

TORONTO SIGN BY-LAW PROJECT

SUMMARY OF STAKEHOLDER SUBMISSIONS - THIRD PARTY SIGNS

ITEM	STAKEHOLDER SUBMISSION	STAKEHOLDER RATIONALE
SIGN BY-LAW PROJECT GOAL	The goal of this process is to arrive at a new "harmonized" by-law (OMAC, 02/13/09).	
	Support the creation of a new sign by-law to regulate permanent signs (OMAC, 11/27/088).	<ul style="list-style-type: none"> •The existing sign by-laws are outdated, inconsistent and out of sync with changes in technology. •City/Industry suffers with the patchwork of rules. •Prevent the proliferation of signs and remove enforcement burdens.
SIGN BY-LAW PROJECT OBJECTIVES	Public aesthetics and safety in a manner that is consistent, logical and respectful of the meaningful role out-of-home advertising plays in the economy of Toronto (OMAC, 02/13/09).	
CHARTER RIGHTS AND FREE SPEECH	Theoretically prohibit billboards (Illegalsigns.ca, 12/08).	<ul style="list-style-type: none"> •A theoretical by-law prohibiting new billboards would comply with the Charter given the numerous outlets for third-party advertising in the City. •The street furniture program allows third-party speech in thousands of locations around the City.
DOWN-LIGHTING OF SIGNS	Support the proposal of a prohibition on up-lighting (OMAC, 03/31/09).	<ul style="list-style-type: none"> •Proposal is in conformity with the Bird Friendly Policy.
ILLUMINATION OF SIGNS	Do not use 'lux' as a measurement for the illumination of third-party signs (OMAC, 03/31/09).	<ul style="list-style-type: none"> •Using 'lux' as a measurement for illumination is completely out of the realm of sufficient illumination (OMAC, 03/31/09).
	During hours of operation, signs should be illuminated at a minimum 25,000 lux in ALL districts (OMAC, 03/31/09)	
	Illumination levels of third-party signs should be equal across all districts (OMAC, 03/31/09)	
	Apply illumination regulations consistently - both to first-party and third-party signs (OMAC, 02/13/09).	<ul style="list-style-type: none"> •The industry is willing to conform to prescribed illumination standards.
	The City shall adopt a district by district approach to hours in which digital signage may be illuminated (OMAC, 02/13/09).	
RE-USE OR RECYCLING OF SIGN COPY	Do not regulate the re-use or recycling of sign copy (OMAC, 03/31/09).	<ul style="list-style-type: none"> •Re-use and/or recycling of copy is an imposition and should not be considered in deferring the issuance of a sign permit. •Material specs are handled under OBC. •Current research and opportunity is insufficient to impose the re-use and/or recycling of sign copy. •Municipal by-laws are not a means to enforce and enact environmental goals.
SIGN DISTRICTS	Regulate signs according to city districts, not zoning classifications (OMAC, 12/08/08).	<ul style="list-style-type: none"> •Eliminate regulations by zoning category. This method is a confusing, unnecessarily complex and obsolete as the City evolves. •Provides clear direction towards areas where outdoor advertising is appropriate.
	Maintain existing special sign areas (Illegalsigns.ca, 12/08).	<ul style="list-style-type: none"> •If the restrictions which Toronto City Council identified as the most inappropriate for billboards were lifted, these areas would experience the most new development of billboards. •Restrictive special sign areas should either be maintained or strengthened.
SIGN TYPES	Rotating signs, tri-vision signs, mechanical static copy signs, electronic static copy signs, uniform changeable copy signs (read-o-graph) are all permitted sign types (OMAC, 03/31/09).	
	Sign types should be substrate neutral and not subject to additional permissions or a new sign permit (OMAC, 02/13/09).	<ul style="list-style-type: none"> •The use of digital signage will increase over the next ten years. •Substrate neutral sign types will eliminate the necessity of future revisions to the by-law.
	Eliminate the ambiguity regarding signs not subject to Building Code review (Illegalsigns.ca)	<ul style="list-style-type: none"> •A painted mural sign that has been replaced by a sign type requiring Building Code review shall be deemed to be a substantially altered sign.
	Remove distinction between painted wall murals and fascia signs. Allow for a fascia sign area of 100 m ² and no higher than 8 storeys (Abcon, 12/15/09).	<ul style="list-style-type: none"> •Too many sign variance applications for these type of signs; too many illegal vinyl signs. This will create efficiencies through sign permit review and reduce City staff workloads. •There are not many usable 4 and 5 storey buildings in the City.
		<ul style="list-style-type: none"> •"Trading signage volume for technology" is purely favourable to firms with large extensive inventories. •Firms with smaller but legal inventories would not be able to participate in forward technologies. •Larger firms, including those the city has partnered with, are placed at a competitive advantage (ClearChannel, 03/31/09).
ENERGY USE OF VIDEO SCREENS	LCD and LED video screens consume enormous amounts of power (Illegalsigns.ca, 09/08).	<ul style="list-style-type: none"> •One standard 14'x48' digital billboard consumes 397,485 kWh/year equal to 49 typical billboards, 18 cars and 13.39 homes.
DYNAMIC DIGITAL DISPLAY SIGNS	Direct ignorance of City to consider opportunities for dynamic digital display signs (OMAC, 03/31/09).	<ul style="list-style-type: none"> •All digital signs contribute positively to public place-making. •Dynamic digital display is integral to the media mix. •Dynamic digital display enhances the surrounding architectural context.
	Control locations of video/electronic signage via area-specific restrictions (OMAC, 02/13/09).	<ul style="list-style-type: none"> •The city may have concerns with respect to how video signage is deployed in the public sphere. •There are understandably locations where video signage will not be appropriate.

	The benefits of digital signs (OBN, 12/08/08).	<ul style="list-style-type: none"> •Brightness levels automatically adjust to ambient light. •Saves power. •Reduces visual impact at night. •No paper or printing. •No trucks dispatched to change message display.
	Full motion video signs and static images on electronic display are appropriate in busy commercial and tourist areas (OMAC, 02/13/09).	
DWELL TIME OF DIGITAL STATIC DISPLAY	Five second dwell time for digital static display (OMAC, 03/31/09).	•The proposed dwell time does not reflect the industry's general sales practices.
LEGAL NON-CONFORMING	Changes to non-conforming signs shall be provided by way of sign variance application (OMAC, 02/13/09).	<ul style="list-style-type: none"> •To ensure that old signage based on old permits do not become relics that detract from the public aesthetic. •The goal of the new sign by-law should not be to perpetuate obsolescence in sign displays or features.
	Allow only for "repair and maintenance" of non-conforming sign structures (Illegalsigns.ca, 09/08).	•Consistent with COTA, 2006.
	Use the Burlington Sign By-law (Section 8.5) (CBS, 12/08/08).	•Allow for maintenance and repair but not allow for enlargement or substantial alteration.
	A sign is not legally existing if: 1. The sign is not permitted and the owner of the sign cannot show clear and convincing evidence that the sign legally existed; 2. The sign is located within 400 m of a provincial highway; 3. The sign did not conform to all applicable law when it was built and there is no clear and convincing evidence of variance or exception available on the public record ; 4. The sign required but did not obtain a variance or exception; 5. The sign does not meet the required distance separation; 6. The permitting of the sign was only possible through the removal of another sign, and such sign to be removed did not legally exist or was not removed. (Illegalsigns.ca, 03/30/09)	
SUBSTANTIAL ALTERATION	Does not include a change in the manner by which copy is displayed (OMAC, 03/31/09).	<ul style="list-style-type: none"> •All digital signs contribute positively to public place-making. •Dynamic digital display is integral to the media mix. •Dynamic digital display enhances the surrounding architectural context.
	A sign is deemed to be substantially altered if: 1. The owner of the sign cannot show clear evidence that the sign was either permitted or not substantially altered; 2. The sign has been altered in a manner which may have caused it to not conform to the by-law under which it was originally permitted; 3. The sign face has an area of sign not equal to that of a standard billboard; 4. The area of sign face has increased by over 10%; or the height or width of the sign has increased by over 10%; 5. The sign contains tri-vision where the original structure did not permit tri-vision; 6. The alteration proceeded without a permit; 7. The original structure was removed and replaced; 8. In the case of a wall sign, the sign has been relocated on the wall; 9. In the case of a ground sign, it is not located at the unaltered setback; 10. The sign does not comply with the specifications or conditions of a sign variance granted; 11. Additional sign faces where added; 12. The sign contains third-party copy where first-party copy was originally permitted; 13. If, at any point in time, the sign ceased to exist. (Illeg	
SPATIAL SEPARATION OF SIGNS	Verified by a OLS after issuance of sign permit (OMAC, 03/31/09).	
	Large third-party signs with signs area of between 70 m ² and 100 m ² shall be separated by a minimum distance of 150 m (OMAC, 03/31/09).	
	75 m in a Mixed Use sign district, on the same side of the street (OMAC, 03/31/09).	
	60 m in an Employment sign district, on the same side of the street (OMAC, 03/31/09).	
	75 m in a Utility Corridors sign district, on the same side of the street (OMAC, 03/31/09).	
	100 m in a Neighbourhood sign district, on the same side of the street (OMAC, 03/31/09).	
	100 m in an Apartment Neighbourhood sign district, on the same side of the street (OMAC, 03/31/09).	
	Third-party signs shall be buffered by 40 m from an Open Space sign district and 20 m from a residential use (OMAC, 03/31/09).	
	Third-party signs should be buffered by 60 m from a residential or park zone (Illegalsigns.ca, 12/08).	
	Billboards should only be permitted on major arterial roads (Illegalsigns.ca, 12/08).	
	In practice, the proposed geographic restrictions, would be closing the signage industry (ClearChannel, 03/31/09).	•The proposed geographic restrictions would eliminate most existing signage structures and would likely not allow for any new developments.
	Maintain radial distancing provisions between third-party signs with the exception of rail corridors where it is permitted to install signs on opposite sides of an intersecting street (Outdoor Opportunities Inc.).	<ul style="list-style-type: none"> •Historically, sign by-laws allowed for this. •Rail corridors in Toronto are seen as an appropriate use for third party signs. •The sign variance process is lengthily and costly. •Third-party signs in rail corridors help mitigate ground signs lost to development.

	Separate third-party signs facing a residential zone by 40 m and backing on a residential zone by 20 m and not on the opposite side of the street of a residential zone (CN, 02/20/09).	
	A linear separation distance of 60 m between third-party signs is an acceptable measurement (OMAC, 02/13/09).	<ul style="list-style-type: none"> •This ensures one third-party sign per block. •Separation requirements are imposed to eliminate proliferation. •Linear separation ensures that the average person walking down the street is not bombarded with signage and that the person is incapable of seeing the sign erected in the opposite direction. •Radial separation is restricted in places where such signage could not be visible by the same person.
	City-wide, a radial separation of 230 m between third-party signs is recommended (Illegalsigns.ca, 12/08).	•This is consistent with what is permitted in the Former North York Industrial zones.
	Separation distances between signs should be calculated as a radius (Illegalsigns.ca, 12/08).	<ul style="list-style-type: none"> •This is an important means to regulate the overall number of signs in the City and the visual impact of cascading sign images. •Avoid using "visibility triangles" to control separation of signs. Additional permissions above the current by-laws would occur.
	Reduce separation distance requirements in the urban core (bounded by Bathurst, Bloor, Parliament and Lake Shore) and specifically in the Entertainment District, the Financial District, and the Theatre District (OMAC, 02/13/09).	•By relaxing separation distances in this prime advertising area, we can accept additional restrictions (through separation requirements) in other areas of the City.
	Separation distance requirements shall only apply to "lawfully erected signs" (OMAC, 02/13/09).	•This is not a valid interpretation of the municipal by-law and it punishes a permit applicant for the actions of rogue operators.
	Increase sign size and decrease separation distances in the urban core of the City (CBS, 12/08/08).	•In recognition of the different character of the area.
DEFINITION OF GRADE	The level of the sidewalk abutting the property or the level of the ground immediately below the sign, whichever is least restrictive (OMAC, 03/31/09).	
DEFINITION OF FULL MOTION	Electronic image that displays movement within a two second time-frame (OMAC, 02/13/09).	
DEFINITION OF SEPARATION DISTANCE	The linear distance between lawful signs whose distance is measured by utilizing the roadway to travel from one sign to another (OMAC, 03/31/09).	
NOTICE OF VIOLATION	Indicate, with reasonable specificity, the nature of non-compliance (OMAC, 03/31/09).	
	The Notice of Violation shall require the person to make the sign comply within a reasonable amount of time OMAC, 03/31/09).	
SPECIAL FINES	Impose special fines on illegal billboards through Section 370 of COTA, 2006 (Illegalsigns.ca, 12/08).	•To prove the economic value of a billboard in court and to set fines to offset the economic value of breaking the law.
SIGNS ON HIGHWAYS	Prohibit billboards within 400 m of provincial highways (illegalsign.ca, 12/08).	<ul style="list-style-type: none"> •Adopt the regulations currently applied by the Province. •The Province will be downloading the responsibility of signage along provincial highways to the municipalities. •Ensure the same thing that happened when the Province downloaded the QEW to the City doesn't.
SIGN DISTRICT BOUNDARIES	Only the sign by-law provisions of the use district of the building or structure to which the sign is attached shall apply to the sign (OMAC, 03/31/09).	
NUMBER OF SIGNS	One or more signs are permitted on each lot (OMAC, 03/31/09).	
	Maximum of one billboard per lot in Industrial zones (Illegalsigns.ca, 12/08).	
HEIGHT OF SIGNS	Third-party signs shall not exceed the height limit set forth in the applicable zoning by-law (OMAC, 03/31/09).	
	In the urban core and along major corridors, wall signs shall have a maximum height of 22.5 m (OMAC, 02/13/09).	
AREA OF SIGN	18.6 m ² is the current standard for billboard advertising signs across the country. Maintain a common size for outdoor billboards coast-to-coast (ICA, 02/19/09).	<ul style="list-style-type: none"> •Reducing the size would necessitate incremental cost for design and construction. •Reducing the size would risk a reduction in communication value and effectiveness.
	The minimum size for conventional billboards be 18.6 m ² (ACA, 02/10/09).	<ul style="list-style-type: none"> •Outdoor advertisers buy outdoor posters in standard sizes. •Any size less than this will cause advertisers to incur additional costs to create their campaigns, diminish the communication value, compromise design guidelines that ensure message visibility and comprehension.
	A billboard in an Industrial zone should be no larger than the maximum size allowed for first-party signs (Illegalsigns.ca, 12/08).	
	In Industrial zones, a maximum area of 200 sq.ft. for wall signs; not facing a street (illegalsigns.ca, 12/08).	
	The standard copy size for most forms of outdoor advertising is 10'x20' (OMAC, 02/13/09).	<ul style="list-style-type: none"> •Any reduction in the standard size would significantly impact the effectiveness of outdoor advertising. •Arbitrary size restrictions will reduce interest in outdoor advertising as a potential medium for marketers and ad agencies.
	In the urban core and along major corridors, a maximum size for wall signs should be 100 m ² (OMAC, 02/13/09).	<ul style="list-style-type: none"> •This is a current format of commercial messaging. •When applying first-party wall sign principles to third-party wall signs (i.e. % of building face), accurate measurements, applications and enforcement of such restrictions would be cumbersome and susceptible to interpretation.
	20 m ² is the industry's smallest standard size (CBS, 12/08/08).	
SETBACK FROM LOT LINE	Sign is set back at least 1.5 metres from a street line (OMAC, 03/31/09).	

	Strengthen encroachment provisions in the new by-law to address encroachment requirements to change sign copy (Illegalsigns.ca).	•Require a 1 m encroachment provision with the abutting neighbour for those signs located at the property boundary, for sign copy change.
SIGN VARIANCE APPLICATION	Preliminary Project Review is an optional submission requirement (OMAC, 03/31/09).	
	A community notification process, similar to the CofA, should be sought (Illegalsigns.ca, 12/08).	•Input from both the public and the proponent should be sought when staff write variance applications.
	Variance applications should be posted to the City's website (Illegalsigns.ca, 12/08).	•Input from both the public and the proponent should be sought when staff write variance applications.
	All third-party sign variance applications should be timed items (Illegalsigns.ca, 12/08).	
	Larger wall signs may be permitted, subject to a site-specific variance (OMAC 02/13/09).	•In specific districts and subject to a new variance process.
	Allow full motion video signage via sign variance applications where full motion video signage is not permitted (OMAC, 02/13/09).	
	Variances for signs along highways and video signs should flow through P&GM (Illegalsigns.ca, 12/08).	•The local Ward Councillor has less sway. •These signs in these locations are City-wide issues as opposed to Ward issues.
	Provide a clear process for seeking variances from the by-law restrictions. The process needs to be fair, open, transparent, accessible and capable of being exercised in an informed and administrative manner (OMAC, 02/13/09).	•The industry can accept a higher level of regulation with a fair and objective method for seeking variances. •If OMAC's suggestions are applied the City's regulation of signs will be properly respectful of the sign variance applicant's right to free expression as enshrined in the <i>Charter of Rights and Freedoms</i> .
	Include a right to appeal (OMAC, 02/13/09).	
	Include "tests" to assess individual variance applications (OMAC, 02/13/09).	•The variance process often gets hijacked by interest groups caring more about injuring the out-of-home advertisers than the impact of the proposed sign.
	Provide a posted notice of a variance application (OMAC, 02/13/09).	•Posted notices alert the public and are more appropriate than circulated notices. Those that see the notice are most likely to be impacted.
	Provide a notice of a variance application to the local Ward Councillor (OMAC, 02/13/09).	•Allows Ward Councillor to alert constituents through Councillor's website or newsletter.
	The decision-making process for sign variances should follow a series of tests (OMAC, 02/13/09).	•Create a process which mirrors a Minor Variance application under the Planning Act. •The nature of the tests could take into account O.P. policies, the area context, the contribution of the sign to the public aesthetic, safety issues, and determining whether the sign variance is minor.
	Make a Standing Committee of City Council the appellant body for sign variance applications (OMAC, 02/13/09).	•To provide sign variance applicants with potential relief where the process has been flawed in some way.
	Remove politics from the sign variance decision-making process (OMAC, 11/27/08).	•Create a neutral committee of Council appointed members. •The City will retain control over the proliferation of signs without unjustifiably restricting opportunities to erect new signs. •A clear non-political process will enhance perceptions of fairness.
	Establish a citizen's Sign Committee to hear sign variance applications (Pattison, 12/08/08).	
	Variance applications which are not minor should proceed by by-law amendment (Illegalsigns.ca).	•To prevent avoidance of potential community notification processes.
ROOF SIGNS	Third-party roof signs, containing a sign area of 67 m ² , a height of 30 m, with various types of changeable message display and located on listed heritage properties are permitted in all Regeneration Area and Employment Area sign districts (OMAC, 03/31/09).	
	Third-party roof signs, containing a sign area of 33 m ² , a height of 7.5 metres, with various types of changeable message display and located on listed heritage properties are permitted in all Mixed Use Area sign districts (OMAC, 03/31/09).	
	Roof signs should be prohibited (Illegalsigns.ca, 09/08).	•All across Ontario, cities are realizing that roof signs create the worst aesthetic blight.
	Provide as-of-right opportunities for roof signs (OMAC, 02/13/09).	•In the current by-laws there are overly-restrictive regulations on ground and wall signs forcing the industry to focus on the installation of roof signs. •Prohibiting roof signs forces the industry to rely on old permits. •Prohibiting roof signs forces the industry to pressure for new ground, wall and other types of signs. •Roof sign concerns are addressed through appropriate spacing and sensitive design.
	Concern over a restriction on roof signs (CBS, 12/08/08).	•The City is in most parts pretty much built up and roofs are the only places to install signs. •To ban or prohibit roof signs would make it very difficult to develop new signage.
NEIGHBOURHOOD SIGN DISTRICTS (RESIDENTIAL)	Third-party ground and wall signs, containing a sign area of 20 m ² , a height of 7.5 m (ground) and 15 m (wall), with various types of changeable message display are permitted in all Neighbourhood sign districts (OMAC, 03/31/09).	
	Allow signs in residential areas where the sign is invisible to the residential area (OMAC, 02/13/09).	
APARTMENT NEIGHBOURHOOD SIGN DISTRICTS (RESIDENTIAL)	Third-party wall signs, containing a sign area of 25 m ² , a height of 15 m, with various types of changeable message display are permitted in all Apartment Neighbourhood sign districts (OMAC, 03/31/09).	
MIXED USE AREAS	Third-party wall signs, containing a sign area of 100 m ² , a height of 20 m, with various types of changeable message display and located on listed heritage properties are permitted in all Mixed Use sign districts (OMAC 03/31/09).	

	Third-party ground signs, containing a sign area of 33 m ² , a height of 9 m, with various types of changeable message display and located on listed heritage properties are permitted in all Mixed Use sign districts (OMAC 03/31/09).	
	Prohibit roof and ground signs in commercial zones (Illegalsigns.ca, 12/08).	•To allow these sign types in commercial zones where they are currently prohibited would lead to new as-of-right permissions.
	In commercial zones, billboards should be located only on major arterial streets, on a wall not facing a street, be restricted in size to 150 sq.ft. and a maximum of one per lot (Illegalsigns.ca, 12/08).	•Area restrictions and location might reduce the economic benefit of placing billboards in areas where they are currently prohibited.
RAILWAY AND HYDRO DISTRICTS	200 sq.ft. billboards only at grade separated railway crossings at a major arterial road (Illegalsigns.ca, 12/08).	
	Prohibit billboards along railway corridors that do not cross streets but run parallel to streets (Illegalsigns.ca, 12/08).	
	Explicitly permit third-party signs in Rail zones (CN, 02/20/09).	•Most municipalities have recognized railway properties as an appropriate land use for third-party signs. •Most former sign by-laws either implicitly or explicitly allowed them.
ADVERTISING ON RAILWAY BRIDGES	Permit an advertising component on rail bridges where it can be demonstrated an aesthetic improvement to the appearance of the bridge is warranted (Outdoor Opportunities Inc.).	•Rail bridges rust out and become unsightly. •Railways are reluctant to spend enormous sums to re-paint the structures and there is no economic benefit in doing so. •Painting bridges does not prolong the life of the bridge.
SIGN PERMIT RENEWAL	Do not include "sunset clause" provisions in the new sign by-law (OMAC, 02/13/09).	•Such a provision is neither appropriate nor in accordance with the City's authority to regulate advertising devices under COTA, 2006. •Third-party signs require a substantial investment on both the part of the landlord and the out-of-home advertiser. •A sign permit provides for the continuous use of a location to erect lawful signage. That permission remains until such time as it is materially altered or until changes to the subject property make the erection of a sign incompatible or without value.
	Billboards should be permitted by renewable permits for a period of five years (Illegalsigns.ca, 12/08).	•The permit is renewed if the sign still conforms to the regulations and is permitted in the zone where it is located. •Like the City of Ottawa.
	Concern over subjecting new third-party signs to a "sunset clause" (CBS, 12/08/08).	•Signs are tremendously expensive to build. •Sign permits are expensive to obtain. •The natural course of development provides enough "sunsetting".
	The Sunset Clause does not consider capital costs, especially ongoing capital costs (ClearChannel, 03/31/09).	•No vendor will extend capital to introduce new technology if the City intends to have the sign removed at the end of the sunset period anyway.
OTHER	Provide the industry with a draft of the new sign by-law at least 30 days prior to going before Committee or Council (OMAC, 02/13/09).	
SIGN UNIT	Support a dedicated sign unit (OBN, 12/08/08).	•Sign by-laws can be complicated - a dedicated unit would compliment the expertise of the Toronto Building; streamline decision-making; increase efficiencies for all parties.
	Create a dedicated City Sign Division (OMAC, 11/27/08).	•To overcome the complexity of sign regulations and the impact of enforcement decisions. •If sign permit fees increase or a new tax is imposed, the industry expects greater sign expertise on the part of City officials. •Results in a stream-lined and efficient sign application process.
LICENSING OF SIGN COMPANIES	License Outdoor Advertising Operators (Illegalsigns.ca, 12/08).	•Compel all outdoor advertisers to provide evidence that their existing sign inventory is legal through licensing. •Electronically report the investigation of each sign and its permit on Toronto.ca.
IDENTIFICATION PLATE	All signs to display an identification plate (Astral, 12/08/08).	•To determine which signs are fully compliant.
	Require all existing billboards to obtain permit plates (Illegalsigns.ca, 12/08).	
SIGN PERMITS	Separate sign permits from building permits (OMAC, 11/27/08).	•Sign structure under OBC; sign display, in the public space, under new sign by-law. •Simplify inspection and enforcement and a more clear and efficient process. •Leads to greater clarity on issues such as legal non-conforming and revocation of permits.
	Separate sign permits from building permits (Titan, 12/08/08).	•The combining of these permits creates confusion, inefficiency and difficulty for issuance and enforcement. •The distinct sign permit is issued under the authority of COTA, 2006 and regulates how a sign is integrated into the public realm specifically, size, location, height and attributes. •To ensure that a sign integrated into the public realm is approved in accordance with the sign by-law.
INDUSTRY SELF REGULATION	Allow the industry to regulate itself (ACA, 12/08/08).	•In a highly competitive industry, self-regulation is more effective and more efficient than government intervention. •Advertisers already endorse industry codes and guidelines. •Advertisers have a right to freedom of speech. •The City's history of regulating the sign industry is characterized by inefficiency and ineffectiveness. •Advertisers make an important contribution to the economy.
NEW AS-OF-RIGHT PERMISSIONS	Proceed with an eye towards minimizing the creation of new as-of-right permissions for billboards (Illegalsigns.ca, 12/08/08).	•There would otherwise be a situation not intended by Toronto City Council. •Billboards in the City are completely "built out".
VINYL SIGN COPY	Prohibit vinyl on all sign face copy (Illegalsigns.ca, 12/09).	•Biodegradable vinyl is a fraudulent product. •Due to the number of times sign copy is changed, vinyl should be banned.