



July 6th, 2015

Toronto City Council
100 Queen St. West
Toronto, ON., M5H 2N2

Dear Mayor Tory and Members of Toronto City Council:

RE: PG5.13 – Electronic and Illuminated Sign Study and Recommendations for Amendments to Chapter 694

I am writing you today on behalf of TABIA, a non-profit umbrella organization representing Toronto's 81 BIAs with a collective membership of 40,000 Toronto businesses and properties assessed at more than \$45 billion.

Many of our members have first-party signs and many others are third-party sign property owners. As such our members have a significant stake in this item. First and foremost we have serious concerns about the far-reaching staff recommendations contained in PG5.13 and the lack of meaningful consultation of affected businesses and property owners in developing this report. While some consultation opportunities occurred during the review there was no meaningful consideration given to recommendations and concerns raised by our members including that the City Economic Development division undertake an impact study. Second, this report contains 35 pages of complex by-law amendments and was only provided to the public for its comment, seven days prior to the meeting of Planning & Growth Management Committee.

In reviewing the recommended amendments in PG5.13, it seems that, in effect, there will be a ban on electronic billboard signs and significant implications to first party signs. This proposed legislative change is all the more troubling when coupled with the City Council decision on May 11th, 2015 to request authority from the Province to strike out Section 110 of Chapter 694 and to grant the City the sole authority to legislate signs within the city of Toronto. Nowhere in this report is there consideration of the impact on the financial interests of individual property owners and businesses.

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Many of our property owners bought their real estate in good faith with roof top signs in place and rely on the income derived from the agreements with billboard sign companies to make

their mortgage payments and balance their books. Nowhere in this or the previous report is there mention of the costs associated with changes to first-party advertising by eliminating the protections currently afforded under Section 110.

At a time when small business in the city of Toronto is facing significant economic challenges and a digital retail shift among other pressures, this is not a time for council to impose yet more red tape by seeking strict compliance to this by-law and reduction of income for those properties that have agreements in place for roof top signs.

Mayor Tory and City Council, you have committed yourself and shown in the past as a group to make improved economic activity and job creation in this city a priority.

TABIA urges you to take that commitment seriously and choose to defer consideration of this matter until such time as an economic impact study can be prepared by the appropriate city staff. We suggest that such a study by Economic Development include the impact on the industry itself and the thousands of tax dollars and jobs that it generates annually, the impact on Toronto's small business community who have in good faith purchased these properties and agreements, all in the context that the legislative changes will have on property owners as captured by the new amendments and relief from Section 110.

We would be pleased to be party to such an undertaking and provide any information we can regarding impacts to our members.

Sincerely,



John Kiru
Executive Director, TABIA