



June 13, 2016

Ms. Nancy Martins  
10th floor,  
West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2  
Via email: [pgmc@toronto.ca](mailto:pgmc@toronto.ca)

Dear Councillor David Shiner and Committee Members,

**RE: PGMC 13.5 Amendments to the Sign By-Law:  
Regulations concerning signs in visibility zones**

The ABCRA wishes to advise the members of the Planning and Growth Management Committee (PGMC) that, in absence of further information, we oppose the proposed regulations which would permit signs located in visibility zones.

The proposed amendment can be analyzed according to its two component questions:

1. Whether there are circumstances under which it is appropriate to allow a sign to be placed within a visibility zone; and
2. Whether it is appropriate to allow decisions regarding a sign within a visibility zone to be made as variances to the Sign By-law and determined by staff or the Sign Variance Committee, as opposed to the current provision which requires an owner to obtain a site-specific amendment through City Council.

**Question 1: whether signs should be allowed in visibility zones**

According to the proposed amendment, there are circumstances where a sign can be placed in a visibility zone, and not obstruct the view that a driver would have of the street; however, no specifics or examples are given as to what those circumstances might be, other than one drawing.

Given the critical importance of visibility zones to the safety of pedestrians and vehicles, it is vital that the public have more than such cursory information about the circumstances under which a sign in a designated visibility zone might be considered 'safe'. We are very concerned about the precedent such a decision could set.

We urge the PGMC to require staff to further elaborate on these circumstances, and on the criteria they would consider in their analysis of the safety impacts of a sign located in a visibility zone, and further, we urge PGMC to share their full analysis with the public for consideration and comment.

In the absence of such further information, the ABC Residents Association opposes this proposed amendment.

**Question 2: whether decisions regarding signs in visibility zones should be made as variances to the Sign By-law and determined by staff or the Sign Variance Committee**

Setting aside the applicability of Question 2 (given our opposition to Question 1), we support staff's recommendation that decisions regarding signs located in visibility zones should be made as variances to the Sign By-Law and determined by staff or the Sign Variance Committee, on the condition that affected stakeholders are given notice of the proposed variance and an opportunity to respond fully.

If the proposed regulations are considered as one amendment (despite its two separate and distinct components), please register our opposition to the proposed regulations.

Thank you for your consideration.

Ian Carmichael  
John Caliendo  
ABC Residents' Association

cc: Councillor Wong-Tam