



Geoffrey A. Wilson
President & Chief Executive Officer
Président-directeur général

60 Harbour Street, Toronto, Ontario, Canada M5J 1B7

Tel/Tél: 416.863.2037 • Fax/Télécopieur: 416.863.0495 • email: gwilson@torontoport.com

February 27, 2014

Mr. John Livey,
Deputy City Manager, City of Toronto
11th Floor, East Tower, City Hall
100 Queen Street West
Toronto, Ontario M5H 2N2

Re: Proposal by Porter Airlines for use of Bombardier CS100 jet aircraft at the Billy Bishop Toronto City Airport (the "Porter Proposal")

Environmental Assessment for Proposed Runway Extension for the Porter Proposal (the "project")

Dear John:

The Toronto Port Authority has engaged in full with City staff to provide assistance and support to your review efforts of the Porter Proposal. You'll note our letters of January 24, 2014, February 27, 2014, and the January 23, 2014 Technical Summary of items raised in the City staff report and public meetings all point to commitments we are proposing as part of the TPA's conditional support of the Porter Proposal. The TPA believes in a "Do No Harm" approach regarding airport operations on Toronto's waterfront, ensuring that the airport continues to co-exist effectively with others and does not overwhelm the mixed-use nature of the area. We have stated that our support for the Porter Proposal would require this condition be met.

Should the Porter Proposal be approved by members of City Council, the TPA would undertake its own rigorous assessment of the Porter Proposal applying our "Do No Harm" criteria to all elements of the proposal, including the assessment of a business case as to whether to proceed. Prior to making any irrevocable decision about the construction of any runway modification or related requirement, the TPA would undertake a robust Environmental Assessment (EA) of the proposed project, which would include consideration and assessment of potential effects and appropriate mitigation. We attach a copy of a summary document describing the EA process we would follow.

Environmental protection and sustainability are important in the TPA's operation of the BBTCA. We are the only airport in North America that is 100% powered by renewable energy, through Bullfrog Power. The airport's two commercial air carriers each operate the Bombardier Q400 aircraft, which is recognized as among the world's leading aircraft for reduced emissions and noise. Interestingly, the health impact assessment prepared by the city indicated significant emissions improvement from the proposed CS100 aircraft. This would be an important consideration to us in our evaluation of the project.

The TPA has recently completed 2 environmental assessments for i) the BBTCa Pedestrian Tunnel Project (Dillon Consulting, 2011), and ii) the BBTCa MEZ Lake Fill Project (Dillon, 2012), as well as earlier assessments regarding projects at the BBTCa. Both of the recent projects involved consultation that included providing information to and obtaining feedback and participation from interested parties, including community groups and other members of the public. They also included direct consultation with important agencies such as the Toronto Region Conservation Authority, the City of Toronto's Waterfront Secretariat, the federal Department of Fisheries and Oceans, and Transport Canada, among others. We would anticipate these agencies would again be participating and commenting as part of the EA process. The EA reports for these two recent projects can be found on the TPA's website at <http://www.torontoport.com/About-TPA/Media-Room/Reports-and-Publications.aspx>

The TPA expects that the EA process for the proposed project would be conducted and completed over the course of 9-12 months. Costs for the EA would be for the TPA's account. The TPA would consider selection of the project consultant through a RFP process, including the invitation to the City to participate in the review and selection of the project consultant. Selection criteria for the consultant would focus expressly on experience specific to airport runway work, marine environment work, and the project would incorporate industry best practices.

Attached is the EA description document.

We look forward to continuing our collaboration and work with the City on the Porter Proposal.

Yours truly,

TORONTO PORT AUTHORITY

Geoffrey A. Wilson
President and Chief Executive Officer



cc: The Hon. James M. Flaherty, P.C., M.P.
Minister of Finance

The Hon. Denis Lebel, P.C., M.P.
Minister of Infrastructure, Communities and Intergovernmental Affairs

The Hon. Lisa Raitt, P.C., M.P.
Minister of Transport

The Hon. Glen Murray, MPP
Minister of Transportation and Infrastructure

Mr. Mark McQueen, Chair, Toronto Port Authority

Attachment: i) Environmental Assessment Summary for Proposed Project.

Environmental Assessment for Proposed Runway Extension and Operation of Commercially Registered Jet-Powered Aircraft at Billy Bishop Toronto City Airport ("BBTCA");

Background, Legislative Requirements, Process, Consultation and Reporting

Background

An Environmental Impact Assessment, or Environmental Assessment ("EA") is a planning tool that is used to predict the potential effects of a proposed development on the environment. The Toronto Port Authority, or TPA, is committed to ensuring that the appropriate EA is completed for the proposed project. This will allow the TPA, and other decision-makers, to be properly informed about the potential effects on the environment of the proposed project. For the purpose of the proposed project and the EA, the environment includes the natural environment, the built environment, human health and socio-economic matters (including, for example, transportation, land use, businesses, cultural and heritage matters). Given it is a planning process, the EA would be conducted as early as practicable, and before the TPA exercises its powers or makes an irrevocable decision. Consultation will be an important feature of the EA, which is described more fully below.

The EA will identify the existing, or baseline, environmental conditions, and then identifies and assesses potentially significant effects for relevant aspects of the proposed project. The EA also identifies and assesses appropriate mitigation, which may include revisions to the design of the project, to address potentially significant environmental effects.

The purposes of the EA include, taking into account the federal nature of the TPA's activities:

- to protect the components of the environment that are within federal jurisdiction from significant adverse environmental effects that would likely be caused by the proposed project, including the effects of accidents and malfunctions;
- to promote and engage in consultation about the proposed project and to ensure that appropriate opportunities are provided for meaningful public participation during the environmental assessment;
- to consider actions that promote sustainable development in order to achieve or maintain a healthy environment and a healthy economy; and,
- to consider the cumulative effects of physical activities associated with the proposed project.

Legislative Requirements

Under the Canadian Environmental Assessment Act, (2012) (the "Act"), a proposal to extend the length of the existing runway by approximately 400 metres to accommodate jet aircraft is not a "designated project". The extension of a runway by 1500 metres or more would be a designated project. As such, the Act does not require a federal authority (including a Port Authority) to undertake an environmental assessment, including an EA under the Act, prior to exercising a power, such as making a decision to proceed with such a project.

However, the Toronto Port Authority, as a prudent land owner, federal authority and steward of the waterfront, is committed to ensuring that an appropriate EA is completed that is consistent with the Act and practices that are common to airports throughout Canada. The EA will take into account the terms of the Tripartite Agreement between the TPA, the City of Toronto and the Federal government regarding the BBTCA. The EA will also take into consideration other studies that have been conducted in the area, including previous environmental assessments that have been conducted in and around the location of the proposed project. As part of this EA, the Toronto Port Authority is committed to ensuring that a meaningful public consultation program is part of the process.

Environmental Assessment Process

The EA process would be a systematic, objective assessment of potential impacts that would likely arise if the proposed project were to proceed. It would commence with baseline studies on the condition of the environment, including socio-economic conditions, existing prior to implementation of the proposed project.

Based on the proposed construction and modifications that would comprise the project, baseline components would be identified and assessed for potentially significant impacts based on applicable, relevant factors.

The environmental effects that will be taken into account in relation to the proposed project are:

- 1) Any changes that may be caused to the following components of the environment that are within federal jurisdiction:
 - a) fish and fish habitat, as defined in the *Fisheries Act*;
 - b) aquatic species, as defined in the *Species at Risk Act*;
 - c) migratory birds, as defined in the *Migratory Birds Convention Act*; and
 - d) other components previously considered in prior EAs related to the BBTCA, such as air quality; noise and vibration; visual; navigation; transportation; traffic; parking; wildlife species and habitat; species at risk; soils and sediments; surface and groundwater; vegetation and wetlands.
- 2) With respect to Aboriginal peoples, an effect occurring in Canada of any change that may be caused to the environment on:
 - a) health and socio-economic conditions;
 - b) physical and cultural heritage;
 - c) the current use of lands and resources for traditional purposes; and
 - d) any structure, site or thing that is of historical, archaeological, paleontological or architectural significance.

The EA will consist of:

- i. Preparation of a statement describing the EA process, including the scope of the assessment, methodology and criteria to be used, approvals that would be required, the consultation process, commitments, reporting of results and the decision making process;
- ii. Preparation of a description of the proposed project, including:
 - a. the location of the proposed project;

- b. the area that will be considered and assessed (also referred to as the study area, which is the environment that would potentially be affected by the project), including for the baseline condition and the likely effects;
 - c. a description of the physical works and activities (i.e., the components) of the proposed project;
 - d. a description of the activities to be performed in relation to the proposed project;
 - e. scheduling; and
 - f. regulatory requirements, such as permits, licences or other approvals that would be required.
- iii. Assessment of the effects likely to arise from carrying out of the proposed project (i.e., the likely effects on baseline conditions), including the significance of the effects, the assessment of mitigation measures that are technically and economically feasible, and the assessment of residual, or net, effects (i.e., effects in light of mitigation measures).
 - iv. Assessment of effects of other existing or known planned developments in the applicable study area (i.e., to assess cumulative effects).

A description of the federal lands will be provided in the description of the proposed project, including changes to the environment that may occur on federal lands as a result of carrying out the project.

Determination of the level of detail required for the EA will be part of the initial phase of the EA. In that regard, the consultative process will include opportunities to identify, and possibly reduce, the number of matters to be considered and assessed, so that the appropriate matters that will be subject to detailed assessment. This will help to ensure that the EA will not include trivial matters or effects.

Consultation and Public Participation

The TPA is committed to consultation involving two-way communication between the TPA and government agencies, Aboriginal peoples, members of the local community, and other members of the public and interested stakeholders who have an interest in the proposed project (collectively referred to as interested parties). One purpose of consultation is to raise awareness and understanding about the proposed project and the EA, and to receive comments for consideration in order to make better, more informed decisions about proposed projects. The TPA will ensure that interested parties are provided with opportunities to participate in the environmental assessment of the proposed project.

There will be opportunities for consultation, including public participation, throughout the environmental assessment process. The focus of consultation is to share information with, and gather input from, interested parties. Conducting such consultation as part of the EA process will enable those who must make decisions to be properly informed.

Interested parties have interests of varying degrees that range from a person who may be directly affected by a project to individuals or organizations with more general interests about issues related to the project.

The TPA understands the value of consultation, including public participation, and its importance for the EA and the proposed project, including to:

- obtain valuable information about the environment and potential impacts;
- enhance understanding of the various interests, concerns and priorities of interested parties;
- avoid or minimize adverse environmental effects;
- address concerns as early as feasible in the process, thereby reducing likelihood for conflicts;
- correct misinformation or rumours;
- align the project design as much as feasible with priorities and expectations of interested parties; and
- increase the effectiveness and credibility of decisions and decision makers related to the project by allowing for better informed decisions to be made.

Meaningful consultation, including public participation, includes and reflects the principles of accessibility, impartiality, transparency, consistency, efficiency, accountability, fairness and timeliness, and recognizes that all parties have responsibilities in meeting these principles. To be meaningful, consultation needs appropriate public notice and public access to information relating to the proposed project.

In that regard, the TPA will provide appropriate public notice to provide information and raise awareness of the project and the EA process. The TPA is committed to notifying interested parties about the proposed project and the EA, including scheduling (e.g., commencement date of the EA), status, scope, location of information, such as documents, that can be reviewed, and details about opportunities for participation.

The TPA will follow eight key elements of meaningful consultation, including public participation.

- early notification;
- accessible information;
- shared knowledge;
- sensitivity to community values;
- reasonable timing;
- appropriate levels of participation;
- adaptive processes; and
- transparent results.

The TPA will provide access to information relating to the EA and the proposed project, so interested parties can increase their understanding and be informed about the proposed project and the EA process.

The consultation process will include requests for written comments about the proposed project and relevant documents. It will also include webinars, questionnaires, surveys, information panels and other methods to provide information and facilitate the receipt of comments about the proposed project.

Consultation may also include focus groups, public meetings, community facilitators, tours or interviews, followed by questionnaires that solicit feedback, or a public comment period and request for written submissions on an environmental assessment report, for example.

Reporting

The TPA will provide a draft report that will include the results of the EA, for consideration and comments by interested parties. The TPA will take into account all comments received, and will publish a final report that can be used by the TPA, and others, to make decisions regarding the proposed project.]