

May 6, 2025

Via E-mail

City Council
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Nancy Martins, Secretariat

Dear Sirs/Mesdames:

Re: Item 2025.PH21.1 – Official Plan Amendments to Align with Provincial Legislative and Policy Changes related to Employment Areas – Decision Report

We write on behalf of 1097547 Ontario Limited (c/o 'Groupe Petra'), the registered owner of a property known municipally in the Scarborough District as 325 Milner Avenue (the 'property'), to provide comments on draft Official Plan Amendment No. 804 ('OPA 804'). Please refer to Image 1, and Figures 1 and 2.

Objective of our Submission

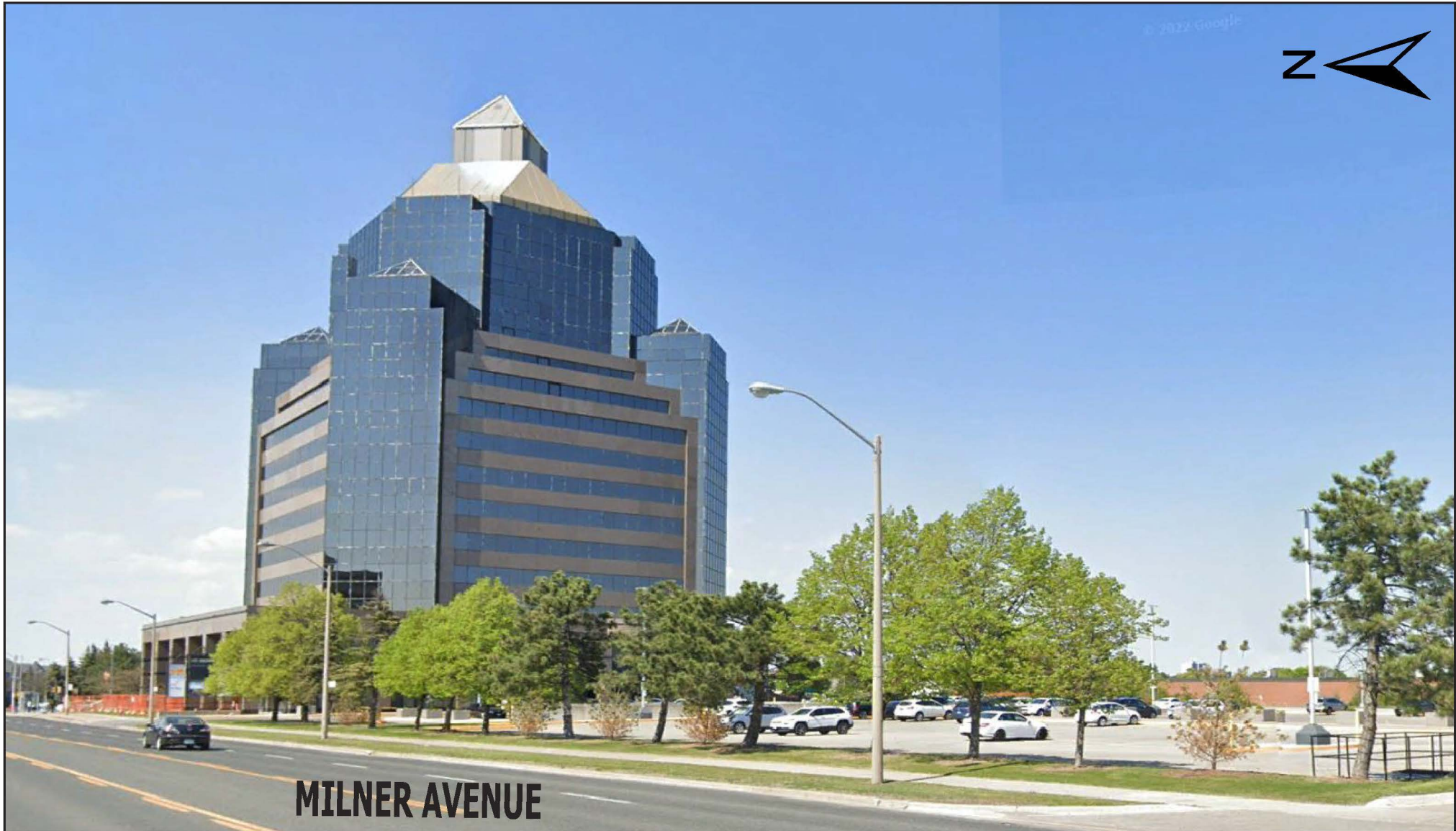
We continue to request the addition of 'Educational and Training Facilities' or 'Institutional Uses' as an additional use to broaden this property's community service functions and to offset high office space vacancy. Unlike a residential conversion, adding the 'Educational and Training Facilities' use to the existing building should not be viewed or processed as a conversion, as there is no harm to planned function as an outcome, as it remains 'office'.

OPA No. 804 Ought to More Broadly Encourage a Flexible Mix of Employment Uses

While highly accessible, this property's role in the Malvern community is impeded as it is located within the boundary of an 'Employment Areas' with use restrictions. Why is OPA No. 804 not consistent with the intent of PPS 2024, *Section 2.8.1 'Supporting a Modern Economy'* by permitting a mix of employment land use opportunities in support of a modern economy? As it stands, this property, and similar as-built, standalone major office buildings in the city are in effect 'orphaned' by OPA No. 804, et al being left out of the City's modern 'Official Plan Review programs.



IMAGE 1 - LOOKING EAST ALONG MILNER AVENUE WEST OF PROGRESS AVENUE



**325 MILNER AVENUE
CITY OF TORONTO**

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Image1_July.2024

City Studies & Official Plan Updates to Date and past Submissions

In managing the “Employment Areas” definition per the *Planning Act*, and the ‘PPS 2024’, the city has conducted a number of planning initiatives, with studies and policy decisions. In lock step with these planning processes submissions were filed on our client’s behalf (as dated below) in an effort to achieve the above noted objective for 325 Milner Avenue, without success to date.

- **Office Space Needs Study – Stakeholder Participation - February 6, 2024**
- **Bill 97 “Area of Employment” OPA Updates & Analysis - OPAs 668 & 680 - May 17, 2024:**
- **Employment Area Land Use Permissions - Decision Report - Approval - July 10, 2024**
- **Official Plan Review - Office Replacement Policies - Proposals Report - July 10, 2024**
- **Proposed OPA Nos. 668 & 680 - City of Toronto Official Plan - October 22, 2024**

More recently, two submissions were filed with Planning Staff per draft OPA 804 to provide a planning basis in support of the above noted objective. See Appendices 1 and 2 to this letter.

Recommendations

This property continues to be left out of the City’s modern ‘Official Plan Review’ programs. While it is important to maintain all existing land use permissions applying to this property, we request the city consider the following recommendations as it relates to this property:

- Creating a new ‘Office Areas’ land use designation in the Official Plan, based on the PPS 2024, *Section 2.8.1 ‘Supporting a Modern Economy’* to preserve a broad range of ‘employment’ land use permissions, and add ‘Educational and Training Facilities’ to the benefit of local and regional communities.
- Introduce ‘Regeneration Areas’, as is recommended elsewhere by OPA No. 804, to allow for a broadened range of land uses.

OPA No. 804 provides an opportune time to ensure the City’s undertaking is fair and complete as it relates to this property, among others. Therefore, please ensure our firm remains on the City’s mailing list regarding any future public notices, updates, reports, Committee and Council Agenda related items, and any Council decision or actions on the above captioned matter.



FIGURE 1: TORONTO OFFICIAL PLAN, FEBRUARY 2019, MAP 22, LAND USE
325 MILNER AVENUE, CITY OF TORONTO

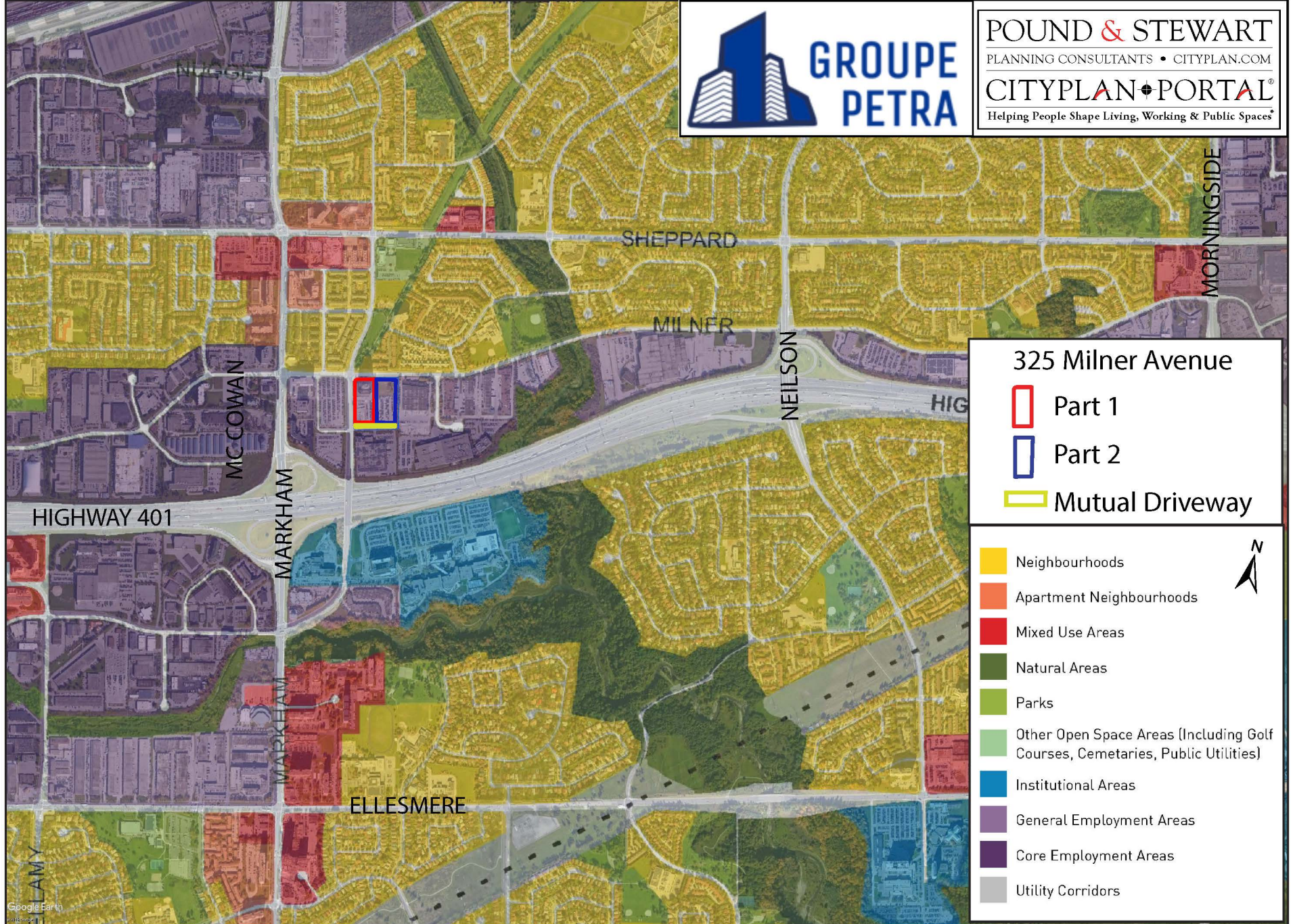
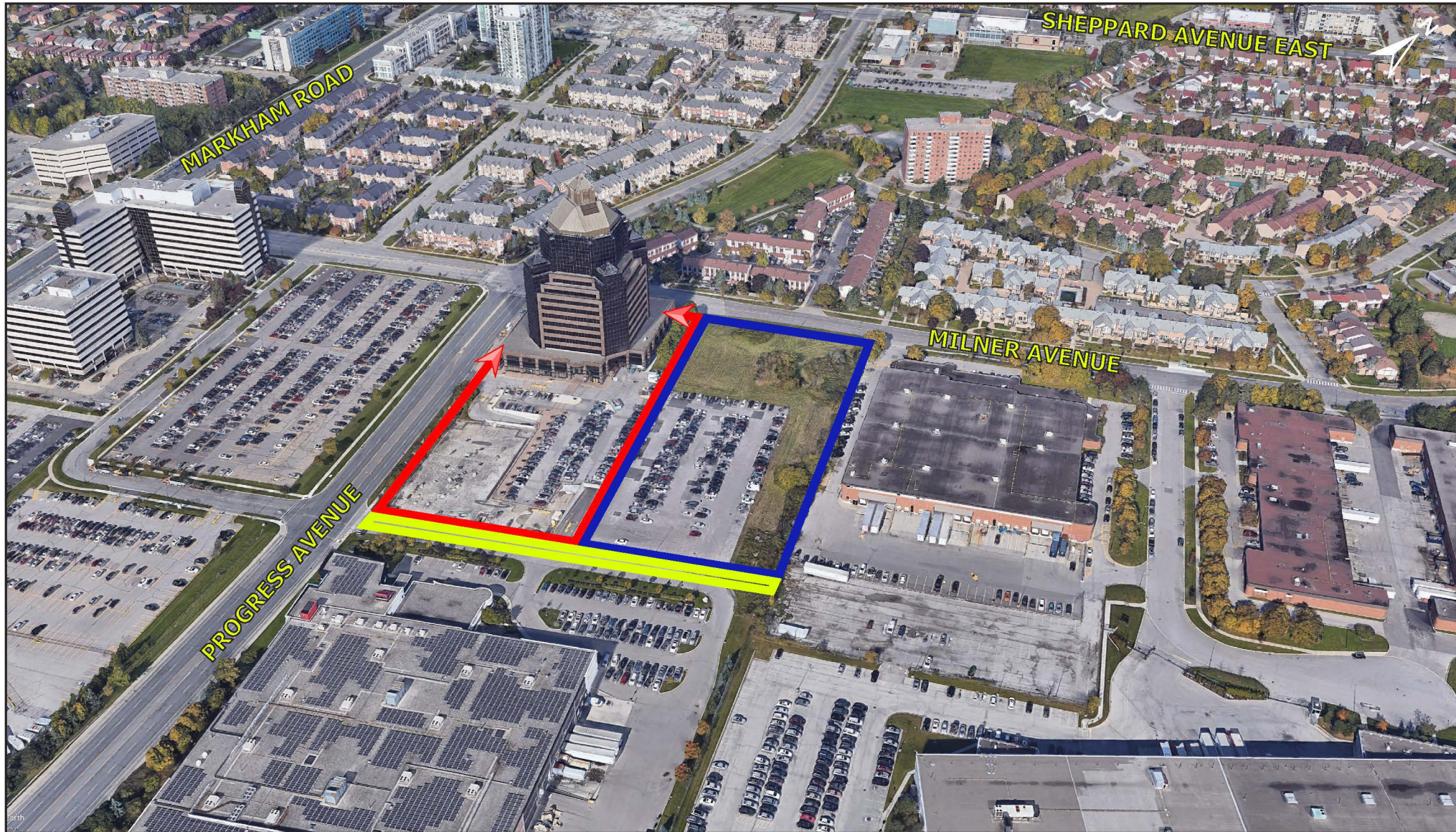


FIGURE 2: AERIAL PERSPECTIVE
325 MILNER AVENUE, CITY OF TORONTO



325 Milner Avenue

 Part 1

 Part 2

 Mutual Driveway



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Thank-you for your consideration of this matter.

Yours truly,
Pound & Stewart Associates Limited



Philip J. Stewart, MCIP, RPP

/la_1889ltr.May.06.2025

Attachments: As noted herein – Appendices 1 and 2

cc. Hon. R. Flack, Minister of Municipal Affairs and Housing Rob.Flack@pc.ola.org

cc. Mr. J. Filipowicz, Executive Director of Policy, Minister of Municipal Affairs and Housing
Josef.Filipowicz@ontario.ca

cc. Mr. P. Kelly, Deputy Director of Policy, Minister of Municipal Affairs and Housing
Patrick.Kelly44@ontario.ca

cc. Mr. J. Elvidge, City Clerk, City of Toronto John.Elvidge@toronto.ca

cc. Councillor J. Myers, City of Toronto Councillor_Myers@toronto.ca

cc. Mr. J. Thorne, MCIP, RPP, Chief Planner Jason.Thorne@toronto.ca

cc. Mr. J. Cantos, Manager, Official Plan & Legislation, City of Toronto Jeffrey.Cantos@toronto.ca

cc. Mr. R. Juknevicius, Project Manager, Strategic Initiatives, Policy & Analysis
Romas.Juknevicius@toronto.ca

cc. Mr. Kyle Pakeman, Project Coordinator Kyle.Pakeman@toronto.ca

cc. Mr. A. Darouiche, Acting Project Coordinator, Official Plan & Legislation Unit
Ali.Darouiche@toronto.ca

cc. Ms. R. McNeil, Planner, City of Toronto Rory.McNeil@toronto.ca

cc. Mr. C. Ventresca, Community Planning, Scarborough District, City of Toronto
Christian.Ventresca@toronto.ca

cc. Ms. P. Tenuto, Sr. VP Policy & Advocacy, BILD, advocacy@bildgta.ca

cc. Client (by email & hardcopy)

POUND & STEWART ASSOCIATES LIMITED

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APPENDIX 1

**January 14, 2025 letter submission by Pound & Stewart Planning
regarding Provincial Planning Statement ('PPS 2024') & the City's Official Plan
per 325 Milner Avenue, Scarbrough District**

January 14, 2025

BY EMAIL: Kyle.Pakeman@toronto.ca & **REGULAR MAIL**

Mr. Kyle Pakeman, Project Coordinator

Official Plan & Legislation Unit

City Planning Division

Metro Hall

22nd Floor, 55 John Street

Toronto, Ontario

M5V 3C6

Re: Provincial Planning Statement 2024 ('PPS 2024') & the City's Official Plan

Dear Mr. Pakeman:

As planning consultants, we represent 1097547 Ontario Limited (c/o 'Groupe Petra'), the registered owner of 325 Milner Avenue, Scarborough District. 325 Milner Avenue is comprised of an existing 'landmark' and standalone office building, with supporting landscaping, parking and drive aisles, fronting onto the corner of two major roads.

We support the City's initiative to ensure that the City's Official Plan is consistent with the Provincial Planning Statement ('PPS 2024') and the *Planning Act*, by 'undertaking' a review of the Official Plan, with pending Official Plan Amendments for Council's consideration.

Please also note, this submission is further to my October 22, 2024 letter to the Hon. P. Calandra, Minister of Municipal Affairs and Housing regarding proposed Amendment Nos. 668 and 680 to the City of Toronto Official Plan.

We understand the city is proposing two phases to complete this undertaking:

City Phase 1: To address policy conflicts between the Official Plan and the PPS 2024

City Phase 2: To ensure the Official Plan aligns with to support PPS 2024 objectives

POUND & STEWART ASSOCIATES LIMITED



This undertaking provides an opportune time to ensure the City's Terms of Reference ('ToR') is fair and complete per the implementation of employment lands and permitted uses, so as to fit the PPS 2024, a provincial policy statement.

The PPS 2024 establishes both "*areas of employment*" and "*employment areas*" with distinct land use planning characteristics for each.

- **"Areas of Employment" (2.8.1 Supporting a Modern Economy)** is a broader term that refers to all lands designated for employment uses within a municipality. These include lands planned for a variety of employment purposes, such as offices, retail, industrial, manufacturing, and institutional uses.
- **"Employment Areas" (2.8.2)** is a specific term defined under the *Planning Act*, referring to areas designated exclusively for certain types of employment uses, such as industrial, manufacturing, warehousing, logistics, and similar uses.

325 Milner Avenue - Land Use Planning Characteristics

Based on the PPS 2024 it would be appropriate for 325 Milner Avenue to be placed in an "Areas of Employment" classification as this property is:

- *an 'as-built' - 'stand-alone' landmark office building, supporting the Malvern community, fronting onto the Malvern 'Neighborhood Area' in proximity to amenities;*
- *proximate to Markham Road and Highway 401, with existing and planned public transit services nearby, making the property highly accessible, further supported by ample vehicular parking on-site;*
- *a large corner property (2.84 ha. – 7.03 ac.) fronting onto two 'Major Streets', Milner Avenue and Progress Avenue;*
- *located in the proposed 'Malvern Progress' Major Transit Station Area ('MTSA'-570) boundary pending the Sheppard East LRT Extension project under study by Metrolinx;*
- *a proposed MTSA, qualifying as a proposed Strategic Growth Area ('SGA');*
- *supporting a tenant list, including among others, the 'City of Toronto Employment and Social Services' and 'City of Toronto Children Services', and 'Government of Canada's Immigration Refugees and Citizenship' offices, and health services.*



Currently the City's in effect Official Plan and Zoning By-law for this property does not permit 'Educational and Training Facilities', including adult educational facilities, in the form of college and/or university uses including administration, training and continuing education in this office building.

The property owner, 'Groupe Petra', is historically on the City's record requesting the addition of 'Educational and Training Facilities' or 'Institutional Uses' to broaden the community service functions of their building, which would also assist in off-setting high post pandemic vacancy.

325 Milner Avenue - Land Use Compatibility

Land use compatibility is a recognized principle of good land use planning, and land uses known or expected to create environmental adverse effects when in proximity, are deemed incompatible. (Provincial D-1-3 Land Use Compatibility: Definitions).

The proposed 'Educational and Training Facilities' use would involve about 25% of the total GFA at 26,012 m² (280,000 sq. ft.) of this major office building which is a desirable, feasible and a highly compatible use. In my opinion 'Educational and Training Facilities' are similar to normal office uses within the planning context.

If an office use is permitted, then 'Educational and Training Facilities' ought to be permitted as well.

Conclusion

The PPS 2024 "Areas of Employment" accommodates broad spectrum of modern economic activity, supporting flexibility and mixed-use where appropriate.

Mixed land use benefits the community by minimizing trip generation and distance travelled by maximizing the public access and convenience. Mixed land use provides support for cultural, social and economic diversity and is appropriate as it relates to the planning context of 325 Milner Avenue.



Broadening the permitted uses at 325 Milner Avenue to allow 'Educational and Training Facilities' would offset vacancy, without harming the traditional office functions or formats. It has been relayed that once an office building is converted to residential it will not return. In the case of 325 Milner Ave. adding the 'Educational and Training Facilities' should not be viewed or processed as a conversion as the 'office uses' planned function is maintained.

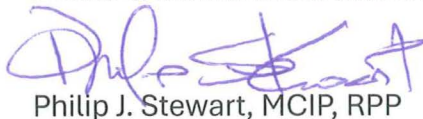
It is my opinion that 325 Milner Avenue, like other 'suburban' as-built, standalone office buildings and properties, were in effect 'orphaned' as they were left out of the City's recent 'Official Plan Review - Office Replacement Policies Review'. This undertaking provides the city with the opportunity to be consistent with the PPS 2024 by the applying the distinctions between the provincial "Areas of Employment" and "Employment Areas" in its Official Plan.

If the ToR for this undertaking is public information, we would appreciate receiving a copy for our review and records.

Also, please ensure our firm remains on the City's mailing list regarding any future public notices, updates, reports, Committee and Council Agenda related items, and any Council decision or actions on the above captioned matter.

Thank-you for your consideration of this matter.

Yours truly,
Pound & Stewart Associates Limited



Philip J. Stewart, MCIP, RPP

/la_1889ltr.Jan.14.25

cc. Hon. P. Calandra, Minister of Municipal Affairs and Housing Paul.Calandra@pc.ola.org

cc. Mr. J. Filipowicz, Director of Policy, Minister of Municipal Affairs and Housing
Josef.Filipowicz@ontario.ca

cc. Mr. P. Kelly, Deputy Director of Policy, Minister of Municipal Affairs and Housing
Patrick.Kelly4@@ontario.ca

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cc. Ms. P. Tenuto, Sr. VP Policy & Advocacy, BILD, advocacy@bildgta.ca

cc. Ms. V. Mortellitti, Manager, BILD, advocacy@bildgta.ca

cc. Client (by email & hardcopy)



APPENDIX 2

April 29, 2025 letter submission by Pound & Stewart Planning

**Regarding Planning Submission concerning a 'Proposed Official Plan
Amendment, including changes to Land Use Designations, *Employment
Areas* policies and related Secondary Plans and Maps'**

per 325 Milner Avenue, Scarborough District

April 29, 2025

BY EMAIL: Kyle.Pakeman@toronto.ca **& REGULAR MAIL**

Mr. Kyle Pakeman, Project Coordinator

Official Plan & Legislation Unit

City Planning Division

Metro Hall, 22nd Floor, 55 John Street

Toronto, Ontario

M5V 3C6

Re: Planning Submission concerning a 'Proposed Official Plan Amendment, including changes to Land Use Designations, Employment Areas policies and related Secondary Plans and Maps'

Dear Mr. Pakeman:

Please accept the enclosed planning submission on behalf of 1097547 Ontario Limited (c/o 'Groupe Petra'), who is the registered owner of the lands and building known municipally in the City of Toronto, Scarborough District (the 'city') as 325 Milner Avenue (the 'property'). Please refer to Image 1, and Figures 1 and 2.

We write with respect to the city's program underway, described as:

- **'Proposed Official Plan Amendment, including changes to Land Use Designations, Employment Areas policies and related Secondary Plans and Maps'**

Objective of our Submission

The property owner, 'Groupe Petra', is historically on the City's record requesting the addition of 'Educational and Training Facilities' or 'Institutional Uses' to broaden their building's community service functions and to offset high office space vacancy.

Our objective is to permit 'Educational and Training Facilities' as an additional use. It has been relayed that once an office building is converted to residential it will not return. However, unlike a residential conversion, the adding of the 'Educational and Training Facilities' use should not be viewed or processed as a conversion, because in terms of planned function, an 'office' function is technically maintained. There is no harm to planned function as an outcome.

POUND & STEWART ASSOCIATES LIMITED

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IMAGE 1 - LOOKING EAST ALONG MILNER AVENUE WEST OF PROGRESS AVENUE



**325 MILNER AVENUE
CITY OF TORONTO**



Image1_July.2024

FIGURE 1: TORONTO OFFICIAL PLAN, FEBRUARY 2019, MAP 22, LAND USE
325 MILNER AVENUE, CITY OF TORONTO

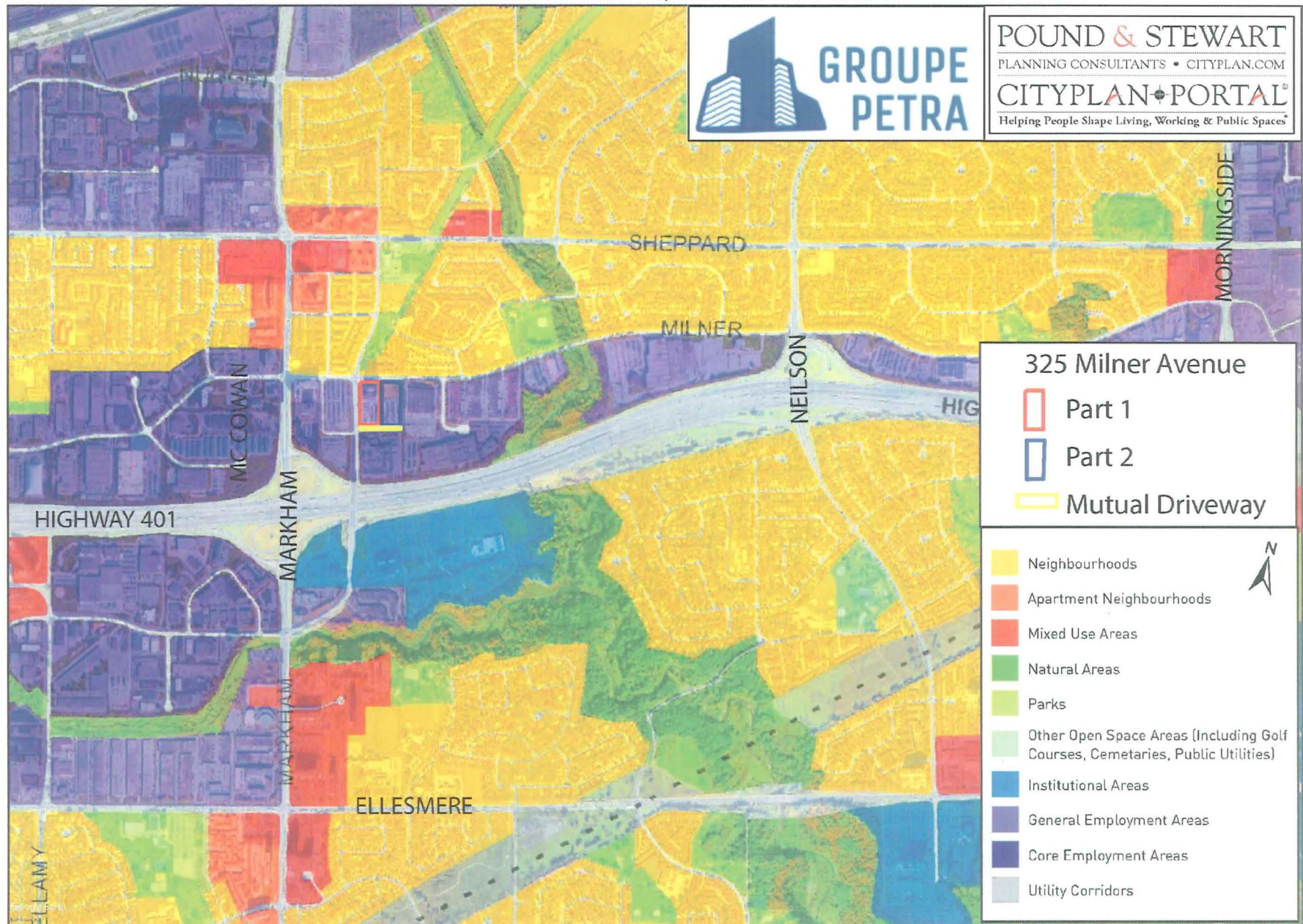


FIGURE 2: AERIAL PERSPECTIVE
325 MILNER AVENUE, CITY OF TORONTO



325 Milner Avenue

 Part 1

 Part 2

 Mutual Driveway



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City Studies & Official Plan Updates to Date

In managing the changed definition of “Employment Areas” per the *Planning Act*, and the new Provincial Planning Statement 2024 (‘PPS 2024’), the city set out to protect ‘office’ planned functions in ‘Employment Areas’. And, at the same time consider ways to balance the oversupply of office space and undersupply of residential space.

This effort has translated into broadened land uses in certain areas of the city through the city’s various planning initiatives, such as:

- **Office Space Needs Study – Stakeholder Participation - February 6, 2024**
- **Bill 97 “Area of Employment” OPA Updates & Analysis - OPAs 668 & 680 - May 17, 2024:**
- **Employment Area Land Use Permissions - Decision Report - Approval - July 10, 2024**
- **Official Plan Review - Office Replacement Policies - Proposals Report - July 10, 2024**
- **Proposed Amendment Nos. 668 & 680 - City of Toronto Official Plan - October 22, 2024**

In lock step with these processes, planning submissions were filed on our client’s behalf requesting consideration of the above noted objective for 325 Milner Avenue.

Background & Land Use Planning Characteristics of 325 Milner Avenue

- *It an ‘as-built’ - ‘stand-alone’ landmark office building, supporting the Malvern community, fronting onto the Malvern ‘Neighborhood Area’ in proximity to amenities;*
- *The total GFA of this 16 storey major office building is 26,012 m² (280,000 sq. ft.);*
- *It is proximate to Markham Road and Highway 401, with existing and planned public transit services nearby, making the property highly accessible, further supported by ample vehicular parking on-site;*
- *It is a large corner property (2.84 ha. – 7.03 ac.) fronting onto two ‘Major Streets’, Milner Avenue and Progress Avenue;*
- *It is located in a proposed ‘Malvern Progress’ Major Transit Station Area (‘MTSA’-570) boundary pending the Sheppard East LRT Extension project under study by Metrolinx. And, a proposed MTSA, qualifies as a proposed Strategic Growth Area (‘SGA’);*



- *It has a community supportive tenant list, including among others, the 'City of Toronto Employment and Social Services' and 'City of Toronto Children Services', and 'Government of Canada's Immigration Refugees and Citizenship' offices, and health services.*

Proposed OPA No. 804 - The City's Interpretation of the *Planning Act* & PPS 2024

The *Planning Act* establishes "employment areas", providing a definition as acknowledged by the City's proposed Official Plan Amendment no. 804 ('OPA No. 804'). In this case both the City's 'General Employment Areas' and the 'Core Employment Areas' are tied to the "employment areas" definition per the *Planning Act*.

Notwithstanding, the PPS 2024 appears to distinguish or refine permitted land uses in a broader manner. For example:

- **2.8.1 Supporting a Modern Economy or "areas of employment"** refers to all lands designated for employment uses within a municipality. These include lands planned for a variety of employment purposes, such as offices, retail, industrial, manufacturing, and institutional uses.
- **2.8.2 "employment areas"** is per the *Planning Act* refers to areas designated exclusively for certain types of employment uses, such as industrial, manufacturing, warehousing and goods movement uses, and related ancillary uses.

In practical terms, the City could consider interpreting the land use designations and permitted uses as set out above as follows in terms of the City's Official Plan:

- 'General Employment Areas' as per PPS 2024, Section 2.8.1 "areas of employment" uses, and;
- 'Core Employment Areas' as per PPS 2024, Section 2.8.2 as per the *Planning Act*.

What Proposed OPA No. 804 means to the Property

The PPS 2024 2.8.1 accommodates a broad spectrum of modern economic activity, including institutional uses. However, supporting flexibility with a mix of employment uses does not appear to be reflected in proposed OPA No. 804 to the Official Plan which appears to maintain the status quo on this property. The City's Official Plan prohibits 'Institutional uses' (and by default 'Educational and Training Facilities') in an 'Employment Area'.



Land Use Compatibility & Planned Function

Land use compatibility is a recognized principle of good land use planning, and land uses known or expected to create environmental adverse effects when in proximity, are deemed incompatible. (Provincial D-1-3 Land Use Compatibility: Definitions).

The proposed 'Educational and Training Facilities' use would involve about 25% of the total GFA of this major office building which is a desirable, feasible and a highly compatible use. While an 'industrial trade school' is permitted use within 'Employment Areas', (such as a 'carpentry shop' etc.,) this type of use does not fit within the context of a major office building. Currently, the City's 'Employment Areas' policies do not support the co-existence of office and 'Educational and Training Facilities' uses such as Kumon, Mathletics, IT, computer programming, including adult educational facilities, in the form of college and/or university uses including administration, training and continuing education in a major office tower.

There is a need for learning opportunities to promote computer skills and support job creation for business and corporate learning programs to accommodate e-learning and e-commerce. However, because this major office building is located within an 'Employment Areas' these compatible 'office like' opportunities are currently prohibited.

A mix of employment uses benefits the community by minimizing trip generation and distance travelled by maximizing the public access and convenience. This provides support for cultural, social and economic diversity and is appropriate as it relates to the planning context of the property.

In my opinion 'Educational and Training Facilities' are similar to normal office uses within the planning context. If an office use is permitted, then 'Educational and Training Facilities' ought to be permitted as well.

Conclusions

OPA No. 804 ought to more broadly encourage a flexible mix of employment uses. And, it is my opinion that this property, like similar 'suburban' as-built, standalone major office buildings and properties, are being 'orphaned' by OPA No. 804, and continue to be left out of the City's modern 'Official Plan Review programs.



While highly accessible, this property's role in the Malvern community is impeded because it is located within the boundary of the City's 'Employment Areas'. Perhaps OPA No. 804 ought to be consistent with the 'Area of Employment' land use policy objectives and intent of the PPS 2024, permitting a mix of employment land use opportunities in support of a modern economy.

While it is important to maintain all existing land use permissions applying to this property, perhaps the city ought to consider various options available such as:

- Creating a new 'Office Areas' land use designation in the Official Plan to permit a broad range of 'employment' land use permissions, including 'Educational and Training Facilities' that benefit of local and regional communities, as set out in the PPS 2024, Section 2.8.1 Supporting a Modern Economy.
- Removal of the property from 'Employment Areas' and the introduction of 'Regeneration Areas', as is recommended by OPA No. 804 for other areas of the City to allow for a broad range of land uses.

The City's Official Plan has to be consistent with 'PPS 2024' and conform to the *Planning Act* and we support the undertaking a review of the Official Plan, with pending Official Plan Amendments for Council's consideration. The city's undertaking provides an opportune time to ensure the City's undertaking is fair and complete as it relates to this property, among others.

Please ensure our firm remains on the City's mailing list regarding any future public notices, updates, reports, Committee and Council Agenda related items, and any Council decision or actions on the above captioned matter.

Thank-you for your consideration of this matter.

Yours truly,
Pound & Stewart Associates Limited



Philip J. Stewart, MCIP, RPP

/la_1889ltr.Apr.29.2025



cc. Hon. R. Flack, Minister of Municipal Affairs and Housing Rob.Flack@pc.ola.org

cc. Mr. J. Filipowicz, Executive Director of Policy, Minister of Municipal Affairs and Housing
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