

## APPENDIX D – ANALYSIS OF STAKEHOLDER SUBMISSIONS

### Response to motion filed by Planning and Growth Management Committee at its meeting of April 14, 2009

#### TORONTO SIGN BY-LAW PROJECT ANALYSIS OF STAKEHOLDER SUBMISSIONS - THIRD PARTY SIGNS DATA COLLECTED UP TO APRIL 2009

ITEM	STAKEHOLDER SUBMISSION	STAKEHOLDER RATIONALE	CITY COMMENT	STAKEHOLDER MEETING COMMENTS (April 27, 2009)	CITY RESPONSE
<b>SIGN BY-LAW PROJECT GOAL</b>	The goal of this process is to arrive at a new "harmonized" by-law (OMAC, 02/13/09).		<ul style="list-style-type: none"> <li>The goal is to create a new by-law that is current and consistent across the amalgamated city.</li> <li>The exercise will result in a by-law reflecting the City's goals and reflecting the specific objectives of the new sign by-law.</li> </ul>		
	Support the creation of a new sign by-law to regulate permanent signs (OMAC, 11/27/08).	<ul style="list-style-type: none"> <li>The existing sign by-laws are outdated, inconsistent and out of sync with changes in technology.</li> <li>City/Industry suffers with the patchwork of rules.</li> <li>Prevent the proliferation of signs and remove enforcement burdens.</li> </ul>			
<b>SIGN BY-LAW PROJECT OBJECTIVES</b>	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).		<ul style="list-style-type: none"> <li>The City is attempting to achieve a balance among all interests.</li> </ul>		
<b>CHARTER RIGHTS AND FREE SPEECH</b>	Theoretically prohibit billboards (Illegalsigns.ca, 12/08).	<ul style="list-style-type: none"> <li>A theoretical by-law prohibiting new billboards would comply with the Charter given the numerous outlets for third-party advertising in the City.</li> <li>The street furniture program allows third-party speech in thousands of locations around the City.</li> </ul>	<ul style="list-style-type: none"> <li>The new sign by-law will regulate billboards. A prohibition on third-party advertising is not contemplated.</li> </ul>	<ul style="list-style-type: none"> <li>Based on the newly proposed performance standards, it would be impossible to erect a new billboard in Toronto.</li> </ul>	<ul style="list-style-type: none"> <li>In the former Etobicoke and North York, third-party wall signs will be permitted.</li> <li>The "cap" on third-party signs will be removed in the former York and the former Scarborough.</li> <li>Third-party ground signs will be permitted in hydro and rail corridors across all the former municipalities.</li> <li>Separation distances in Employment Areas, in the former North York and the former Etobicoke will be greatly reduced.</li> <li>In the former East York, third-party signs on roads other than arterial roads.</li> </ul>
<b>DOWN-LIGHTING OF SIGNS</b>	Support the proposal of a prohibition on up-lighting (OMAC, 03/31/09).	<ul style="list-style-type: none"> <li>Proposal is in conformity with the Bird Friendly Policy.</li> </ul>	<ul style="list-style-type: none"> <li>Proposed direct application of City of Toronto Bird-Friendly Guidelines.</li> </ul>		
<b>ILLUMINATION OF SIGNS</b>	Do not use 'lux' as a measurement for the illumination of third-party signs (OMAC, 03/31/09).	<ul style="list-style-type: none"> <li>Using 'lux' as a measurement for illumination is completely out of the realm of sufficient illumination (OMAC, 03/31/09).</li> </ul>	<ul style="list-style-type: none"> <li>'Lux' is an internationally used standard measure of luminance and luminous emittance.</li> </ul>	<ul style="list-style-type: none"> <li>The Stakeholder's Meeting clarified that this proposed measurement was above ambient light levels.</li> </ul>	
	During hours of operation, signs should be illuminated at a minimum 25,000 lux in ALL districts (OMAC, 03/31/09)		<ul style="list-style-type: none"> <li>The proposed standard is based on the National Green Building Standard.</li> <li>6.5 lux at the site boundary or at 10 metres from sign face is recommended illumination in Mixed Use and Regeneration Area districts.</li> </ul>	<ul style="list-style-type: none"> <li>The Stakeholder's Meeting clarified that this proposed measurement was above ambient light levels.</li> </ul>	
	Illumination levels of third-party signs should be equal across all districts (OMAC, 03/31/09)		<ul style="list-style-type: none"> <li>There are public concerns identified through the consultation which spoke to illumination.</li> <li>Naturalized areas (including parks, open spaces and utility corridors) require natural lighting for the maintenance and vitality of existing flora and fauna.</li> <li>Neighbourhood and Apartment Neighbourhood Sign Districts contain predominately residential uses - high illumination levels of third-party signage has an impact on these areas.</li> </ul>		
	Apply illumination regulations consistently - both to first-party and third-party signs (OMAC, 02/13/09).	<ul style="list-style-type: none"> <li>The industry is willing to conform to prescribed illumination standards.</li> </ul>	<ul style="list-style-type: none"> <li>Regulations for illumination are intended to apply to all signs.</li> </ul>		
	The City shall adopt a district by district approach to hours in which digital signage may be illuminated (OMAC, 02/13/09).		<ul style="list-style-type: none"> <li>As some proposed sign districts contain more sensitive land uses, the proposed regulations controlling illumination levels and the operating hours of signs is being considered for application on a district by district basis.</li> </ul>		

<p><b>RE-USE OR RECYCLING OF SIGN COPY</b></p>	<p>Do not regulate the re-use or recycling of sign copy (OMAC, 03/31/09).</p>	<ul style="list-style-type: none"> <li>•Re-use and/or recycling of copy is an imposition and should not be considered in deferring the issuance of a sign permit.</li> <li>•Material specs are handled under OBC.</li> <li>•Current research and opportunity is insufficient to impose the re-use and/or recycling of sign copy.</li> <li>•Municipal by-laws are not a means to enforce and enact environmental goals.</li> </ul>	<ul style="list-style-type: none"> <li>•Proposed regulations in the new sign by-law have been derived from City policy objectives including environmental goals and the promotion of energy efficiency.</li> <li>•Municipal by-laws are a means to enforce and enact environmental goals.</li> </ul>		<ul style="list-style-type: none"> <li>•The proposed sign by-law does not intend to regulate the re-use or recycling of sign copy.</li> </ul>
<p><b>SIGN DISTRICTS</b></p>	<p>Regulate signs according to city districts, not zoning classifications (OMAC, 12/08/08).</p>	<ul style="list-style-type: none"> <li>•Eliminate regulations by zoning category. This method is a confusing, unnecessarily complex and obsolete as the City evolves.</li> <li>•Provides clear direction towards areas where outdoor advertising is appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>•The sign district proposal is intended to flow from Toronto's latest city-building principles and Official Plan policies.</li> <li>•Support Clean and Beautiful City objectives, a defining element of Toronto's evolving identity.</li> </ul>	<ul style="list-style-type: none"> <li>•Would third-party signage at intersections be precluded from specific sign districts?</li> </ul>	<ul style="list-style-type: none"> <li>•It is necessary to distinguish between <i>Sign Districts</i> and <i>Special Sign Districts</i>. <i>Sign Districts</i> are deemed areas in the city where certain sign types are permitted, based on the use, context and typology of the area, performance standards for each sign type would vary with each district. <i>Special Sign Districts</i> would include a specifically defined area of the City which contains special features which should be preserved or enhanced with the assistance of specific sign regulations.</li> </ul>
	<p>Maintain existing special sign areas (Illegalsigns.ca, 12/08).</p>	<ul style="list-style-type: none"> <li>•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.</li> <li>•Restrictive special sign areas should either be maintained or strengthened.</li> </ul>	<ul style="list-style-type: none"> <li>•All existing special sign areas are being assessed for their continuation.</li> </ul>		
<p><b>SIGN TYPES</b></p>	<p>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).</p>		<ul style="list-style-type: none"> <li>•Implications to the public realm where copy is displayed using technological methods.</li> <li>•Intent is to distinguish between static display and animated display.</li> <li>•Concern with vehicle and pedestrian safety as well as visual impact.</li> </ul>		
	<p>Sign types should be substrate neutral and not subject to additional permissions or a new sign permit (OMAC, 02/13/09).</p>	<ul style="list-style-type: none"> <li>•The use of digital signage will increase over the next ten years.</li> <li>•Substrate neutral sign types will eliminate the necessity of future revisions to the by-law.</li> </ul>	<ul style="list-style-type: none"> <li>•Generally agree, except with respect to the "animated" images where provisions would be tailored to copy type.</li> </ul>		
	<p>Eliminate the ambiguity regarding signs not subject to Building Code review (Illegalsigns.ca)</p>	<ul style="list-style-type: none"> <li>•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.</li> </ul>	<ul style="list-style-type: none"> <li>•Proposal is to remove the distinction between painted mural and fascia sign.</li> </ul>		
	<p>Remove distinction between painted wall murals and fascia signs. Allow for a fascia sign area of 100 m<sup>2</sup> and no higher than 8 storeys (Abcon, 12/15/09).</p>	<ul style="list-style-type: none"> <li>•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.</li> <li>•There are not many usable 4 and 5 storey buildings in the City.</li> </ul>	<ul style="list-style-type: none"> <li>•Proposed to regulate third-party sign size to a maximum area of 20 m<sup>2</sup> irrespective of display material or substrate.</li> <li>•Third-party wall signs proposed to be permitted in Mixed Use Sign Districts to a maximum height of 15 m, not facing a street, 150 m from another third-party sign, 75 m from an intersection and 100 m from a neighbourhood sign district.</li> </ul>		<ul style="list-style-type: none"> <li>•Proposed to limit third-party signs to a maximum area of 20 m<sup>2</sup> irrespective of display material or substrate.</li> <li>•Third-party wall signs proposed to be permitted in Commercial and Commercial Residential Sign Districts to a maximum height of 15 m, not facing a street, 100 m from another third-party sign, 30 m from an intersection and 30 m from a Residential and Open Space Sign District.</li> </ul>
		<ul style="list-style-type: none"> <li>•"Trading signage volume for technology" is purely favourable to firms with large extensive inventories.</li> <li>•Firms with smaller but legal inventories would not be able to participate in forward technologies.</li> <li>•Larger firms, including those the city has partnered with, are placed at a competitive advantage (ClearChannel, 03/31/09).</li> </ul>			<ul style="list-style-type: none"> <li>•The original "host-and-donor" proposal has been abandoned.</li> </ul>
<p><b>ENERGY USE OF VIDEO SCREENS</b></p>	<p>LCD and LED video screens consume enormous amounts of power (Illegalsigns.ca, 09/08).</p>	<ul style="list-style-type: none"> <li>•One standard 14"x48" digital billboard consumes 397,485 kWh/year equal to 49 typical billboards, 18 cars and 13.39 homes.</li> </ul>	<ul style="list-style-type: none"> <li>•Environmental regulations, including requirements for on site energy production and purchase of renewable energy for new signs, are being considered.</li> </ul>	<ul style="list-style-type: none"> <li>•The power consumption of an LED sign is 1/4 that of an incandescent sign.</li> <li>•The information presented by the Stakeholder requires to be verified.</li> <li>•Hydro consumption on a video board is approximately 1/8 the cost of hydro consumption on a conventional billboard.</li> </ul>	
<p><b>DYNAMIC DIGITAL DISPLAY SIGNS</b></p>	<p>Direct ignorance of City to consider opportunities for dynamic digital display signs (OMAC, 03/31/09).</p>	<ul style="list-style-type: none"> <li>•All digital signs contribute positively to public place-making.</li> <li>•Dynamic digital display is integral to the media mix.</li> <li>•Dynamic digital display enhances the surrounding architectural context.</li> </ul>	<ul style="list-style-type: none"> <li>•Digital display signs are being recognized in the draft by-law and appropriate locations are being considered.</li> <li>•The public is most concerned about digital and video display of all sign types.</li> </ul>	<ul style="list-style-type: none"> <li>•All typical billboards should be allowed to, as-of-right, change to digital signs in order to address the current natural attrition of third party signs.</li> </ul>	<ul style="list-style-type: none"> <li>•New permissions to convert static billboards to tri-vision (mechanical copy).</li> <li>•New permissions to recognize new locations for digital signs.</li> </ul>
	<p>Control locations of video/electronic signage via area-specific restrictions (OMAC, 02/13/09).</p>	<ul style="list-style-type: none"> <li>•The city may have concerns with respect to how video signage is deployed in the public sphere.</li> <li>•There are understandably locations where video signage will not be appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>•Digital display signs to be recognized in the draft by-law and appropriate locations being considered.</li> <li>•Public has expressed concern about digital and video display on all sign types.</li> </ul>	<ul style="list-style-type: none"> <li>•Digital and LED signs should not be allowed outside of Special Sign Districts.</li> </ul>	<ul style="list-style-type: none"> <li>•Digital signs proposed to be permitted in certain Special Sign Districts.</li> </ul>
	<p>The benefits of digital signs (OBN, 12/08/08).</p>	<ul style="list-style-type: none"> <li>•Brightness levels automatically adjust to ambient light.</li> <li>•Saves power.</li> <li>•Reduces visual impact at night.</li> <li>•No paper or printing.</li> <li>•No trucks dispatched to change message display.</li> </ul>	<ul style="list-style-type: none"> <li>•Digital signs depend on both power and illumination. Not clear how they reduce visual impact and save power.</li> </ul>		

	Full motion video signs and static images on electronic display are appropriate in busy commercial and tourist areas (OMAC, 02/13/09).		<ul style="list-style-type: none"> <li>Digital display signs to be recognized in the draft by-law and appropriate locations being considered.</li> <li>Public has expressed concern about digital and video display on all sign types.</li> </ul>	<ul style="list-style-type: none"> <li>Clarification of what is a mechanical sign.</li> </ul>	<ul style="list-style-type: none"> <li>A mechanical sign is a sign that changes sign copy mechanically, be it tri-vision or scrolling change of copy.</li> </ul>
<b>DWELL TIME OF DIGITAL STATIC DISPLAY</b>	Five second dwell time for digital static display (OMAC, 03/31/09).	<ul style="list-style-type: none"> <li>The proposed dwell time does not reflect the industry's general sales practices.</li> </ul>	<ul style="list-style-type: none"> <li>Current MTO regulations require dwell time of 3 minutes.</li> <li>1440 minutes in one day; 1440 advertising display opportunities.</li> <li>Intent is to distinguish between static display and animated display.</li> <li>Concern of vehicle and pedestrian safety and visual impact.</li> </ul>	<ul style="list-style-type: none"> <li>A dwell time of between 5 seconds and 10 seconds be considered.</li> <li>Not only should the dwell time be regulated but the amount of time required to change the copy.</li> </ul>	<ul style="list-style-type: none"> <li>For electronic static copy, a dwell time of 10 seconds and a transition time of 1 second is proposed.</li> </ul>
<b>LEGAL NON-CONFORMING</b>	Changes to non-conforming signs shall be provided by way of sign variance application (OMAC, 02/13/09).	<ul style="list-style-type: none"> <li>To ensure that old signage based on old permits do not become relics that detract from the public aesthetic.</li> <li>The goal of the new sign by-law should not be to perpetuate obsolescence in sign displays or features.</li> </ul>	<ul style="list-style-type: none"> <li>Changes to legally existing non-conforming signs shall be provided by way of either permit, variance or by-law amendment, as required.</li> </ul>		
	Allow only for "repair and maintenance" of non-conforming sign structures (Illegalsigns.ca, 09/08).	<ul style="list-style-type: none"> <li>Consistent with COTA, 2006.</li> </ul>	<ul style="list-style-type: none"> <li>Changes to legally existing non-conforming signs shall be provided by way of either permit, variance or by-law amendment, as required.</li> </ul>		
	Use the Burlington Sign By-law (section 8.5) (CBS, 12/08/08).	<ul style="list-style-type: none"> <li>Allow for maintenance and repair but not allow for enlargement or substantial alteration.</li> </ul>	<ul style="list-style-type: none"> <li>Sign by-laws from various jurisdictions were considered during the by-law drafting exercise.</li> </ul>		
	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)		<ul style="list-style-type: none"> <li>All appropriate criteria will be reviewed.</li> </ul>		
<b>SUBSTANTIAL ALTERATION</b>	Does not include a change in the manner by which copy is displayed (OMAC, 03/31/09).	<ul style="list-style-type: none"> <li>All digital signs contribute positively to public place-making.</li> <li>Dynamic digital display is integral to the media mix.</li> <li>Dynamic digital display enhances the surrounding architectural context.</li> </ul>	<ul style="list-style-type: none"> <li>Changes to the display technology and power requirements represents a change that warrants City review.</li> </ul>		
	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; 12. If, at any point in time, the sign ceased to		<ul style="list-style-type: none"> <li>All appropriate criteria will be reviewed.</li> </ul>		
<b>SPATIAL SEPARATION OF SIGNS</b>	Verified by a OLS after issuance of sign permit (OMAC, 03/31/09).		<ul style="list-style-type: none"> <li>Plans Examiner required to verify location of other signs prior to sign permit issuance.</li> </ul>	<ul style="list-style-type: none"> <li>Survey requirements for the erection of new signs cost the proponent somewhere between \$900.00 - \$1500.00. The City should allow a proponent to verify the proximity to another third-party sign after the permit has been issued.</li> <li>It should be the responsibility of the City to determine if the location of the sign is in adherence to the regulated separation requirements.</li> </ul>	<ul style="list-style-type: none"> <li>If verification of proximity to another third-party sign is made after permit issuance, the proponent may not only lose the cost incurred to perform the verification exercise but if the sign was not in compliance with the regulations, the cost to install the sign structure would also be lost.</li> <li>Often times there is insufficient information provided on the sign permit application.</li> <li>The onus lies with the applicant to satisfy regulations. Furthermore the permit would be revoked if it was deemed to be non-compliant..</li> </ul>
	Large third-party signs with signs area of between 70 m <sup>2</sup> and 100 m <sup>2</sup> shall be separated by a minimum distance of 150 m (OMAC, 03/31/09)		<ul style="list-style-type: none"> <li>Proposed that all third-party signs be separated by a radial distance of 150 m.</li> </ul>		<ul style="list-style-type: none"> <li>Proposed that all third-party signs be separated by a radial distance of 100 m.</li> </ul>

	75 m in a Mixed Use Sign District, on the same side of the street (OMAC, 03/31/09).		*Proposed that all third-party signs be separated by a radial distance of 150 m.		*Proposed that all third-party signs be separated by a radial distance of 100 m.
	60 m in an Employment Sign District, on the same side of the street (OMAC, 03/31/09)		*Proposed that all third-party signs be separated by a radial distance of 150 m.		*Proposed that all third-party signs be separated by a radial distance of 100 m.
	75 m in a Utility Corridors Sign District, on the same side of the street (OMAC, 03/31/09).		*Proposed that all third-party signs be separated by a radial distance of 150 m.		*Proposed that all third-party signs be separated by a radial distance of 100 m.
	100 m in a Neighbourhood Sign District, on the same side of the street (OMAC, 03/31/09).		*Third-party signs are currently not permitted in these sign districts. These districts are primarily residential in nature.		*Proposed that third-party signs only be permitted in Commercial, Commercial Residential, Employment and Utility Sign Districts.
	100 m in an Apartment Neighbourhood Sign District, on the same side of the street (OMAC, 03/31/09).		*Third-party signs are currently not permitted in these sign districts. These districts are primarily residential in nature.		*Proposed that third-party signs only be permitted in Commercial, Commercial Residential, Employment and Utility Sign Districts.
	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).		*City of Toronto Official Plan policies guide the preservation and protection of stable residential neighbourhoods. *Matters related to privacy and enjoyment of these areas are necessary to enhance quality of life.		*Proposed 100 m separation between third-party signs; 30 m from residential; 30 m from open space and parks.
	Third-party signs should be buffered by 60 m from a residential or park zone (Illegalsigns.ca, 12/08).		*Proposed 100 m radius from Park, Open Space and Residential Sign Districts.		*Proposed 100 m separation between third-party signs; 30 m from residential; 30 m from open space and parks.
	Billboards should only be permitted on major arterial roads (Illegalsigns.ca, 12/08).		*Performance criteria as described above.		*Proposed 30 m from the intersection of a Major Street with any other street.
	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.			*The regulations in the proposed by-law describe a marked change in the original proposal.
	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.).	*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 lengthy and costly. *Third-party signs in rail corridors help mitigate ground signs lost to development.	*Criteria in rail corridors and other Sign Districts needs to be consistent with Official Plan and other policies.		*Third-party sign distancing provisions will continue to be applied radially.
	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).		*Proposed 100 m radius from Park, Open Space and Residential Sign Districts.		*Proposed 30 m from residential; 30 m from open space and parks for all new third-party signs.

	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"> <li>This ensures one third-party sign per block.</li> <li>Separation requirements are imposed to eliminate proliferation.</li> <li>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.</li> <li>Radial separation is restricted in places where such signage could not be visible by the same person.</li> </ul>	Signs are perceived from more than one direction from various vantage points.	<ul style="list-style-type: none"> <li>The negative impacts between radial and lineal separation of third-party signs are the same.</li> <li>It is more difficult to enforce radial separation.</li> <li>Radial separation restricts the amount of signs permitted per city block.</li> </ul>	<ul style="list-style-type: none"> <li>The same challenges are faced whether the separation requirement is applied lineal or radial.</li> <li>Linear separation often ignores the type of street and the immediate visual impact.</li> </ul>
	City-wide, a radial separation of 230 m between third-party signs is recommended (Illegalsigns.ca, 12/08).	<ul style="list-style-type: none"> <li>This is consistent with what is permitted in the former North York Industrial zones.</li> </ul>			
	Separation distances between signs should be calculated as a radius (Illegalsigns.ca, 12/08).	<ul style="list-style-type: none"> <li>This is an important means to regulate the overall number of signs in the City and the visual impact of cascading sign images.</li> <li>Avoid using "visibility triangles" to control separation of signs. Additional permissions above the current by-laws would occur.</li> </ul>			
	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)	<ul style="list-style-type: none"> <li>By relaxing separation distances in this prime advertising area, we can accept additional restrictions (through separation requirements) in other areas of the City.</li> </ul>	These districts are also Mixed Use Sign Districts.	<ul style="list-style-type: none"> <li>There has not been much growth opportunity for the sign industry over the past 5 years and very few legal signs have been permitted by the regulations of the current sign by-laws.</li> <li>Newly proposed separation requirements would severely limit any growth opportunities of the outdoor sign industry.</li> </ul>	<ul style="list-style-type: none"> <li>Opportunities for dynamic large-format signs are proposed to be provided in specific Special Sign Districts.</li> </ul>
	Separation distance requirements shall only apply to "lawfully erected signs" (OMAC, 02/13/09).	<ul style="list-style-type: none"> <li>This is not a valid interpretation of the municipal by-law and it punishes a permit applicant for the actions of rogue operators.</li> </ul>	Proposed intention to clarify this practice.		
	Increase sign size and decrease separation distances in the urban core of the City (CBS, 12/08/08).	<ul style="list-style-type: none"> <li>In recognition of the different character of the area.</li> </ul>			
<b>DEFINITION OF GRADE</b>	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).		<ul style="list-style-type: none"> <li>Proposal contemplates using Scarborough definition: The average elevation of the surface of the ground where it meets the base of the sign structure.</li> </ul>	<ul style="list-style-type: none"> <li>Grade should be carefully considered especially in circumstances where a roadway intersects a railway. The height of the sign should be appropriately measured in these circumstances.</li> </ul>	<ul style="list-style-type: none"> <li>The new by-law will create general regulations applicable for all circumstances. A variance process exists for special circumstances where a proposal cannot meet the general regulations of the by-law but can still meet the purpose and intent of the by-law.</li> </ul>
<b>DEFINITION OF FULL MOTION</b>	Electronic image that displays movement within a two second time-frame (OMAC, 02/13/09).		<ul style="list-style-type: none"> <li>Digital display signs are being recognized in the draft by-law and appropriate locations are being considered.</li> <li>The public is most concerned about digital and video display of all sign types.</li> </ul>		
<b>DEFINITION OF SEPARATION DISTANCE</b>	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).		<ul style="list-style-type: none"> <li>The direction the sign is facing with respect to traffic does not reduce the visibility of the sign to the public.</li> <li>Inability to view the sign copy does not preclude the ability of the public to view the sign structure.</li> </ul>		<ul style="list-style-type: none"> <li>Proposed 100 m separation distance between third-party signs.</li> </ul>
<b>NOTICE OF VIOLATION</b>	Indicate, with reasonable specificity, the nature of non-compliance (OMAC, 03/31/09).		<ul style="list-style-type: none"> <li>To be established in the new sign by-law.</li> </ul>		
	The Notice of Violation shall require the person to make the sign comply within a reasonable amount of time (OMAC, 03/31/09).				<ul style="list-style-type: none"> <li>For Notices of Violation, the By-law proposes that the sign be brought into compliance within 14 days.</li> </ul>
<b>SPECIAL FINES</b>	Impose special fines on illegal billboards through Section 370 of COTA, 2006 (Illegalsigns.ca, 12/08).	<ul style="list-style-type: none"> <li>To prove the economic value of a billboard in court and to set fines to offset the economic value of breaking the law.</li> </ul>			<ul style="list-style-type: none"> <li>The "Special Fines" clause provided for in COTA has been proposed in the by-law.</li> </ul>
<b>SIGNS ON HIGHWAYS</b>	Prohibit billboards within 400 m of provincial highways (Illegalsign.ca, 12/08).	<ul style="list-style-type: none"> <li>Adopt the regulations currently applied by the Province.</li> <li>The Province will be downloading the responsibility of signage along provincial highways to the municipalities.</li> <li>Ensure the same thing that happened when the Province downloaded the QEW to the City doesn't.</li> </ul>	<ul style="list-style-type: none"> <li>The proposal is to adopt the current regulations applied by the Provincial Ministry of Transportation.</li> </ul>	<ul style="list-style-type: none"> <li>The City should not enforce restrictions on 400 series highways.</li> <li>The Gardiner Expressway should not be included in a proposed 400 m separation requirement.</li> <li>The current requirement of 45 m prevents new billboards from being constructed.</li> <li>Any new regulations for billboards along the highway should consider whether the sign faces the highway or not.</li> </ul>	<ul style="list-style-type: none"> <li>The proposal is to adopt the current regulations applied by the Provincial Ministry of Transportation as well as carry over existing provisions requiring setbacks from major roadways.</li> <li>The approach is intended to be consistent, objective and easily applied.</li> </ul>
<b>SIGN DISTRICT BOUNDARIES</b>	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).		<ul style="list-style-type: none"> <li>The current regulations are to the property boundary or to the centreline of the roadway. No changes are contemplated.</li> </ul>		
<b>NUMBER OF SIGNS</b>	One or more signs are permitted on each lot (OMAC, 03/31/09).		<ul style="list-style-type: none"> <li>Only one ground sign is proposed to be permitted on a lot, subject to specific performance criteria.</li> </ul>		
	Maximum of one billboard per lot in Industrial zones (Illegalsigns.ca, 12/08).		<ul style="list-style-type: none"> <li>Only one ground sign is proposed to be permitted on a lot, subject to specific performance criteria.</li> </ul>	<ul style="list-style-type: none"> <li>Some industrial lots can span three city blocks, would consideration be given to allow more signs on large industrial lots?</li> </ul>	<ul style="list-style-type: none"> <li>If the industrial lot is separated by street to become blocks, then more than one sign can be on a large industrial lot.</li> </ul>
<b>HEIGHT OF SIGNS</b>	Third-party signs shall not exceed the height limit set forth in the applicable zoning by-law (OMAC, 03/31/09).		<ul style="list-style-type: none"> <li>Not all current zones have maximum height regulations.</li> <li>Sign by-law to be enacted under COTA.</li> </ul>		

	In the urban core and along major corridors, wall signs shall have a maximum height of 22.5 m (OMAC, 02/13/09).		*In Mixed Use and Regeneration districts, proposed that wall signs have a maximum height of 15 m.		*In Commercial and Commercial Residential Sign Districts, proposed that wall signs have a maximum height of 15 m.
<b>AREA OF SIGN</b>	18.6 m <sup>2</sup> 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).	*Reducing the size would necessitate incremental cost for design and construction. *Reducing the size would risk a reduction in communication value and effectiveness.	*Proposed maximum area of 20 m <sup>2</sup> for all third-party advertising signs encompasses the current standard for billboard advertising across Canada.		
	The minimum size for conventional billboards be 18.6 m <sup>2</sup> (ACA, 02/10/09).	*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.	*Proposed maximum area of 20 m <sup>2</sup> for all third-party advertising signs.		
	A billboard in an Industrial zone should be no larger than the maximum size allowed for first-party signs (Illegalsigns.ca, 12/08).		*Proposed maximum area of 20 m <sup>2</sup> for all third-party advertising signs.		
	In Industrial zones, a maximum area of 200 sq.ft. for wall signs; not facing a street (illegalsigns.ca, 12/08).		*Proposed maximum area of 20 m <sup>2</sup> for all third-party advertising signs.		
	The standard copy size for most forms of outdoor advertising is 10' x 20' (OMAC, 02/13/09).	*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.	*Proposed maximum area of 20 m <sup>2</sup> for all third-party advertising signs.		
	In the urban core and along major corridors, a maximum size for wall signs should be 100 m <sup>2</sup> (OMAC, 02/13/09).	*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.	*The City proposes to create a new by-law, up-to-date and in harmony with Council mandated policies. *Proposed maximum area of 20 m <sup>2</sup> for all third-party advertising signs.		
	20 m <sup>2</sup> is the industry's smallest standard size (CBS, 12/08/08).		*Proposed maximum area of 20 m <sup>2</sup> for all third-party advertising signs.		
<b>SETBACK FROM LOT LINE</b>	Sign is set back at least 1.5 metres from a street line (OMAC, 03/31/09).		*It is proposed that signs not accessory to the use of the building and lot shall not be located between the building and the front lot line.	*Why regulate the setback of a third-party ground sign in front of a building?	*The intent is to not allow large structures in front yards where the applicable zoning regulations would otherwise prohibit these large structures.
	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.			*It is proposed that encroachments on, into and over the public right-of-way be considered by the City's Transportation Services. *The draft by-law does not speak to encroachments onto neighbouring properties. This is a civil matter.
<b>SIGN VARIANCE APPLICATION</b>	Preliminary Project Review is an optional submission requirement (OMAC, 03/31/09)		*The PPR process provides a more complete review of the proposal.		
	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.	*Sign variance process proposals include mailed notification and posting of notice signs on property.		*For first-party sign variance applications: mailed notice to owners in a 60 m radius from the subject property and posting a notice of the proposal on the property.
	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.	*Sign variance process proposals include mailed notification and posting of notice signs on property.		*For third-party sign variance applications: mailed notice to owners in a 120 m radius from the subject property and posting a notice of the proposal on the property.
	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.	*Administrative procedure proposed to include public notice to affected neighbours; posting of a notice on site; criteria for determining whether the proposal is minor and prohibiting variance applications for prohibited signs.		
	Allow full motion video signage via sign variance applications where full motion video signage is not permitted (OMAC, 02/13/09).		*Administrative procedure proposed to include public notice to affected neighbours; posting of a notice on site; criteria for determining whether the proposal is minor and prohibiting variance applications for prohibited signs.		*The draft by-law would require by-law amendment for signs not otherwise permitted.
	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.	*Consideration is being given to Committee procedures for variances and amendments.		*Signs not otherwise permitted would not be considered through sign variance process.
	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> .	*The proposed new variance process will include public notice to affected neighbours; posting of a notice on site; criteria for determining whether the proposal is minor and not considering prohibiting variance applications for prohibited signs.		*Additional opportunities to receive approvals through new by-law amendment tool.

	Include a right to appeal (OMAC, 02/13/09).			•Provide a non-political appeal process, such as the Committee of Adjustment.	•The proposal describes the creation of a new Sign Variance Committee to hear variance applications. The decision of the Committee would be final.
	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.	•Sign by-law proposed to contain criteria for assessing sign variance applications.		
	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.	•Current proposal is to both post a notice and provide a notice to property owners and residents within a specific vicinity - similar to CoFA notification process.		
	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.	•Current proposal is to both post a notice and provide a notice to property owners and residents within a specific vicinity - similar to CoFA notification process. •Current proposal also contemplates notification to Ward Councillor.		
	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.	•Tests will be proposed for variance applications (e.g. special physical circumstances applicable to land building or use not shared by others; circumstances were not created by applicant; outcome is a better sign solution than strict application of regulations would produce; approval of variance will not alter essential character of area or conflict with urban design policies or guidelines and affect public safety).		
	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.	•Proposed to clarify criteria for sign variances.	•The sign variance and potential appeal process should not be governed by Community Council because they would not be able to maintain the general purpose and intent of the new by-law. Consider the Committee of Adjustment or an arms-length quasi-judicial body.	•The proposal describes the creation of a new Sign Variance Committee to hear variance applications. The decision of the Committee would be final.
	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.	•It is proposed that prohibited signs cannot proceed via variance but rather by-law amendment.		

<b>ROOF SIGNS</b>	Third-party roof signs, containing a sign area of 67 m <sup>2</sup> , 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).		<ul style="list-style-type: none"> <li>•Roof signs are proposed to be a prohibited sign type, whether first or third-party.</li> <li>•Roof signs dominate and overwhelm building below sign.</li> <li>•Roof signs intrude into the skyline and illuminate the night sky.</li> <li>•Roof signs undermine limits on building height, massing and form.</li> <li>•Physically challenging to integrate roof signs into architecture of building.</li> <li>•Historical restrictions on roof signs in Toronto.</li> </ul>	<ul style="list-style-type: none"> <li>•Has the City's Heritage Department been consulted regarding third-party signs on the roofs of heritage buildings?</li> <li>•Would the City's Heritage Department restrict third-party ground signs on heritage properties?</li> </ul>	It is anticipated that the City's Heritage Preservation Services would review third-party sign proposals on heritage properties on a case-by-case basis and measure the merits of the proposal against the impacts to the heritage resource, in Special Sign Districts like Yonge/Dundas.
	Third-party roof signs, containing a sign area of 33 m <sup>2</sup> , 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).		<ul style="list-style-type: none"> <li>•Roof signs are proposed to be a prohibited sign type, whether first or third-party.</li> <li>•Roof signs dominate and overwhelm building below sign.</li> <li>•Roof signs intrude into the skyline and illuminate the night sky.</li> <li>•Roof signs undermine limits on building height, massing and form.</li> <li>•Physically challenging to integrate roof signs into architecture of building.</li> <li>•Historical restrictions on roof signs in Toronto.</li> </ul>		
	Roof signs should be prohibited (Illegalsigns.ca, 09/08).	•All across Ontario, cities are realizing that roof signs create the worst aesthetic blight.	•Roof signs are proposed to be a prohibited sign type in the new sign by-law.		
	Provide as-of-right opportunities for roof signs (OMAC, 02/13/09).	<ul style="list-style-type: none"> <li>•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.</li> <li>•Prohibiting roof signs forces the industry to rely on old permits.</li> <li>•Prohibiting roof signs forces the industry to pressure for new ground, wall and other types of signs.</li> <li>•Roof sign concerns are addressed through appropriate spacing and sensitive design.</li> </ul>	•Roof signs are proposed to be a prohibited sign type in the new sign by-law.	•Some of the downtown BIA's would like to consider the use of third-party roof signs, specifically Yonge/Dundas BIA.	•Outside of the Signage Vision for the Downtown Yonge Strip and the consideration of creating a <i>Special Sign District</i> for this area, roof signs will be a prohibited sign type throughout the City. Proposals for new roof signs in the Downtown Yonge Strip will be carefully measured against the new sign by-law and the Sign Visioning Exercise, adopted in principle by Toronto City Council.
	Concern over a restriction on roof signs (CBS, 12/08/08).	<ul style="list-style-type: none"> <li>•The City is in most parts pretty much built up and roofs are the only places to install signs.</li> <li>•To ban or prohibit roof signs would make it very difficult to develop new signage.</li> </ul>		•The sign industry can incorporate roof signs into the design of the building.	
<b>NEIGHBOURHOOD SIGN DISTRICTS (RESIDENTIAL)</b>	Third-party ground and wall signs, containing a sign area of 20 m <sup>2</sup> , 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).		<ul style="list-style-type: none"> <li>•No current sign by-law permits this.</li> <li>•Neighbourhood sign districts are primarily residential.</li> </ul>		
	Allow signs in residential areas where the sign is invisible to the residential area (OMAC, 02/13/09).			•The proposed separation distance to residential areas is worrisome.	•Separation of signs to residential areas is an attempt to mitigate visual impacts. •Proposed separation of third-party signs from residential neighbourhoods reduced from 100 m to 30 m.
<b>APARTMENT NEIGHBOURHOOD SIGN DISTRICTS (RESIDENTIAL)</b>	Third-party wall signs, containing a sign area of 25 m <sup>2</sup> , a height of 15 m, with various types of changeable message display are permitted in all Apartment Neighbourhood sign districts (OMAC, 03/31/09).		<ul style="list-style-type: none"> <li>•No current sign by-law permits this.</li> <li>•Apartment Neighbourhood sign districts are primarily residential.</li> </ul>	•The proposed separation distance to residential areas is worrisome.	•Separation of signs to residential areas is an attempt to mitigate visual impacts. •Proposed separation of third-party signs from residential neighbourhoods reduced from 100 m to 30 m.
<b>MIXED USE AREAS</b>	Third-party wall signs, containing a sign area of 100 m <sup>2</sup> , 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).		•A sign area of 20 m <sup>2</sup> is an industry standard as expressed through public and stakeholder consultation.		
	Third-party ground signs, containing a sign area of 33 m <sup>2</sup> , 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).		<ul style="list-style-type: none"> <li>•City proposes no ground signs in Mixed Use and Regeneration sign districts. These districts are generally areas of redevelopment and transition which currently contain and potentially contain high levels of residential uses.</li> <li>•A sign area of 20 m<sup>2</sup> is an industry standard as explicitly expressed through public and stakeholder consultation.</li> </ul>		•Third-party ground signs proposed to be permitted in Employment and Utility Sign Districts.
	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.			•Proposed third-party wall signs in Commercial and Commercial Residential Sign Districts. •No roof signs proposed to be permitted in new sign by-law.
	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.			

<b>RAILWAY AND HYDRO DISTRICTS</b>	200 sq.ft. billboards only at grade separated railway crossings at a major arterial road (Illegalsigns.ca, 12/08).		•Proposed maximum area of 20 m <sup>2</sup> for all third-party advertising signs.		
	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.	•The proposed regulations describe third-party advertising ground and wall signs permitted where a utility corridor crosses a major street; within 75 m of the intersection.		
<b>ADVERTISING ON RAILWAY BRIDGES</b>	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.	•The new sign by-law proposes to regulate permanent signs and restrict sign installations in the right-of-way.		
<b>SIGN PERMIT RENEWAL</b>	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.	•Previous iterations of municipal sign by-laws contained these types of provisions. •The City of Ottawa and the City of Edmonton both have sign permit renewal provisions. •The City is dynamic and constantly changing. Signs should be subject to review.		
	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.	•Previous iterations of municipal sign by-laws contained these types of provisions. •Potential opportunity for automatic renewal if sign still conforms.		
	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.	•Potential opportunity for automatic renewal if sign still conforms.		
<b>OTHER</b>	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).			•Provide a draft of the proposed by-law prior to going to Council and continue to consult further with the third-party sign industry.	•The draft sign by-law is anticipated to be heard by the Planning and Growth Management Committee of City Council on November 4, 2009. A working draft of the by-law was provided prior to the fifth Stakeholder Consultation Workshop held on September 10, 2009. •The Sign By-law Project Team has utilized stakeholder input throughout the comprehensive consultation process. The by-law drafting team continues to analyze all comments received consider incorporating them into the new by-law.
<b>SIGN UNIT</b>	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.	•Sign unit is proposed		
	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.	•Sign unit is proposed		
<b>LICENSING OF SIGN COMPANIES</b>	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.	•Licensing of sign companies under consideration.		
<b>IDENTIFICATION PLATE</b>	All signs to display an identification plate (Astral, 12/08/08).	•To determine which signs are fully compliant.	•Under consideration.		•The new by-law proposes that all newly erected third-party signs require a unique identifier, subject to the requirements of the CBO.
	Require all existing billboards to obtain permit plates (Illegalsigns.ca, 12/08).		•Under consideration.		•The new by-law proposes that all newly erected third-party signs require a unique identifier, subject to the requirements of the CBO.

<b>SIGN PERMITS</b>	Separate sign permits from building permits (OMAC, 11/27/08).	<ul style="list-style-type: none"> <li>•Sign structure under OBC; sign display, in the public space, under new sign by-law.</li> <li>•Simplify inspection and enforcement and a more clear and efficient process.</li> <li>•Leads to greater clarity on issues such as legal non-conforming and revocation of permits.</li> </ul>	•Under consideration.		•The new by-law proposes that all signs be required to obtain a sign permit, under the new sign by-law and a building permit, where applicable, under the Building Code Act.
	Separate sign permits from building permits (Titan, 12/08/08).	<ul style="list-style-type: none"> <li>•The combining of these permits creates confusion, inefficiency and difficulty for issuance and enforcement.</li> <li>•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.</li> <li>•To ensure that a sign integrated into the public realm is approved in accordance with the sign by-law.</li> </ul>	•Under consideration.		•The new by-law proposes that all signs be required to obtain a sign permit, under the new sign by-law and a building permit, where applicable, under the Building Code Act.
<b>INDUSTRY SELF REGULATION</b>	Allow the industry to regulate itself (ACA, 12/08/08).	<ul style="list-style-type: none"> <li>•In a highly competitive industry, self-regulation is more effective and more efficient than government intervention.</li> <li>•Advertisers already endorse industry codes and guidelines.</li> <li>•Advertisers have a right to freedom of speech.</li> <li>•The City's history of regulating the sign industry is characterized by inefficiency and ineffectiveness.</li> <li>•Advertisers make an important contribution to the economy.</li> </ul>	•City is developing a new sign by-law based on the goals and policies found in the Official Plan.	•If there ever was an offending sign that a local Councillor complained about, that sign would be removed by the sign industry.	
<b>NEW AS-OF-RIGHT PERMISSIONS</b>	Proceed with an eye towards minimizing the creation of new as-of-right permissions for billboards (Illegalsigns.ca, 12/08/08).	<ul style="list-style-type: none"> <li>•There would otherwise be a situation not intended by Toronto City Council.</li> <li>•Billboards in the City are completely "built out".</li> </ul>		•The sign industry wants to work with the City to enable its growth without creating negative visual impacts.	•The industry has been involved in the consultation process to establish a new sign by-law.
<b>VINYL SIGN COPY</b>	Prohibit vinyl on all sign face copy (Illegalsigns.ca, 12/09).	<ul style="list-style-type: none"> <li>•Biodegradable vinyl is a fraudulent product.</li> <li>•Due to the number of times sign copy is changed, vinyl should be banned.</li> </ul>			

# TORONTO SIGN BY-LAW PROJECT

## ANALYSIS OF STAKEHOLDER SUBMISSIONS - THIRD PARTY SIGNS

### DATA COLLECTED FROM APRIL 2009 TO PRESENT

ITEM	STAKEHOLDER SUBMISSION	STAKEHOLDER RATIONALE	CITY COMMENT
<b>WALL SIGNS</b>	Increase the permissible projection of a wall sign from 0.15 metres to 0.30 metres, exclusive of lighting source and sign structure (Megaposter/Abcon, 09/18/09).	•Technology is evolving and this increase in distance may be helpful.	•Revised maximum projection of a wall sign from 0.15 metres to 0.60 metres, exclusive of lighting source and sign structure.
	Removal of copy on a wall sign does not constitute abandonment of the sign site (Megaposter/Abcon, 09/18/09).	•The reality of the business is that the duration of sign copy varies.	•Where no work has seriously commenced within 6 months from the issuance of the sign permit, the sign permit may be revoked. •New permit issued for 5 years; revocation if permit not completed within 12 months; change of copy is permitted.
	Existing mural signs should be given as-of-right permissions to be converted to vinyl, maintaining the same size, height and location of the mural sign (Megaposter/Abcon, 09/18/09).	•Because the proposed by-law does not differentiate between painted murals and fascia signs.	•Any sign erected on a wall is a wall sign under new by-law. Substantial alteration to any existing sign requires a permit. •There was no intention in the existing by-laws or within the spirit of the new by-law to allow for large wall signs.
<b>PROJECTING SIGN</b>	Revise length of projecting sign (OMAC, 09/15/09).		•The intent is to distinguish between wall sign and projecting sign. •Projecting signs also fall under the jurisdiction of the City's Transportation Services where they project over and into the public right-of-way.
<b>GROUND SIGNS</b>	Pedestal signs are not defined in the draft by-law (Pattison, 09/24/09).	•Is it intended to be described as a ground sign?	•Third-party pedestal signs are proposed to be, by definition, third-party ground signs.
<b>SIGN PERMITS</b>	Separate sign permits from building permits (OMAC, 10/02/09).	•One permit for two processes (the current method) causes confusion in the administration and enforcement of signs. •Sign permits should be issued under a sign by-law in accordance with the City's powers under COTA and focus on how a sign is displayed within the public space. •Building permits should be issued under the BCA and focus on the composition of a sign's structure.	•A two permit system is being proposed. •The new sign by-law will require a sign permit and, where required, a building permit under the Building Code Act.
	An applicant can be either a property owner or an authorized agent (Megaposter/Abcon, 09/18/09).		•The proposed definition provides for this. •An applicant is defined as that person who applies for the sign permit.
	Revise definition of applicant to include authorized agent (OMAC, 09/15/09).		•The proposed definition provides for this. •An applicant is defined as that person who applies for the sign permit.
	Insert language that the permit may be issued subject to approved variances (Megaposter/Abcon, 09/18/09).		•Where variances are required, they must be obtained prior to the issuance of sign permit.
	For abandoned sign permits, the applicant should receive written notice prior to the City abandoning the application (Megaposter/Abcon, 09/18/09).	•To allow the applicant the opportunity to address the issues and concerns.	•The abandonment clause in the proposed by-law is similar in nature to that of building permits. Abandonment occurs when the application remains inactive for 6 months. •Notice will be provided in practice.
<b>SEPARATION OF SIGNS</b>	Separate third-party signs by 60-65 metres (Megaposter/Abcon, 09/18/09).	•This is more than adequate.	•Third-party signs are proposed to be separated by a minimum 100 metres, measured radially. This separation distance is more in some previous by-laws and less in others.
	The rationale for using a radial measurement is not consistent with eliminating clutter (Megaposter/Abcon, 09/18/09).	•It is more logical to use a "line-of-sight." •Radial distance separation does not allow for signs to be erected on parallel streets or around the corner, where both signs could not be viewed simultaneously.	•Radial separation does eliminate clutter.
<b>SIGN PERMIT RENEWAL</b>	Third-party sign permits should expire at a minimum of 5 years rather than <u>up to</u> 5 years (Megaposter/Abcon, 09/18/09).	•Anything less than 5 years (or ideally 10) creates an economic hardship and there is a significant capital cost in the sign structure.	•The proposal is to issue third-party sign permits with a five year time-frame.

<b>SIGNS ON RAILWAY BRIDGES</b>	Leave the possibility open for third-party signs on railway bridges (Outdoor Opportunities Inc., 09/22/09).	<ul style="list-style-type: none"> <li>To create a financial benefit for the City.</li> <li>To create an aesthetic improvement to railway bridges</li> </ul>	•The proposed by-law prohibits third-party signs on railway bridges.
<b>THIRD PARTY SIGN RESTRICTIONS</b>	The list of third-party area restrictions is excessive and overly restrictive (OMAC, 09/15/09).		•The list was generated from restrictions existing in the current by-laws of the former municipalities, current municipal policy and intent, provincial policy and "broad-stroke" regulation to ensure that the existing areas with restrictions are maintained.
	The new regulations amount to an effective prohibition on the industry's growth (OMAC, 09/15/09).	•This jeopardizes the industry's ability to remain a viable contributor to Toronto's economy.	•Opportunities continue to exist for new third-party signs. Where some areas may have become more restrictive, other areas for signage opportunities have opened up.
	MTO regulations state that no third-party advertising shall be visible to a class one highway (SAC, 09/28/09).	•This does not preclude the sign from facing another street and not be visible from a class one highway.	•In accordance with principles of readability and ease of use, and in accordance with consistency with other sign by-laws enacted by the City, no third-party sign shall be located within 400 metres of a class one highway.
<b>SIGN INSPECTION</b>	Why must the applicant give notice that the sign has been installed? (Megaposter/Abcon, 09/18/09)	•It is presumed that the City does not intend to carry out inspections.	•The City will carry out the inspection of signs to ensure compliance with the OBC and the Sign By-law.
<b>APPLICABILITY</b>	The new by-law needs to be clear as to what types of signage it does not apply to (OMAC, 10/02/09).		•The draft by-law includes a section on <b>Scope</b> (what is to be excluded in the by-law) and it includes a section on <b>Exemption from Permit Requirements</b> .
<b>LEGISLATIVE JURISDICTION</b>	Is the by-law coming under the Municipal Act or the Planning Act? (OMAC, 09/15/09)	•Usually by-law amendments come under the Planning Act which means there is an appeal to the OMB.	<ul style="list-style-type: none"> <li>The sign by-law is being enacted under the City of Toronto Act.</li> <li>The process for sign by-law amendments is described in the proposed by-law.</li> </ul>
<b>REVOCATION</b>	Grounds for revocation should be clearly and justifiably articulated. Written notice should be provided for any intention to revoke. There should be an opportunity to remedy prior to revocation. There should be a fair and reasonable mechanism for challenging the revocation (Megaposter/Abcon, 09/18/09).		<ul style="list-style-type: none"> <li>A fair and open process for revocation is described in the proposed sign by-law. There is sufficient opportunity provided to respond to violation notices and revocation notices.</li> <li>Grounds for revocation are clearly articulated in the proposed by-law.</li> </ul>
<b>DEDICATED SIGN DIVISION</b>	It is disappointing to have City staff with little or no experience making decisions on permit applications or enforcement (OMAC, 10/02/09).	<ul style="list-style-type: none"> <li>The outdoor advertising industry is large and competitive.</li> <li>The regulation of signs can be at times nuanced and at other times complicated.</li> <li>There is the potential to greatly affect revenue streams for both the sign owner and the relevant landlord.</li> </ul>	•A dedicated sign unit is proposed.
	Create a specialized sign division within the City to process sign permit and variance applications, assist in sign related issues, advise municipal enforcement efforts and advise on sign variance cases (OMAC, 10/02/09).	<ul style="list-style-type: none"> <li>Achieved through increasing permit fees or imposing a tax on signs.</li> <li>To increase the level of proficiency with implementing the new sign by law.</li> </ul>	•A dedicated sign unit is proposed.
	Sign companies are prepared to provide the City with a book of common sign structures (OMAC, 10/02/09).	•To act as a reference point for staff to ensure that building permits have been procured for proposed signage.	•Please provide the information.
<b>DEFINITION OF GRADE</b>	The definition does not address signage at railway crossings (OMAC, 09/15/09).		•The by-law is intended to be comprehensive and City-wide. Isolated situations or special circumstances are dealt with through the variance tool or the by-law amendment process provided in the proposed by-law.
<b>FIRST PARTY VS. THIRD PARTY</b>	Modify the current distinction between first and third-party signs (OMAC, 10/02/09).	<ul style="list-style-type: none"> <li>There is no consideration for second-party signs and these sign types are proliferating.</li> <li>With digital technology, a sign can contain first, second and third-party messaging.</li> <li>In terms of sign proliferation and impact on the public space and safety, first-party signage has the same effect as third-party signage.</li> </ul>	<ul style="list-style-type: none"> <li>First-party signs are primarily used to identify a business or service on a premises. Third-party signs are primarily used to advertise products and services not available on a premises.</li> <li>Third-party signs are often the largest signs in communities, located in highly visible locations in high traffic areas to maximize exposure to vehicles and pedestrians.</li> <li>Permissions to advertise second-party copy on first-party signs are provided for in the proposed by-law.</li> </ul>
<b>LIGHTING</b>	Are backlit signs recognized? (Megaposter/Abcon, 09/18/09)		•Yes, the definition of illumination includes a light source located within, on or external to the sign.
	Maximum and minimum outputs are irrelevant on ambient illumination (OMAC, 09/15/09).	•Adopt OAAA guidelines for recommended illumination levels.	•Regulations regarding illumination stem from the Canada Green Building Council and their LEED standards.
	Illumination periods should reflect broadcast hours of 2am to 5am (OMAC, 09/15/09).		•Requirements for a reduction in illumination levels are proposed to be between sunset and sunrise.

	Remove smog alert requirements for third-party signs (OMAC, 09/15/09).	•There is no central on/off switch; we would create more smog driving to each location to turn the lights off.	•Agreed, new third-party signs would be required to provide on-site renewable energy or purchase renewable energy for the operation of the sign.
<b>SIGN DISTRICTS</b>	Sign districts should be clear and unambiguously defined (Megaposter/Abcon, 09/18/09).	•To avoid any misunderstandings in the interpretation and application of by-law provisions.	•Sign Districts are clearly defined in the maps associated with the proposed by-law text. The districts follow property boundaries and are reflective of the O.P. Land Use designations.
	Current in-force sign by-laws regulate signs vis-à-vis zoning (OMAC, 10/02/09).	•The key failure of this approach is a total disregard for the existing urban features of Toronto. •It is important to recognize areas of the City that are appropriate for signage and areas where signage is less appropriate. The current by-laws make no effort to delineate between the two.	•The new by-law will present sign districts reflective of the O.P. Land Use designations.
	Utilize the 16 maps found in the former City of Toronto sign by-law to provide guidance for special sign regulations (OMAC 10/02/09).	•These maps better account for the urban features of a specified area rather than dealing with signs using the broader zoning categories.	•The new by-law will present sign districts reflective of the O.P. Land Use designations. Further the new by-law will introduce Special Sign Districts where, due to the nature of signage in a specific area, special considerations are required. •The 16 maps found in the former City of Toronto sign by-law refer to the Gardiner Expressway and the DVP and are part of a larger group of maps outlining restrictive exceptions in the current by-law. •As maps they are not intended to express the urban features of a specified area where signage may be appropriate.
	Establish sign districts rather than regulate signs through zoning (OMAC, 10/02/09).	•To direct the sign industry towards areas where outdoor advertising is appropriate and away from areas where the City would prefer to limit advertising.	•The new by-law will present sign districts reflective of the O.P. Land Use designations and will introduce Special Sign Districts where, due to the nature of signage in a specific area, special considerations are required.
<b>SPECIAL SIGN DISTRICTS</b>	Include Yonge/Bloor and Yonge/Eglinton as special sign districts (Megaposter/Abcon, 09/18/09).		•A number of special sign districts have been described in the proposed sign by-law. New tools are provided in the proposed by-law to consider opportunities for new special sign districts.
	The downtown core of Toronto, including the Entertainment and Fashion Districts and the Yonge Street Corridor is a highly suitable area for outdoor advertising (OMAC, 10/02/09).		•A number of special sign districts have been described in the proposed sign by-law. New tools are provided in the proposed by-law to consider opportunities for new special sign districts.
	There is a legitimate expectation that the urban heart of Canada's most populated city will play host to a higher concentration of advertising in much the same way as other North American urban centres currently do (OMAC, 10/02/09).	•To achieve a trade-off - greater restrictions in certain areas of the City in exchange for more permissive regulations in the denser, more urbanized areas of the City.	•The by-law is intended to be comprehensive and City-wide. •The effort behind the new sign by-law is to replace the fractured and inconsistent regulations existing prior to amalgamation.
<b>SIGN IDENTIFIER</b>	A proposed system of identification plates to be displayed with every permitted sign (OMAC, 10/02/09).	•To allow enforcement officials to easily reference the relevant permit and determine compliance. •To allow enforcement officials to contact the sign operator and alert them of potential issues and to address problems directly. •Where no identification plate exists, enforcement officials should be empowered to immediately remove the offending sign.	•New third-party signs shall provide a unique identifier in the form, manner and location approved by the C.B.O. •Unlawfully erected signs may be issued a notice of violation requiring the sign to be brought into compliance within 14 days. •Failure to comply with the notice may cause the removal of the sign.
	Require that the sign be identified by the sign owner's corporate name (Megaposter/Abcon, 09/18/09).		•New third-party signs shall provide a unique identifier in the form, manner and location approved by the C.B.O.
<b>LEGAL NON-CONFORMING</b>	A change in the attributes of a legal non-conforming sign, provided the sign is not enlarged, should not constitute substantial alteration (OMAC, 10/02/09).	•As described in COTA, the maintenance and repair of a sign or a change in the message displayed is deemed in itself to not constitute substantial alteration.	•The proposed sign by-law is in accordance with COTA..
<b>MECHANICAL COPY</b>	Presumably "mechanical copy" refers to "tri-vision" signs and that they must be wall signs. Does this include scrolling-type signs too? (Megaposter/Abcon, 09/18/09)	•It is difficult to understand.	•Yes, mechanical copy is sign copy which physically moves in whole or in part and includes tri-vision copy and scrolling copy. •Mechanical copy is permitted on all newly erected third-party signs, be they wall or ground.
	Mechanical copy shall include tri-vision copy and electronic static copy and shall be applicable to legal non-conforming signage (OMAC, 09/15/09).		•Electronic static signs are proposed to be recognized in the new by law at appropriate locations. •Mechanical copy includes tri-vision.
<b>DURATION OF ELECTRONIC COPY</b>	Change from 60 seconds to 5-10 seconds (OMAC, 09/15/09).	•Current signs of this type are operating on a 7-10 second duration.	•The duration and transition of mechanical sign copy is not intended to be regulated; the duration of electronic static copy is proposed to be 10 seconds.

<b>SIGN VARIANCE</b>	Specifically identify who is responsible for reviewing and approving variances (Megaposter/Abcon, 09/18/09).	<ul style="list-style-type: none"> <li>To ensure consistency of decisions and application of the process.</li> <li>The current process is inconsistent and sometimes unfair due to the nature of the process.</li> </ul>	<ul style="list-style-type: none"> <li>It is proposed that variances for third-party signs be considered by a quasi-judicial committee comprised of members of the public.</li> </ul>
	Prohibited signage types shall be subject to variance and by-law amendment applications (OMAC, 09/15/09).		<ul style="list-style-type: none"> <li>Prohibited sign types can only be permitted by way of an amendment to the sign by-law.</li> </ul>
	The variance criteria must be articulated in clear and unambiguous terms (Megaposter/Abcon, 09/18/09).		<ul style="list-style-type: none"> <li>The variance criteria described in the proposed by-law are clear and unambiguous.</li> </ul>
	There should be a series of subjective criteria to assess variances (OMAC, 10/02/09).	<ul style="list-style-type: none"> <li>The best way to ensure oversight and compliance with the spirit and intent of the sign by-law is to have variance criteria determined by City Council.</li> </ul>	<ul style="list-style-type: none"> <li>The new by-law proposes variance criteria (or tests) by which an application for variance can be measured.</li> </ul>
	Prescribe a clear variance process within the by-law (OMAC, 10/02/09).	<ul style="list-style-type: none"> <li>To provide guidance as to what is to be considered by CC on an application.</li> <li>The existing process is neither fair nor equitable and is often hijacked by political considerations or the influence of unaffected parties.</li> </ul>	<ul style="list-style-type: none"> <li>The by-law proposes variance criteria (or tests) by which an application for variance can be measured. It also include public notice to immediately affected properties and posting of a notice on the subject property. A new quasi-judicial committee is also proposed to hear and decide on variances for third-party signs.</li> </ul>
	Variance applications should be heard by a neutral committee comprised of members appointed by City Council (OMAC, 10/02/09).	<ul style="list-style-type: none"> <li>Because signs are a form of free expression, they need to be removed from politics.</li> <li>Consider the Committee of Adjustment or some other neutral committee.</li> </ul>	<ul style="list-style-type: none"> <li>A new Sign Variance Committee is proposed to be introduced comprised of public members appointed by Council. The intent of the Committee is to hear appeals from decisions by staff for first-party sign variance applications and hear <i>de novo</i> variance applications for third-party signs.</li> </ul>
	The proposed neutral committee should conduct a full hearing (OMAC, 10/02/09).	<ul style="list-style-type: none"> <li>Similar to the Committee of Adjustment, with the merits of the application presented by the proponent, comments by City staff and objectors, an opportunity for the local Councillor and finally an opportunity for the proponent to reply.</li> <li>Decisions should be provided in writing, with reasons and decisions can be deliberated on and may be reserved until later.</li> </ul>	<ul style="list-style-type: none"> <li>It is proposed that a full hearing be conducted.</li> <li>The Statutory Powers and Procedures Act applies.</li> </ul>
<b>CHARTER RIGHTS</b>	Commercial advertising is a form of free expression that is protected under the Charter of Rights and Freedoms (OMAC, 10/02/09).	<ul style="list-style-type: none"> <li>Restrictions on this form of free speech must be demonstrably justified.</li> <li>It is a violation of the Charter not to provide a proper forum and process by which meritorious proposals for sign by-law variances can be heard.</li> </ul>	<ul style="list-style-type: none"> <li>The by-law proposes variance criteria (or tests) by which an application for variance can be measured. In the interest of public participation, it also includes public notice to immediately affected properties and posting of a notice on the subject property. A new Sign Variance Committee is also proposed to hear and decide on variances for third-party signs.</li> </ul>
<b>ENCROACHMENT OF SIGNS</b>	The city should not incorporate any requirements to demonstrate non-encroachment on adjoining private property (OMAC, 10/02/09).	<ul style="list-style-type: none"> <li>Encroachments upon a neighbour's private lands is a civil matter between neighbouring landowners.</li> <li>It is not for the City to police potential trespasses.</li> <li>Encroachment remedies are available in tort through the civil courts.</li> </ul>	<ul style="list-style-type: none"> <li>Agreed.</li> </ul>

# TORONTO SIGN BY-LAW PROJECT

## ANALYSIS OF STAKEHOLDER SUBMISSIONS - FIRST PARTY SIGNS

### DATA COLLECTED TO PRESENT

ITEM	STAKEHOLDER SUBMISSION	STAKEHOLDER RATIONALE	CITY COMMENT
<b>DEFINITION OF MANSARD ROOF</b>	This definition needs to be clarified (SAC, 09/28/09).	•Review the possibility of clarifying how to identify a mansard roof situation.	•This definition has been clarified.
<b>DEFINITION OF MODIFICATION</b>	This definition needs to be clarified (SAC, 09/28/09).	•"Modify ...shall not include the removal and replacement of the sign face and or sign copy."	•This definition has been clarified. •"Modification...shall not include the removal and replacement of sign copy on the sign face."
<b>DEFINITION OF OVERHANGING STRUCTURE</b>	This definition needs to be clarified (SAC, 09/28/09).	•This definition should state that these are architectural features of the building and issued under separate building permit. •The maximum projection should be increased from 0.15 metres to perhaps 0.6 metres.	•The maximum projection of a wall sign has been revised to 0.60 metres.
<b>DEFINITION OF PROJECTING SIGN</b>	This definition needs to be clarified (SAC, 09/28/09).	•Can projecting signs be parallel to the wall face?	•This definition has been clarified. Projecting signs are intended to be perpendicular to the wall.
<b>DEFINITION OF RESTORE</b>	This definition needs to be clarified (SAC, 09/28/09).	•It should clearly state that it refers to the restoration of structural components.	•The current definition is clear.
<b>DEFINITION OF SIGN FACE</b>	This definition needs to be clarified (SAC, 09/28/09).	•Any painting or colour applied to a wall surface behind a sign shall not be a part of the sign face or sign face area.	•The current definition is clear.
<b>DEFINITION OF SIGN FACE AREA</b>	This definition needs to be clarified (SAC, 09/28/09).	•How would individual logos and letters be measured? •Clarify that it encompasses individual elements. •Clarify that it does NOT include any painted wall surface. •Clarify that it is per sign face, not the total of all sign faces.	•The current definition is clear.
<b>DEFINITION OF SUBSTANTIALLY ALTERED</b>	This definition needs to be provided (SAC, 09/28/09).		•Substantially altered is a term used in provincial legislation.
<b>DEFINITION OF WALL SIGN</b>	This definition needs to be clarified (SAC, 09/28/09).	•Increase the depth of a wall sign to 0.6 metres to allow for the industry standards.	•The maximum depth of a wall sign has been increased to 0.60 metres.
<b>DEFINITION OF WINDOW SIGN</b>	This definition needs to be clarified (SAC, 09/28/09).	•A graphic applied to the inside of a window surface should not be regulated by this by-law.	•In order to enhance the public realm, support safety and security and increase pedestrianism within the City, window signs are proposed to be regulated to include graphics applied to the inside surface of a window. •Window signs are proposed to be regulated and exempt from permit requirements.
<b>APPROVALS</b>	Clarify that the City's Transportation Services approval is for encroachments only (SAC, 09/28/09).		•Approval from the City's Transportation Services is for encroachments and for public safety.

	Are encroachment approvals done internally? (SAC, 09/28/09).	•There should be easy procedures for encroachments through the City's Transportation Services.	•Approvals for encroachments are administered by the City's Transportation Services. The procedure for obtaining an encroachment is provided by Transportation Services.
	Streamline the permit approvals process (SAC, 08/27/08).	•The time required to obtain permits has a negative economic impact on local businesses.	•A dedicated sign unit is proposed.
<b>TIME LIMITED PERMITS</b>	Does this include first-party signs? (SAC, 09/28/09).		•No, time-limited permits are for third-party signs.
<b>ABANDONED SIGNS REVOCATION OF SIGN PERMITS</b>	Sign permits should be deemed abandoned after 12 months and not 6 months (SAC, 09/28/09).	•Some signs take longer than 6 months to construct.	•This clause refers to applications and not to construction of the sign after the permit has been issued. •A sign permit may be revoked where construction has not been substantially completed.
	Signs belong to property owners and not to tenants (SAC, 09/28/09).	•A sign should remain in place so long as it is not substantially altered.	•Sign permits expire where the business no longer exists on the property.
	Why is it 12 months for restoration/modification yet only 6 months for new signs? (SAC, 09/28/09).		•This portion of the by-law has been clarified.
	Why should sign permits which have been revoked by the City be returned to the City, along with supporting documentation? (SAC, 09/28/09).		•Clarified, where a sign permit has been revoked, the sign owner shall immediately remove the sign.
<b>ROOF SIGNS</b>	Are first-party roof signs not permitted? (SAC, 09/28/09).		•Roof signs are not permitted.
	There should be provisions for temporary or promotional signage on roofs (TDL, 02/11/09).		•Roof signs are not permitted.
	Does the restriction on roof signs or parapet signs apply to weather canopies at gasoline service stations? (CPPI, 01/23/09).		•It is proposed that signs do not project beyond the roof or parapet of the building.
	What about "blade" signs projecting above the roof and forming part of the parapet or building structure? (TDL, 02/011/09)	•These type of signs can still maintain the integrity of the site.	•It is proposed that signs do not project beyond the roof or parapet of the building.
<b>ENVIRONMENTAL CONSIDERATIONS</b>	How will the smog alert rule be regulated? (SAC, 09/28/09)	•First-party signs are controlled by landlords and tenants. •Sign companies cannot be accountable to turn off signs in the event of a smog alert.	•Signs are required to be turned off within 4 hours of a smog alert.
	The list describing exempt buildings from the smog alert provision appears inappropriate (SAC, 09/28/09).	•Why blood banks, power generating facilities, water and sewage pumping stations, water treatment and storage facilities appear inappropriate.	•The exempt buildings described are classified as post-disaster buildings in the OBC.
<b>LIGHTING</b>	What about Halo Lighting of signs (SAC, 09/28/09).	•This is not direct lighting of signs. It is an even glow all around.	•Signs can be illuminated either directly, indirectly or from within. The regulations proposed apply to all these types of illumination, including "halo lighting."

	How are the illumination levels proposed to be measured? (SAC, 09/28/09).	•For third-party signs it is easy. They all use standard lighting methods and it requires a one-time study.	•Lux and nits are internationally recognized standard forms for measuring illumination. Tools and devices (like common light meters) are used to measure these forms of illumination.
	Controlling lighting spillage is very subjective (TDL, 02/11/09).	•Controls may be based on perception rather than scientific evidence.	•The proposed illumination regulations are clear.
<b>SIGN DISTRICTS</b>	It is assumed there will be a clear and readable map indicating the sign districts (SAC, 09/28/09).		•Yes, there will be a clear and readable map indicating the sign districts.
<b>SECOND PARTY SIGNS</b>		•The language in the proposed by-law is unclear.	•The language is clear.
	Distinguish between first-party signs and third-party signs (SAC, 08/27/08).		•The proposed by-law distinguishes between first-party signs and third-party signs.
<b>GROUND SIGNS</b>	Consider increasing the maximum sign area of ground signs in commercial sign districts from 15 m <sup>2</sup> to 20 m <sup>2</sup> (SAC, 09/28/09).		•Ground signs in commercial sign districts are proposed to be a maximum of 20 m <sup>2</sup> .
	What is proposed restricts multiple pylon signs on larger properties (TDL, 02/11/09).	•Consider the potential size of larger properties as visual clutter is lessened.	•Considered. More than one ground sign is permitted where the lot frontage exceeds 200 metres.
	Allow smaller signs at roadway entrances (TDL, 02/11/09).	•For the sake of public orientation and vehicular safety.	•Considered and incorporated into the new draft.
	Consider allowing more than one ground sign on a frontage of a premises in commercial sign districts (SAC, 09/28/09).	•In exchange for more than one ground sign, regulations for separation of ground signs to each other could be introduced.	•Considered. More than one ground sign is permitted where the lot frontage exceeds 200 metres.
	Signage in drive-thru lanes should be exempt from any restrictions on animated signage (TDL, 02/11/09).	•Drivers in drive-thru lanes are not part of regular traffic and are operating their vehicles under unique circumstances.	•Considered and incorporated into the new draft.
	Allow for small promotional, pylon-mounted advertising on site (TDL, 02/11/09).	•To reduce advertising in windows and to allow brands to connect with on-site consumers.	•The proposed by-law allows for incidental signs.
<b>WALL SIGNS</b>	Considerations should also be had for first-party wall signs not facing a street and first-party wall signs erected on the sides and rear of buildings (SAC, 09/28/09).	•Signs in these locations should be 20-25 m <sup>2</sup> in area and should be erected up to 15 metres in height.	•Signs generally for first-party purposes are intended to identify a business or service located on the premises and may be erected on any wall.
	There may be circumstances where 20% is too limited (TDL, 02/11/09).	•A very tall or very wide building may be able to accommodate more than 20% without visual clutter. •Sign design and function can significantly alter the perception of sign size. •Also consider advanced technologies which lower energy use, or enhance historical details or neighbourhood references.	•For exceptional or isolated circumstances, the by-law proposes a sign variance process.
	Ensure that 20% of the façade does not include multiple planes or architectural details (TDL, 02/11/09).	•Measure the façade area blocked by script or channel letters because script letters are less intrusive.	For ease of applying the by-law a standard approach has been proposed.

	Consider special circumstances for corner lot locations (TDL, 02/11/09).	•It may be appropriate to allow for signage beyond the prescribed limit where it addresses a street corner directly.	•For exceptional or isolated circumstances, the by-law proposes a sign variance process.
	In Employment, Institutional and Utility sign districts why is there no consideration for wall signs above the first storey (SAC, 09/28/09).		•Generally, institutional, utility, employment and industrial uses occupy one-storey buildings.
<b>OTHER</b>	Will weather canopies associated with gasoline service stations be addressed? (CPPI, 01/23/09)		•The proposed definitions are expansive to include this scenario.
	There is a need for outdoor communication of signs of various types to appropriately communicate with the motorist customer (CPPI, 01/23/09).	•As many retail activities at service stations are conducted outside as opposed to inside a typical retail business establishment.	•The proposed by-law allows for incidental signs.
<b>PROJECTING SIGNS</b>	Why not allow projecting signs on premises in Employment, Institutional and Utility sign districts? (SAC, 09/28/09).		•These are uncommon sign types on premises used for employment, institutional and utility purposes.
<b>SIGN VARIANCES</b>	Does COTA provide for notification to neighbouring property owners (SAC, 09/28/09).		•The proposed by-law provides a notification process to neighbouring property owners.
	Delegate variance approvals to the staff level (TDL, 02/11/09).	•To increase to efficiency of the current process.	•The proposal describes delegation of first-party sign variances to the CBO.