



June 2014

## TORONTO AVIATION NOISE GROUP

### OUR GOAL

The Toronto Aviation Noise Group is committed to **achieving an amended air space design which represents a more balanced approach to flight traffic for Toronto residents.**

The NAV CANADA design implemented in February, 2012 over our mid-town neighbourhoods many kilometres from the airport, follows the **most aggressive, business friendly route at the expense of the quality of life and health of residents under its path.** A more community sharing approach must be implemented.

### WHAT WE HAVE LEARNED:

#### NOISE MONITORING

In 2013 there was **ONE** Transport Canada noise violation sanction applied in all of Canada. This was in Montreal. There were **NONE** in Toronto or elsewhere in the country. In addition, we have learned that the GTAA **averages** noise monitoring results, thereby keeping the results below problem levels and safe from criticism. While T.A.N.G. is not opposed to the placement of noise monitoring terminals along this flight path, we believe that citizens would be better served by the appointment of an independent Air Noise Ombudsman (Heathrow Model) for third party oversight.

The problem with our concentrated flight path is **not** that most aircraft exceed the legal decibel limit, although some undoubtedly do. The problem is the **CONSTANT** audible noise intrusion into our neighbourhoods and homes because of the **EXTREME CONCENTRATION** of the path. **We hear aircraft noise at 30-45 second intervals, sometimes less, for large parts of the day and at greater intervals in the evening. The whine of planes as they turn over us can be almost unbearable.** We do not believe that Transport Canada, the GTAA or residents need noise terminals to know that this is happening.

#### 10 NAUTICAL MILE LIMIT

The 10 NM limit around Pearson for registering noise complaints is quite arbitrary as many residents under this concentrated flight path live outside the GTAA limit and are unable to register complaints. Noise complaint numbers are therefore not indicative of constituent concerns. Any resident under the concentrated route should be able to report their grievances to the GTAA.

#### LACK OF MEANINGFUL CONSULTATION

NAV CANADA is **unaccountable** except for safety issues. As a result, their consultation approach involves the **dispensing** of information. In addition we have learned through our research that the information given can be inconsistent and misleading. In the CENAC minutes of February 1<sup>st</sup>, 2012 the Above Sea Level altitudes announced for this flight path are quite different from the actual implementation heights.

There is no apparent interest on NAV CANADA's part in a two way consultation process as envisioned by the International Civil Aviation Organization, under whose guidance NAV CANADA operates. ICAO, in its publication Guidance on a Balanced Approach to Aircraft Noise Management, section 2.4, has clear expectations about the consultation process.

**T.A.N.G. (Toronto Aviation Noise Group)**

The process that resulted in our concentrated flight path is not consistent with the letter or the spirit of these guidelines. Our elected representatives at all levels were not advised of the changes. In a letter to MP Carmichael received on May 10<sup>th</sup>, 2013 NAV CANADA wrote, **“While we are not required to provide notification of flight path changes to anyone other than the pilots who fly them...”** That would appear to summarize their attitude towards consultation.

### **NIGHT FLIGHTS**

The night flight restriction is too short, beginning at 12:30am hours after most residents' preferred sleep time. Giving consideration to an earlier restriction by at least 30 minutes (12am) would provide *some* night time relief. We have learned that the GTAA has undertaken a 2014 Preferential Runway Study and it is essential that we **NOT** be designated **PREFERENTIAL**, in addition to our already concentrated reality.

### **HEALTH CONCERNS**

We understand that NAV CANADA conducted simulation studies for fuel savings and Greenhouse Gas Emissions related to the new air space design. We also understand that there was no off setting (Human Risk Assessment) study commissioned to examine the associated health and environmental factors affecting the residents living under the new concentrated route. We are currently exploring this issue with the Chief Medical Officer, Dr. David McKeown and the Toronto Public Health staff. Their expertise and considerable data from credible sources like the World Health Organization and others support our concerns. Toronto Public Health has initiated dialogue with the GTAA (CENAC) to determine why our neighbourhoods are not included in the 2014 Air Quality Study.

### **CONCENTRATION OF FLIGHT PATH**

Despite our current non preferential status runways **24R and 24L represent an astonishing 40% of all Pearson arrivals traffic.** Any consideration of making these runways preferential is unacceptable and would worsen an already intolerable living experience.

### **MITIGATION OPTIONS**

Over the last year the Toronto Aviation Noise Group has undertaken extensive research regarding the new Toronto Airspace Design implemented by NAV CANADA in February, 2012. We now understand that the design was selected because it was the **most aggressive, business friendly route** available within the **minimum safety guidelines** provided by ICAO.

Regrettably, the business friendly advantage provided has come at **enormous cost to the quality of life and health of those living under this aviation super highway.** Even if there had been proper consultation prior to implementation no one under this flight path could have understood its impact. Simulation studies (NAV CANADA) fall well short of the realized lived experience!

Without any consideration given to the human risk factors and without any health and environmental studies associated with the implementation, we are paying the price of an unacceptable, one sided, industry-driven decision. After extensive research T.A.N.G. knows that there are options for **amendment without elimination** of the arrivals route design. We believe these options represent a **safe, community sharing balance** and compromise.