



3 December 2013

File: 1.14.2.34(kp13085)

Mr. Mark Richardson  
Vice President and General Counsel  
Toronto Port Authority  
60 Harbour St  
Toronto, ON  
M5J 1B7

Dear Mr. Richardson:

Further to our telephone conversation on 15 November 2013 and your subsequent email invitation to provide advice on questions posed to the Toronto Island Pilots Association (TIPA) in your letter to them dated 16 May 2012, I have the following to offer on behalf of the Canadian Owners and Pilots Association (COPA).

I would like to clarify the sectors for which I am providing advice. General Aviation (GA) is defined by international and Canadian authorities as *all activity other than scheduled airline service and the military*. Personal Aviation (PA) is that portion of General Aviation where aircraft are flown for personal transportation and recreation. COPA is recognized by government and industry as the voice of GA and it is with this recognition in mind that I am providing remarks on behalf of not only COPA's 18,000 members but also the broader GA sector.

To put the size of the GA sector of aviation in perspective, of the 35,997 aircraft in Canada<sup>1</sup> only 1,553 are airliner-size (over 5,700kg) commercially registered aircraft. There are 28,729 privately registered aircraft, 28,357 of which weigh less than 5,700kg, and 5,460 commercially registered aircraft weighing less than 5,700kg. These smaller private and commercial aircraft that primarily conduct non-airline activities comprise over ninety percent of the Canadian fleet. I would like to emphasize that, except for a period of flat growth in the 1990s, the GA sector has been and continues to grow, both in terms of number and percentage of the fleet, and that the vast majority of the growth has been due to privately registered aircraft.

You asserted in your email that "TIPA did not provide any of the information requested" in your 16 May letter. You did mention in our telephone conversation, however, that some point-form items were submitted but that this was not sufficient information for the TPA to use in the development of its airport Master Plan.

1. Transport Canada aircraft statistics <http://www.wapps2.tc.gc.ca/Saf-Sec-Sur/2/ccarcs/aspscripts/en/monthsumairbycat.asp>

I learned from TIPA that they submitted the following list to TPA as a basis for further discussion:

“GENERAL AVIATION NEEDS AT BBTCA

IMMEDIATE

1. A safe docking facility to accommodate at least 2 seaplanes at a time.
2. Improved and safe launching and beaching equipment for seaplanes.
3. Not less than 20 tie-downs for resident light aircraft, in addition to those currently existing.
4. Not less than 15 tie-downs for itinerant light aircraft (including 5 for seaplanes), in addition to those currently existing.
5. A commitment to provide, within a reasonable timeframe, not less than 20 hangar spots for resident and itinerant light aircraft (heated or unheated), in addition to those currently existing.

LONGER TERM

These will evolve as more information is provided, but could be seen to include many of the same general aviation facilities that are provided as a matter of course at other airports servicing general aviation in Canada and the United States (and some of which are currently provided at BBTCA), including:

1. Sufficient tie-down and hangar facilities and movement availability to accommodate and encourage a reasonable level of resident and itinerant general aviation activity in accordance with a reasonable long term plan within the terms of the Tripartite Agreement.
2. At least two flight schools.
3. At least two competitive sources of 100LL and Jet A fuel (self-serve card-lock systems are available at many airports).
4. At least one FBO facility available to general aviation and improved self-serve facilities as an option to FBO services.
5. At least one maintenance facility available to general aviation.
6. Consideration of single engine aircraft safety in design of advanced aviation facilities such as instrument approaches.”

Although the above list of requirements does not conform to the bullet list contained in the TPA’s 16 May letter, it nevertheless is a good list of requirements in order for the airport to

adequately serve TIPA's needs. I support this list and encourage the TPA to engage in discussions with TIPA to address this list in the development of the Master Plan.

I will now provide advice regarding the bullet list in the TPA's letter. Many of my points are an expansion on those provided by TIPA in order to provide adequate facilities and services for resident and itinerant GA users of the Airport.

The names of all of the members of TIPA and the details of their current or proposed personal aviation activities at the Airport:

As indicated in an email from Nigel McGrath to Geoffrey Wilson on 31 May 2012, the membership of TIPA wish to keep their list confidential. I will respect their wish.

The Airport should accommodate, to an adequate extent to meet demand, the following PA activities:

- hangar and tie-down space for resident and itinerant aircraft.
- access to aircraft for personal work such as cleaning, maintenance, showing friends etc.
- flight training for new pilots, refresher and upgrading of qualifications.
- repair and maintenance of aircraft and equipment.
- fuelling.
- fixed and rotary wing aircraft, wheel and float equipped.
- approach and departure routes (VFR and IFR) that maximize safety, in particular for single engine aircraft given the water surrounding the Airport.
- social gatherings, such as would occur with a flying club.

Full details of the extent to which any member's current or proposed personal aviation activities at the Airport are not or may not be adequately served by the facilities and services currently at the Airport which are used by personal aviation:

I am aware of a long-standing issue with docking facilities and other services for seaplanes. There are continuing safety and service issue that must be addressed, considering that seaplane access continues to be in demand.

While some very limited housing for aircraft is available and it is currently under pressure because of hangar shortages for Porter's operation, there is demand for additional accommodation, both now and in the very near future due largely to the closure of Buttonville. I am not confident that adequate accommodation will be available even if Porter succeeds in its

promise to free up space when it builds hangars on the south side of the Airport. The Master Plan should include a commitment to adequate accommodation for resident and itinerant aircraft.

Adequate tie-down facilities for both itinerant and resident aircraft should be provided and take into account the increasing restrictions from security regulations. My experience with this issue, from participating in the development of the security regulations, leads me to conclude that it will become more difficult to accommodate airline and GA operations on the same ramp. The Master Plan should, therefore, consider how best to accommodate GA in light of the security regulations.

Full details of any new facilities or services which TIPA wishes to see at the Airport for the benefit of its members:

Facilities and services that should be provided in order for the Airport to meet the needs of resident as well as itinerant PA users are included in the list that was provided by TIPA. As you may be aware, the impending closure of Buttonville (one of the busiest of all airports in Canada) will result in a significant loss for PA as well as the broader GA sector in Toronto. It is logical to conclude that there will be a significant demand for facilities and services, and the Airport is the best location of all alternatives to provide these. The existing facilities and services are not adequate to accommodate the needs of a large group of aircraft owners and itinerant users who are looking for an alternative to Buttonville. In fact, the several facilities, such as parking for aircraft, have been converted to other uses in recent times, leaving even less space to accommodate demand.

Therefore, the Master Plan should ensure that adequate provisions are made to meet the demand of GA. Indications to date, however, lead me to conclude that while the TPA says it intends to continue to make the Airport available for PA, the amount of accommodation for PA and GA is likely to be a fraction of the demand for accommodation.

I am not able to provide full details because this should be the subject of a study of GA in Toronto. It would be appropriate for the TPA to conduct such a study and I am confident that TIPA would participate. I suggest that a survey of area pilots and aircraft owners would be appropriate and I offer to assist by publicizing the survey.

Full details of any financial or other commitments which any of TIPA and its members are prepared to commit in furtherance of its wishes for any additional facilities or services at the Airport:

It is unusual for a pilot group to commit funding for facilities that they need, except at small aerodromes such as ones that are owned or run by the users of the airport. However, with a Master Plan in place that clearly welcomes investment in GA, it is highly likely that some of the members of TIPA and others would step up to invest in businesses there. It is a matter of commitment in the Master Plan.

Any other information which you would like us to consider in our planning for the future of the Airport:

The Greater Toronto Airports Authority conducted a study for the federal government on the need for retaining the Pickering Lands. The GTAA's *Needs Assessment Study – Pickering Lands* contained several errors and omissions that led to their conclusion that there was no need to accommodate GA in the GTA should any of the existing airports close (at the time of their assessment, the closure of Buttonville had not been announced). COPA commissioned a review<sup>1</sup> of the GTAA's assessment. I invite you to consider our findings as you develop the Master Plan.

Finally, the TPA should consider the following in the development of the Master Plan. In a TPA letter to the Deputy City Manager, dated 7 November 2013, Geoffrey Wilson states:

“Private hobbyist aviators must and will continue to have appropriate access to Billy Bishop.”

This statement is limiting. There is much more to PA than simply hobbyists. Tens of thousands of pilots use their aircraft for other than hobby flying. In addition to using them like a family car for personal transportation and recreation, they use them as a business tool to conveniently get to places that the airlines do not serve. As the recognized voice of GA, COPA's concern also goes beyond PA, as detailed in this letter. We need facilities and services to train and upgrade our skills as well as maintain our aircraft and the broader GA sector needs adequate facilities and services to meet their needs.

The TPA has a golden opportunity, in light of demand for facilities and services from the closure of Buttonville and the continuing growth of GA, to develop facilities for GA. It should be possible, given the land that is still available on the Airport property, to provide adequate facilities and services that can coexist with and complement the airline operations and this should be reflected in the Master Plan.

1. <http://www.copanational.org/files/Review%20of%20GTAA%20Study.pdf>

I and COPA look forward to working with the TPA to establish what facilities and services are appropriate for GA at the Airport.

Yours truly,

A handwritten signature in black ink, appearing to read "Kevin Psutka". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kevin Psutka  
President and CEO

Cc Geoffrey Wilson, President and CEO TPA  
Mark McQueen, Chair TPA  
John Livey, Deputy City Manager