

Ontario Municipal Board
Commission des affaires municipales
de l'Ontario



ISSUE DATE: May 26, 2014

CASE NO(S).: PL131251

Applicant and Appellant:	The Estate of K.E. Kennedy
Subject:	Consent
Legislative Authority:	Subsection 53(19) of the <i>Planning Act</i> , R.S.O. 1990, c. P.13, as amended
Property Address/Description:	1320 Minaki Road
Municipality:	City of Mississauga
Municipal File No.:	B060/13
OMB Case No.:	PL131251
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APPEARANCES:

Parties

Counsel

City of Mississauga (the "City")	M. Taggart
The Estate of K. E. Kennedy (the "Applicant")	G. Swinkin

Participants

J. McKinnon

C. Hayhoe

A. Mullett

J. De Wolf

M. Walmsley

R. Sethi

J. Page

HEARING EVENT INFORMATION:

Continuation: Held in Mississauga, Ontario on February 26 and April 16, 2014

DECISION DELIVERED BY BLAIR S. TAYLOR AND ORDER OF THE BOARD**INTRODUCTION**

[1] On or about August 26, 2013, the Applicant made a consent application to the City to sever the existing property known municipally as 1320 Minaki Road (the "Subject Lands"). Numerous letters and emails in opposition to the consent were filed with the City. The Planning Staff recommended against the consent. The Committee of Adjustment heard the matter and denied the application. The Applicant appealed to the Board.

[2] The Board heard the matter in two hearing days: the first on February 26th, and the continuation on April 16, 2014.

DECISION

[3] The Board finds that the consent application will preserve the character of the lands designated Residential Low Density 1, is consistent with the Provincial Policy Statement, conforms to the Growth Plan, conforms to the City Official Plan, fully complies with the City's Zoning By-law, and satisfies all the conditions of s. 51(24) of the *Planning Act*. Thus the Board grants the provisional consent subject to the conditions of approval set out below.

BACKGROUND AND CONTEXT

[4] The Subject Lands are located at the south west corner of Mineola Road West and Minaki Road. Currently the Subject Lands have frontage onto Minaki Road of 30.58 metres ("m"), a depth of lot of 60.96 m (along Mineola Road West), and a total lot area of 1,861.3 square metres ("sq m). A bungalow house is located on the Subject Lands, with driveway access from Minaki Road and also Mineola Road West.

[5] Generally the Subject Lands are located south of the Queen Elizabeth Highway, east of the Credit River, north of the Canadian National Railway (“CNR”) tracks, and west of Hurontario Street, in an area known as the Mineola Neighbourhood, which is characterized by a development approach that utilized existing topography. Thus the roads undulate with the natural topography, have no curbs, and use existing drainage patterns. The resulting community is described as having a variety of quality housing stock, and a landscape that blends the houses with their natural and manicured surroundings. This development approach has resulted in tree retention and larger lots.

[6] The development proposal is to demolish the existing house, and to sever the Subject Lands to create two new lots: the first on the westerly side having frontage onto Mineola Road West of 30.48 m and a lot area of 929.9 sq m, and the second to have frontage onto Mineola Road West of 30.48 m, a depth of lot on Minaki Road of 30.58 m, and a lot area of 931.4 sq m. For the second lot, the driveway access would utilize the existing driveway off Minaki Road.

PROVINCIAL POLICY STATEMENT (“PPS”)

[7] The Subject Lands are within the existing settlement area of Mississauga. Section 1.1.3.1 provides that settlement areas will be the focus of growth and regeneration shall be promoted. Section 1.1.3.2 notes that the land use patterns within settlement areas shall have densities and a mix of lands use that efficiently use land and resources, and s. 1.1.3.4 states that appropriate development standards should be promoted which facilitate intensification, redevelopment, and a compact form. The implementation section provides in s. 4.7 that the Official Plan is the most important vehicle for implementation of the PPS.

GROWTH PLAN

[8] The Growth Plan for the Greater Golden Horseshoe, 2006 requires accommodation for growth by directing a significant portion of the new growth to the built up areas of the community through intensification (s. 2.2.2.1(a)). Additionally s. 6 requires municipalities to encourage intensification generally throughout the built up area (b), and facilitate and promote intensification (f).

THE REGIONAL OFFICIAL PLAN

[9] There were no regional official plan policies raised by the parties in this matter.

HERITAGE

[10] The Subject Lands are not designated nor are they part of a Conservation District. They however do fall within a cultural landscape inventory for the Mineola Neighbourhood, and are listed in the City's Heritage Register. No heritage objections or issues were raised concerning the development application in the agency circulation.

MISSISSAUGA OFFICIAL PLAN

[11] The City's Official Plan designates the Subject Lands as being within the "Mineola Neighbourhood" and "Residential Low Density 1". "Neighbourhoods" (of which Mineola is one) are characterized in s. 5.3.5 as being physically stable, with a character that is to be protected. Hence the policy provides that the City's Neighbourhoods are not appropriate areas for significant intensification, but also that they are not static. When development occurs, the policy directs that such development should be sensitive to the Neighbourhood's existing and planned character.

[12] This policy directive is laid out in s. 5.3.5.1 which notes the existing character is to be preserved. Section 5.3.5.2 states that residential intensification will generally occur through infilling, and s. 5.3.5.5 provides that where intensification occurs in a Neighborhood that the development is to be compatible in built form and scale to surrounding development.

[13] In s. 9 of the Official Plan, the introduction provides guidance with regard to intensification:

Appropriate infill in both Intensification Areas and Non-Intensification Areas will help to revitalize existing communities by replacing aged buildings, development of vacant or underutilized lots and by adding to the variety of building forms and tenures. **It is important that infill "fits" within the existing urban context and minimizes undue impacts on adjacent properties.** Redevelopment projects include a range of scales, from small residential developments to large scale projects, such as redeveloping strip malls. Redevelopment must also be sensitive to the

existing urban context and minimize impacts on adjacent properties.
(Emphasis added)

[14] For Non-Intensification Areas, the Official Plan in s. 9.22 specifically lists “Neighbourhoods” as one such area, and states that Neighbourhoods are stable areas where limited development is anticipated. Where development does occur, it is required to be context sensitive and to respect the existing or planned character and scale of development.

[15] With regard to the Residential designations, those are found in s. 11.2.5 and are to consist of 4 designations: Low Density I, II, Medium Density and High Density. Section 11.2.5.3 provides the permitted uses for Low Density I, which included detached dwellings.

[16] Neighbourhoods are dealt with in s. 16 of the Official Plan, and Mineola is noted as one of the 22 such Neighbourhoods in the City. This policy section contains some critical policies which the Board will set out in full as it is the focus of the objections to the development application:

16.1.2.1 To preserve the character of lands designated Residential Low Density I and Residential Low Density II, the minimum frontage and area of new lots proposed along the periphery of a draft plan of subdivision, or which are subject to a consent application, will generally represent the greater of:

the average lot frontage and lot area of residential lots on both sides of the same street within 120 m of the subject property. In the case of a corner lot, lots on both streets within 120 m will be considered.

Or

the requirements of the Zoning By-law.

16.1.2.2 Notwithstanding 16.1.2.1, where the average lot frontage or lot area of residential lots determined pursuant to 16.1.2.1 is less than the minimum requirements of the zoning by-law, consideration may be given to a minor variance.

[17] Finally the Official Plan in the Urban Design Policies for Infill Housing in the Mineola Neighbourhood (s. 16.18.1) provides site plan guidance to preserve and enhance generous front, rear and side yard setbacks, encourage new housing to fit the scale and character of the surrounding area, preserve and enhance existing trees and

groupings of trees, and represent a building mass with yard that respect and relate to adjacent lots.

ZONING BY-LAW

[18] The Subject Lands are zoned R2-5.

[19] Generally the residential lands in the North side of Mineola Road West range in zoning from R2-1 at Hurontario/Victor Avenue, to R2-4 across most of Mineola Road West until the North West corner of Stavebank Road, where the zoning changes to R1-1, requiring the largest minimum lot area.

[20] Generally the residential lands on the south side of Mineola Road West range in zoning from R2-5 at Hurontario, then R2-4 from Woodland Avenue to Minaki Road, then R2-5, for a portion of the block, then R2-1, and then R1-1 to Stavebank Road.

[21] The R-2 Zone differentiates standards for interior and corner lots. For Lot Frontage, an interior lot requires 18.0 m, and a corner lot 21.0 m. For Lot Area, the R-2 requires an interior lot to have 695 sq m of lot area, and a corner lot to have 810 sq m.

[22] The zoning by-law also provides certain exceptions to the usual R-2 standards. For instance the R2-4 exception would require a minimum of 22.5 m of lot frontage and the R2-5 requires a minimum lot frontage of 30.0 m.

[23] Thus the applicable zoning provisions for the Subject Lands are the R2-5 regulations which require each lot to have a minimum lot frontage of 30 m, the interior lot to have a minimum lot area of 695 sq m, and the corner to lot to have a minimum lot area of 810 sq m.

[24] For ease of reference the Board would note that the proposed interior severed lot would have lot frontage of 30.48 m and a lot area of 929.9 sq m. The proposed retained corner lot would have lot frontage (on to Mineola Road West) of 30.48 m (and a depth of 30.58 m along Minaki Road) and a lot area of 931.4 sq m. Both the proposed lots would fully comply with the zoning requirements for the R2-5 zone.

WITNESSES

[25] During the course of the hearing, the Board heard from David Brown land use planner, David Ferro land use planner, Laura Waldie heritage planner, and from the seven participants.

MOTIONS

[26] Both the City's and the Applicant's counsel sought to have Mr. Ferro and Mr. Brown qualified as experts entitled to give opinion evidence in the field of land use planning. Both were challenged.

[27] Mr. Brown is the former committee technician for the City's Committee of Adjustment from 1988 to 1991 and then became the Secretary Treasurer of the City's Committee of Adjustment from 1991 to 1999, and since 1999 has been in private practice representing clients in the municipal land use planning field. He has been previously qualified to give professional planning evidence before the Board. In cross examination by the City, Mr. Brown confirmed that he has no formal education in land use planning, he is not a professional planner and is not a member of any planning association. The Board found that Mr. Brown had acquired special knowledge through his 26 years of practical planning experience, and qualified him as an expert entitled to give opinion evidence in land use planning.

[28] Mr. Ferro is a recent graduate of Ryerson University where he obtained his Bachelor of Urban and Regional Planning in 2012. He is a candidate member of the Ontario Professional Planners Institute and will, in July 2014, write his exam. He is presently the Committee of Adjustment Planner at the City, a position he has held since July 2012. He has previously been qualified in one Board hearing. His qualifications were challenged by the Applicant's counsel as not having the "critical mass of credentials and experience" to warrant qualification as an expert entitled to give opinion evidence in land use planning. The Board qualified Mr. Ferro as an expert based on two factors: first that he had the academic training and education in land use planning, and secondly that he had almost two years of practical experience dealing with the development applications to the Committee of Adjustment for the City.

THE HEARING

[29] The Applicant's case was solely put forward by Mr. Brown. It was his opinion that the development application was consistent with the PPS, conformed to the Growth Plan, satisfied all the development criteria in s. 51(24) of the *Planning Act*, represented good planning, met or exceeded all of the R2-5 zoning standards (and thus no variances to the Zoning By-law were required), was compatible with the Neighbourhood, and had no unacceptable adverse impact on adjacent lands.

[30] Mr. Brown advised that there were no adverse circulation comments from any agency except from the Planning Department. He opined that the Planning Department's comments were "mechanical" in nature and did not consider all of the policies of the official plan and the PPS. He stated that the Planning Department comments offered up only a "numeric" approach which he believed to be too narrow an approach.

[31] He referred the Board to the Planning Department comments dated September 20, 2013. There the report in a one and one half page report advised the Committee that the application should be refused as it did not meet the "120 m" test of s. 16.1.2 (noted above). The report did not address lot frontage, but did conclude that the lot areas did not meet the 120 m test as the lot areas were significantly less than the average lot area for both Mineola and Minaki within 120 m of the Subject Lands.

[32] Mr. Brown opined that the "120 m" test was too narrow an approach as it only examined about eight lots on Minaki Road and nine lots on Mineola Road West, and thus only the most immediate lots. He drew the Board's attention to the official plan language in s. 5.3.5 which anticipated development in Neighbourhoods so long as it is sensitive to the existing and planned character, and s. 5.3.5.5 where development was to be compatible in built form and scale to surrounding development and enhance the existing or planned development and is consistent with the policies of the official plan. The proposal here he told the Board was two lots that would each likely have two storey detached dwellings on lots that fully complied with the zoning by-law.

[33] Instead of the “120 m test”, Mr. Brown reviewed virtually the entire length of Mineola Road West, from Hurontario to Stavebank, comprising some 57 lots. This neighbourhood study area he testified was the “spine” for the neighbourhood and he opined would provide a better assessment of the character of the area, and in particular the corner lots in the area, such as was before the Board.

[34] The results of his study were that the proposed lot frontage was well within the range of the average lot frontage: proposed was 30.48 m and the “average” lot frontage was 30.54 m, and the “median” was 30.3 m.

[35] With regard to lot area, the results of his study were that the “average” lot area was 1435.50 sq m, the “median” lot area was 1391.93 sq m and the proposal was for two lots at 929.9 and 931.4 sq m. Breaking the lot area results down further, he found that there were 15 lots of 975 sq m or less in his study area, some 26%.

[36] With regard to the corner lots he testified that there was no consistency of lot size or area, and that with an older area such as Mineola there were obviously some that predated the existing planning regime and did not replicate the original lotting pattern. He did note that the south east corner of Mineola Road West and Minaki Road appeared to have been previously severed, as the lot sizes were comparable to the lots being proposed by the Applicant to the Board. In his opinion all that contributed to the development of the character of the area over the last 50 -75 years, and that one would not receive a true assessment of the character of the area by working at a 120 m test range.

[37] Mr. Brown then noted that a tree assessment had been completed for the Subject Lands based on proposed building envelopes that would maximize tree protection. From an examination of the tree report it would appear that four existing trees would be lost.

[38] In conclusion Mr. Brown testified that the two proposed lots fully complied with the R2-5 zoning by-law and no variances were required. He stated that site plan approval would be required and that the tree report would be part of such a process.

[39] He then summarized his professional opinion and opined that the development application was consistent with the PPS, conformed to the Growth Plan, and he then reviewed each criterion in s. 51(24) and advised that each was satisfied. He told the Board that approval would represent good planning and that he had reviewed and was satisfied with the proposed development conditions of approval as provided by the City.

[40] The Board then heard from seven participants; some from the immediate area, and others from the larger Mineola neighbourhood. The submissions were effectively encapsulated by the evidence from Mr. John McKinnon, the Chair of the Credit Reserve Association. The Credit Reserve Association was formed in 1972 and in 1988-89 it had then requested the City to examine ways to prevent overbuilding and control lot severances. He advised that official plan policies were put in place to deal with such matters in order to maintain the character of the neighbourhood, but that there had been a number of severances on Mineola Road West prior to the implementation of that policy.

[41] With regard to the current application Mr. McKinnon provided a petition opposed to the proposed development from over 100 households in the immediate neighbourhood and emails from over 200 other individual households. Mr. McKinnon stated that the Credit Reserve Association and the neighbourhood were very concerned that the proposed lot sizes were significantly less than those in the neighbourhood and that being on a corner lot, were quite shallow which would result in intrusion into backyards, constitute a significant reduction in open space, the destruction of more trees, and represent a undesirable precedent that would threaten the character of the neighbourhood.

[42] The Board then heard from the City's planner Mr. Ferro, who had prepared the staff report. He opined that the character of the Mineola Neighbourhood was one of large generous lots, heavily treed areas, and with generous setbacks. He testified that the Subject Lands were located in a unique pocket of lots on Minaki Road south of Mineola Road West, and that this would be the area impacted by the severance, and taking the Board to a series of photographs he testified that this immediate area was different from the rest of the Mineola Neighbourhood. He opined that the Subject Lands

were the “gateway” to Minaki Road and provided a sense of “what will be on Minaki Road”.

[43] In reviewing the official plan, Mr. Ferro noted that the Subject Lands were not within an intensification area, that Policy 5.1.7 directed the protection and conservation of the character of stable residential neighbourhoods, and that s.16.1.2.1 provided a test for such applications as the one before the Board. Such applications he said should result in lot frontages and lot areas that “will generally represent” the greater of the average of lot frontages and lot areas within 120 m of the Subject Lands or the requirements of the zoning by-law.

[44] In this regard, Mr. Ferro had researched and produced the January 1990 report to City Council reviewing the comments on policies and standards for Land Severance and Infill Housing. The report had been requested by the Credit Reserve Association because of... “the potential effect on the existing character of their neighbourhood”, which was described as being south of the Queen Elizabeth Highway, west of the Cooksville Creek, north of the CNR tracks and east of the Credit River.

[45] The report summarized the proposed changes and noted that a study that had been done for the City had recommended that lots within 120 m of the severance should be included in the calculation. The report states:

This figure was chosen as it represents the notification requirements for rezoning by-law, and provides a fair sample of lot sizes in the immediate area.

[46] Mr. Ferro took the Board to his calculations with regard to the 120 m test. His chart consisted of eight lots for Minaki Road, and nine lots for Mineola Road West.

[47] Since there was no challenge to the lot frontage, the Board will focus on the lot areas. For Minaki Road, the average lot area for the eight lots south of the Subject Lands was 2,031.01 whereas the proposed lots were 929.9, and 931.4 sq m respectively. The smallest lot in the range was 892.96 sq m and the largest was 4,685.14 sq m. For the homes on Mineola Road West, the average lot area for the nine

lots was 1,589.3 sq m. The smallest lot in the range was 892.88 sq m and the largest was 3,259.64 sq m.

[48] Mr. Ferro noting the discussion in the 1990 staff report was of the opinion that based on the 120 m test area that the proposed lots with lot areas of 929 and 931 sq m “did not generally represent” the greater of the average lot area, or the requirement of the zoning by-law. This he testified would create an undesirable precedent for lots that were not in keeping with the established character of the streetscape.

[49] Thus he recommended that the consent be denied.

[50] In the alternative, he noted that if the Board were to approve the application, that five conditions of approval should be attached as set out in Exhibit 2A, Tab 16.

CONSIDERATIONS

[51] The Board in considering this matter has reviewed the provincial interests, the PPS, the Growth Plan, and the Regional Official Plan. The parties only differ on these items with regard to s. 4.7 of the PPS which provides that the official plan is the most important vehicle for implementation of the PPS.

[52] Turning to the City’s official plan, the Board notes that the character of Neighbourhoods is to be protected and preserved: i.e. stable, but not static. Redevelopment and some modest intensification is to be expected, provided that it is in a built form and scale that is compatible with the surrounding development. The Board finds that the proposal for two, two storey detached dwellings on lots that fully comply with the City’s zoning by-law are of a built form and a scale that is compatible with the neighbourhood.

[53] In this proposal, an existing lot at the south west corner of Mineola Road West and Minaki Road is proposed to be severed into two lots. The City planner opines that this location is at the gateway to Minaki Road and should not be authorized. However the reality is that at this gateway, the existing lots at the south east corner appear to

have already been severed and this proposal would result in lots of a similar shape and size.

[54] On principle, the Board finds that the character of the neighbourhood is being protected and preserved, and that the proposed development would “fit” in without any undue adverse impact on adjacent properties.

[55] This leads to the issue of fundamental disagreement: s. 16.1.2.1 and its 120 m test.

[56] The City’s position is that the 120 m test is set out in the Official Plan and that the proposed development does not generally represent the average lot area from the test area and hence the application is contrary to the Official Plan and not consistent with s. 4.7 of the PPS.

[57] The Applicant’s position is that the 120 m test area is not indicative of the character of the neighbourhood (and especially that along Mineola Road West), that the proposed lots would actually exceed the zoning by-law standards, and that the character to be preserved goes well beyond 120 m.

[58] The Board notes that the introduction to s 16.1.2.1 commences with this language: **“To preserve the character of lands designated Residential Low Density I and Residential Low Density II”**.. (Emphasis added)

[59] Schedule 10 Land Use Designations of the Mississauga Official Plan depicts a large area west of Cawthra Road, north of the CNR tracks, east of the Credit River and south of the QEW Highway that are designated as Residential Low Density I and Residential Density II.

[60] No exhibit was filed with the Board that illustrated the zoning, lot frontages, and lot areas for that same designation. The only larger area zoning exhibit was found in Exhibit 2A, Tab 15 showing the zoning for lands west of Hurontario Street, south of the QEW, east of the Credit River and north of the Railway. The residential zones varied

with exceptions, but generally were R1, R2 or R3 zones, with a transition from R1 in the west to R3 in the east.

[61] To understand the genesis of the 120 m test, the Board looked to the 1990 staff report found in Exhibit 2A, Tab 15.

[62] The report at page 113 discusses the 120 m test area and states:

While it is acknowledged that establishing a distance is somewhat arbitrary, the recommended 120 m (400 ft) distance conforms with the distance used in notification requirements for public meetings, and would help ensure that the impact of a severance is evaluated primarily with respect to those most affected by it-the owners of nearby lots.

[63] Further the report discusses the term “generally represent” and states at page 112 that:

The term “generally represent” was chosen to indicate that compatibility does not mean identical or similar to. Further it is believed that the term will provide sufficient flexibility to accommodate lots, which are marginally below the average lot area, and frontage of surrounding lots. While this formula would generally allow for deviations up to 10%, to include a precise numerical formula in the policy would reduce flexibility.

[64] With regard to the use of an “average”, the report at page 114 provides:

Finally, the term “average” will allow consideration of the mean, median, or percentile distribution of lots so that consideration can be given to the distribution of lot sizes and frontages within the sample area.

[65] Thus the 1990 staff report recommended for the study area a Secondary Plan policy amendment that would read as set out at page 100:

To preserve the character of the area, the minimum lot frontage and area of proposed new lots will generally represent the average lot frontage and lot area of lots on both sides of the same street within 120 m (400 ft.) of the subject property. In the case of a corner lots, lots on both streets within 120 m (400ft.) will be considered.

[66] The 1990 recommended policy has now come to have a larger geographic impact: i.e. the lands designated Residential Low Density I and II.

FINDINGS

[67] Having regard to the Official Plan, the Board finds that it is the character of the lands designated Residential Low Density I and Residential Low Density II that are to be preserved. That encompasses an area far greater than 120 m.

[68] The Board finds that there is no planning justification that determines that the character of Residential Low Density I and II is best determined by the examination of the lots within 120 m of any particular lot.

[69] The Board finds that the 120 m test in 2014 is indicative of the immediate area, but not indicative of ... “the lands designated Residential Low Density I and Residential Low Density II” as that area of land far exceeds the 120 m.

[70] The Board also notes that the genesis of the 120 m test predated the 1996 PPS.

[71] The Board has examined the study area proposed by the Applicant’s planner. This study area includes 57 lots from Hurontario to the Credit River along Mineola Road West.

[72] The Applicant proposes lot frontage of 30.48 m for each lot. From the 57 lots, there are within the study area, 20 lots with frontages less than 25 m. There are six lots with frontages less than 30 m, and there are 23 lots with frontages between 30-40 m. The Board finds that the proposed lot frontages are within the range of lot frontages in the study area.

[73] In terms of lot areas, the Application was for the severed lot to have a lot area of 929.9 sq m and the retained lot to have a lot area of 931.4 sq m.

[74] From the Applicant’s study area the range of lot areas was from 695.93 sq m to 3,241 sq m. There were 15 existing lots that had lot areas from 693.50 sq m to 1,000 sq m. Of those 15 lots nine had an area less than that proposed by the Applicant.

[75] The Board therefore prefers the evidence of the Applicant’s planner.

[76] The Board finds that the proposed lot areas are within the range of lot areas in the larger neighbourhood and are generally representative of the lot areas of the larger study area.

[77] Moreover, the Board finds that the character of the Residential Low Density I and II lands is also influenced by the zoning of the area. Here the development application fully meets the City's Zoning By-law requiring 30 m of frontage and lot areas of 695 sq m for an interior lot, and 810 sq m for a corner lot.

[78] The Board finds that all of the criteria of s. 51(24) have been met and that the application is consistent with the PPS, conforms to the Growth Plan, is generally in the range of lot frontages and lot areas in the larger neighbourhood, and preserves the character of the Residential Low Density I and II lands without any undue impact on any adjacent properties, and represents good planning.

[79] Thus the Board allows the appeal of the Applicant and grants the consent application subject to the proposed conditions of approval as set out in Exhibit 2A, Tab 16, and subject to the condition that the proposed dwellings shall be located on the Subject Lands in substantial conformity with the building envelopes set out in the Arborist's Proposed Site Plan as set out in Exhibit 1A, Tab 8.

"Blair S. Taylor"

BLAIR S. TAYLOR
MEMBER

Ontario Municipal Board

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