

Attention: Consultation – Future of Billy Bishop Toronto City Airport
Transport Canada, Air Policy
Place de Ville, Tower C
330 Sparks St
Ottawa ON K1A 0N5

July 17, 2026

Re: Federal Consultation – Future of Billy Bishop Toronto City Airport, 2026

The Atmospheric Fund (TAF) is a regional climate agency serving the Greater Toronto and Hamilton Area (GTHA). We work closely with public and private partners to advance practical urban climate solutions that support affordability, equity, resilience, and long-term prosperity.

TAF appreciates the opportunity to comment on Transport Canada’s consultation on the future of Billy Bishop Toronto City Airport. We recognize the federal government’s interest in strengthening regional connectivity, supporting economic development, and planning for Southern Ontario’s long-term transportation needs. The proposed expansion of Billy Bishop Toronto City Airport has implications for regional transportation planning, waterfront land use, infrastructure investment, local air quality, public health, and Canada’s climate objectives. Given the scale and permanence of the decisions contemplated through this consultation, any expansion-related authorities should be supported by an independent, publicly available, business case and regional aviation assessment before major decisions proceed.

1: Require an independent business case before expansion proceeds

TAF recommends that an independent business case and regional aviation assessment be commissioned before supporting significant expansion at Billy Bishop. There is no publicly available business case assessing whether Billy Bishop expansion is necessary, climate-compatible, and aligned with regional transportation priorities. In addition, as of May 28, 2026, no comprehensive plan, business case, or formal consultation process has been provided to the City of Toronto. Existing studies are outdated and do not reflect current demand projections, policy commitments, or technological developments. Consideration should also be given to how the proposed expansion aligns with existing national transportation and climate priorities, and whether it may overlap with investments already underway.

A useful precedent exists in the federal government’s approach to the Pickering Lands. In 2016, Transport Canada retained KPMG LLP, in partnership with WSP, to conduct [a multi-phase Aviation Sector Analysis of Southern Ontario’s airport system](#). It examined supply and demand forecasts,

the role different airports could play in the regional network, and the revenue and economic implications of potential development scenarios.

- [KPMG's Supply and Demand Report](#) projected Southern Ontario passenger demand of approximately 74 million passengers per year by 2036, while finding that the existing airport system could support approximately 94.7 million passengers using current runway infrastructure.
- Pearson Airport itself also remains well below its modeled long-term capacity. The Greater Toronto Airports Authority has stated through [2017-2037 master planning documents](#) that Pearson's ultimate long-term capacity is expected to reach approximately 80-85 million annual passengers once terminal, taxiway, and airfield upgrades are completed. that Pearson's ultimate long-term capacity is expected to reach approximately 80-85 million annual passengers once terminal, taxiway, and airfield upgrades are completed.
- By comparison, Pearson handled roughly 43-45 million passengers in 2025, accounting for nearly 29% of all Canadian air traffic.
- In May 2026, Pearson also [announced](#) a \$3 billion investment that will support the airport's ability to grow to serve up to 65 million passengers annually.
- With targeted runway and taxiway improvements, regional capacity could increase to approximately 119.6 million passengers annually. On that basis, the analysis concluded that a new airport on the Pickering Lands was not required before 2036 from a capacity standpoint.
- In January 2025, Transport Canada announced that the lands would not be used for a future airport and that high-conservation-value lands would instead be transferred to Parks Canada.
- The [Contextual Bridge Report](#) found that secondary airports, including Hamilton, Waterloo, and Billy Bishop, could provide additional capacity within their existing boundaries.

TAF's analysis of current activity levels at Billy Bishop indicates that the airport has not yet reached the traffic volumes assumed in the 2017 Environmental Assessment's (EA) future scenarios. Using Statistics Canada data and Toronto Port Authority passenger reporting, we estimate that in 2025 there were 115,564 takeoffs and landings at Billy Bishop, almost the same as the EA's 2014 existing-conditions figure of 114,428. That remains well below the EA's future scenario range of about 138,000-141,000 takeoffs and landings. Recent passenger data from the Toronto Port Authority similarly show about 1.7 million passengers in 2025, down from 2 million in 2024 and far below the EA's Future Baseline and Proposed Future assumptions of 2.7 million and 4.1 million groundside passengers, respectively. Together, these figures indicate that Billy Bishop has not reached the higher demand levels used in earlier planning, which calls into question the need for significant expansion at this time.

The federal government's subsequent decision not to proceed with an airport on the Pickering Lands further reinforces the value of this approach. Expanding capacity at Billy Bishop without a clear, system-wide demand justification risks fragmenting passenger volumes across regional airports and undermining the efficient use of existing and planned infrastructure investments.

A stronger business case should establish, at minimum:

- The specific regional transportation or capacity problem that expansion is intended to address.
- The rationale for choosing Billy Bishop as the preferred solution over further optimization of Pearson, regional airports, rail, or other lower-emission transportation alternatives.
- A complete assessment should also consider the future impact of the proposed [Alto](#) high speed rail line on regional travel demand and commuter traffic patterns, including potential effects on passenger volumes at Billy Bishop Airport.
- Current passenger volumes at Billy Bishop also remain below pre-pandemic levels, raising further questions about the need for significant expansion in the absence of demonstrated demand.
- The infrastructure investments required beyond runway changes, including airfield, terminal, ground access, safety, and landside improvements.
- The full public costs of expansion, including greenhouse gas emissions, local air pollution, traffic, noise, public health impacts, and the opportunity cost of scarce waterfront land.

2: Assess Billy Bishop within the broader regional transportation and land-use system

TAF also recommends that any assessment of Billy Bishop expansion be grounded in the full Southern Ontario transportation and land use context. A regional assessment should also reflect changing land use patterns across Southern Ontario. Several urban airport sites, including Downsview, Buttonville, and Pickering, have closed or are being redeveloped for mixed-use communities. **These trends highlight that airport lands are scarce urban lands with competing public uses, particularly in areas facing housing, congestion, infrastructure, and climate pressures.** Billy Bishop's waterfront location makes this especially important. The airport sits next to dense residential communities, parks, schools, community facilities, and planned waterfront development areas.

- Increased passenger volumes could place additional pressure on [the already constrained Bathurst Street access point](#), increase local vehicle trips, and add congestion and emissions in surrounding neighbourhoods.
- TAF's analysis found that Billy Bishop's aircraft activity generated approximately [64,000 tonnes](#) of CO₂-equivalent emissions in 2024, excluding ground operations and surface travel to and from the terminal.

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- If passenger volumes increased five-fold, airport-related emissions could [exceed 300,000 tonnes annually](#).
 - Expansion also raises local air quality and public health concerns related to ultrafine particle (UFP) exposure in nearby communities. A [University of Toronto study](#) on the Bathurst Quay neighbourhood found that higher UFP concentrations occurred under southerly winds when Billy Bishop Airport was operating, particularly during aircraft landing and takeoff, and identified airport flight and ground activities as major sources of local UFP emissions.
 - Exposure to these pollutants has been associated with a range of adverse health effects, particularly affecting the cardiovascular and respiratory systems.

TAF appreciates the opportunity to provide comments on the future of Billy Bishop Toronto City Airport. A comprehensive, independent business case would help ensure that decisions regarding Billy Bishop Airport are transparent, well grounded, and aligned with Canada's long-term transportation, economic, climate, health, and land-use priorities.

Sincerely,
Bryan Purcell



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About The Atmospheric Fund

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. Please note that the views expressed in this submission do not necessarily represent those of the City of Toronto or other GTHA stakeholders. We are experienced leaders and collaborate with stakeholders in the private, public and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.