must be premised on sound engineering judgement and certification, regardless if the NEF software is used to identify costly land expropriation requirements when land planning, or if used to review the impacts on humans that are projected to result from a proposed flight mix.

In 2011, airport decision makers approved a flight mix for Island Airport which included 202 slots per day of Q400 aircraft, as was previously modelled in 2010 by Jacobs Consultancy with noise contained within the Control Contour limit at the Control Contour location on the water surface. It was verbally noted during the PIC 2 presentation that NEF modelling does not take into account the water surface and marine environment surrounding the Island Airport. Since 1983, the Tripartite Agreement signatories have been relying on similar incomplete NEF growth contour calculation processes by various consultants when making flight capacity decisions at the Island Airport. Please address in Master Plan process.

The terms of the Tripartite Agreement can only make matters better for the residents, exceeding the standard requirements of municipalities and agencies referred to under Agreement Section 16. The

terms of the Agreement cannot make impacts worse for residents than the standard to which the land use was approved by the signatories as envisioned collectively when the Agreement was signed.

Page 5

As noted in CLC 29, the currently approved flight mix, approved in 2011, has since been confirmed to be an arbitrary decision, not supported by sound technical analysis, and without engineering certification (based on publicly available documentation). Environmental noise impact capacity assessment at the Island Airport has not yet been concluded and professionally sealed as required. The 2014 framework does not acknowledge this major impact assessment deficiency which impacts airport infrastructure spending decisions. Please address in Master Plan process.

Page 6

Of concern to many local residents is lack of parking. As observed over 2 decades, parking problems were initially caused by City approval of new buildings containing too few parking spaces due to aspirational modal split assumptions not achieved. The problem has been severely exacerbated by airport users and high parking overnight rates of airport service providers, despite current airport activity being significantly below the approved number of daily flights. The proposed underground parking adjacent the proposed aquatic center is not shown or discussed. Please address parking capacity and construction timing in Master Plan process.

Page 13

The increased use of Uber and non-taxi or limo trips to airport was not discussed. Please address in Master Plan process.

Ports Toronto monitoring of idling traffic on local roads waiting airport passengers not discussed. Please address in Master Plan process.

Coordination of major city events affecting waterfront traffic for periods of time, and airport passenger road traffic not addressed. This affects accessibility of emergency equipment to residents and airport. Please address in Master Plan process.

Page 19

The first sentence contains incomplete information concerning the City's municipal obligation regarding the Island Airport.

- Contrary to what is alluded to on this slide, the City is at minimum an equal signatory of the Tripartite Agreement which governs airport activity on City property. The Agreement itself was to facilitate City approval of the airport activity on City land.
- Based on the overtures of both Transport Canada and the Harbour Commission in the 3 years leading up to the City signing the Agreement, the context is such that the City is in fact the primary signatory.

- Also, the Island Airport is not a traditional federally run airport as suggested on the slide. By approving the activity level on the airport site through the Tripartite Agreement, the City has at minimum equal jurisdiction and responsibility of air quality and noise issues.

Page 23

This PIC 2 is supposed to be a key milestone for the Master Plan Update process. Why was the City's "coordinated, inter-divisional response on proposed Master Plan changes" NOT available for PIC 2 presentation and Q&A? Was PIC 2 scheduled too soon? Can a separate public meeting be held just to discuss this City response so that public can be assured that past discrepancies in such responses are addressed? Please address the response in Master Plan process.

### **Development Concepts presentation**

Page 2

Please include an appendix to Master Plan with comprehensive of list of public concerns and action items for the Master Plan which emerged through the community consultations.

Page 3

The first bullet is confusing as it suggests noise is especially of concern at ground level. In addition, NEF modelling results apply to ground elevation only, to which there are concerns as terrain modelling of the residential tower corridor in marine environment has not yet been completed.

Please clarify that noise concerns to be addressed in Master Plan include:

- Ground roar from airport site.
- Departure and landing noise.
- Noise impacts at middle and upper storeys from both airport ground source and fly-by.
- Vibrating windows.

The third bullet is confusing in that it suggests the concerns expressed are with respect to the future increase in activity beyond what is already approved. Community is concerned with the current level of activity which is below the approved level. Given enormity of current concerns, any proposed future increase in activity beyond approved is not even under consideration currently by YQNA members.

A top concern not mentioned is fuel transport and storage to support currently approved 202 slots per day as well as any projected growth beyond that already approved not yet utilized. These are in addition to the heavy commercial trucks on Eireann Quay. Please address in Master Plan process.

Page 4

The list of tenant concerns is perplexing.

- The key issues from airport tenants would suggest that growth has exceeded that projected in the previous Master Plan. This is confusing given the current aircraft activity is below the previous Master Plan growth projected.
- Given the poorly defined window of public input to this Master Plan process, it is not known when these concerns from tenants were raised. For example the congestion/ delays on the existing apron and taxiways will probably be addressed at conclusion of 3-year Airfield Rehabilitation project later this year.
- Please address why these concerns exist and are unavoidable, otherwise they can be readily interpreted as having been artificially induced.

Page 5

The improvements to 'operational efficiency' which do not require infrastructure improvements following Airfield Rehabilitation were not presented at PIC 2 as anticipated.

It is anticipated that operational efficiencies will emerge once noise standard compliance assessment is completed.

Page 6

There are large arrows showing noise aimed north. However none are aimed at YQNA community. Why? Please show arrows of aircraft noise pointing in all directions 360 degrees surrounding airport.

Please add information to this figure showing the vertical radiation of the noise to higher storeys, not just ground elevation. Noise emanates from source in all multiple dimensions.

This figure assumes that YQNA residents are not bothered by ground roar (including reverberations off reflective horizontal and vertical surfaces)? Please address in Master Plan process. This was mentioned in consultation meeting.

Please add traffic congestion area to include southbound and south turn lanes of Lakeshore/ Bathurst intersection observed to be blocked occasionally due to airport traffic.

Page 7

Presenting the development concepts are premature without environmental growth capacity assessment, which should have been presented in PIC 2 to justify the proposed development concepts.

The central issue of Master Plan is not addressed in PIC 2 ie. growth projections, number of flights, and aircraft flight mix.

- Master Plan is to identify infrastructure improvements required to address growth need.



- Growth infrastructure needs are in turn determined in part by compliance of the projected growth noise contours, with the NEF Control Contour and the environmental capacity assessment of the vicinity.
- Based on community experiences, the Q400 aircraft has contributed significantly to speech interference, sleep deprivation, and vibrating windows.
- Growth contours including 202 slots per day of Q400 aircraft activity were modelled in 2010 to be contained within the NEF Control Contour.
- The subsequent Draft Noise Impact Assessment study, which was to study the impact of the modelled results on which the eventual 202 slot per day approval was based, was never concluded or professionally sealed. This draft report contains obvious technical errors and omissions. This study was never publicly presented despite it being the critical study directly and indirectly affecting all public concerns surrounding the Island Airport.

Given that there is no information available at PIC 2 meeting supporting the projected growth or by extension these development concepts, can another meeting be held prior to the final proposed PIC, to present professionally certified Noise Impact Assessment information which supports the current infrastructure capacity of the Island Airport as of completion of ongoing 3-year Rehabilitation project to be completed Fall 2018?

Please define growth scenarios to be tested for environmental impact. This was not presented at PIC 2 as anticipated by Master Plan process timeline. Eg. flight mix, loading, fly-through scenarios pre-defined for traffic data collection impact analysis.

### **Runway End Safety Areas presentation**

Page 5

Apparently carriers expressed concern over economic viability if reduced runway length declared. Tripartite Agreement does not require the airport to be economically viable. Ports Toronto confirmed in past that Ports Toronto was viable as of 2009. Any level of aircraft activity exceeding this level is in excess, based on economic viability perspective, and based on publicly available environmental impact assessment information.

Page 9

This presentation of RESA requirements at PIC 2 is premature given the fundamental NEF growth contour limits have not been prepared or assessed yet as required by PIC 2 per Master Plan process timeline. It is anticipated that once a subsequent noise impact assessment is completed and the approvable number of slots per day is finally certified to meet standards governing municipalities and Tripartite Agrmt Section 16, the demand for RESA requirements may warrant pause for reflection.

Based on community experience, the rise of concerns regarding speech interference, sleep deprivation and interruption, and vibrating windows is strongly correlated to use of Q400 aircraft.

**General: Was the Open House helpful**

Open House Meeting format was not appropriate for content nor for the number of attendees expected.

- Multiple streams of presentations are beneficial when insufficient time exists for all presentations to be done in succession. This was not the case for this meeting.
- Why were all presentations not made in succession in one room, so that the same questions do not get asked by different people in 3 separate rooms. The variety of questions to be reported on will be lower as a result.
- Public Q&A time was therefore reduced and lost between meetings despite requiring same length of time to attend for the evening.
- The meeting materials were not made available 2 weeks prior to the public meeting as requested. It was stated one month prior, in previous CLC 30 meeting on May 30, 2018, that PIC 2 meeting materials could not be made available given the status of the project. A long series of presentations to neighborhoods, in which significant inter-connected concerns were expressed, had just ended. Why is the PIC 2 meeting and project being rushed?
- The Open House format generally does not work for YQNA members with respect to airport expansion. A major public concern is lack of alignment and cohesiveness in public policy and coordination between jurisdictions with respect to airport activity. It needs to be observed by public that all Tripartite Agreement signatories and airport decision makers understand the totality of issues and concerns. There should not be an opportunity for some staff to miss a key presentation. This is especially the case when there is expressed disagreement amongst signatories on some key issues.

Parking information on meeting notice was insufficient.

- There are two parking lots west of the Westin Harbour Castle Hotel: an open air lot and underground lot at 39 Queens Quay East.
- The immediately adjacent open air lot contained significantly reduced parking spots due to construction crew equipment with traffic guard.
- Cost of parking at 530pm in both lots cost \$25 flat rate. Some members of public may have been unable to afford and did not attend meeting.
- Cost of parking at same lots as of 6pm was \$8 flat rate.
- Accordingly, after driving to Hotel and arriving at 5:25pm in order to catch opening presentation, I instead waited a half hour inside car, missing the presentation, and paid for parking at 6pm. I then walked to the main Hotel entrance at south building.

Meeting location details provided in notice were insufficient.

- Meeting location was actually in West Harbour Castle north building (not main south building). Meeting notice did not state this.
- At 6:07pm, the greeter at podium at front door at top of stairs in south building told me that the message board says the meeting was between 4pm-6pm and has just ended. Some members of public may have been turned away from meeting.

- Given configuration of building, it took approx 10 minutes more from south building entrance to actually arrive late after the first break out presentation started.

#### Time of meeting inappropriate

- The opening remarks for a public meeting were scheduled at 530pm on a work day. By choosing this time, was the intention to keep number of public attendees low?

#### Timing of meeting also inappropriate

- The meeting was on June 25 during one of the most festive weeks in the City's calendar and at onset of summer vacation period. I have always advised tourist friends to come to Toronto specifically in this last week of June before Canada Day long weekend. By choosing this date, was the intention to keep number of public meeting attendees low?

#### Timing of PIC #2 Meeting Pre-mature

- As discussed herein, this PIC #2 was pre-mature with respect to the critical technical consideration of Phase 2 not yet completed ie. demand/capacity work tasks. This means the proposed final PIC #3 will contain too much new information for public presentation and Q&A .
- PIC 2 was to present all work completed under both Phase 2 and 3 of the study, both of which are still partially completed. PIC 2 should also have showed how the list of concerns from the recently concluded neighbourhood meetings have been incorporated into the various work tasks. This was not presented.
- Essentially the key material that was to have been presented at PIC 2 will now be presented alongside the draft recommendations for the Master Plan according to the process timeline.
- An additional PIC #4 should now have to be added to Master Plan process.