



WINNIPEG  
AIRPORTS AUTHORITY

August 30, 2019

Office of Premier Brian Pallister  
Province of Manitoba  
Room 204 Legislative Building  
450 Broadway  
Winnipeg, MB R3C 0V8

Office of Mayor Brian Bowman  
The City of Winnipeg  
2nd Floor, 510 Main Street  
Winnipeg MB R3B 1B9

Dear Premier Pallister and Mayor Bowman:

I want to raise some concerns with the proposed amendments to the Airport Vicinity Protection Area (AVPA) Plan currently being considered by City Council. As written, the amendments will serve to negatively impact Manitoba's economy and create avoidable friction within the community.

Winnipeg Airports Authority exists for the benefit of the community we serve. The first three words of our mission statement are "With our community." WAA board members are all Manitobans, nominated by airport stakeholders and guided by an understanding that the airport exists to leverage the assets with which we've been blessed to serve the current and future needs of this great province. This conviction is why WAA has invested over \$1 billion to transform the airport into what it is today.

This investment has paid off. Today, Winnipeg Richardson International Airport is an economic engine in the province. Operations at the airport support over 17,000 jobs; generate \$245 million in taxes and have a \$3.4 billion total economic impact. Our targeted investments have helped make Winnipeg an air cargo hub, with non-stop cargo services from Montreal to Vancouver to Iqaluit, and all the major U.S. hubs. With truly global reach, Winnipeg is today the third busiest air cargo airport, and the busiest nationally for dedicated air cargo freighter flights.

Manitoba business is ready to compete on the global stage and the airport needs to meet this demand. E-commerce is the fastest growing retail sector, and the airport's reputation as a cargo leader gives Manitoba business a competitive advantage internationally. The future of any community is directly related to its connectivity, and air service is essential.

Protecting the long-term economic viability of that connectivity is essential, which is why the AVPA was developed initially. The AVPA protects against the encroachment of incompatible land use development around the airport for the benefit of all Manitobans.

To date, the AVPA has proven the wisdom of its foresight as effective policy. Winnipeg has avoided the friction other cities have seen with residential development close to airports. A lack of this long-term thinking has resulted in airports being forced to restrict air access, while others have seen contentious public debates about noise pollution, resulting in lawsuits and advocacy campaigns targeted at elected officials.

Developers occasionally seek amendments to the AVPA for their benefit. WAA has opposed amendments that were not consistent with the intent of the AVPA – the safety and long-term economic

viability of the airport. WAA strongly supports development and growth of our city. It is a mutually beneficial relationship. We cannot, however, support actions which are fundamentally incompatible with the long-term economic benefit of the region.

To be specific, there are several concerns with the proposals currently before the Committee. First, while there is truth to the comments that aircraft have reduced their noise footprints over the last 30 years, the suggestion that enhanced construction materials, newer aircraft technology, and real estate disclosures will be sufficient to stifle opposition is flawed. Globally, there is overwhelming evidence to the contrary, as despite the prevalence of these mitigation factors air traffic complaints continue to rise. This increase is, in part, because non-acoustic factors can have an equal or more significant impact on elevating community concerns. A 2015 study by the Community Oriented Solutions to Minimize Aircraft Noise (COSMA) found that only 30 percent of community concerns with aircraft are attributable to acoustic factors, while 70 percent are from non-acoustic factors.

This finding is consistent with the March 2019 report by the House of Commons Standing Committee on Transport, Infrastructure, and Communities. The committee discovered that despite technological advancements, the general public's tolerance for noise has decreased over time. The committee heard from several witnesses that more citizens are expressing high levels of annoyance at lower and lower noise exposure thresholds, refuting the notion that improvements to technology and enhancements to building materials are a panacea for developing near airports.

It is also important to note that the AVPA is consistent with Transport Canada's view and TP1247 – Land Use in the Vicinity of Aerodromes which states that "Transport Canada does not support or advocate incompatible land use (especially residential housing) in areas affected by aircraft noise."

The AVPA is also consistent with the Province of Manitoba's Provincial Planning Regulation, which states:

*"Transportation, including roads, rail, air and marine, is critical to Manitoba's sustainable development. By influencing where and how land is used and developed, transportation directly affects our economy, competitiveness and quality of life. As such, Manitoba's transportation system should be enhanced and protected so it can continue to move people and goods in an efficient, safe and environmentally responsible way. Integration of land use and transportation planning will support development that is compatible with both local and provincial transportation networks. By integrating land use and transportation considerations in development decisions, planning authorities can anticipate and minimize the potential for conflicts and hazards. For example, certain land uses, depending on their type, size and operation, may have a negative impact on the function of a highway, cause unsafe conditions or accelerate the need for costly transportation upgrades. Similarly, many land uses can be negatively affected by their proximity to transportation facilities due to dust, noise or odor.*

*To ensure Manitoba's competitive strength in global markets, local land-use decisions must support the efficiency of an interconnected and multimodal provincial transportation system that can effectively serve freight while continuing to meet mobility and tourism needs. This system must also serve new economic trends and resource developments, as well as address the transportation access and equity challenges faced by northern and remote communities."*

Section 7.1.3 of the regulation goes further, saying that development must be restricted in areas "that are in the vicinity of airports and airfields, if development is incompatible with aircraft operations or the expansion of airport facilities."

The regulation also recognizes the critical role the airport plays in driving future economic growth. Section 9.1.3 instructs that land use planning should protect and capitalize on the region's vital economic advantages, including "the Winnipeg James Armstrong Richardson International Airport, its 24-hour operation status, and the clustering of industrial development in the vicinity of the airport."

Today, Winnipeg Richardson International Airport serves more than 4.5 million passengers a year. We are a growing Canadian cargo hub, in large part a result of our 24/7 operations. WAA has ambitious plans to continue to leverage that success to grow the airport for the benefit of all Manitobans. This plan will

create over 30,000 new jobs, \$133 million in new taxes and \$1.7 billion in new GDP. However, for this to occur, the government must not make short-term decisions that will limit growth.

Economic growth benefits all Manitobans and WAA supports strategic investment that delivers on this goal. However, good public policy that safeguards the interest of the community is not accomplished in an environment of pressure brought to bear through "one off" amendments proposed by self-interested developers. It is achieved by understanding and delivering on the long-term needs of the community. As such, we ask that these amendments be paused while we work together to find a long-term solution that continues to benefit all Manitobans.

Should you have any questions or require further information, please do not hesitate to contact me.

Sincerely,



Barry Rempel  
President and CEO

cc: Hon. Blaine Pedersen – Minister of Growth, Enterprise and Trade  
Hon. Jeff Wharton – Minister of Municipal Relations  
Mr. Scott Gillingham – Councillor St James