

Planning and Housing Committee  
City of Toronto

June 10, 2026

**Re: PH31.10 - Humber Bay Shores, Christie's Redevelopment and Park Lawn GO Station**

To Whom It May Concern:

Please accept our written submission for consideration by the Planning and Housing Committee.

While we support efforts to encourage Metrolinx to move Park Lawn GO forward, city planners have failed to advance the city's own higher order rapid transit infrastructure plans in Humber Bay Shores. Equal responsibility belongs to the city for allowing one of its densest residential communities to remain without higher order transit and for there being no clear timeline for providing it.

**Park Lawn GO**

Park Lawn GO station development is stalled by both the encumbrances of the paused developer partnership for building the infrastructure and the significantly delayed GO electrification project, which the addition of a Park Lawn GO station near Mimico GO station was predicated on. The business case is unequivocal that GO trains cannot serve both Mimico and Park Lawn GO without electrification. Electrification is now expected to be completed in 2036 at the earliest, and as late as 2042, but the project still holds uncertainties.

Even if the Park Lawn GO station development proceeds at an indeterminate date in the future, Humber Bay Shores and the larger south Etobicoke transit watershed need City Council's previously prioritized WWLRT connection from Legion Rd. to Exhibition Ontario Line station to support existing and projected population densities. There is no community in Ontario (and likely Canada) as dense as Humber Bay Shores (either current or post-Christie's site development) that is supported solely by regional express rail service (RER) and surface transit running in mixed traffic.

While we fully support the city's efforts to find ways to move Park Lawn GO forward, and we recommend that Metrolinx explore legal avenues for effectively building the station and charging the cost back to the developer as a condition for proceeding with the proposed project, we believe the city has been negligent in taking responsibility for its own lack of transit infrastructure development in the area.

Both Park Lawn GO and WWLRT are necessary and justified to support a community that has, through a succession of development proposals and subsequent construction, shoehorned a

population equivalent to Orangeville into less than 1 square kilometre. If there was justification for building a new GO station at Lansdowne, in close proximity to multiple Line 2 subway stations, another GO station at Dundas, and UP Express – with no requirement for developer contributions – there is no logical excuse for withholding funding for Park Lawn GO, where there is *no* higher order transit and an exponentially higher population.

At the many stakeholder and public consultations we have attended over the years, city planners have continuously assured us that Park Lawn GO *isn't* the only higher order rapid transit infrastructure needed. Yet the city has failed to advance its own approved plans for the WWLRT.

Most recently, and virtually simultaneous with the pausing of Park Lawn GO, south Etobicoke has been left out of a 3-billion-dollar funding envelope earmarked for WELRT, despite there being fewer residents on the eastern waterfront currently, and those residents already living closer to existing higher order rapid transit. The eastern waterfront is now set to benefit from new LRT, two Ontario Line stations, and a new GO station at East Harbour long before south Etobicoke sees any new higher order transit infrastructure at all. This is an egregious lack of transit equity and the city is just as responsible as Metrolinx for it.

### **Waterfront West Light Rail Transit (WWLRT)**

The city has already, in 2018, approved the WWLRT alignment recommended by the [Waterfront Transit Reset](#)<sup>1</sup> as a priority segment of the Waterfront Transit Network Plan, and in 2018 [Council directed city staff](#)<sup>2</sup> to proceed with the planning work for the Colborne Lodge Dr. to Exhibition alignment. At that point in time, segments of WWLRT and WELRT were formally deemed to be of equally high priority. To date, not even the initial background studies for WWLRT have been completed. The Exhibition Loop-Dufferin Loop Streetcar Connection infrastructure touted as being able to deliver an Exhibition Streetcar Loop and Ontario Line Station connection from south Etobicoke in the near term, without the full, eventual LRT was described in the [Transit Expansion Update](#)<sup>3</sup> as “ready to go to procurement and construction in 2019/2020” yet hasn't advanced past the 30% design stage.

In short, the city has studied and approved the WWLRT alignment and long ago given staff the go ahead to proceed with background studies needed to develop the transit project. Had those studies proceeded years ago the city would have been able to request federal and provincial funding for WWLRT when it did so for WELRT, and contribute an equivalent 1-billion-dollar amount to WWLRT which would be a solid start to a far less complex LRT project with extensive existing infrastructure to build on. With Park Lawn GO indefinitely delayed it is incumbent upon the City of Toronto to advance the WWLRT with haste, and that should include a funding commitment.

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<sup>1</sup> <https://www.waterfrontoronto.ca/our-projects/waterfront-transit-reset>

<sup>2</sup> <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.EX30.1>

<sup>3</sup> <https://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.EX4.1>

## Prioritization of Planned Higher-Order Transit Projects

Finally, we want reiterate our previously submitted comments in response to PH26.7 - South Etobicoke Transportation Improvements to Lake Shore Boulevard West, Humber Bay Shores and The Queensway in Ward 3 - Etobicoke-Lakeshore on the evaluation methodology of the February 2024 report on the [Prioritization of Planned Higher-Order Transit Projects](#)<sup>4</sup>. That evaluation exercise made errors in its evaluation of WWLRT, and we have requested that it be corrected and reevaluated. To our knowledge, the report has not since been revised.

1. The report calculates the cost of WWLRT based on the need for net new LRT infrastructure instead of evaluating only the new sections and any necessary modifications to existing infrastructure. In the absence of detailed costing, the authors should have consulted Waterfront Transit Reset cost estimates for the Legion Rd. to Exhibition segment, and provided an inflation adjusted estimate. That would be far more accurate, fair, and honest assessment than simply estimating the cost of net new LRT infrastructure on a /km basis.
2. The report assessed WWLRT based on a Park Lawn to Union segment instead of the logical and obvious post-Ontario Line context of a Park Lawn to Exhibition segment alone. This effectively eliminated it as a slow and redundant alternative to a Park Lawn to Union station GO trip. WWLRT was never solely about getting people from Humber Bay Shores to Union station. It was intended to get people to the subway network and provide network connections and resiliency through multiple route connections and to provide reliable transit service to destinations along the way – including, for instance, St. Josephs Health Centre.
3. The evaluation was severely weakened by the length scaling effects of the above flaws. For example, WWLRT was deemed to have a low ability to promote new residential and commercial because the Exhibition to Union segment is already fully developed. Yet this dismisses the existing residential and commercial built at Humber Bay Shores which lacks higher order transit. Responsible transit planning cannot prioritize long corridors of low-rise residential over neighbourhoods that have been built up with the expectation of higher order transit, only to then be told there is no economic benefit derived from providing higher order transit, now that the area is built up and does not have adequate transit.

We call on the city to both push for Park Lawn GO *and* own up to its own transit responsibilities to Humber Bay Shores and south Etobicoke and to fully restart the WWLRT project.

Regards,

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<sup>4</sup> <https://www.toronto.ca/legdocs/mmis/2024/ex/bgrd/backgroundfile-243162.pdf>