

Comox Valley Airport: Opportunities for Airport Adjacent Land

Prepared for:

**The Comox Valley
Economic Development Society**

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1.0 Introduction

This briefing paper was prepared for the Comox Valley Economic Development Society for a seminar on land uses for properties adjoining the civilian terminal at CFB Comox. The intent of the seminar is to discuss the economic potential of these properties, and appropriate related planning.

The briefing provides information on:

- The Comox Valley Airport and its operations in **Chapter Two**;
- Aviation security and aviation restructuring trends in **Chapter Three**;
- Airport planning best practices on lands in the vicinity of Canadian airports in **Chapter Four**; and
- Scenario analysis of the potential for economic growth and development on the lands adjacent to the leased civilian air terminal and related infrastructure in **Chapter Five**.

2.0 The Comox Valley Airport

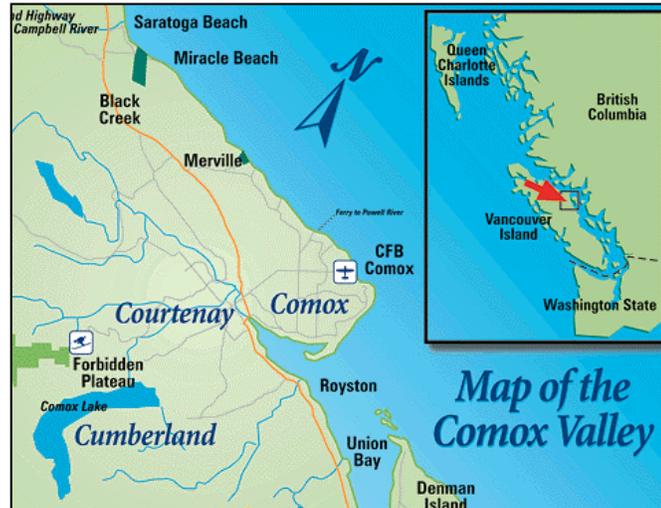
2.1 A DND Facility

The Comox Valley Airport is located on federal land which is part of a Department of National Defence (DND) base. The civilian terminal is leased from the federal government. The Canadian Forces Base (CFB) Comox Airport, located in the Township of Comox, adjacent to the City of Courtenay, was constructed by DND in 1942 and is the only military airport in British Columbia today.



Currently, 19 Wing Comox occupies the military aerodrome. Three squadrons and a Search and Rescue school are based at Comox – a maritime patrol squadron (407), a transport and rescue squadron (442), and an air maintenance squadron (19).¹ The prime mission for the airport is maritime patrol and search and rescue. As Canada's only Pacific air base, its strategic importance is significant and long-term.

The Department of National Defence guides the base's operations and management. As a federal property, provincial legislation and regional district and municipal by-laws do not have jurisdiction.



2.2 The Civilian Airport

The current, civilian operations at Comox are relatively new. A civilian terminal was added to the airbase in 1956 and run by Transport Canada until 1996, when the Comox Valley Airport Commission (CVAC) was formed. CVAC assumed management of the civilian terminal in July of that year.

CVAC operates under a long-term lease with DND.

¹ Canadian Air Force web site.

The Original Civilian Terminal Building



In May 1997, CVAC purchased the terminal for \$1 and has run it as a self-supporting business without government assistance. CVAC has a long-term lease agreement with DND for its new site at the airbase.

CVAC is a community-oriented, volunteer-run organisation that is accountable to Comox Valley taxpayers, who retain ownership of the airport. The Commission is made up of representatives from each of the Valley's townships (Cumberland, Comox and Courtenay), its four district areas (A, B, C, and K), and the Comox Valley Economic Development Society (CVEDS).

CVAC's strategic vision is to provide facilities and services for civil aviation and related industries that will foster and sustain economic growth and efficient air transportation for the benefit of all citizens of the Comox Valley and surrounding region.

2.3 Military-Civilian Joint-Ventures

The military-civilian agreement at the Comox Valley Airport is unique. In Canada there are only two comparable military-civilian joint-ventures – Goose Bay and Cold Lake – and neither compares well. In brief, the two sites have the following attributes:

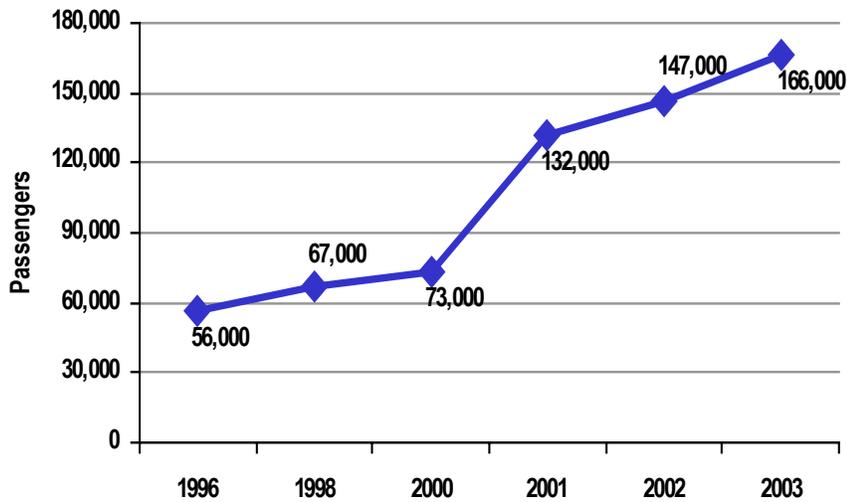
The military-civilian agreement at the Comox Valley Airport is unique.

- CFB Goose Bay, Labrador is used for technical stops and low level aircraft flight training. The Goose Bay Airport Corporation is negotiating a lease with DND and pays a fee for air traffic control services and crash, fire and rescue. Three air carriers serve Goose Bay: Air Canada Jazz to Halifax, Provincial Air to Newfoundland, and Labrador Air to other communities in Labrador.
- CFB Cold Lake receives flights from Calgary twice per day operated by Peace Air with turbo-prop aircraft. DND operates the terminal building.

2.4 Comox Valley Airport Five-Year Growth

CVAC has experienced continuing success after taking over the civilian terminal operations at the airport. Since WestJet started flying to Comox in 2001, passenger traffic at the site has more than doubled over the 2000 numbers, during a period of aviation industry slowdown. Passenger numbers in 2004 continue to track the high forecasts for the site. As the only airport north of the Malahat able to serve larger jet aircraft (such as WestJet's Boeing 737-700s), the airport is well-positioned to serve the population and business growth on mid and north Vancouver Island.

Comox Valley Airport Passenger Growth, 1996-2003



3.0 Aviation Security and Industry Change

Since 2000, the aviation industry has continued to undergo rapid and dramatic change, and this process has not ended. The causes for this change have been safety and security concerns largely stemming from the September 11th, 2001 terrorist attacks and restructuring in the airline industry. September 11th has made aviation security a significant focus of U.S. and Canadian government policy. The recent release of the 9/11 Commission Report has again put airport security at the front of public policy debate, including recommendations for increased air cargo security.

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3.1 Security

Since 2001, the renewed emphasis on security in Western economies has resulted in the creation of new government organisations and strategies, and intensive security-related spending. This process has largely been driven by U.S. requirements and changes and has largely focused on aviation. The aviation attention is because the 2001 attacks used the aviation industry as target and weapon.

In response to the terrorist threat, the U.S. government instituted the Department of Homeland Security in 2002 “to secure the homeland from terrorist attacks.” Homeland Security is the first new U.S. government department in decades and has over 180,000 employees.



A local example of the changing environment is the creation by the Department of Homeland Security of bases in northern Washington State from which aircraft and high speed boats will operate to monitor marine traffic between B.C. and Washington State.² The new Bellingham Air Marine Branch will have 69 staff members.

A symbol of this changing environment is the colour-coded Threat Advisory system of green, blue, yellow, orange and red. The advisory was created to communicate on a timely basis to the U.S. public the current threat of major terrorist attacks perceived by government agencies based on up-to-date intelligence.



In Canada, the continued response to the post 2001 terrorist threat has included the reorganisation of Customs and the creation of a new government agency, the Canadian Air Transport Security Authority (CATSA). The authority's



² Seattle Post-Intelligencer, “Homeland security begins air surveillance of Canadian border,” 20th August 2004.

mission is to protect the public by securing the air transportation system. CATSA was created in 2001 as part of a \$2.2 billion air security initiative. To the travelling public, the authority's primary role is employing and managing airport screeners.

After the attacks the Canada Customs and Revenue Agency (CCRA) was



Canada Border Services Agency / Agence des services frontaliers du Canada

divided into the Canada Border Services Agency (CBSA) and the Canada Revenue Agency (CRA). The CBSA reports to the new Department of Public Safety and Emergency Preparedness. Its role is to manage the nation's borders and the 75 domestic laws that govern trade and travel.

At the regional airport level, the security changes have resulted in new standards, increased security staff, and new capital expenditures. The most visible sign of these changes in the uniformed CATSA employees screening passengers before flights and the x-ray machines at Canadian airports, but the changes in attitude and approach run much deeper and are continuing to develop.

The increased security requirements have impacted the Comox Valley Airport as well. In addition to the changes mandated for civil aviation, CVAC must comply with new DND requirements. These include mandatory security screening for all employees and tenants with airside access, increased facility security, more restrictions on airside access, and the probable need to meet the requirements of the Critical Infrastructure Protection Program, once identified.

3.2 Aviation Industry Restructuring

Throughout the new millennium, the aviation industry has undergone significant change, and the change is not expected to slow down. Two August examples of this include Air Canada's departure from CCAA protection and the release of an U.S. government report on legacy carriers.

Air Canada's restructuring continues and it has left Companies' Creditor Arrangement Act (CCAA) protection. Air Canada argues that its business model was broken and that the CCAA protection has allowed it to respond and fix the model, particularly as a result of the war in Iraq and the SARS crisis in 2003. Since April 2003, Air Canada has successfully sought new credit and labour cost reductions, and CEO Robert Milton argues they are exiting from CCAA ready to compete with lower cost air carriers such as WestJet.



The recent U.S. Government Accountability Office (GAO) report, "Legacy Airlines Must Further Reduce Costs to Restore Profitability," casts doubts on the ability of legacy air carriers such as Air Canada to restructure to challenge the low cost carriers. Key findings of the report include:

- Despite cost cutting, U.S. legacy carriers experienced an increase in unit costs from 2000 to 2003, while low cost carriers (LCC) further reduced costs;

- U.S. legacy carriers had \$6.8 billion in cash at the end of 2003, but face \$20 billion in long-term debt and lease obligations over the next four years. In contrast, LCCs had \$3.5 billion in cash and four-year obligations of only \$2.1 billion.
- Legacy carriers face \$21 billion in underfunded pension liabilities.

While the legacy carriers are not close to ending service, this report shows that ongoing turmoil in the aviation industry can be expected to continue. While Air Canada has significantly restructured, the LCCs (WestJet, Jetsgo, CanJet) in Canada will continue to put comparable pressure on Canada's sole legacy carrier.

The growth of LCCs is good news for Comox because WestJet, a LCC, is its dominant carrier. This bodes well for the continued growth of the Comox Valley Airport and related businesses.

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4.0 Airport Planning Issues

Aside from security, safety and community planning issues have an impact on regional airports. Compatible land use planning is a significant issue for airports in Canada and other developed countries.

4.1 Aviation Safety and Airport Zoning Regulations

While Transport Canada has transferred ownership and management of regional airports to commissions and authorities, the department has continued responsibility for inspecting airports and ensuring that they meet safety standards. The Aeronautics Act governs airport operations and management, and most related regulations are contained in the Canadian Aviation Regulations (CARs).



Airport Zoning Regulations are of particular importance to planners. These regulations govern the construction of buildings immediately around airports to ensure that structures are not built above specified heights and therefore impede the safe operation of aircraft to and from the airport. The regulations also allow the Minister to order trees to be topped. The Comox Airport Zoning Regulations describe the height limits in the vicinity of CFB Comox.

4.2 Aviation Noise and Planning

For many communities, noise is the issue which planners aim to manage. While individual response to noise is variable, Transport Canada has developed planning tools to predict the levels of noise impacts generated by aircraft operations to assist in making land use and zoning decisions. In Canada, the Noise Exposure Forecast (NEF) is the officially recognised metric for airport noise assessment. The NEF calculates the sound generated by individual aircraft types operating, or expected to operate, at the airport, and adjusts for the number of operations that are forecast to occur.

DND has adopted NEF criteria and they apply to CFB Comox. The NEF guidance is available through the Comox-Strathcona Regional District and it provides recommendations on the types of development that are compatible within the NEF contours adjacent to the airport.

Transport Canada standards indicate that land areas situated within the 30 NEF contour and above are inappropriate for residential uses.³ To reduce the risk of residential areas being impacted by aircraft operations, many jurisdictions have adopted land use controls and airport vicinity development schemes to ensure sustainable development. In Canada, the Province of Ontario has a



³ Transport Canada, "Land Use in the Vicinity of Airports," TP1247e, 1996.

Policy Statement providing guidelines for airport vicinity development and the Province of Alberta has enacted Airport Vicinity Protection Areas (AVPAs) around Calgary and Edmonton International Airports to avoid potential land use conflicts.

5.0 Comox Valley Airport Development Opportunities

5.1 Types of Airport Commercial Development

Development of land at airports is typically driven by the customers and businesses that the airport serves. Airports sometimes specialise in one type of business, such as general aviation. Typical types of traffic which shape airport development include:

- Domestic business and tourist passengers. This type of traffic drives revenues at most North American airports.
- International and transborder passengers. Few airports are dominated by international traffic, but it is particularly important because fees and revenue related to this traffic are generally higher.
- Cargo and distribution. Some airports, such as Hamilton, specialise in this traffic, but at most it is a relatively small aspect of air services.
- General aviation (private aircraft) and corporate aircraft. In areas with high per capita income and many business headquarters, general aviation and corporate aircraft traffic can be high. For example, Orlando has a very busy, downtown executive airport.
- Aerospace and aviation maintenance. This can be an important tax and employment generator at airports such as Abbotsford and Kelowna, where hundreds of people are employed by aerospace/maintenance activities.
- Light industry and/or processing, including the B.C. Forest Service. Examples of airports where industrial activity is important include the nearby Alberni Valley Regional Airport which supports heli logging operations. At many regional and small airports in B.C., flights supporting forest fire fighting generate considerable, though inconsistent, revenue.

5.2 Airport Development Examples

To provide a clearer picture of what opportunities Canadian airports have developed in the last 10 years, four simple case studies are provided below for Abbotsford, Edmonton International Airport, Kelowna, and Thunder Bay. This overview provides examples of the variety and diversity of developments that four airports have taken. Two types of developments are discussed – airside and groundside. Airside refers to businesses which have access to the airfield, and groundside refers to the businesses that do not have access to the airfield. :

Abbotsford. *New airside services and business:*

- WestJet air services;
- Northern Hawk regional B.C. air services;

- Seasonal Air Transat sunspot charter services;
- Jetsgo non-stop service to Toronto;
- WestJet transborder services starting this fall;
- Significantly expanded Cascade Aerospace facility; and
- Rental car services.

New groundside services and business:

- Development of plans for cargo facilities; but
- The Abbotsford Airport is not currently trying to market its land.

Edmonton International Airport. *New airside services and business:*

- FedEx cargo centre;
- Improved air services to the North, acting as the Gateway to the NWT;
- Non-stop services to Winnipeg, Victoria, and possibly Montreal, and through services to Halifax;
- Non-stop services to five U.S. hubs;
- Development as a WestJet hub;
- Construction of a new terminal building;
- Executive Flight Centre is under construction.

New groundside services and business:

- Golf course;
- Development of AirLINKs Business Park and AirLINKs Cargo Park;
- Service station and 7-11;
- Car wash and auto service centre.

Kelowna. *New airside services and business:*

- WestJet services to Vancouver, Edmonton and Calgary;
- Transborder service to Seattle on Horizon Air;
- Non-stop, seasonal service to Toronto on Air Canada;
- New maintenance and aerospace developments.

New groundside service and business:

- BCIT training facility;
- Rental car service centre; and

- parkade.

Thunder Bay. New airside services and business:

- WestJet service to Winnipeg and Hamilton/Toronto;
- Improved Northwest Airlink services to Minneapolis-St. Paul;
- Opened a duty free shop;
- Attracted Pilatus aircraft sales and maintenance.

New groundside service and business:

- Canadian Tire outlet;
- Purolator local support facility;
- Operated a subsidiary, Thunder Bay Airport Services Inc., which provides airport management services to small Ontario airports;
- Developed an Aerospace Commercial Sub-division, including the opening of the Confederation College Aviation Centre of Excellence.

5.3 Comox Valley Airport Scenarios

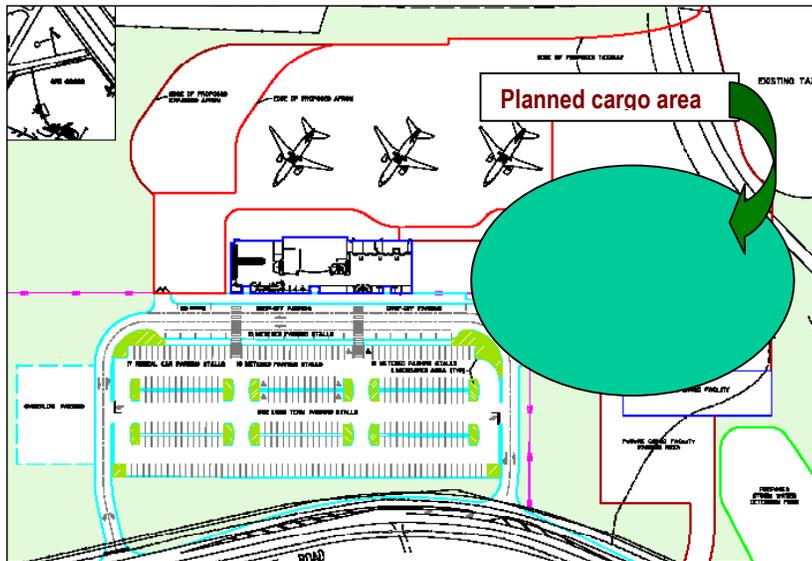
Assuming that the Canadian and the regional economy continue to experience growth rates of approximately 2% per year, CVA's existing traffic is projected to grow, and the airport is tracking the high end of the passenger forecasts prepared for it in 2002. The types of opportunities likely to develop include:

- **Inbound Long-distance and international charters.** Tourism markets smaller than Vancouver Island such as Whitehorse receive weekly transatlantic charters during the summer. Vancouver Island is one of the top 10 tourism destinations in Canada and Comox is the only airport north of the Malahat in a position to serve these long-distance flights. These flights could potentially come from Central Canada or Europe. Air Transat has already announced plans to provide an outbound winter charter service from Comox to Puerto Vallarta in 2004/05.
- **Transborder Traffic.** Transborder is another word for U.S. flights. As the growth airport in the centre of a growing tourism and business market (Central and North Vancouver Island), the CVA has considerable potential for attracting daily transborder flights to Sea-Tac International Airport in Seattle, and is already in discussions with a major U.S. air carrier.
- **Cargo/distribution traffic.** CVAC has identified the potential for exports of Vancouver Island products such as seafood from Comox to U.S. or even Asian airports. For example, the Comox area is perfect for shellfish and cargo exports might be part of the regional Marine Frontier Shellfish Initiative.

Airside Challenge. Developing typical airside business opportunities such as aircraft maintenance will be a significant challenge at Comox because it is a DND airport with security restrictions on airside access and because the civilian terminal has relatively little land leased. The aircraft apron in front of the new terminal is already fully utilised on some busy days.

Groundside Opportunities. As the CVA expected to continue its strong growth, groundside development opportunities on land adjacent to the airport is probable. These could include cargo, distribution, ground transportation, and retail opportunities, for example, and potentially processing or light industrial.

Plan of the New Comox Valley Airport



Through-the-Fence Agreements. Through-the-fence agreements that allow airside access to properties adjoining the airport are possible, but not probable at a military airport and in the current security environment. Where through-the-fence agreements exist, aircraft are able to leave the airport via taxiways that are extended onto adjoining properties.

There are few Canadian examples. Winnipeg has a number of these agreements but they are all grandfathered from the Second World War when aircraft were manufactured there, and these taxiways are still used by Boeing Canada and other aerospace companies for the maintenance of aircraft and the fabrication of aerospace components. Toronto International Airport has similar aerospace related agreements dating back to the Second World War.



As through-the-fence agreements are uncommon and security restrictions have been significantly increased at airports, the probability of developing new such arrangements appears unlikely. Airports do not favour these arrangements because under them they take responsibility for significant insurance and security risks, and obtain relatively little revenue in exchange.

5.4 Potential Adjoining Land Uses

Based on the scenarios for potential traffic and business growth at the Comox Valley Airport, a number of uses are possible on adjoining lands included the following:

- Rental car facilities for cleaning and managing operations;
- Tour bus facilities;
- Hotels, motels, and convention centres;
- Resort offices for meeting and greeting passengers;
- Warehouses, storage and distribution centres;
- Light industrial including manufacturing and retail; and
- In-bond FTZ-type activity.

Appendix A: Meeting Agenda

AGENDA

Airport Adjacent Lands Meeting

August 25, 2004 9:30 a.m. – 1:30 p.m.

Comox Valley Airport Terminal Boardroom

1. Welcome: Terry Law, Chair, CVAC
2. Introduction: John Watson
 - **Objective:** To explore the various issues and opportunities presented by the opening of the new Comox Valley Airport in regards to potential development lands within the vicinity of the new terminal.
 - **Meeting Goals:**
 1. To establish a strong partnership of key stakeholders that would proactively seek to plan for the future of the region.
 2. To provide an opportunity to work together to determine target sectors and industries that may locate within an airport industrial zone.
 3. To begin the process of identifying infrastructure, servicing, and regulatory challenges that may better be solved by a joint effort of the public and private sector.
3. Airport Update: Chuck Fast, President & CEO, CVAC
4. InterVISTAS Consulting: presentation by Rob Beynon, Director of Airport Marketing
 - Regulatory and Industry challenges/update
 - Case examples
5. Open Discussion: Facilitated by Rob Beynon/John Watson
 - Challenges and Opportunities, ie:
 - Infrastructure & Servicing & Transportation
 - Land Use, Environmental & Regulatory
 - Investment Attraction & Marketing
6. Vann Struth Consulting: presentation by Jamie Vann Struth, Consultant
 - Targeted Investment Attraction
7. Closing Remarks

Appendix B: Jamie Vann Struth Presentation Handout

Comox Valley Airport Investment Opportunities

With the opening of a new terminal and continued rapid passenger growth at the Comox Valley Airport, there is increasing potential to attract new business investment to adjacent lands.

The question is what type of companies are typically attracted to areas adjacent to airports. As an example, the following table shows total employment on Sea Island in Richmond (location of Vancouver International Airport) in 2001. The Comox Valley Airport will clearly not have the same range of investment opportunities as the Vancouver Airport, but the table is nevertheless revealing of the types of businesses that cluster near airports.

Note that the employment figures cover the airport terminals and airside facilities as well as the adjacent lands (which we unfortunately cannot separate from the other numbers with the data that is available). The names of some of the industry groups are vague, so further details on what is included in each industry group are provided on the following page.

Table 1. Jobs on Sea Island in Richmond, 2001

Industry Group (with NAICS code)	Jobs	% of total	Location Quotient*
4811 Scheduled air transportation	8,745	45.4%	42.11
4881 Support activities for air transportation	2,450	12.7%	38.61
7223 Special food services	1,055	5.5%	14.05
4921 Couriers	925	4.8%	13.88
4885 Freight transportation arrangement	630	3.3%	8.30
9112-9119 Other federal services	470	2.4%	1.42
7211 Traveller accommodation	450	2.3%	1.87
4812 Non-scheduled air transportation	415	2.2%	31.33
5321 Automotive equipment rental and leasing	380	2.0%	11.29
5616 Investigation and security services	365	1.9%	3.84
7222 Limited-service eating places	290	1.5%	0.69
7221 Full-service restaurants	205	1.1%	0.27
4532 Office supplies, stationery and gift stores	185	1.0%	2.46
5615 Travel arrangement and reservation services	170	0.9%	1.22
5617 Services to buildings and dwellings	165	0.9%	0.90
4931 Warehousing and storage	120	0.6%	1.66
4841 General freight trucking	110	0.6%	0.90
3364 Aerospace product and parts manufacturing	105	0.5%	6.38
Total	19,265	-	-

*Location Quotients are a measure of industry specialization. Values higher than 1 indicate that Sea Island is more specialized in that industry than the GVRD, and values less than 1 indicate lower specialization.

Sources: Statistics Canada, Vann Struth Consulting Group

The location quotient statistics in the far right column show which industries are most specialized on Sea Island relative to the rest of Greater Vancouver. Automotive rental and leasing, for example, is 11 times as concentrated on Sea Island as in the Greater Vancouver region as a whole. Even though it has fewer employees on Sea Island than traveler accommodation, it is far more specialized to the Sea Island location.

Description of Industry Groups in Table 1

Some of the industry groups in Table 1 have somewhat vague descriptions. Here are further details on what is included in these industry groups. Employment statistics for the individual components of the industry groups are not available.

Industry Group	Includes...
4881 Support activities for air transportation	♦ Air traffic control, Other airport operations
7223 Special food services	♦ Food service contractors, caterers, mobile food services
9112-9119 Other federal services	♦ Federal protective services, Immigration services, Foreign affairs and international assistance
5616 Investigation and security services	♦ Investigation, guard and armoured car services; Security systems services
5615 Travel arrangement and reservation services	♦ Travel agencies, Tour operators
5617 Services to buildings and dwellings	♦ Exterminating and pest control services, Janitorial services, Landscaping services, Carpet and upholstery cleaning services
4931 Warehousing and storage	♦ General warehousing and storage, Refrigerated warehousing and storage, Farm product warehousing and storage

Appendix C: Flip Chart Notes

The following represents the notes taken by John Watson and Rob Beynon on the two flip charts at the meeting

Summary: Comments/Actions

- Time is important
- New business will need the infrastructure plan
- Might be talking about a competitive development process
- Needs to include those that can “risk the \$”
- Residential vs. Industrial/Commercial land mass
- Properties are “too small” on own
- “Group” will need a champion
- #1 step should be a sewer and water plan
- Political will may exist
- Refine/Expand group – MOT, ALC
- Jurisdiction/Annex
- Define area of interest

Challenges: Infrastructure – Servicing – Transportation

- Connector Rd. (minor collector) may be possible (at Brighton)
- Independent servicing systems at YQQ. Slow release storm water management improvements in vicinity will/may be difficult to obtain (queens ditch)
- Sanitary will/may be straight forward
- Water at CVAC entrance main meets current OCP therefore change in use will require review. i.e. hotels
- Knights road intersection – ICBC traffic review underway
- Means to connect to sewer exists
- RDCS report on watershed & Queens Ditch upgrade
- How to finance costs of storm water management system
- DND “out of ditch” business – right of way & ditch upgrade to handle catchments area
- Cost of Sewer from Cambridge to connector established?
 - Study completed on feasibility #'s need to be updated
 - Doesn't currently include knight to Cambridge
 - Estimates & plan for passing costs required
 - Potential for property owner partnership
- Identification of lands that have retention capabilities (land loss)
 - S.W.R. on-sight options vs. those that require joint system
- Late comers fee option has 10 year lifespan
- DCC's (front \$ is required)
- Traditional vs. innovative solutions to S.W.M.?

Challenges: Land Use, Environmental Regulatory

- Light industrial targeted for aviation by municipality
- Land south of airport could be used for residential
 - Servicing
 - Community “importance”
- Community choices on zoning
- NEF noise contours not considered now
- 9m structure height restriction

Environmental

- federal legislation
- storm drain management
 - major issue
- storm water management future issue
- air force concerned about flooding liability resulting from storm drains
- can't retain water as pond because attracts birds
 - becomes aviation safety hazard
- salmon spawning in Queen's ditch
 - DFO interest

Planning

- Question: How will we reserve land for aviation use?
 - e.g. who pays for sewer and when?
- Issue – regional planning of storm water solution
- How much do we want to expend on finding a solution
- ALR lands adjacent to airport

Next Steps

1. Storm Drains
2. Sewer
3. Road
 - a. Necessary to development
 - b. Designs & costs required
 - c. This group has to “sit on” town & developers will pay...DCC's , taxes

Next Steps 2

Chuck Fast

- Comprehensive Development Plan
- What will the process be?

Harold Long

- A developer will have to lead
- Land in two sections
 - Residential – sooner
 - Industrial
- Study by owners?
- Business plan for multiple properties required – need a lift station?

Regional Issues

Glenn Westendorp

- Storm water management
 - Want a few facilities
 - Town & CVEDS
 - PR