

Verbatim Public Comments on the Proposed Sign Bylaw

received as of February 22, 2019

Freestanding Signs

Stakeholder Comment	Administration Response
Figure includes Free Standing Signs; however the bylaw only defines Ground Signs. Are they supposed to be the same?	“Freestanding sign” has replaced “ground sign” as it more accurately describes the sign type. The definition section has been updated to reflect this change.

Portable Signs

Stakeholder Comment	Administration Response
MLM (mixed large market) is not an approved zone which means that we would have to classify portables as “Portable Signs used as Billboard Signs” (Section 63-68) in an MLM zone which requires the signs to be spaced 90 meters apart as opposed to the 20 meters for standard portable signs. This restricts Landlords of MLM zones from simple Tenant advertising of openings or special events if there are other permanent Billboard signs installed on site. Example: We have 2 permanent pylon/billboards signs installed 90 meters apart from each other but want to place a portable sign in between the 2 pylons for a 4 week period to announce an opening.	The proposed 90 metre separation has been reverted back to 45 metres, which is the same as the existing regulation. The example given in this comment would be permissible.

Wall/Building/Roof Signs

Stakeholder Comment	Administration Response
<ul style="list-style-type: none"> We are confused by “constructed of the same construction type as the cladding” language. Does this prohibit a metal frame to be mounted on a brick or stucco wall? Please define "construction type". Why does the material of the sign have to match the cladding? This would likely result in poorer sign quality and perhaps even building code violations. This restriction seems like an architectural control that would be put in place by a Landlord rather than something that regulated by a City Bylaw. 	Changed to clarify that where a building is required to be built using non-combustible materials, the sign must be constructed using the same non-combustible materials. This change was made to clarify the regulation and make its purpose clear.
We suggest greater specificity around "projecting". If the distance the sign projects is minimal there should be no requirement for architect or engineer involvement. We propose "signs projecting more than 3 meters above the top of the roof or parapet wall".	Changed the requirement to signs projecting more than 1.52 metres (5 feet) above a roof or parapet wall. However, projecting signs meeting other conditions that trigger the need for design by an engineer (i.e. exceeding 3.2 metres in height or 3.0 square metres in sign face area on any side) would still need to be designed by an engineer. Projecting signs falling below the thresholds that would trigger the need for design by an engineer are expected to have minimal impacts on public safety, hence making this change. The 1.52 metre standard proposed instead of the 3 metres requested in the comment is consistent with comparable cities’ regulations.
Max sign surface area may not be adequate; consider 5-10% of the wall area for residential zones and 15% for special zones.	No change made, as the proposed regulations are consistent with the existing regulations for wall signs. Analysis of the regulations for wall signs in comparable communities showed a mix of approaches (limiting wall signs by size or as a percentage of the wall), but there is no indication that one approach is more suitable than the other. Additionally, 5-10% of the wall in residential zones could result in much bigger signs than desired in residential areas if located on large residential buildings.

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Canopy/Awning Signs

Stakeholder Comment	Administration Response
We suggest the awning definition is too broad. As an example, the rooflike structure that projects from gas stations over the pumps is typically a much larger and more robust structure than a sun visor, and provides for a considerably different type of signage.	“Awning” has been removed from the bylaw and “awning sign” has been revised to better distinguish it from “canopy sign.” “Awning” was removed entirely as the Sign Bylaw only regulates awnings with signs on them, not awnings generally, and “awning sign” includes the information necessary to define them and distinguish them from other sign types.
Restricts a multi-tenant building that would have projecting or blade signs for each business.	Changed to allow for one projecting sign per commercial use, where there is more than one such use on a lot. The purpose of this change is to not restrict business owners from erecting a projecting sign just because they share a lot with another business that has one.

Billboards

Stakeholder Comment	Administration Response
legal nonconforming should include billboards leased on R.O.W's	No change made. As the signs have been erected under the existing regulations, they would already be legally non-conforming regardless of whether they are located on private property or land leased from the City.
More than one billboard should be allowed per lot if the lot has more than 90m frontage or if the lot abuts more than one traffic direction	The limit of 1 has been removed as it conflicted with the existing regulations for secondary signs. The number of signs permitted is now tied to lot frontage and the secondary sign regulations. This is the same as the existing regulations.
Would this section preclude having a pylon sign with static Tenant signage as well as an embedded electronic board? Example: Remove one Tenant panel from a pylon sign (classified as a billboard) and replace it with an embedded electronic sign instead.	No change made, as the proposed regulation applies only to billboards (i.e. off-site advertising). The example noted in this comment would be permissible under the proposed regulations.
National industry standard billboard sizes are 10'x20' (18.6m ²) and 14'x48' (62.5m ²). Capping sizes to smaller than these standards would be unreasonably restrictive and result in ineffective advertising for businesses. This would also greatly restrict the amount of advertising money coming into Regina and impair the ability for businesses to reach to consumers. Large format advertising is necessary for properly reaching audiences, we suggest a maximum size of 63m ²	No change made. The existing regulations allow for freestanding billboard signs up to 24 square metres in the HC – Highway Commercial zone. As a result of amalgamating this zone with other commercial zones in the proposed Zoning Bylaw, this size is now permitted in the MLM zone and in all industrial zones. This accommodates standard-sized billboards (10 ft x 20 ft, or 18.6 square metres, in sign face area) and even permits them to be a bit larger than that. Increasing the standard to allow for the largest size noted in the comment would mean approximately tripling the largest permitted size, which is why that change has not been made. Only one of the five comparable cities looked at (Saskatoon) permitted signs larger than 24 square metres in sign face area.
Limitations on the sign surface area and max height permitted for billboard signs - should be standard sizes currently used in the marketplace (i.e. 10'x20' or 20'x20')	No change made. A 10 ft x 20 ft sign (18.6 m ²) is already proposed to be permitted in MLM and industrial zones, which would actually permit up to 24 m ² . 20 x 20 (37.2 m ²) is a significant increase from the current max. permitted area of 24 m ² .
Definition of billboard sign should also include on premises signage (i.e. first, second, and third party, community - mixed use signage) - if installing a digital billboard - the owner would want the option to also advertise the companies located on the property - and not be limited to offsite signage (i.e. (1) Tim Horton's located in a shopping centre, would not be permitted to advertise on a digital board located on the same property (2) Bridgestone Tire sold at Canadian Tire)	No change made, as a billboard is specifically intended for off-site advertising. The examples given in this comment would be permissible, as someone could erect a digital billboard but then sell advertising space on it to tenants located on-site, too (assuming that billboards are permitted in the zone).

Digital Signs

Stakeholder Comment	Administration Response
As a general comment on this section, we suggest that EMCs should be regulated by size. Smaller signs have less visibility and less impact.	No change made because digital signs are already regulated by size, as any sign type (free-standing, projecting, etc.) may be a digital sign and each sign type is subject to different size standards based on the zone.
The brightness level is appropriate but there should be some language around how it is measured. e.g. “No electronic message center shall exceed a brightness level of 0.3 foot candles (substitute 3 Lux for the metric version) above ambient light as measured using a foot candle (Lux) meter at a preset distance depending on sign area, determined using the following formula: The square root of the product of the sign area and one-hundred. Example using a 3 square metre sign: Measurement Distance = $\sqrt{(3 \text{ Sq. M.} \times 100)} = 17.3$ metres measuring distance.”	Changed the regulation to include the measurement as suggested in this comment. This change was made in order to clearly identify the method used to measure sign brightness.
The word "switch" is not consistent with sign configuration. Consider "dimmer functionality" or similar.	Changed to “dimmer function” rather than “dimmer switch.” Dimming functions are typically automatic rather than controlled manually by a switch; making this change aligns the regulations with sign industry standards.
This is overly restrictive and is effectively more restrictive than that provided for billboards. There should be some allowance for frame effects and animation.	Changed regulation to specify that it pertains only to the sign copy area in order to improve the clarity of the regulation. Effects on the sign frame are not restricted, which is consistent with the existing regulations.
There can be a number of minor failures or malfunctions that don’t merit the display being turned off. If the failure or malfunction has a very limited impact on the sign display, the shut-down should be exempted. We suggest a modification that this provision will apply only when a meaningful percentage of the display is not working, or there exists a malfunction that has a meaningful adverse affect on the image quality of the display.	Changed the regulation to require that signs be turned off only if the malfunction adversely affects the image quality of the sign. As noted in the comment, not every malfunction of a digital sign will significantly impact the image, and it is not necessary to require a full shutdown of the sign if the sign copy is still readable.
Why is the cone of vision language included for illuminated and digital signs and not for other signs?	The Roadways and Transportation Department only uses this for digital signs due to the greater risk of driver distraction.
I understand and appreciate that the City needs a provision to change signage as the City and technology evolves but I think 10 years presents a large risk to electronic sign as that would be shorter than the useful life of the asset. Banks are willing to provide debt facilities with an amortization period of 20 years which seems like a more appropriate time frame for signs with a capital cost over \$200,000.	This regulation has been removed, as the proposed standards for digital signs should mitigate any of the concerns that were being addressed by the proposed validity period. For example, signs won’t be too bright/adversely impact traffic safety because there are now standards for brightness.
Based on our recent study of the market, 8 seconds per sign copy isn't the standard as a lot of ad space is sold in 6 second increments in order to have 10 advertisers per minute. static copy should meet industry standard of 6 seconds This will effectively reduce the amount of advertising available in the city, drive up the cost of advertising for local business, and necessitate more digital billboards to compensate. The current standard across the prairies is a minimum 6 second advertising length. 6 seconds is more than enough time to read the copy without distraction, the addition of 2 more seconds is unnecessary. 6 seconds should be the required minimum for Regina. Minimum 8 seconds is restrictive. Digital Sign business models often prefer 6 seconds min. to be financially viable	Changed the minimum requirement to six seconds rather than eight seconds. As noted by multiple stakeholders, six seconds is aligned with industry standards and is also still aligned with the recommendations made in the TAC Guidelines (though on the less conservative side of the scale).
Who is going to police the time constraints of each billboard in the City?	Enforcement of this provision would be complaint driven, or if it is otherwise noted by City enforcement staff.
What about gas stations that use digital components to display gas prices?	Changed the regulation to exclude digital signs on lots containing either the Service Trade, Motor Vehicle – Light or Service Trade, Motor Vehicle – Heavy (both of which allow for gas stations). Digital signs of the type typically used by gas stations are low-impact in terms of their distracting effects and should be permitted wherever gas stations are permitted.

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Digital Signs (cont'd)

<p>The current language of Definitions #5, (c) reads: “‘Alteration’ means a change or extension to any sign or part of a sign;” However, in Legally Non-conforming Signs, #9 suggests that the most recent alteration determines which set of regulations applies to the sign. And #11 excludes a face change, for example. But there is no consideration if a sign is changed in a non-structural manner (within its existing dimensions and less than 75% of value). If a sign owner wishes to improve the superficial attractiveness, the safety or the efficiency of the sign, say by converting from fluorescent lamps to LEDs or replacing neon sign transformers with electronic power supplies, those changes would trigger a loss of legal nonconformity. We propose that the definition of "Alteration" is less broad for #9 and 11.</p>	<p>Changed the definition for "alteration" and the regulation to clarify that sign copy changes do not entail alterations. Superficial changes (like painting the sign or changing the ad) are permitted under the proposed regulations, but the changes noted here would not be considered superficial. These types of changes to legally non-conforming signs would apply specifically to digital signs approved under Zoning Bylaw No. 9250, which does not include regulations for digital signs that are aligned with current technology or the TAC Guidelines. For this reason, changes of the type mentioned in this comment should trigger a loss of legal non-conformity, as this would ensure that the signs are brought into alignment with the regulations for digital signs in the proposed Sign Bylaw.</p>
<p>Driver's cone of vision + proximity circle requirements are too complicated to understand and to apply</p>	<p>These are tools used by Roadways and Transportation Department to assess whether or not the proposed location for a sign is appropriate (i.e. does not cause traffic safety issues). Anyone wishing to erect a sign can contact the City to better understand how these concepts are applied if they are unclear.</p>
<p>Referring to: be plainly marked with the voltage and wattage of the sign, as applicable, the name of the contractor or erector, size and weight, and said information must be readily visible after its erection. Is there a reason for this? Where would it be posted on the sign?</p>	<p>This regulation has been removed. Engineered plans must be submitted as part of the sign permit application package, which would include the most pertinent information being requested here, so it is not necessary to have this information visible on the sign itself.</p>
<p>All digital signs should have automatic dimming abilities based on ambient light sensors. The large variation in sunrise/sunset times throughout the year and the general ambient brightness through changing weather conditions (sunny day/stormy day) necessitate automatic dimming based on ambient conditions.</p>	<p>Changed the regulation so that digital signs require an automatic dimming function rather than a dimmer switch. This change aligns the regulations with sign industry standards and is also more desirable from an enforcement perspective because signs will automatically adjust based on ambient light levels and should therefore not be brighter than permitted by the regulations.</p>

General

Includes general comments on bylaw, definition or terms and comments that may relate to several different sign types.

Stakeholder Comment	Administration Response
<p>Legally Non-conforming signs are defined as those that are "legally erected and displayed at the time of the coming into force" which is different than what we were told during the sneak peek meeting which was "if you have an approved permit in hand that sign will not have to adhere to the new bylaws".</p>	<p>Changed the regulation to clarify that signs for which a permit has been approved are legally non-conforming, even if the sign has not been erected upon the coming into force of the Sign Bylaw. The City could not require an applicant to conform to the regulations in the proposed Sign Bylaw if the permit was issued while Zoning Bylaw No. 9250 is or was in effect.</p>
<ul style="list-style-type: none"> • The 10 year validity period is highly unusual. We also see a host of business, operational and enforcement challenges. For example it's unlikely a company will invest in a high quality, high cost sign if they may have to remove it in 10 years. This will adversely affect the city landscape. We understand the city's intent to allow for a change if circumstances dictate one but this is too broad. We suggest no end date but with clear exceptions as to what would require a new permit (e.g. significant complaints, meaningful change in surrounding environment, safety issues) or barring that, a longer period of 15 years minimum. • Will I have to re-apply for a sign permit every 10 years? • Will the owner have to re-apply for a sign permit every 10 years? Signs are a significant long term investment - preference would be for them to be permitted in perpetuity 	<p>This regulation has been removed. The intent of the validity period was primarily to address any digital signs that may cause issues unforeseen when the sign was approved. The regulations for digital signs in the proposed Sign Bylaw should mitigate most if not all of the concerns that may arise, so the validity period was determined to be unnecessary.</p>
<p>In the case of a landlord which could have upwards of 100 signs owned by Tenants or Third Parties but installed on our buildings, how do we ensure that all signs are current from a permit standpoint? Is there an online listing?</p>	<p>The 10 year validity period for sign permits has been removed from the proposed Sign Bylaw. Accordingly, there is no need to keep track of permits as there is no longer a validity period (other than for portable signs, which are valid until June 31 of every year, but this is consistent with the current practice for this sign type).</p>

APPENDIX A-8

General (cont'd)

Stakeholder Comment	Administration Response
Is there a required spacing between ground signs or between ground signs and billboard signs on the same parcel? Example from current bylaw: 2 billboard signs spaced 90 meters apart and a ground sign in the middle with 45 meters of spacing between it and each billboard respectively.	The current regulations in Zoning Bylaw No. 9250 do not include a required separation distance between freestanding signs unless they are billboards. This is carried forward in the proposed Sign Bylaw.
I have not seen anything relating to MMR or MXN zones in the proposed bylaw.	Zone references have been updated to reflect the proper names.
Has there been any consideration given to a "master signage plan" for large developments that will have multiple signs on-site developed over time as Tenants open? For our past two projects (Acre 21 and Aurora) we have sat down with City staff to confirm our assumptions and create a plan that can be implemented over time and cut down on questions and permitting time. It has worked great so far and we would be interested in formalizing that process.	This is an internal process matter that is outside the scope of the Zoning Bylaw. Administration will continue to work with applicants in this way.
Create a greater separation distance between portable signs and billboards. The visual clutter created from clusters of signs creates driver distraction. We recommend a separation distance of 90m between portable and billboard signage.	Increasing the separation distance between portable signs and billboards from 45 metres to 90 metres would unfairly penalize portable sign owners who are forced to move their signs whenever a new billboard is erected that is closer than the minimum required distance. As maintaining the current standard of 45 metres still reduces visual clutter, Administration has determined that this standard should remain unchanged.
Is that 6 months until construction completion or construction commencement? There should be a mechanism for extensions	The six-month period is in relation to the application itself if the application has not been completed properly. The purpose is to allow the City to discard abandoned or incomplete applications.
We agree with a height restriction, but suggest height should be restricted to 15m in all zones. This allows signage to be visible over trees and other obstacles.	Changed the regulation to permit signs up to 14 metres tall in some zones (approximately 45 feet), which should be adequate to be visible over any obstructions/trees. 14 metres is consistent with the maximum permitted height currently permitted in Zoning Bylaw No. 9250 and with comparable cities.
In the case of a landlord owning a parcel that is 40 acres with streets on all sides, there should be an ability to have more than 1 sign per lot. I think it is reasonable that you can place as many billboard signs as the 90m clearance (as the crow flies) allows.	The limits on number of signs permitted per lot have been removed and are now consistent with the current regulations in Zoning Bylaw No. 9250 for secondary signs. Lot frontage dictates the amount of signs permitted.
This information is not standard labelling for the sign industry and will cause inadvertent non-compliance. We suggest as part of the permitting process the City could require the sign company to submit the shop drawing and it can be kept on file.	This regulation has been removed. The reason for this is that engineered plans must be submitted as part of the sign permit application package, which would capture the information that was required as a result of this regulation.
Similar to my comments above on S.69 - 1 sign per lot does not consider Developers that are producing residential neighbourhoods, as they wouldn't be able to install ground signs to promote show homes, "coming soon" or other marketing initiatives if that land is yet to be officially subdivided. Areas for residential signs are also way too small from a developers prespective.	The limits on number of signs permitted per lot have been removed and are now consistent with the current regulations in Zoning Bylaw No. 9250 for secondary signs. Lot frontage dictates the amount of signs permitted. The permitted sizes for signs in residential areas in the proposed Sign Bylaw are consistent with the existing standards in Zoning Bylaw No. 9250, as these limits ensure that signs do not significantly impact the amenity of primarily residential areas.

APPENDIX A-8

General (cont'd)

<p>(1) Max # per lot does not account for frontage; we suggest provision for 1 per frontage and permit a 2nd pylon on the same frontage if the frontage exceeds 50 m. (2) Max sign surface area may not be adequate; consider increasing by 3-5 m².</p>	<p>The limits on number of signs permitted per lot have been removed and are now consistent with the current regulations in Zoning Bylaw No. 9250 for secondary signs. Lot frontage dictates the amount of signs permitted.</p> <p>The maximum sign surface area has been increased to 24m² in the MLM – Mixed Large Market zone and all industrial zones. This size is consistent with the maximum size permitted under Zoning Bylaw No. 9250 and allows for industry standard-sized billboards (typically 10 ft x 20 ft, or 18.6m²). The maximum permitted sign face area in other zones remains consistent with the existing regulations in Zoning Bylaw No. 9250 in order to reduce visual clutter.</p>
<p>We suggest tighter language around "externally illuminated". At present it is sufficiently broad to include unintentional, indirect illumination</p>	<p>Changed definition to include language excluding indirect or unintentional illumination of signs. This change was made because the intent of the regulation is not to include unintentional or indirect illumination caused by sources unrelated to the sign.</p>
<p>We suggest the language be tightened so as not to include unintentional visibility (e.g. "Is intended to be visible from outside a building")</p>	<p>No change made. A sign is a sign regardless of whether or not it is intended to be visible from outside a building.</p>
<p>We suggest adding an additional "(k) Historic Markers" to the list of permit exceptions.</p>	<p>"Historic Markers" has been added to the list of sign types that do not require a permit unless they exceed the noted standards related to size of the sign face, height or weight. The purpose of this change is to make it easier to mark and identify places of historical significance.</p>
<p>What control measures are in place for electronic billboards? The electronic billboards need to be regulated I applaud the City for recognizing electronic billboards are an issue as well. However, the proposed Sign Bylaw specifies a relative standard 'not exceed a brightness level of 0.3 foot candles above ambient light'. This creates an ever increasing spiral upward as more light is added. A much better approach would be to use an absolute standard such as not to exceed 200 or 300 nits between sunset and sunrise. The space on this form was very limited I would be happy to consult with you to help on this issue.</p>	<p>The proposed Sign Bylaw includes standards for digital signs regulating their brightness, how long a digital image must remain static, proximity to high-speed roads, street intersections and traffic control devices, and other measures aligned with the recommendations in the TAC Guidelines for Digital Signs. The proposed standard for brightness is aligned with the TAC Guidelines. While ambient light may increase as more light sources are added, the impact of digital signs' increasing brightness is mitigated because it is still relative to the brightness of surrounding light sources and should not be significantly brighter than those other sources.</p>
<p>Ring Road setback of 100m not necessary</p>	<p>The Administration has identified that there are safety concerns around having digital signs close to high-speed areas. This regulation has therefore been included in the proposed Sign Bylaw.</p>
<p>MH zone should have the same permissions as the MLM zone in terms of Ground Signs/Freestanding Signs and Billboard Signs (i.e. shopping centre, multi-tenanted building)</p>	<p>Based on the review and consolidation of existing zones, it was determined that the MH – Mixed High Rise zone is closer to MX and MS zones (from ZB No. 9250) than it is to major commercial zones. Accordingly, the regs are aligned with the existing regulations for the MX and MS zones.</p>