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Via Email to: exc@toronto.ca

April 13th, 2026

Dear Members of the Executive Committee,

Re: Agenda Item EX30.2 Toronto Personal Watercraft Safety Plan, April 15 2026

This letter is submitted on behalf of The Toronto Beaches Open-Water Swimmers [“TBOW”].

Background

We are Toronto’s largest open-water swimming group, with over 2,000 members who regularly swim along the city’s shoreline, including all designated swimming beaches. We are a self-regulating community that prioritizes safety—promoting practices such as swimming with a buddy and using high-visibility tow floats. While most of our members are experienced swimmers, we actively support those new to open-water swimming.

Over the past decade, conditions for open-water swimming and recreational paddling in the City have become increasingly unsafe. This is largely due to the growing number of motorized vessels, particularly PWCs, operating in close proximity to swimmers and paddlers. Our members have reported numerous close calls, and many in the broader waterfront community have reduced or altered their activity, often limiting use to early morning hours to avoid peak motorized traffic.

Our members actively participated in the PWC Safety Plan engagement process, including meetings with members of Council, completion of the public survey, and attendance at stakeholder sessions.

Our Thanks

We recognize the coordination required across multiple City divisions and external agencies to bring this report forward. We thank the City Manager’s Office and Parks and Recreation staff for the significant work behind the Staff Report and Recommendations, and we acknowledge the Project Team’s commitment to incorporating public input, stakeholder perspectives, and user experience into the development of the Personal Watercraft (PWC) Waterfront Safety Plan.

Support for Staff Report and Recommendations

TBOW supports all 5 recommendations contained in motion 2026.EX30.2. We urge the Executive Committee to adopt the staff recommendations and advance them to City Council for approval.

Additional Comments and Considerations Going Forward

In addition to the 5 recommendations covered by this motion, we ask the Executive Committee for the following:

- 1. “Woodbine” MWEZ geographic scope to include the shoreline from the western end of Woodbine Beach to R.C. Harris and includes Kew/Balmy Beach**

The *Decision History* section of the Toronto Personal Watercraft Safety Plan correctly notes that City Council requested the implementation of a Motorized Watercraft Exclusion Zone (MWEZ) “from Woodbine Beach to the R.C. Harris Water Treatment Plant.” However, recommendation #2 of this agenda item—and the attached letter from the Port Authority—refer only to “Woodbine Beach,” omitting the full extent of Council’s direction.

The area from Woodbine Beach to the R.C. Harris Water Treatment Plant includes both Woodbine and Kew-Balmy Beaches—distinct in name but contiguous in use. While the *ThoughtExchange* survey treats Kew-Balmy Beach as a separate location, Council’s motion clearly contemplated the full continuous stretch. By the City’s own website, Kew-Balmy Beach makes up 60% of the distance between Woodbine to RC Harris which is significant and should not be overlooked.

Further, there should be no motorized watercraft allowed to come-ashore at the western end of Woodbine Beach or anywhere within the proposed MWEZ from Woodbine Beach to RC Harris. By ensuring the Woodbine Beach MWEZ boundaries cover the western end of Woodbine Beach, the current “come-ashore” area used by motorized watercraft today will be removed, improving safety for swimmers, lifeguards, and beachgoers, while enabling more effective enforcement of motorized activity.

Allowing any motorized watercraft to come ashore at or adjacent to Blue Flag Beaches creates several issues:

- It conflicts with Blue Flag standards, which require motorized watercraft to remain 100–200 metres from swimming areas.
- “Come-ashore” areas such as the western end of Woodbine Beach have contributed to the illegal PWC rental activity, as Bylaw Officers cannot distinguish between illegal renters and private owners, making enforcement difficult.
- “Come-ashore” areas have historically created unsafe conditions for beach-going families and lifeguards due to their proximity to supervised bathing areas.

This recommendation is supported by public input, including *ThoughtExchange* survey results where removing shore access at Woodbine Beach received strong support.

We are not seeking to alter the substance of the recommendation or the Port Authority’s letter, but rather to ensure alignment with Council’s original intent. **We recommend a clarifying amendment to this agenda item which replaces “Woodbine Beach” with “Woodbine/Kew-Balmy Beaches to R.C. Harris”.**

2. The distance-from-shore for the Woodbine/Kew-Balmy to R.C. Harris MWEZ be measured from outside of all shore protection structures

We understand that the specific MWEZ boundaries will be defined by the Port Authority in consultation with the Toronto Police Service Marine Unit. However, at its meeting of July 23–24, 2025, City Council explicitly requested an MWEZ for Woodbine/Kew-Balmy Beach to R.C. Harris extending at least 150 metres from shore.

Within this area, there are multiple rocky groynes—shore protection structures that extend perpendicularly from the beach into the water. As fixed shoreline features, groynes should be considered part of the “shore” for the purpose of measuring the MWEZ boundary.

Accordingly, the 150-metre distance should be measured from the outer edge of the groynes, not from the sandy nearshore. This distinction is critical: it is not possible to safely swim or paddle between the beach and the groynes, and as a result, swimmers and paddlers use the waters south of these structures and require adequate separation from motorized watercraft.

We recommend that the Executive Committee direct the Port Authority to define MWEZ boundaries in a manner that recognizes groynes as part of the shoreline and ensures the minimum 150-metre from shore requirement is applied accordingly.

3. **Require More than Two Physical Buoys to demarcate 2.4 km length of shoreline in the MWEZ**

We strongly recommend that Council request the Port Authority to install physical buoys to clearly demarcate all MWEZs. As noted in the *Federal Regulatory Framework* section of the Staff Report, “*Federal navigational and safety rules include speed restrictions, notably a maximum speed of 5 knots (about 9 km/h) within 150 metres of shore along all of Toronto's waterfront*”. However, in our experience, the existing unmarked 150-metre “go-slow” zone within the Port Authority’s jurisdiction is routinely ignored, in part because it is difficult for operators to identify on the water.

The distance from Woodbine Beach to the RC Harris Filtration Plant is approximately 2.4 km. Based on findings from the 2025 Hanlan’s Point MWEZ pilot and subsequent recommendations from Friends of Hanlan’s, a minimum of one marker buoy per 500 metres per zone is required to effectively communicate boundaries. Applying the 500 meter recommendation, there needs to be more than two buoys from Woodbine Beach to R.C. Harris.

While we acknowledge that our recommendation exceeds the number of buoys budgeted per this agenda item, non-compliance by motorized watercraft also comes with a cost. An unmarked MWEZ—relying solely on signage and public education—will face the same limitations as the current “go-slow” zone and will be difficult to enforce. Clear, on-water buoy demarcation is essential to ensure visibility, compliance, and effective enforcement.

We strongly recommend physical buoy demarcation for all MWEZs, and use the 500m per buoy rule of thumb when planning the number of markers to be installed.

4. **Add Cherry Beach and the Outer Harbour to the list of candidate beaches for implementation of an MWEZ**

Cherry Beach is one of the city’s most popular locations for open-water swimming and ranks as the third highest area of safety concern in the *ThoughtExchange* survey. The Outer Harbour also supports a high volume of non-motorized users.

Stakeholders have raised concerns about displacement effects, noting that new restrictions in one area may shift motorized activity to adjacent locations, creating new safety risks along the waterfront.

We support expanding the list of MWEZ candidates to include Cherry Beach and the Outer Harbour and recommend that the Executive Committee pursue their inclusion.

In Conclusion

We agree that an unregulated PWC industry is not in the public interest and support the City's direction to strengthen enforcement, including increased fines for illegal operators and bylaw violations. We also support establishing protocols and MWEZs in advance of any consideration of legalizing or regulating PWC rentals.

We support the implementation of Motorized Watercraft Exclusion Zones at Hanlan's Point Beach, Humber Bay Shores, and Woodbine/Kew-Balmy Beach to R.C. Harris for the 2026 season and beyond. To further strengthen this motion we hope you will adopt our 4 recommendations above.

TBOW welcomes the opportunity to be involved in the design and implementation of this important initiative through ongoing stakeholder engagement.

Sincerely,

Toronto Beaches Open-Water Swimmers

Jane Anderson
Jessica Campbell
Mitsy Layton

Cc: Councillor Brad Bradford, Beaches-East York
Michael Riehl, Director of Harbour Operations and Harbour Master, Toronto Port Authority