

**BQNA position on the Runway End Safety Areas (RESA) Environmental  
Assessment (EA) –  
An Unacceptable and Unnecessary Disturbance to Our Community**

July 7, 2025

The Bathurst Quay Neighbourhood Association (BQNA) submits the following comments on Ports Toronto's draft Environmental Assessment of the proposed Runway End Safety Area at Billy Bishop Toronto City Airport. Many community members have submitted other individual input.

**Background to a flawed and incomplete RESA environmental assessment**

In July 2024, Transport Canada officially notified Ports Toronto that Billy Bishop Toronto City Airport had surpassed the passenger volume threshold outlined in the Runway End Safety Area (RESA) regulations, and that compliance at the island airport was to be achieved by July 2027. To comply with RESA regulations, an extended landmass would have to be built; OR an engineered material arresting system (EMAS) installed; OR the airport could reduce its passenger volume by relocating its commercial aircraft to Pearson International Airport. Transport Canada would accept a shortened runway (as per its previous size).

The public was made aware of RESA options at a public meeting, held outside our neighbourhood, in July 2024, and this was followed by a City of Toronto presentation. [On September 24, 2024 the City hosted an in-person public information session and conducted an online survey.](#) This was to inform and educate residents on RESA and collect feedback that would inform a staff report to Toronto City Council in October. At that meeting only 3 options were presented, all 3 requiring lakefill. Public feedback at this meeting confirmed that environmental and health impacts were the top two concerns as well as public concern about the rushed process and lack of serious consideration of all available options -- not just the 3 options presented at the meeting. At this hastily called public meeting, Ports Toronto stated their preference for Option 3 – the most expensive and lengthy engineering proposal. Regardless of the public's concerns, in October 2024 Toronto City Council granted an extension of the Tripartite Agreement which was set to end in 2033, for up to an additional 12 more years to enable Ports Toronto to implement RESA Option 1. The ramifications of this rushed process will have long term impacts to our community and the future sustainability of Toronto's waterfront. And it is short sighted.

The following position highlights some key points raised by our community in addition to many other individual comments sent separately by the community.

**1. The Environmental Assessment process is rushed, confusing and does not allow adequate public input. BQNA asks for an extension of the Environmental Assessment response process and a public meeting to raise all issues of concern.**

It is clear the whole process has been unnecessarily rushed. The RESA regulation came into effect December 21, 2021 and Ports Toronto initiated discussions with City and Transport Canada staff in early 2023. However, the general public only heard of Ports Toronto's plan to comply with RESA through a hastily convened public meeting by the City in September 2024. The actual Environment Assessment report was not released until June 2025 and the public was given a 30-day window to comment. There were no additional public meetings once the EA was released to discuss the actual report's contents. So now the community is faced with a 295-page EA plus an additional 17 separate Appendices. To further complicate matters, the report discusses Option 1, 2 and 3 citing Option 3 as Ports Toronto's preferred option, even though Toronto Council only approved Option 1. The result is a very lengthy, verbose report that is highly confusing. It also does not address key omissions. Because the process is fundamentally flawed, we are calling for an extension and a public meeting to address these and other issues of very high concern to the community.

**2. The less intrusive option of an engineered materials arresting system (EMAS) was briefly discounted by Ports Toronto's in the Environmental Assessment – yet this would also protect the BQNA from 18 months to over 2 years of nighttime construction, noise, and light pollution that will be incurred by other RESA options. EMAS is a viable option and we ask that EMAS be reinstated as a priority consideration in a more comprehensive Environmental Assessment.**

A key option - EMAS (Engineered Materials Arresting System) was discounted by Ports Toronto with no adequate explanation. EMAS is an effective alternative to the three RESA options and it was noted that EMAS is [widely used in the USA](#), including New York, indicating the system's viability in winter northern climates. It is the cheapest, and the most effective way to stop wayward aircraft and it can be built entirely on the existing landmass. Yet this option was summarily passed over by Ports Toronto citing 'unacceptable operational and feasibility risks' which were never detailed but discounted for 'other more practical, longer-lasting, and sustainable alternatives.'

Instead, the BQNA will be directly impacted by RESA construction by months of overnight construction, noise, and light pollution set to begin early 2026 and ranging from 18 months for completion of the RESA 1 option to more than 2 years for the RESA 3 option – Ports Toronto's preferred option. This is the opposite of practical or sustainable. Furthermore, choosing the EMAS option would not require a rushed approach to the EA process for public feedback as little construction is needed to accommodate this option. Under the Canadian Environmental Assessment Act (CEAA 2012), a formal Environmental Assessment must evaluate all potential environmental and health impacts of a project and its "reasonable alternatives" (s 5(1)(a)–(b)). We find the brief and inadequate discounting of the EMAS option contrary to best practice, and the public should have seen unbiased and transparent third-party input to the EMAS option. We therefore ask that EMAS be reinstated as a priority option in a more comprehensive EA.

**3. Air Quality, Noise Disruption and Light Pollution is not adequately addressed. Ports Toronto's preferred RESA option 3 would involve more than two years of overnight RESA construction from 11 pm to 6.45 am. The City's recommended RESA Option 1 would still involve 18 months of overnight construction. None of this should be allowed.**

**Air Quality.** A recent University of Toronto investigation of air quality in the Bathurst Quay neighbourhood concludes that the airport is the primary source of ultrafine particles in the community [with short term spikes in the community](#) vastly exceeding recommended World Health Guidelines. The [emissions of UFPs from the airport](#) has resulted in our community having the same average levels of UFPs as heavy traffic areas in downtown Toronto. However, the EA does not include UFPs in its assessment of background air pollutants which will result in inaccurate assessment of current and future air pollutants resulting from RESA impacts.

Furthermore, the EA states that cumulative NO2 levels during construction are projected to exceed Canadian Ambient Air Quality Standards (CAAQS) at sensitive receptors including local daycare and seniors' facilities.

**Sleep disturbance from overnight noise and light pollution is seen as less important to daily airport operations. We, who will be directly impacted by overnight construction, do not agree with this assumption.**

**Noise pollution will exceed the threshold for adverse sleep impacts:** The EA states that "All construction activities are anticipated to occur during nighttime (11:00 pm to 6:45 am)." And that 'This overnight construction schedule is planned to minimize disruption to airport operations, which typically occur during the day.' Construction will start in early 2026 with final project close-out in Spring 2028 under Ports Toronto's preferred option.

Unlike other airports in Canada, the Billy Bishop Toronto City Airport is situated right next to high density mixed residential buildings, such as the Windward Coop, the first fully-accessible co-op in Toronto. But these impacts are considered less important than the commercial operation of the airport. The EA justifies this as of no consequence by stating:

Existing nighttime background noise conditions and predicted construction sound levels are anticipated to exceed Health Canada's thresholds for adverse sleep impacts at assessed points of reception. However, the estimated change in percentage of population 'highly annoyed' at all locations is less than Health Canada's suggested mitigation level.

We firmly reject this assumption.

**Overnight Light Pollution.** The EA states that overnight construction could result in increased artificial lighting, affecting: nearby residential areas, marine users and navigators and wildlife, especially

migratory birds and aquatic species. Suggestions to mitigate this light pollution include: angling the lights downward and away from residences and natural habitats to minimize light spill; shortening the duration of the lighting; and notifying residents in advance of construction schedules and any expected light emissions.

All these measures will be inadequate. The duration and disruption of over 18 months to more than 2 years of RESA overnight construction should not be allowed. The physical and mental health of the community must take precedence over the commercial interests of the airport – particularly if Ports Toronto refuses to consider less disruptive RESA options such as EMAS or reduction of airport flights.

We in the Bathurst Quay Neighbourhood hope you take these comments seriously and we look forward to your detailed response.

Bev Thorpe  
Chair, BQNA  
July 7, 2025

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