

Comments to Transport Canada

**Public consultation on
the future of Billy Bishop Toronto City Airport**

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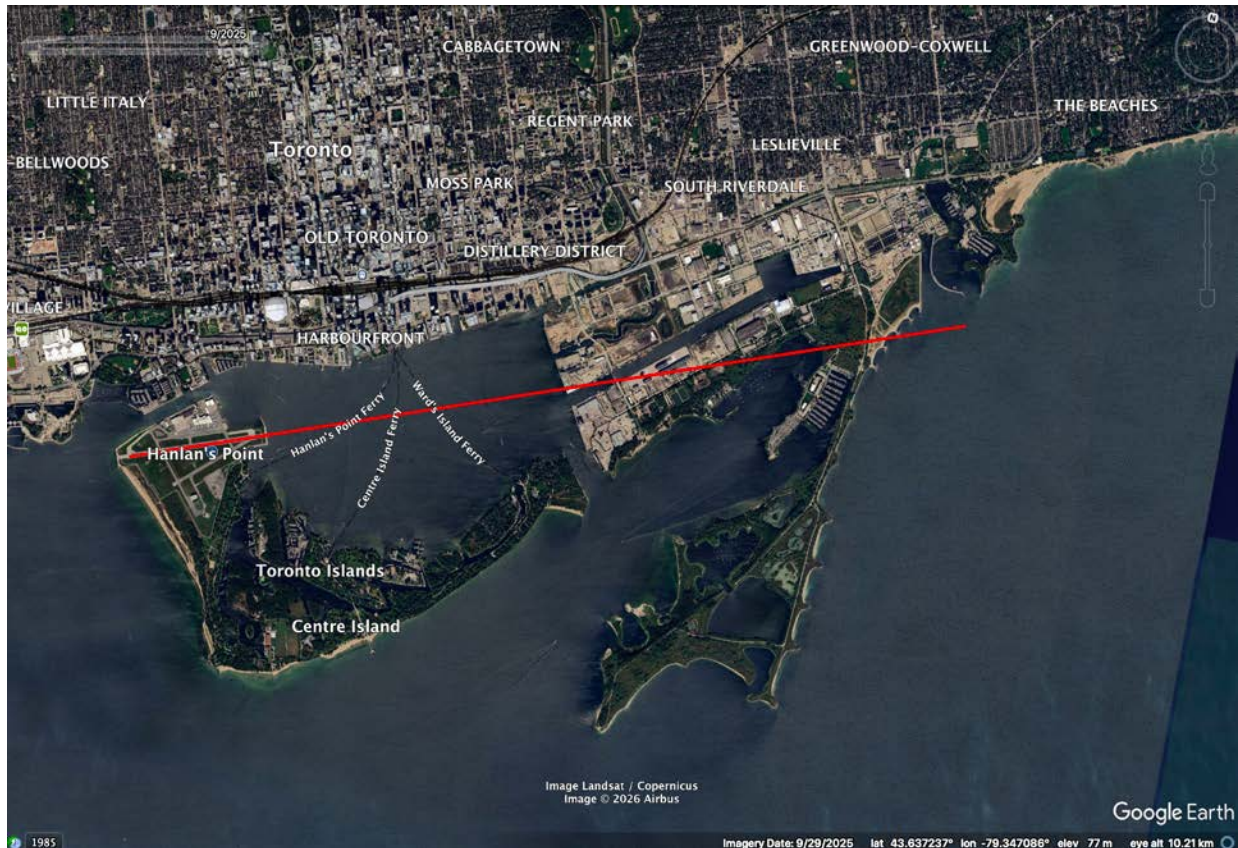
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Introduction

1. I am a citizen from Montréal who has flown with City Express in the 1980s using the original terminal, few Porter from its early days, seeing their original small terminal transformed from a cozy facility that gave Porter an edge, into a large aseptic facility like any other airport. I have also cycled on the islands to experience the islands outside of the airport area.
2. As a resident of the West Island of Montréal since 1976, we moved there with the promise of Dorval (Trudeau) airport being limited and with curfews with Mirabel eventually becoming the primary airport. Mirabel has literally been demolished, Dorval has lifted the curfew. When policies change, citizens who planned their lives based on those policies are not happy.
3. In 2015, Minister Garneau confirmed no jets would be allowed at Toronto Island, Billy Bishop (YTZ). Flip flopping on this long standing policy of restricting this small airport to turboprops would not be good and means that no government decision can be trusted.

Executive Summary

4. The Toronto Islands provide a unique park with beaches, as well as an even more unique car-less residential area with a unique lifestyle. This is a unique part of Toronto and it is unthinkable for the government to allow it to be defaced forever by the construction of a major airport on site. The Portlands further east along flight path are planned to have major residential developments.
5. There is much uncertainty over the future of turboprops, regional jets, and more importantly, the differentiation between newer jets such as E195-E2 and A220s such that enabling the airport for them means enabling any narrow-body jet and turning Billy Bishop into a noisy major airport. A runway that is just barely long enough for these jets will not be attractive for airlines such as Porter that need a hub from which they can launch fully fuelled planes on transcontinental flights.
6. ***The Government of Canada must insist on preserving the nature of the Toronto Islands and Toronto's waterfront by preserving the turboprop policy of Billy Bishop. Furthermore, until the future of regional aviation (aircraft types and business models) is better defined, long term investments at Billy Bishop would be unwise.***



Livable City

7. Densification of residential dwellings in the downtown core requires parks more than ever. While the runway project may not physically reduce parkland, the flight paths will reduce the quality of those parks. Including the port area and Don River being redeveloped.
8. It is important to note that while the middle of the Toronto Islands are further away from the flight path, the eastern edge where there are residents is much closer to the flight path and they do hear the turboprops passing by. Furthermore, with many condos having been built on the "Harbour Front" in the narrow space between the Gardiner and the shore, those residents would also be impacted by increase in flights and gauge of aircraft.

Toronto Portlands

Toronto has a once-in-a-lifetime opportunity to transform an underused resource in the heart of downtown. The Port Lands will be home to sustainable new communities that deliver affordable housing and job opportunities, along with renewed connections to the water and natural environment¹.

9. As an industrial wasteland, the "Portlands" didn't mind being under flight path. But as a redeveloped park and planned residential neighbourhoods, this becomes an important consideration. The amount of money spent on this redevelopment must not be ignored in a decision to change course and allow large jets at YTZ.
10. *Converting Toronto Island into a major airport would jeopardize Toronto's efforts to reclaim its waterfront for livable spaces.*



An artistic rendering of Ookaewin Minising at full build out.

<https://www.waterfronttoronto.ca/news/building-first-residential-community-on-torontos-new-island-neighbourhood>

¹ <https://www.waterfronttoronto.ca/our-projects/scope-scale/port-lands>

History of the Islands

11. A plaque on the Islands reads:

Residents or parks?

Remaking Toronto Island

As early as 1880, homes and businesses lined the streets of Toronto Island from Hanlan's Point to Ward's Island.

Before the Second World War, there were more than 600 leased residences. However, shortly after its establishment in 1953, the Metropolitan Toronto Council began to expropriate land to create a new public park for the growing city, compensating for waterfront parkland lost through the construction of the Gardiner Expressway.

Metro began bulldozing residences and businesses as Island leases expired. By 1960, one-third of all, buildings had been demolished and the land cleared. In response, a coalition of residents and politicians advocated for, and won, an extension of the remaining leases, thereby delaying Metro's plans.

Toronto City Council increasingly favoured the Island community and its newly formed Residents Association and voted, in 1973, to preserve the remaining homes, predominantly on Ward's and the Island community Algonquin Islands. Following an intense legal battle between Toronto City Council and Metro,

A 1981 provincial inquiry recommended that residents be allowed to stay for 25 years. The community's permanence was secured a decade later through provincial legislation, permitting the purchase of 99-year leases from a land trust.

Heritage Toronto 2014

12. I do not live there, yet, just by visiting, I saw the unique nature of the eastern part of the islands and understood why residents fought to preserve their peaceful way of live. A car-free, quiet oasis in Toronto. This is more than buildings, it is a lifestyle. No lavish homes with multiple Roll Royces in a 10 car garage next to the mansion.



A residential street on Ward Island

Limiting capacity

13. One could conceptually reduce impact on the population via physical or management restriction to limit number of flights. But would it work?

Distance Perimeter?

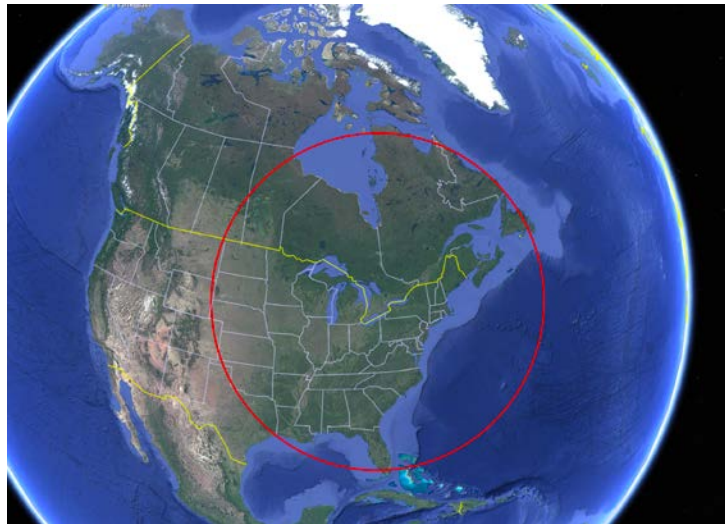
14. In the United States, restrictions on airports are (or were) based on distance. Flights from La Guardia are limited by a distance perimeter of 2400km. Washington Reagan (DCA) is limited to 2000km. Dallas Love Field (DAL) had the Wright amendment limiting flights to Texas and the 4 neighbouring states and then allowed service outside the region on aircraft with fewer than 56 seats. The Wright amendment ceased to be in effect in 2014.

15. Perimeter based restrictions do not limit aircraft noise and large aircraft may still be used.

16. Limiting the perimeter to 520km would give access to Montréal St-Hubert (YHU), Trudeau (YUL), Ottawa, Kingston, Sault Ste Marie, Sudbury, Detroit, Cleveland. (just short of New York, Philadelphia, Washington).

Such distances are more economically served by a Dash-8 than jets but

marketing pressure favours jets. Would such limitations limit number of daily flights to a level acceptable to the population? NO.



What a 2000km perimeter limit would look like for YTZ

Runway length limitations

17. Billy Bishop's runway 8/26 is 1216m. London City Airport has a short runway length of 1508m and steep approach/take off requirements. It can handle A220-100 and E195-E2 and in the past the A318 and BaE146 but not with full fuel load, so there is an implicit range limit since they can't fully fill tanks. Aircraft types have to be certified to use the airport and pilots require training due to approach steepness.
18. With short runway, it requires a jet's full performance for take off and reverse thrust for landing, so this increases noise levels.

Limiting Capacity (cont)

19. Furthermore, aircraft runway requirements vary wildly depending on temperature, aircraft weight and altitude². For instance, An A220-100 could take off nearly empty on 1.02 km, sea level at 15°C, but would require 2.4km runway at full load. The A220-300 can also take off empty on just over 1km runway, but goes up to 2.7km at full load, but reduced to just over 2km at full load but with the more powerful PW1524G engines.
20. Meanwhile, the Boeing 737-8 can also take off empty at nearly 1km runway, and takes up to 2.5km when full (MTOW). (sea level, 15° temp). But at 40° temperature, that same 737 requires almost 3.6km runway.
21. So if you plan to extend a runway, to what length do you extend it considering climate change will make higher temperatures more frequent and may prevent aircraft from operating profitably and/or with reduced range during summer due to load restrictions?
22. And when extending a runway beyond the island's landmass, remember that one also needs a taxiway to the north of the runway so landed aircraft can backtrack to the terminal without obstructing the runway (or departing aircraft can taxi to runway threshold for eastbound departures).
23. While the current government has committed to ignoring climate change by increasing fossil fuel extraction, it should still consider that with warming temperatures, runways designed to limit use to specific aircraft will become unusable by these very aircraft during summer.
24. Due to current crop of new jets having overlapping runway requirements, any attempt to limit aircraft type by having short runway would fail because many narrow-body jets can operate in such a runway, albeit with limited cargo and fuel/range.



Simulated 2.9km runway and taxiway

2 One can safely assume that the altitude of Billy Bishop's runway won't change significantly :-)

Which Jets to allow?

Canadian Industry

25. Porter has chosen the Embraer E195-E2. Air Canada was forced for legal reasons to purchase some A220-300s. Air Canada has no interest in YTZ, other than to try to kill off a competitor. Porter is moving to Toronto Pearson as a new hub to serve all of North America. Unless the YTZ runway is sufficiently lengthened to offer full performance/range for the E195-E2 even during hot days of summer to serve all of North America, Porter would not be interested in returning there. This would require YTZ to be transformed into a major airport with frequent noisy jets. And should Porter continue to grow, it will eventually want larger jets. Porter should be deemed to have outgrown YTZ and there is no point in trying to lure them back.
26. With the demise of Bombardier Commercial Aviation, only 3 relevant aircraft are still made in Canada: The DHC-6 Twin Otter by De Havilland Canada, The Dash-8 whose production will hopefully be restarted, and the A220-100 and -300, and potentially the -500.
27. Building a jet runway at YTZ would only benefit Embraer and hurt De Havilland which has been conspicuously ignored by the current and previous Prime Ministers despite its huge success in reviving the Twin Otter, and rescuing the CL415 water bomber and Dash-8 from Bombardier's liquidation. The Dash-8 is still maintained. De Havilland is refurbishing to "new" some of the abandoned aircraft, so there is still a supply. The ATR42/72 is still in production.

Business Jets

28. The government must be weary of any plans that would essentially turn Billy Bishop into a business jet facility. Such a scenario would not generate business for the terminal owner and look very bad for the government.
29. But sufficiently lengthening the runway for commercial jet operations is also political poison because of the noise on residential areas and wrecking of the Toronto shoreline.

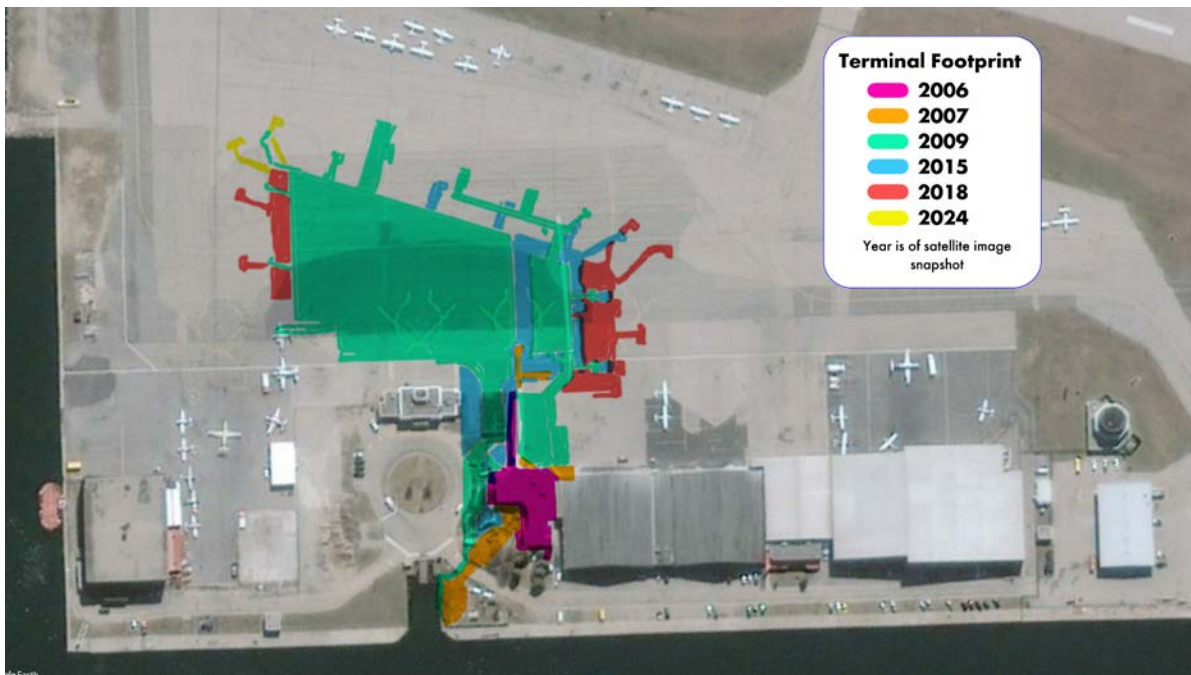
Which Jets? (cont)

Aircraft trends

30. 50 seats jets such as the CRJ-200 have been out of production for many years because airlines now demand larger jets. Bombardier saw the limits in growing the CRJ family beyond the -900 and decided to embark on its C-Series project to focus on the over 100 seat capacity.
31. While there are still many CRJs still in service in North America, mostly due to scope clauses, it is unclear how much longer they will remain in use and how the airline industry will decide to serve smaller markets. Embraer still makes the E175 at 78 passengers. It is this uncertainty which makes predicting YTZ's future needs so hard.
32. Both City Express and Porter started as niche turboprop airlines with limited short haul network. City Express was successfully culled by Air Canada's predatory practices, but Porter has managed to survive and grow out of YTZ. Their remaining operations at YTZ are no longer strategic. Porter recently suspended service to Sudbury.
33. However, as even smaller jets are now out of favour, if the priority is to grow the airport, it would require massive runway and enlargement to turn it into an airport able to handle full jet service. Building up a runway to allow CRJ service would provide a few flights from USA airlines while they still have CRJs. Is there a point in spending the big bucks for runway expansion where there is no visibility on how long the CRJs will remain in service for and what they will be replaced with ?

Billy Bishop as a business

34. When it started, Porter took over an FBO building and turned it into its own comfortable, cozy terminal. In 2007, it added a corridor to the ferry terminal and in 2009 did a major new terminal, the bulk of the current one. With the work for the tunnel came other work to include a former satellite building into the core of the main terminal. In early 2015, Porter sold the terminal to Nieuport Aviation. Despite knowledge that the government had said no to jets in 2015, there was more expansion between 2015 and 2018 as well as addition of 2 new fingers between 2018 and 2024.



35. One can understand Nieuport wanting to remain relevant in an uncertain future of turboprops, especially as the investment was made on the assumption of certain traffic levels. But there remains also an uncertain future over regional jets as well as whether allowing jets such as E195-E2 and A220-300 would also implicitly allow the 737 and A320 family, turning this into a major airport.
36. A new tenant might replace Porter with a service more akin to what City Express offered (and what Porter started with). But such would not require anywhere near the size of terminal offered by Nieuport, not for many years until it grows to what Porter was before it decided to move to jets at YYZ.

Billy Bishop as a business

37. The needs of the many outweigh the needs of the one³. Nieuport, the one, may need some help with getting long term return on its investment in the large terminal. But the many residents of Toronto want to see their park preserved, and the residents of the Island and future residents of the Portlands will want to preserve peace and quiet associated with their lifestyle.
38. Nieuport may be faced with a no-win situation if the only way to cope with apparent loss of turboprops is to turn YTZ into a major jet airport, then this must be stopped to protect residents. Democracy = power to the people not to the airport terminal owner. When there is no viable middle ground, the status quo must be preserved.
39. One solution would be for the federal government to buy the terminal from Nieuport and lease it back to a non profit, and if it does become too big after Porter has left, demolish parts of it. The federal government had no problem with ADM completely demolishing Mirabel airport's terminal which was architecturally far more interesting than the current YTZ terminal.
40. Or the government could learn of the existence of De Havilland Canada and help it restart Dash-8 production and generate turboprop business for YTZ airport, especially to serve smaller towns.
41. It should be noted that building a real rail connection to Pearson airport with modern electric trains and modern signalling would cost far less and provide much faster transit to the airport and benefit far more people.

3 Core Vulcan philosophy.

Conclusion

- Considering the uncertainty over both turboprops and the smaller jets people think about when thinking of YTZ
- Considering the unique nature of the islands and its residential area
- Considering Toronto's efforts to revitalize its waterfront and add residential density to the Portlands,
- The balance of convenience points to maintaining the turboprop-only nature of Billy Bishop airport, and provide palliative help to Nieuport if necessary.

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