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December 2, 2025

**Re: PH26.7 - South Etobicoke Transportation Improvements to Lake Shore Boulevard West, Humber Bay Shores and The Queensway in Ward 3 - Etobicoke-Lakeshore**

To Whom It May Concern:

We are writing with comments on the Nov. 17, 2025 report: South Etobicoke Transportation Improvements to Lake Shore Boulevard West, Humber Bay Shores and The Queensway in Ward 3 - Etobicoke-Lakeshore.

We consider the report to be incomplete as written and ask that the report be revised to address the concerns noted below before being accepted by the Planning and Housing Committee.

1. The report seems to make no mention of either previous [Waterfront Transit Reset](#) Study or the [2018 Council approval](#) to proceed with the planning work for the Colborne Lodge Dr. to Exhibition alignment (not even the initial background studies have been completed to date). On April 16, 2019 the status was described in the [Transit Expansion Update](#) as:

- a. "several projects will be ready to go to procurement and construction in 2019/2020, including ... the Exhibition Loop- Dufferin Loop Streetcar Connection (a priority segment of the Waterfront Transit Network Plan)"
  - b. This is important because the Waterfront Transit Reset study placed equal importance on WELRT and WWLRT and indeed, identified the Colborne Lodge Drive to Dufferin segment as a priority (which is reflected in the council decisions on transit infrastructure prioritizations at the time).
  - c. If the authors of this report are refuting the recommendations, or asserting that the study is no longer relevant, a rationale and supporting evidence should be included for consideration by the Planning and Housing Committee. Providing reference to prior planning studies, Council decisions, and background contexts should be considered a requirement for a report of this nature.
2. There are numerous references to current ridership and TTC service currently being adequate to address demand.
    - a. However, they make no mention of the fact that the entire Christie's project, which is approved even if delayed, is expressly designed to offer almost no parking to the residents of approximately 7,700 new units. The question isn't whether current ridership can be handled today, but whether the demands of the approved development populations can be met with only a GO station and surface transit running in mixed traffic.
  3. There is insufficient context provided for the densities projected for Humber Bay Shore. This is one of the densest populations in the city, and probably the densest residential neighbourhood that is not within 500m of existing or funded higher order rapid transit. It is set to grow to approximately 38,000 residents with the approved Christie's site development, based on the report's own population growth estimates of 141% of the 2025 population of 15,610.

We ask that planners provide appropriate context by addressing the following questions in the report:

- a. What comparable examples exist in the GTA, or Canada, of a residential neighbourhood as dense as Humber Bay Shores that is not served by *higher-order rapid transit*?
  - b. If the contention is that Park Lawn GO will be sufficient to address future population growth, which of the other numerous existing and planned GO stations in the city is the only higher order transit for a community of equivalent size? Which of them is subject to approved development on the same scale as Humber Bay Shores?
4. The report makes little mention of the February 2024 [Prioritization of Planned Higher-Order Transit Projects](#). That transit Prioritization exercise fundamentally misevaluated WWLRT. We believe this report should address how WWLRT was evaluated considering the below points:
    - a. The report erroneously calculated cost based on the need for net new LRT infrastructure instead of evaluating only the new sections and any necessary modifications to existing infrastructure.

- b. The report assessed WWLRT based on a Park Lawn to Union journey and distance instead of in the post Ontario Line context of a Park Lawn to Exhibition journey.
  - c. The evaluation was severely weakened by the length scaling effects of the above flaws e.g. its ability to promote new residential and commercial (because the Exhibition to Union segment is already fully developed).
5. While transit infrastructure enhancements on Queensway would be welcome, the reality is that it is already only a 10-minute bus trip to Line 2, with very short headways due to interlining of bus routes north of Evans Ave (Kipling 44 and 944 Express Bus; Islington 110A/B/C; Royal York 76A/B/C and Evans 15).

Thank you for addressing our concerns.

Regards,

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