Lithos

November 3rd, 2025

Ministry of Municipal Affairs and Housing

Municipal Services Office – Central Ontario

(Priority Projects)

777 Bay Street, 12th Floor

Toronto, ON

Re: Servicing and Stormwater Management Letter in support of the proposed Development
Location: 1875 Steeles Avenue West
City of Toronto

Lithos Group Inc. (Lithos) was retained by Tenblock on behalf of Microbjo Properties Inc. (the "Owner") for civil engineering services in support of the Rezoning and Site Plan applications at 1875 Steeles Avenue West.

We are writing to provide feedback on the Ministry of Municipal Affairs and Housing's request for input on ERO notice 025-1108 regarding a request from the Minister of MEDJCT to make a Minister's Zoning Order (''**MZO**'') to restrict building heights in the City of Toronto at 1875 Steeles Avenue West (the ''Site''). Specifically, the Ministry requested feedback on environmental risks on the municipality of this request.

In 2020, Tenblock filed an application for a Zoning By-law amendment to redevelop the Site with three new residential apartment buildings with heights of 14 storeys (53 metres), 33 storeys (115 metres), and 39 storeys (133 metres), containing a total of 960 dwelling units, including 120 rental replacement units, and 12 new affordable rental units. The Site would be enhanced with a new public park, a publicly accessible open space (POPS), improvements to the public realm and extensive restoration and expansion of the neighboring valley lands managed by the Toronto and Region Conservation Authority (the ''Proposed Development''). We understand that the Proposed Development will not be financially viable to proceed if the MZO is issued.

Lithos being the civil engineers on the Proposed Development, we have completed detailed evaluations of the municipal sewer and water networks under existing and post – development conditions. **Based on our findings, the proposed development will result in significant improvements to the local municipal servicing infrastructure and West Don River watershed that will not happen unless the project proceeds, and therefore, <u>we are recommending that the Minister's request for an MZO be refused.</u>**

Stormwater Management

Under existing conditions, the subject site does not have a formal stormwater management system. The City's Wet Weather Flow Management Guidelines (WWFMG) impose the implementation of stormwater management measures to control 100-year storm events. Under existing conditions, the 100-year storm flow towards the municipal storm network is calculated at 328.2 L/s. Under proposed conditions where stormwater management measures are implemented, the proposed discharge into the storm network is 115.6 L/s. This represents an approximate 65% reduction in discharge to the storm sewer network and ultimately to the West Don River. This reduction will mitigate flooding risks, enhance system resiliency, and improve downstream hydraulic performance during minor and major storm events. In addition, implementation of quality control measures, including the installation of an Oil & Grit Separator unit, will achieve 80% removal of Total Suspended Solids (TSS), thereby improving the quality of stormwater discharged to the City's infrastructure and the West Don River watershed. This improvement would not occur if the MZO is granted and the Proposed Development is cancelled.

Sanitary Servicing

As part of the servicing works, a new 375mm diameter municipal sanitary sewer will be constructed within the POPS area, located on the south side of the development. This new sewer will connect the proposed municipal sanitary sewer infrastructure of a new public road (running between 1875 and 1881 Steeles Avenue W.) to the existing sanitary sewer network within the Valley Lands. This connection through the proposed POPS area of the 1875 Steeles Avenue development will provide a more direct and reliable sanitary servicing route, improving system capacity and operational efficiency. Moreover, a 6.6m wide servicing easement will be provided to the City, ensuring long – term maintenance accessibility. The construction of the sanitary sewer would not occur if the Proposed Development is cancelled due to the MZO being granted.

Water Supply

Based on our hydraulic analysis completed using InfoWater modeling, it was determined that the municipal water network along Steeles Avenue West would experience velocity issues as development intensifies in the area, in accordance with Provincial and Municipal housing targets.

To address the above, Tenblock has previously communicated their commitment to implement municipal watermain upgrades in cooperation with nearby landowners or would consider undertaking the works independently. These works include the installation of a twin 300mm diameter water along Steeles Avenue and the creation of a water loop from Dufferin Street to Hidden Trail. The implementation of these upgrades will improve pressure and velocity conditions within the City's water distribution network, benefiting not only the proposed development but also the broader surrounding area.

In summary, the Proposed Development not only fully conforms to the City of Toronto's design standards and environmental requirements, but it will result in a significant environmental benefit. Specifically, the Proposed Development will enhance the existing municipal servicing infrastructure by reducing stormwater impact, strengthening sanitary servicing capacity and upgrading the local municipal water network to improve system performance. These improvements are consistent with urban development principles and will provide long – term benefits to the surrounding community and municipal servicing systems. If this MZO were to be granted by the MMAH and the Proposed Development were not able to proceed as a result, none of these benefits would take place, resulting in a negative impact to the environment. Accordingly, we are **recommending the MMAH refuse the request** for an MZO.

Should you have any further questions, please feel free to contact the undersigned.

Yours truly,

Nick Moutzouris, P.Eng., M.ASc.
Principal