

June 15, 2015

Planning and Growth Management Committee  
c/o Nancy Martins  
City Hall, 100 Queen Street West, 10<sup>th</sup> Floor  
Toronto, ON M5H 2N2

Dear Planning and Development Committee,

We appreciate the consultation process and would like to thank the Toronto Sign By-law unit for taking the time to discuss the proposed amendments to the sign bylaw, Chapter 694 of the Municipal Code, on multiple occasions.

The Sign Association of Canada represents the interests of manufacturers, suppliers, and users of on-premise signs and sign products. We support proper and consistent enforcement of sign bylaws.

Here are our comments for the proposed changes to the bylaws regarding First Party Signs Displaying Electronic Static Copy:

- *“Where the sign is located in a Commercial Sign District, signs displaying electronic copy only be permitted on properties with commercial developments that contain ten or more tenants”*  
Draft By-Law: §694 – 21C 7(n) 1; §694 – 21C 8 (n) 1

We find that this bylaw amendment would be overly restrictive as it would only apply to a dozen locations in Toronto: Yorkdale, Sheridan Mall, Sherway Gardens, Cloverdale Mall, Peanut Plaza, Scarborough Town Centre, Eaton Centre, Gerrard Square, and maybe a few more in Scarborough and North York.

This bylaw recommendation could create complications for sites where one tenant leaves and the space remains empty or another tenant decides to expand their property by taking over the vacant property. What happens then? Does the existing and compliant sign displaying electronic copy become non-compliant? If the owner of the previously compliant sign has to go through a variance process, how much time is it going to take and how much extra is it going to cost them?

We recommend that there would be no set minimums on the amount of tenants with a commercial property to display an electronic sign. Having a set minimum creates an inherent unfairness between businesses. When done right, electronic static signs are no brighter or distracting than non-electronic illuminated signs.

- *“That the lot frontage where the sign is located is 100 meters or greater”*  
Draft By-Law: §694 – 21C 7 (m) ; §694 – 21C 8 (m); § 694-21I 6(l); § 694-21I 7(m)

This is restrictive to the small business owner who has frontage but cannot put in a sign because they do not have enough frontage to meet the bylaw.

Our recommendation is for the allowed electronic sign area to be proportional to the frontage, to reflect the current bylaw for freestanding ground signs.

- *“That the portion of the sign displaying electronic static copy be located in the bottom 50% of the sign face area”*  
Draft By-Law: §694 – 21C 7 (j)

Respectfully, we strongly believe that depending on the location, this restriction can diminish the effectiveness and visibility of the Electronic Message Centre (EMC). In locations where there is a lot of foliage, the EMC might simply not be seen. Furthermore, with the added restrictions to illumination placed by Chapter 694 of the Municipal Code – brightness, dwell time, as well as the timing restrictions – there should be very little to no impact from the variable light levels.

- *“That there be no more than one sign containing electronic static copy per premise”*  
Draft By-Law: §694 – 21C 7 (h); §694 – 21C 8 (h);§ 694-21I 6(g); ;§ 694-21I 7 (h)

We recommend that this recommendation be reworded to “That there be no more than one sign containing electronic static copy per **frontage**” to allow corner businesses with more than one frontage to have better visibility. Since these businesses pay much more for the prime location (and more tax dollars to the city), it would make good business sense to allow for better signage opportunity.

- *“Only non-electronic readograph copy be permitted in R districts”*  
Draft By-Law: § 694-21A 4 (g) [2]; § 694-21A 5 (e) [2]

Our recommendation would be to have illuminated non-electronic **as well as** electronic readograph signs permitted in the R districts. We are currently receiving a lot of requests for EMCs for schools and churches. As long as the electronic readograph signs are set at an appropriate illumination level and remain static, they shouldn't be invasive or a nuisance to the homes around.

Most small businesses have small profit margins and cannot afford to spend excessive funds on advertising, so they must frequently rely solely upon on-premise signs to advertise their goods and location to potential customers. We believe that businesses have a better chance to succeed if they are allowed to have well-placed and well-designed signage. **When done properly, electronic signs reduce clutter, decrease the amount of unprofessional looking signs and make unreadable signs readable.** A properly set up digital sign, is no brighter than a traditional electric sign. A cost-per-exposure analysis comparing on-premise signs and television, radio and newspaper ads shows that on-premise signs are a far less expensive way for a small business to advertise its goods and services.



One further recommendation we'd like to add is the review of current sign districts. Based on our day-to-day involvement with our customers, we feel the current sign districts have not caught up with the rezoning of properties. There are numerous instances where businesses opening in a commercial district want to put up a sign but have to apply for a variance as within the sign bylaw the zone is still OS (Open Space). What should be a very straightforward process ends up costing the businesses much more money than necessary.

Should you have any questions or require further information, please do not hesitate to contact us.

Kind regards,

Karin S. Eaton  
Director of Government Relations  
Sign Association of Canada