

WEST NEWFOUNDLAND REGIONAL APPEAL BOARD

URBAN AND RURAL PLANNING ACT, 2000

West Newfoundland Regional Appeal Board

Appeal #	15-006-072-046
Appellant(s)	Wendell Smith
Respondent / Authority	Town of Pasadena
Date of Hearing	January 18 th , 2023

Board Members

Chair	Lloyd Walters
Member	Boyd Noel
Member	Helen Reid

Also in Attendance

Solicitor for the Appellant(s)	Michael Crosbie
Representatives for the Appellant(s)	Wendell Smith Wanda Smith
Representatives for the Authority	Robert Bradley Brian Hudson
Secretary to the Boards	Robert Cotter, Departmental Program Coordinator, Municipal and Provincial Affairs
Technical Advisor to the Boards	Sean McGrath, Planner III, Municipal and Provincial Affairs
Interested Parties	
Start/End Time	11:00 am – 12:35 pm

The authority for appeals comes from section 42 of the *Urban and Rural Planning Act, 2000* (The Act).

Board's Role

The role of the Regional Appeal Board is to determine if Town of Pasadena acted in accordance with the Urban and Rural Planning Act, 2000 and the Pasadena Municipal Plan and Development Regulations, 2021 when it issued an order to Mr. Wendell Smith. The order, pursuant to section

102(1) or the Urban and Rural Planning Act, 2000, ordered Wendell Smith to pull down, remove, carry away, or destroy the “Development” and restore the site to its original state within 15 days of the service of the order. The order indicates that Mr. Smith had constructed a building or edifice at the rear of 18 Walsh’s Avenue, affecting 16-20A Walsh’s Avenue without a permit.

Presentations During the Hearing

Planner’s Presentation

On October 27th, 2021 the Town of Pasadena (the “Authority”) received a complaint from the property owner of 16-20A Walsh’s Ave (property abutting the rear property line of 18 Walsh’s Avenue regarding Mr. Wendell Smith (the “Appellant”) having a shed, rock wall, fire pit and garbage on “the land”. An e-mail record from the Authority dated October 27th, 2021 between Debbie Dower and Brian Hudson did not specify if “the land” was 16-20A Walsh’s Avenue, 18 Walsh’s Avenue or a combination of both.*Subsequent to the initial correspondence, the property owner of 16-20A did provide the Authority a Survey Plan of Land, dated December 13th, 2021, for 16-20A Walsh’s Avenue. The Survey Plan of Land did provide spatial representation of 2 (two) accessory buildings (shed’s) in proximity to Civic No. 18 Walsh’s Avenue, one on the rear property line of Civic No. 18/16-20A and the other situated on Civic No. 16-20A abutting the rear property line of Civic No. 18.

On November 25, 2021, the Town of Pasadena (the Authority) issued an order to Mr. Wendell Smith (the “Appellant”) requiring the removal of a “building or edifice” at the rear of 18 Walsh’s Avenue, and across 16-20A Walsh’s Avenue, within 15 days of the service of the order. The order noted that the Authority has become aware the Appellant constructed a building or edifice in or around the rear of property at 18 Walsh’s Avenue and across 16-20A Walsh’s Ave, Pasadena (the “Development”). Further the order noted no permit has been issued for the “Development”. The Appellant contends the structures have been in place for over 20 years and were lawfully there. Of note: the order did not specify what the “Development” typology contextualized, noting only a “building ” or “edifice”. The Appellant filed an appeal on December 14, 2021.

Whereas a permit for development with respect to the “Development” or “Edifice” has not been produced by the Authority or Appellant the Technical Report assumes the aforementioned are

classified as unpermitted development and fall under the Pasadena Municipal Plan and Development Regulations, 2021.

Should the Appellant produce proof of permit for the subject “Development” or “Edifice” under the previous Municipal Plan and Development Regulations, with the exception of articles which may be exempt from the definition of Development under the Urban and Rural Planning Act, 2000 or legislation at the time of permit issuance, they should be treated as existing non-conforming uses with respect to standards. However, non-conformance with respect to standards applies to development wholly within the property boundaries of 18 Walsh’s Avenue, within the parameters of the executed permit and/or spatial boundaries/civic address prescribed by the permit, should it exist.

The Urban and Rural Planning Act, 2000 contains definitions of building and development. Building includes a structure, erection or improvement placed on land. Development means the carrying out of building, engineering, mining or other operations in on or over land and includes the construction of a building and excludes using the building or land within the courtyard of a dwelling for purposes incidental to enjoyment of that residential property.

The Town of Pasadena Municipal Plan and Development Regulations came into legal effect on June 11, 2021. The subject property is designated Residential Low Density in the Pasadena Municipal Plan and zoned Residential Low Density in the Pasadena Development Regulations, 2021. Municipal Plan Policy UR-4 describes the Residential Low Density Plan Policy:

Municipal Plan Policy UR-4

Residential Low Density (RLD) Zone which has as Permitted Uses: Detached Dwelling; Personal Care Home-Residential; Conservation - All Uses AND Home Business-home office and Bed and Breakfast only; and Discretionary uses: Home business, urban agriculture; and Prohibited Uses; Mobile homes/mini- homes.

Municipal Plan Policy DS-2 describes the requirements for accessory buildings to adhere to municipal requirements as well as multi-jurisdictional regulations and standards to the satisfaction of the Town.

Policy DS-2

All proposed new buildings and structures, including accessory buildings, and structural additions and alterations to existing buildings, shall be the responsibility of the building proponent to ensure full compliance with the applicable provincial and federal building, plumbing, electrical, life safety, fire, and accessibility codes and standards, and the Town may withhold issuance of permit approval until appropriate certification and verification of adherence to building codes and standards for the constructed building or structure has been submitted to the Town for review and verification, and until all other municipal requirements have been addressed to the satisfaction of the Town.

Municipal Plan Policy DS-2 provides plan policy provision for submission of a site plan and location certificate to be submitted to the Authority with respect to building development proposals including accessory buildings and structures.

Municipal Plan Policy DS-4

Following the pouring of foundation or building footings, a developer is required to provide the Town with a site survey and/or location certificate to verify the proper siting of the proposed building with respect to property lines and building setbacks. Location certificates and site plans for residential infill development, land use intensification, residential subdivision, commercial, industrial and all other land and building development proposals, including for accessory buildings and structures, shall be required to be submitted to the Town by the development applicant.

Municipal Plan Policy DE-2 describes an accessory structure or any other form of development shall not be permitted to be constructed over an area of land featuring a form of legal limitation to the use of that land. Municipal and Provincial Affairs would consider a property boundary to be a legal limitation to the use of the land in the form of a boundary or property extent.

Policy DE-2

No building for a residential dwelling, accessory structure, or any other form of development shall be permitted to be constructed over an area of land that is restricted by a legal easement, right-of-way, restrictive covenant or other form of legal limitation to the use of that land.

2.2.1 Who can apply and how

Section 2.2.1 of the Pasadena Development Regulations

An application for a Permit or for Approval in Principle shall be made only by the owner or by a person authorized by the owner to Council on such form as may be prescribed by Council.

Section 1 of the Pasadena Development Regulations states that all development requires a permit from Council. All development, including the subdivision/severance of land, carried out within the Planning Area must have a permit issued by Council in accordance with these Development Regulations.

Section 2.5.6 of the Pasadena Development Regulations states that a written permit issued by Council or delegated staff is permission to carry out development.

2.5.6 Approval of Development Permit

1. A written development permit issued by Council or its designated staff will constitute permission to develop in accordance with these Regulations, but such permission shall not relieve the applicant from full responsibility for obtaining all other permits or approvals prior to commencement of development and complying with all other regulations and statutes during development.

2.3.2.3 Accessory Uses and Accessory Buildings

Section 2.3.2.3 of the Pasadena Development Regulations states a permit is required for accessory buildings. As set out in Section 5, an Accessory Use means a use that is subsidiary to a permitted or discretionary use and that is customarily expected to occur with the permitted or discretionary use. A permit is required for accessory uses and accessory buildings.

Section 5.2.1 Accessory Building as defined by the Pasadena Development Regulations (as set out in the Ministers Development Regulations under the Urban and Rural Planning Act, 2000) states:

A detached subordinate building not used as a dwelling, located on the same lot as the main building to which it is an accessory and which has a use that is customarily incidental or complementary to the main use of the building or land.

- (i) for residential uses, domestic garages, carports, ramps, sheds, swimming pools, greenhouses, cold frames, fuel sheds, vegetables storage cellars, shelters for domestic pets or radio and television antennae,
- (ii) for commercial uses, workshops or garages, and
- (iii) for agriculture and industrial uses, garages, offices, raised ramps and docks;

Section 5.2.1 Accessory Buildings, General Conditions permits accessory buildings in residential use classes providing the buildings are clearly incidental and complimentary to the main buildings character, size and use. Section 5.2.1 Accessory Buildings, General Conditions states:

- 1. Accessory buildings are permitted in residential use class provided the buildings are clearly incidental and complimentary to the main buildings' character, size and use.
- 2. Accessory buildings shall not be used for human habitation.

3. The side yard requirements set out in the Use Zone Tables shall apply to accessory buildings wherever they are located on the lot but accessory buildings on two (2) adjoining properties may be built to property boundaries provided they shall be of fire-resistant construction and have a common firewall.

4. Quonset style/steel accessory buildings may only be permitted within the Resource Use Zone.

Section 5.2.2 Accessory Buildings – Residential Use Classes provides conditions with regards to accessory building development associated with a residential use. Section 5.2.2 states:

1. Size of residential accessory building shall be a maximum of 7% of the lot size of 75 m², whichever is less; except for the Residential Rural zone where larger accessory buildings may be allowed at the discretion of Council with consideration of the criteria listed in #10 below;

2. Accessory buildings shall not be located:

a. within 1.2 m from any property boundary and 2.4 m from any building;

b. within any easement area;

c. in front of the building line on the street which the building has its legal civic address.

d. An accessory building on a corner lot may be located in front of the building line on the flanking yard provided the location does not impede visibility on the flanking street, and the accessory building is set back a minimum of 7 m from the flanking street.

e. Exception: Council may, at its discretion, allow an accessory building with a floor area less than 75 m² to be located in front of the building line provided that:

i. A public notice has been advertised in accordance with the requirements for Variances;

i. The accessory building shall be setback a minimum of 15 m from the front property line;

ii. The slope of the lot and/or natural screening effectively blocks the view of the building from the street and adjoining properties. The placement of the building must not negatively affect neighbouring properties; and,

iii. A development application is submitted showing all buildings on the lot including the proposed accessory building.

3. Accessory buildings shall not be used for commercial or industrial uses on a residential property, regardless of the use zone in which it is located, unless Council has issued a permit for such use;

4. Repairs to vehicles, other than minor vehicle maintenance, are prohibited in accessory buildings;

5. No truck, bus, semi-trailer, freight container, or other vehicle body shall be used as an accessory building;

6. No outside storage or display of materials or finished product;

7. Except for minor maintenance, no accessory building will be used for the repairing, painting, dismantling, or scrapping of vehicles or machinery;
8. An accessory building may be used for a home business as outlined in home business section.
9. Exterior Cladding: With the exception of greenhouses, the exterior cladding of the accessory building shall match or coordinate with the exterior siding of the main dwelling on the lot and shall be residential in character.
10. Discretionary Decisions of Council: In making discretionary decisions with respect to accessory buildings, Council shall consider:
 - a. The location of the accessory building on the lot;
 - b. The size of the accessory building compared to the dwelling on the lot and the size of structures on neighbouring properties;
 - c. Visibility of the structure from neighbouring properties and/or street;
 - d. If the accessory building will block a view and/or light from adjoining properties;
 - e. The use of the accessory building;
 - f. Site conditions, such as topography and the presence of wetlands; and
 - g. Any other on-site conditions that may warrant Council's considerations.

The Authority may issue an order under section 102 of the Urban and Rural Planning Act, 2000 if a person has started a building or development contrary to a municipal plan and/or development regulations.

Order

102. (1) Where, contrary to a plan or development regulations, a person has undertaken or commenced a building or other development, the council, regional authority or authorized administrator responsible for that plan or those regulations or the minister where he or she considers it necessary, may order that the person pull down, remove, stop construction fill in or destroy that building or development and may order that the person restore the site or area to its original state.

2.8.3 Enforcement Authorities

Section 2.8.3 of the Pasadena Development Regulations Enforcement Authorities

states: Where it is determined that a use of land or development is contrary to the Integrated Community Sustainability Municipal Plan and Development Regulations, Council may initiate enforcement measures by issuing a stop work order. Every inspector shall keep a record of any violation of these Regulations and report that violation to Council.

The Authority may issue an order under section 102 of the Urban and Rural Planning Act, 2000 if a person has started a building or development contrary to a municipal plan and/or development regulations.

Order

102. (1) Where, contrary to a plan or development regulations, a person has undertaken or commenced a building or other development, the council, regional authority or authorized administrator responsible for that plan or those regulations or the minister where he or she considers it necessary, may order that the person pull down, remove, stop construction fill in or destroy that building or development and may order that the person restore the site or area to its original state. Under section 102 (4) of the Urban and Rural Planning Act, 2000, Council may stipulate the time limits for compliance with an order.

102 (4) A council, regional authority, authorized administrator or the minister may, in an order made under this section, specify a time within which there shall be compliance with the order.

Section 109 (3)(4) of the Urban and Rural Planning Act, 2000 outlines how an order shall be confirmed. As per section 102 of the Urban and Rural Planning Act, 2000, an Authority by motion of council may issue an order to a person or an authorized administrator may issue an order as per Section 109(3) on the condition the order is confirmed by majority vote of the members of the council at the next meeting of council.

Delegation

109. (1) The minister may delegate his or her duties, powers and functions under this Act to an employee of the department.

(3) An employee of a council or regional authority may issue an order under section 102.

(4) An order made by an employee referred to in subsection (3) shall be confirmed by a majority vote of the members of the council or regional authority present at the next meeting of that council or regional authority after the order is made and if the order is not confirmed in this manner, it shall be considered to be cancelled.

Section 2.8.1 of the Pasadena Development Regulations Delegation of Authority states:

2.8.1 Delegation of Authority

The Urban and Rural Planning Act, 2000 provides for delegation of enforcement responsibilities under section 109, where, an employee of a council may issue an order under the section (see below). An order made by an employee shall be confirmed by a majority vote of the members of

the council present at the next meeting of that Council after the order is made and if the order is not confirmed in this manner, it shall be considered to be cancelled.

The information provided by the Authority does not include minutes of council confirming the order or a motion of council instructing the issuance of the order.

Section 107 (1) of the Urban and Rural Planning Act, 2000 outlines how an order shall be served.

Service

107. (1) Unless otherwise stated in this Act, a notice, order or other document required to be given, delivered or served under this Act is sufficiently given, delivered or served where delivered personally or sent by registered mail addressed to the person at the latest known address of that person. The Appellant indicates that the order was personally served.

Notice of right to appeal was included in the order pursuant to Section 42 of the Urban and Regional Planning Act, 2000 and Section 5 Notice of right to appeal of the Development Regulations under the Urban and Rural Planning Act, 2000 (Newfoundland and Labrador Regulation 3/01).

According to the Appellant, the order relates to lumber piled under a tarp. Storage of wood or lumber would not normally meet the definition of development as it would be associated with the enjoyment of a residential property. Activities and uses on residential property and normally associated with the use of a residential property are excluded from the definition of development. Such uses do not require a permit from the Authority. Accessory buildings or structures would meet the definition of development.

Appellant's Presentation

In his original letter of appeal dated Dec 14, 2021 Mr. Wendell Smith (appellant) identifies himself as the property owner of 18 Walsh's Ave, Pasadena. He indicated that he has stored wood and logs "out back", that is why a tarp was hauled over a few sticks to help shed the water and can be easily removed given applicable time.

The appellant further admitted that there were two small structures on the property that were there 20 plus years but felt he did what was required to have them there. He indicated that assessment personnel has been on his property several times over the past 36 years.

Mr. Smith stated the order was harsh and untimely. He also stated that he assumed that council was being pressured to act by outside interference and influenced by developers pushing an agenda for further development behind our property.

The Board heard from Mr. Crosbie, counsel for the appellant who provided a detailed review of his written submission to the Board. He argued that a permit was not needed and the order was issued in bad faith. He asked the Board to confirm Mr. Smith's request to have the order quashed.

Authority's Presentation

Mr. Brian Hudson CAO of the Town of Pasadena stated he learned of the issue through a complaint from an adjacent property owner.

The Town started a review and the Regional Enforcement Officer visited the property and took pictures. The review found that two sheds/structures were built on the property that were not compliant with the Town of Pasadena's development regulations.

During the process of their review the Town found that Mr. Smith had not acquired a permit for the development of the two sheds/structures as required by the Town of Pasadena's Development Regulations.

The Town has an obligation to enforce their regulations under URPA section 102 (1). In doing so Mr. Brian Hudson CAO for the Town of Pasadena instructed the regional enforcement officer to hand deliver to Mr. Smith an order dated Nov 25th, 2021 to pull down, remove, carry away, or destroy the Development and restore the site to its original state within 15 days of service of this Order.

Board's Analysis

Matters under consideration before the Board.

Order dated November 24, 2021 issued against the structure(s) and debris at 18 Walsh's Avenue
The Board learned that there are two structures and debris (wood pile and tarp) on an area of land behind the residence at 18 Walsh's Avenue, Pasadena.

Q. What is an accessory building?

Section 5.2.1 Accessory Building as defined by the Pasadena Development Regulations (as set out in the Ministers Development Regulations under the Urban and Rural Planning Act, 2000) states:

A detached subordinate building not used as a dwelling, located on the same lot as the main building to which it is an accessory and which has a use that is customarily incidental or complementary to the main use of the building or land.

Q. Are there accessory building(s) in the located area?

Yes. The Board reviewed the photos and the survey of the area as contained in the appeal package which verified that there were two sheds/structures located in the area under appeal.

Q. Are accessory buildings permitted under the zoning regulations?

Yes. The Board learned Mr. Smith's property at 18 Walsh's Avenue is located in the Residential Low Density Land Use Designation as per the Town of Pasadena's Municipal Plan, 2021 and zoned Residential Low Density under the Town of Pasadena's Development Regulations, 2021. In the Town's Development Regulations, 2021 accessory buildings are permitted in the Residential Use Class subject to Section 5.2.1.1. Section 2.3.2.3 of the Pasadena Development Regulation states that a permit is required for accessory buildings and uses.

Q. Did the appellant have a permit to undertake the development?

Mr. Smith stated that he had received a permit when he originally constructed the shed. However, he did not provide the Board with any evidence of a permit nor did the Town of Pasadena provide the Board with any permits for the property in question.

The Board was not able to determine whether a permit for the subject structures were obtained at the time of the development.

Q. Did the appellant require a permit prior to the enactment of the Urban and Rural Planning Act, 2000?

Yes. The Board determined from reviewing the Municipal Plan and Development Regulations in effect in 1997-1998 that Mr. Smith required a permit at the time of development. The Urban and Rural Planning Act, 1990 provides the definition of development under Section 2(j). Section 2(j)(vii) provides exclusion provision to the definition of development as follows:

(vii) the use of a building or land adjacent to a dwelling house for a purpose incidental to the enjoyment of the dwelling house as a dwelling

As the development of a building precludes the use of a building, the “carrying out of building” as included in the definition of development under section 2(j) of the Urban and Rural Planning Act, 1990 enables an Authority (Town of Pasadena) to permit Accessory Buildings prior to the Urban and Rural Planning Act, 2000.

Given the lack of evidence submitted to the Board, the determination is the appellant did not obtain a permit and the given structures are considered by the Board as unpermitted development. Therefore, the Board asserts the Urban and Rural Planning Act, 2000 shall be applied to the review of this appeal.

Q. Did the town have the authority to issue the order?

The Board determined Section 102(1) of the Urban and Rural Planning Act, 2000 provides a council, regional authority or authorized administrator responsible for a Municipal Plan and Development Regulations the authority to issue an order where

102. (1) Where, contrary to a plan or development regulations, a person has undertaken or commenced a building or other development, the council, regional authority or authorized administrator responsible for that plan or those regulations or the minister where he or she considers it necessary, may order that the person pull down, remove, stop construction fill in or destroy that building or development and may order that the person restore the site or area to its original state.

When issuing an order Section 109(3)(4) of the Urban and Rural Planning Act, 2000 outlines how an order shall be confirmed. Section 102(4) provides compliance time frames, Section 107 provides provision for servicing and Section 5 of the Ministers Regulations under the Urban and Rural Planning Act, 2000 provides the requirement for Right to Appeal.

Q. Did the Town act in bad faith in issuing this order?

The Board accepts that Council has the authority to issue orders with respect to these matters. The Board reviewed the grounds of appeal presented by the Appellant and found that there was no evidence of bias or discrimination. All Authorities have the obligation to respond to public inquiries, investigate, and carry out an order as prescribed under the Urban and Rural Planning

Act, 2000, Municipalities Act, 1999 and or in consideration of the Municipal Plan and Development Regulations and act accordingly.

Q. Did the Town of Pasadena follow proper procedure when issuing the order to Mr. Wendell Smith?

Following an investigation by Town officials, Town staff exercised its right to issue an Order under the Municipalities Act, 1999 (to remove the structures and remediate the site to its original condition). On November 25, 2021 the Town's Chief Administrator Officer signed an Order to be issued to the property owner at 18 Walsh's Avenue, Pasadena. The Board learned that the Town arranged for the Regional Enforcement officer to personally serve the order to the Appellant. This is in accordance with Section 107 of the Urban and Rural Planning Act, 2000 which requires that an order be sent by registered mail or personally delivered.

Q. Did Council follow legislation when it issued the orders?

No. The Board learned that the authority did not follow its legislated requirements. The Board has determined that the Town has the right to issue an Order under Section 102 of the Urban and Rural Planning Act, 2000 (URPA, 2000). The Board contends an Order under section 102 can be executed in two (2) ways under Section 102 and 109 of the URPA, 2000. These include:

- a) Council confirming an order through a motion of council and directing a delegated staff member to carry out the order as per 102(1) of URPA, 2000.
- b) An employee of a council or regional authority may issue an order under Section 102(1), pursuant to Section 109(3) on the condition the order is confirmed by a majority vote of the members of the council or regional authority present at the next meeting of the council or regional authority as per Section 109(4) of URPA, 2000. If the order is not confirmed in this manner it shall be considered cancelled.

As no evidence was provided to the Board, illustrating beyond a reasonable doubt the order was confirmed as stated above, the order issued is therefore considered to be cancelled.

Board's Conclusion

In arriving at its decision, the Board reviewed the submissions received prior to the hearing and comments given by all parties present at the hearing along with the technical information. The Board is bound by Section 42 of the Urban and Rural Planning Act, 2000 and therefore must make a decision that complies with the applicable legislation, policy and regulations.

The Board notes that any development in the area requires a permit. The Town of Pasadena erred by not passing a separate motion at the next meeting to confirm the decision to issue the order as required. If Council had completed this action, the Board would have confirmed the Order.

The Board Orders the following; the Council must now issue a new order and provide new timelines for compliance and then confirm that order at the next public meeting in accordance with section 109(4) of URPA, 2000.

Or, it must make a motion at a public meeting of council that the order be issued as per section 102 of URPA, 2000.

Urban and Rural Planning Act, 2000, Section 42(10) states:

42. (10) In determining an appeal, a Board may confirm, reverse or vary the decision appealed from and may impose those conditions that the Board considers appropriate in the circumstances and may direct the council, regional authority or authorized administrator to carry out its decision or make the necessary order to have its decision implemented.

The Board concludes that the Authority acted properly and within its authority with regards to the order. However they erred in their actions by not ratifying their decision in a subsequent public meeting.

Therefore, the Board **reverses** the Town of Pasadena's Order issued on November 25, 2021.

Order

The Board orders that the Order issued to Mr. Wendell Smith under the Urban and Rural Planning Act, 2000 and the Town of Pasadena Municipal Plan and Development Regulations, 2021, to pull down, remove, carry away, or destroy the "Development" and restore the site to its original state at the rear of 18 Walsh's Avenue be reversed.

The Authority and the Appellant(s) are bound by the decision of this Regional Appeal Board.

In accordance with section 44(3) of the *Urban and Rural Planning Act, 2000*, the Board further orders the Authority pay an amount of money equal to the appeal filing fee of \$230.00 to the Appellant.

According to section 46 of the *Urban and Rural Planning Act, 2000*, the decision of this Regional Appeal Board may be appealed to the Supreme Court of Newfoundland and Labrador on a question of law or jurisdiction. If this action is contemplated, the appeal must be filed no later than ten (10) days after the Board's decision has been received by the Appellant(s).

DATED at Deer Lake, Newfoundland and Labrador, this 20, January 2023.



Lloyd Walters, Chair
West Newfoundland Regional Appeal Board



Boyd Noel, Member
West Newfoundland Regional Appeal Board



Helen Reid, Member
West Newfoundland Regional Appeal Board