

November 3, 2025



Sent via email

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***Natural Heritage Improvements Summary for
1875 Steeles Avenue West – Response to ERO Number 025-1108***

Dear Ministry of Municipal Affairs and Housing:

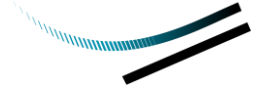
Dillon Consulting has been retained by Tenblock Management Inc., the management company working on behalf of Microbjo Properties Inc., the owner of the property known municipally as 1875 Steeles Avenue West (the “Site”) in the City of Toronto.

This letter relates to Tenblock’s proposal to redevelop the site with 960 new apartments in three connected buildings, accompanied by significant public land dedications and natural heritage improvements (the “Proposed Development”).

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 on the site. Specifically, the Ministry requested feedback on potential environmental risks of this request.

It is our understanding that if the MZO is granted, Tenblock will be forced to cancel its project and therefore will not be able to deliver the environmental benefits and enhancement measures incorporated into the Proposed Development, as detailed in the Natural Heritage Impact Study (NHIS) and as reviewed and supported by professional staff from the Toronto and Region Conservation Authority (TRCA) and City of Toronto.

Therefore, it is our opinion that on the basis of environmental impact, the Minister’s request should be refused. The Proposed Development demonstrates a significant commitment to improving the local environment and the City’s Natural Heritage System (“NHS”), as it was specifically designed to achieve a measurable ecological improvement over the existing conditions.



Overall Net Benefit to the Natural Heritage System (NHS)

The Proposed Development achieves an overall **net benefit to the NHS**, driven by restoration and enhancement activities along the eastern boundary adjacent to the ravine. Most importantly, 1,979 square metres (m²) of valleylands are proposed to be dedicated to the TRCA.

The implementation of buffer plantings and the removal of existing impervious surfaces, such as paved parking lots and hard landscaping, will result in an **overall increase of 560 m² of additional vegetation coverage**. It is the intention of the proponent to convey the new buffer planting areas (200 m²) and the on-site parkland dedication (1,050 m²) to public ownership upon approval, ensuring long-term protection and management. This increase of additional vegetation coverage will not occur if this MZO is approved.

Grading and Slope Restoration for Improved Access

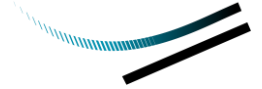
The Proposed Development includes the demolition of the existing retaining wall along the Steeles Avenue West frontage to improve the pedestrian public realm and enhance access to the site and the adjacent City-owned West Don Valley Open Space, connecting to the 300+ acre G Ross Lord Park.

- **Slope Safety and Naturalization:** The grading will improve the City's NHS because it allows for the restoration of the gradual natural slope to the landscape, removing anthropogenic structures from the ravine lands. On top of this, the removal requires temporary grading that encroaches upon approximately 130 m² of the ravine which dominated by non-native, invasive species (Common Buckthorn, *Rhamnus cathartica*).
- **In-Situ Enhancement:** Following the regrading, the entire 130 m² area will be restored and enhanced in-situ utilizing naturalized vegetation which will compliment the retained NHS ravine system.

Naturalized Buffer and Tree Plantings

The Proposed Development incorporates extensive planting and restoration strategies to compensate for necessary tree removals and injuries and significantly enhance the quality of the adjacent Significant Woodlands and Significant Valleylands.

- A total of 385 trees and 900 shrubs are proposed to be planted to the buffer and restoration areas to enhance and naturalize the City's NHS.
- Restoration works will also include the application of a TRCA approved Upland Slope Seed Mix to stabilize and provide ground coverage to the buffer and restoration areas.



Slope Stability

The Proposed Development demonstrates due diligence in maintaining safety and natural function adjacent to the Don River West Branch and associated confirmed ravine system. The Proposed Development restricts construction activities outside of the established limits, which apply a minimum 10-meter buffer from the Long-Term Stable Slope (LTSS) of the valleylands. The determination of the LTSS was reviewed and accepted by the TRCA during an extensive review process.

Avian and Wildlife Protection Measures

The Proposed Development includes measures to integrate into both the construction process and the final building design to protect wildlife, particularly migratory birds and species at risk (SAR) bats, whose potential habitat exists in the retained ravine woodlands of the City's NHS.

- **Bird-Friendly Design:** Designs that reduce reflective glare, such as utilizing glass with fritted patterns, embedded abstract shapes, or decorative grilles and louvres will be incorporated into the development to reduce bird collisions.
- **Lighting Management:** Exterior lighting fixtures before the development will mitigate light pollution that can disrupt migratory birds and other wildlife.
- **Construction Constraints:** To protect breeding birds, clearing is planned to occur outside the breeding bird season (April 1 to August 31).

In summary, the Proposed Development is precisely what the City and TRCA look for as part of new development applications adjacent to the NHS. The Proposed Development provides mandatory compensation plantings, rigorous adherence to hazard limits, and the implementation of best practices for habitat enhancement and bird safety. Tenblock is advancing a proposal that provides a clear and significant improvement to the ecological function and extent of the ravine valley land system. It is our understanding that granting the MZO would force this project to be cancelled, and that none of these significant environmental improvements would be implemented as a result. Accordingly, we are requesting the Minister refuse the request for the MZO.

Sincerely,

DILLON CONSULTING LIMITED

Caitlin Vandermeer, M.Sc.
Biologist, Associate