



P.O. Box 1749
Halifax, Nova Scotia
B3J 3A5 Canada

Transportation Standing Committee
February 28th 2013

TO: Chair and Members of the Transportation Standing Committee
Original Signed

SUBMITTED BY: _____
Jane Fraser, Director, Planning & Infrastructure
Original Signed

Ken Reashor, P.Eng., Director, Transportation & Public Works
Original Signed

Brad Anguish, Director, Community & Recreation Services

DATE: February 11th 2013

SUBJECT: Options for Managing Advertising Signage Provincial Highway 333

INFORMATION REPORT

ORIGIN

Regional Council Motion January 24, 2012, 10.1.1 - Signage Management on Non-100 Series Provincial Highways.

LEGISLATIVE AUTHORITY

Community Control of Non-controlled-access Highway Advertising Amendment (2011) Act, Chapter 371 of the Revised Statutes of Nova Scotia, 1989, the *Public Highways Act*: Section 49A (2), the Council of a Municipality may make a by-law prohibiting or regulating the erecting, maintaining, pasting, painting or exposing of advertisements upon any part of a (Provincial secondary) highway located within the Municipality and designated in the by-law.

BACKGROUND

MOVED by Councillor Rankin, seconded by Councillor Sloane, that Halifax Regional Council:

1. Direct staff to develop a by-law to regulate advertising signs on non-100-series provincially owned highways using Highway 333 as a pilot project; and
2. Direct staff to develop an accompanying signage management program for Council's consideration and approval including:
 - a. Program parameters and implementation strategy; and
 - b. Community partnership(s) for program development and delivery.

In January of 2012, Regional Council directed staff to develop a by-law and program to regulate advertising signs on Provincial secondary roads using Provincial Highway 333 as a pilot program. This was enabled through a 2011 amendment to the *Public Highways Act* allowing municipalities to adopt a by-law to regulate or prohibit advertising signage on non-100 series highways. A key objective for this initiative, as identified in the financial implications section of the 2012 Regional Council report, is to develop a cost neutral or cost-limited solution. In order to fully understand the cost-benefits associated with regulating signage on Provincial roadways, Council has chosen to move forward with a pilot approach. This will allow for a solution that is sustainable (affordable) and manageable over the long-term.

Sign clutter on secondary highways has been a long-standing issue for the Provincial Government. Provincial staff efforts in 2001 to manage advertising signage through a proposed uniform directional signage program, was not successful. The proposed program was never implemented and advertising sign regulations under the Public Highways Act have not been enforced on secondary roads.

Today, there are hundreds of unauthorized signs along the Provincial Highway 333 near Exhibition Park and Tantallon near the Highway 333 (Highway 3 intersection). A look at Google imaging from 2009, as compared to on-site data gathered in 2012, shows that the number of signs has more than doubled along the Prospect Road and by up to fifty percent near the Tantallon crossroads (Attachments 1&2).

The St. Margaret's Bay Regional Tourism Development Association, local Councillors and community and business representatives, have been working with staff to develop an effective regulatory and program solution for Council's consideration. This advisory committee and staff have investigated the signage issue in the pilot area and examined best practices and approaches in other jurisdictions. This work has led to the identification of three program options for how Council might address the management of advertising signage on Provincial roads. The information in this report has also been shaped by input from a public meeting held in July, 2012, (Attachment 3) and ongoing discussion with the Community Advisory Committee.

DISCUSSION

Staff are seeking direction from the Transportation Standing Committee before proceeding further with funding approvals, and subsequent drafting of the proposed by-law and program. This direction will allow staff to continue with the development of a budget, sign by-law and implementation program for Council's consideration in the 2013/14 fiscal year.

Program Objectives:

Following Council's initiation of this process, a public meeting was held to determine the level of support in the community for a regulated signage program and to help shape program objectives.

This consultation resulted in the identification of four key Objectives:



These objectives reflect the communities desire to address the signage issue in a balanced and sustainable way. Residents and businesses alike, support a regulated approach paired with an effective enforcement program. The objective to clean up the roadway and address traffic safety is primary, however, people also recognize the role that signage plays in supporting community economic development.

Current Sign Regulation in HRM:

There are two levels of sign regulation in HRM. On Provincial secondary roads, including Highway 333, advertising sign regulations under the *Public Highways Act Section 49* permit signs with standards for location and size. The aim of these regulations as stated under the Act, are to:

- a.) manage private advertising signage in a safe and equitable manner;
- b.) provide useful and accurate information to travellers; and
- c.) preserve and enhance the beauty of the countryside.

The regulations enable the Minister, or the Minister’s designate, to remove non-compliant signs within 10 days following a written request to the sign owner. These regulations are not enforced and no permits have been issued for signs on the Provincial Highway 333 and surrounding rural roadways.

Sign regulations for Municipal roads fall under HRM’s By-Law S-800, Temporary Sign By-Law. No advertising signs are permitted within the Municipal road Right-of-Way with the exception of sandwich board signs in the urban core.

Provincial Engagement:

HRM Staff have engaged with the Provincial Department of Transportation and Infrastructure Renewal to communicate HRM’s objectives and to address questions around future implementation. This has included discussion regarding future enforcement for Provincial advertising signage regulations. Provincial staff have stated that future enforcement of Provincial regulations (outside of the HRM designated areas) is not likely. This will have a direct impact on the scope of area that HRM will need to consider under the proposed by-law. Without Provincial enforcement of the entire “loop” of highway 333, the issue will not be addressed as sign clutter will simply move to the next neighbourhood.

Questions regarding other implementation mechanisms that might be used, such as putting licensing standards under an administrative order, have also been raised by the community advisory committee (including council representatives on that group) and by managers in CRS and TPW responsible for ROW services and Municipal Compliance. The key objective here is to allow for administrative flexibility and Council control to adjust and revise sign standards as needed without needing ministerial approval for each amendment. Discussions with the Province indicate that the only mechanism available to HRM is a by-law, unless an amendment to the *Public Highways Act* was approved to enable other tools.

SIGNAGE PROGRAM OPTIONS:

	Option 1: Uniform Directional Signs <i>Tourism and/or Business-Oriented</i>	Option 2: Promotional Advertising Signs	Option 3: No Signs
Description	<ul style="list-style-type: none"> • System of signs in designated zones • Uniform blue and white format • Signs installed and managed by HRM • Enforced through Sign By-Law (SOT) • Multi-year or annual license fee • Existing signs phased out/removed • Enforcement regime and administration • Provincial ROW permits required 	<ul style="list-style-type: none"> • Location, size and eligibility standards under By-Law • Signs owned and installed by business/organization • Provincial ROW permits required as part of licence • Multi-year or annual license fee • Maintenance fee would occur under this option • Enforced through by-law, SOT for non-compliance • Non-compliant signs would be removed following communication with sign 	<ul style="list-style-type: none"> • Sign management zones designated under By-Law • No promotional/advertising signs or directional signs would be permitted • All existing signs would be phased out/removed SOT • Provincial sign regulations apply outside By-Law area • Regular enforcement regime or complaint-driven process • Monitoring or stewardship role for community

**Options for Managing Advertising Signage
Provincial Highway 333
Standing Committee Report**

			owners subject to the time-lines and other conditions under the proposed by-law.		
Cost Estimates <i>(high level)</i>	<p><u>Start-up Costs</u> Business development & technical/IT \$80,000</p> <p>Engineering & design \$20,000</p> <p>Sign construction & install (per sign) \$1500 - \$2500</p> <hr/> <p><u>START-UP TOTAL Annual Costs:</u> \$102,500</p> <p><u>Area 1 - Gateways only:</u> admin & enforcement (licensing, site-monitoring, sign removal, legal, storage) \$20,000 - 25% FTE (Full-time employee)</p> <p>\$95,000 1.25 FTE</p> <p><u>Area 2 - Full length of Highway:</u> admin & enforcement</p> <p><u>Revenue:</u> License fees can be structured to off-set sign maintenance costs (\$9,000)</p>		<p><u>Start-up Costs</u> Business development & technical/IT \$80,000</p> <hr/> <p>START-UP TOTAL Annual Costs: \$80,000</p> <p><u>Area 1 - Gateways only:</u> admin & enforcement (licensing, site-monitoring, sign removal, legal, storage) \$40,000 - 50% FTE</p> <p><u>Area 2 - Full length of Highway:</u> admin & enforcement \$115,000 1.5 FTE</p> <p><u>Revenue:</u> License fees can be structured to off-set admin costs (\$10,000)</p>		<p><u>Start-up Costs</u> Business Dev./IT (business analysis and IT systems set-up for licensing) \$50,000</p> <hr/> <p>START-UP TOTAL Annual Costs: \$50,000</p> <p><u>Area 1 - Gateways only:</u> admin & enforcement (site-monitoring, sign removal, legal, storage) \$20,000 - 25% of FTE</p> <p><u>Area 2 - Full length of Highway:</u> admin & enforcement \$95,000 25% of FTE</p> <p><u>Revenue:</u> No fees/cost recovery</p>
	NET ANNUAL COSTS	\$106,000	NET ANNUAL COSTS	\$145,000	NET ANNUAL COSTS
Analysis	<p>Option 1 Uniform Directional Signs:</p> <p>This option has the highest cost-benefit ratio. Environmental, economic, and safety objectives can be achieved through a series of signs installed and managed by HRM. Municipal control over the fabrication and maintenance of signs, lowers “quality-control” issues and lowers site monitoring efforts for sign licensing. There are more positive economic spin-offs for businesses participating in the program and for the larger community with this option as compared to the other two.</p>	<p>Option 2 Promotional Advertising Signs :</p> <p>This option can achieve some degree of environmental, economic development and safety objectives. However, it would be a compromised effort as sign clutter could still be a problem (albeit to a lesser degree than the current situation). Promotional advertising in the public ROW is not supported by best practice. This option is more costly than Option 1 because of the extra effort required to enforce the by-law standards. Each application would require on-site inspection as part of the license process. Because signs would be owned and maintained by individuals, “quality-control” issues would be higher. Although revenue would be highest with this option (more signs/more fees), overall</p>	<p>Option 3 No Signs:</p> <p>This option has the lowest cost-benefit ratio. Although this option would best achieve environmental objectives, it removes signage completely within the public ROW as a means of supporting economic development.</p> <p>This prohibitive approach could be challenging to implement from a legal stand-point (Charter of Rights & Freedoms). Community and business support would be lower with a no-signs approach.</p>		

		implementation costs are highest.	
Considerations	<ol style="list-style-type: none"> 1. If the by-law area only applies to the gateway sections of the Highway, sign clutter will spread to abutting neighbourhoods where no Provincial or HRM enforcement would apply; 2. HRM Temporary Sign By-Law S-800, does not permit advertising signs on Municipal Roads; 3. All options require a service-level enhancement to administer and additional staff resources; 4. No Signs approach could be challenged under the Charter of Rights & Freedoms (freedom of expression); 5. Uniform Directional Signs approach most supported by best practice and community stakeholders. 		

Designating the enforceable boundaries:

Council must determine whether the by-law shall apply to the entire length of the Provincial Highway 333, or just to designated signage management zones near the gateway intersections (where current sign clutter is most prevalent). Possible “signage management zones” have been identified on the maps (Attachment 1&2) to indicate varying levels of by-law enforcement.

Council could choose to only designate the gateway portions of the Highway indicated on the Map as “Controlled Sign Placement Area 1”, in which case any sign standards and enforcement (i.e. removal of unauthorized signs) would be limited to that portion of the highway. Council would not have the authority to enforce sign removal in any other areas. Alternatively, Council can apply the By-Law to the full length of the Highway to enable enforcement in all communities along the Highway.

The two potential zones illustrated on the attached maps could have different standards for sign placement. For example, “Controlled Sign Placement Area 1” could be a permitted zone for primary directional and “assurance” signs, whereas “Controlled Sign Placement Area 2” could be a “no signs” or “limited signs” zone, which would be enforced for sign removal.

FINANCIAL IMPLICATIONS

There are multi-year financial implications associated with each of the three options. A cost-neutral or cost-limited solution is not possible when enforcement and administrative service level requirements are considered. Where license fees can be collected (Option 1 & 2), some degree of cost recovery can be achieved. However, in order for a licensing regime to work, the fee structure must be manageable for the licensee.

The results of staff’s work to date have concluded that delivery of a signage program which can effectively address the key objectives – environmental, economic, safety, and implementation, requires a new level of service delivery and supporting, multi-year financial resources. This financial requirement will be fully developed through a detailed operating budget as part of the draft sign-by-law and final recommendation to Council for fiscal year 2013/14.

COMMUNITY ENGAGEMENT

A community advisory committee was formed in April 2012, to work with staff to develop an appropriate signage program and by-law for Council's consideration. This Committee includes representation from local Councillors, St. Margaret's Bay Regional Tourism Development Association, St Margaret's Bay Stewardship Association, local business, and the Prospect Community Centre. A public meeting was also held in July 2012, to get input from the community on overall program objectives and issues and opportunities associated with the proposed by-law.

ENVIRONMENTAL IMPLICATIONS

There are no natural environmental implications associated with this report. There are, however, positive implications with respect to environmental aesthetics. The current aesthetic problems associated with sign clutter would be eliminated or significantly reduced, depending on the option Council chooses. The scenic beauty found along the Provincial Highway 333 route would be protected and enhanced through appropriate advertising sign regulations.

ATTACHMENTS

- Attachment 1: Map 1 – Signage Area Highway 333 Prospect Road
Attachment 2: Map 2 – Signage Area Highway 333 Tantallon
Attachment 3: Public Meeting Notes

A copy of this report can be obtained online at <http://www.halifax.ca/commcoun/cc.html> then choose the appropriate Community Council and meeting date, or by contacting the Office of the Municipal Clerk at 490-4210, or Fax 490-4208.

Report Prepared by: Holly Richardson, Coordinator, Real Property Policy 490-6889

Original Signed

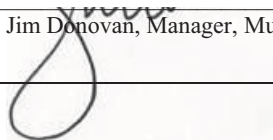
Report Approved by: _____
Peter Stickings, Manager, Real Estate & Land Management 490-7129

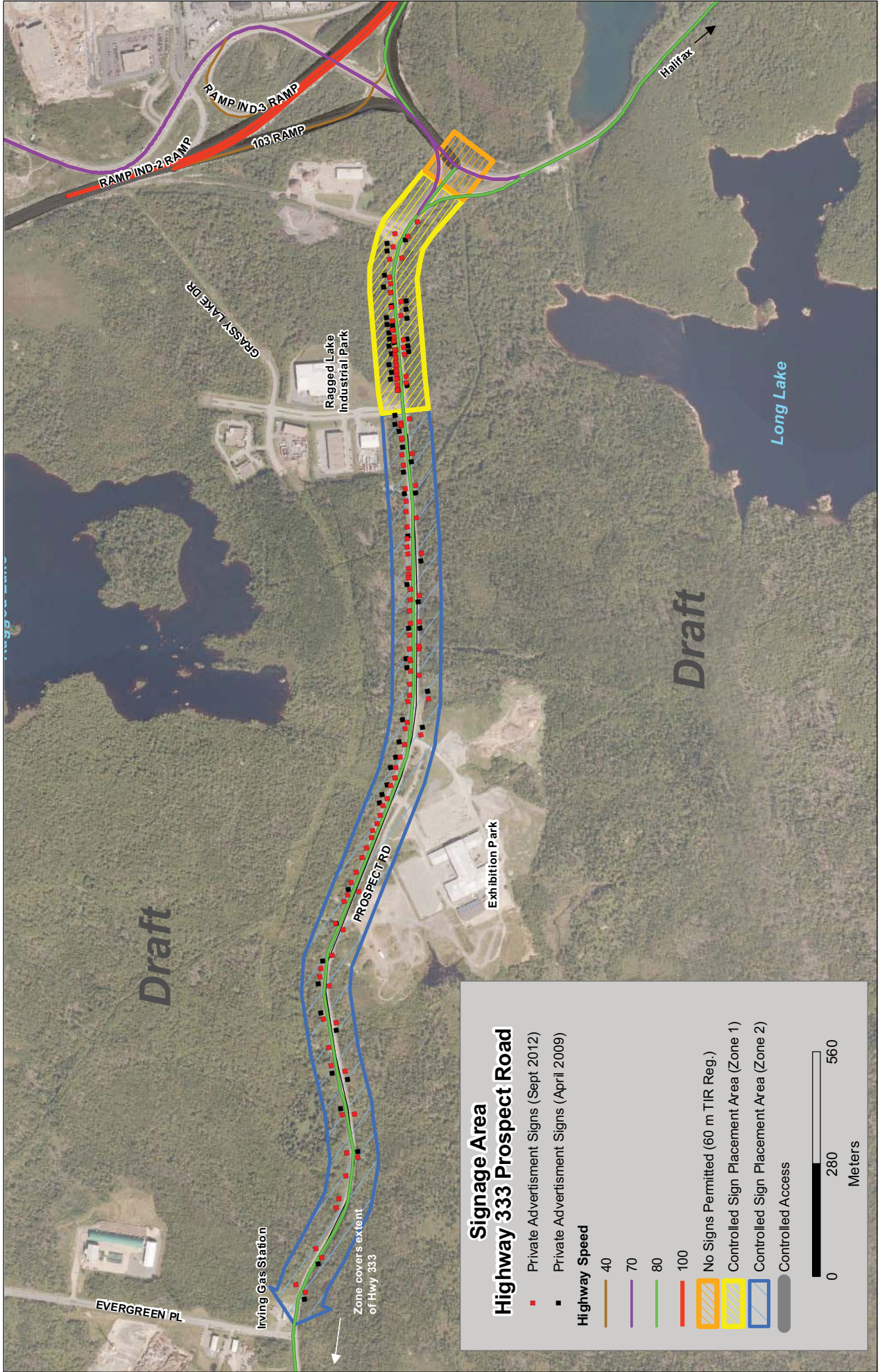
Original Signed

Report Approved by: _____
Taso Koutroulakis, Acting Manager, Traffic & Right-of-Way Services 490-4816

Original Signed

Report Approved by: _____
Jim Donovan, Manager, Municipal Compliance 490-6224





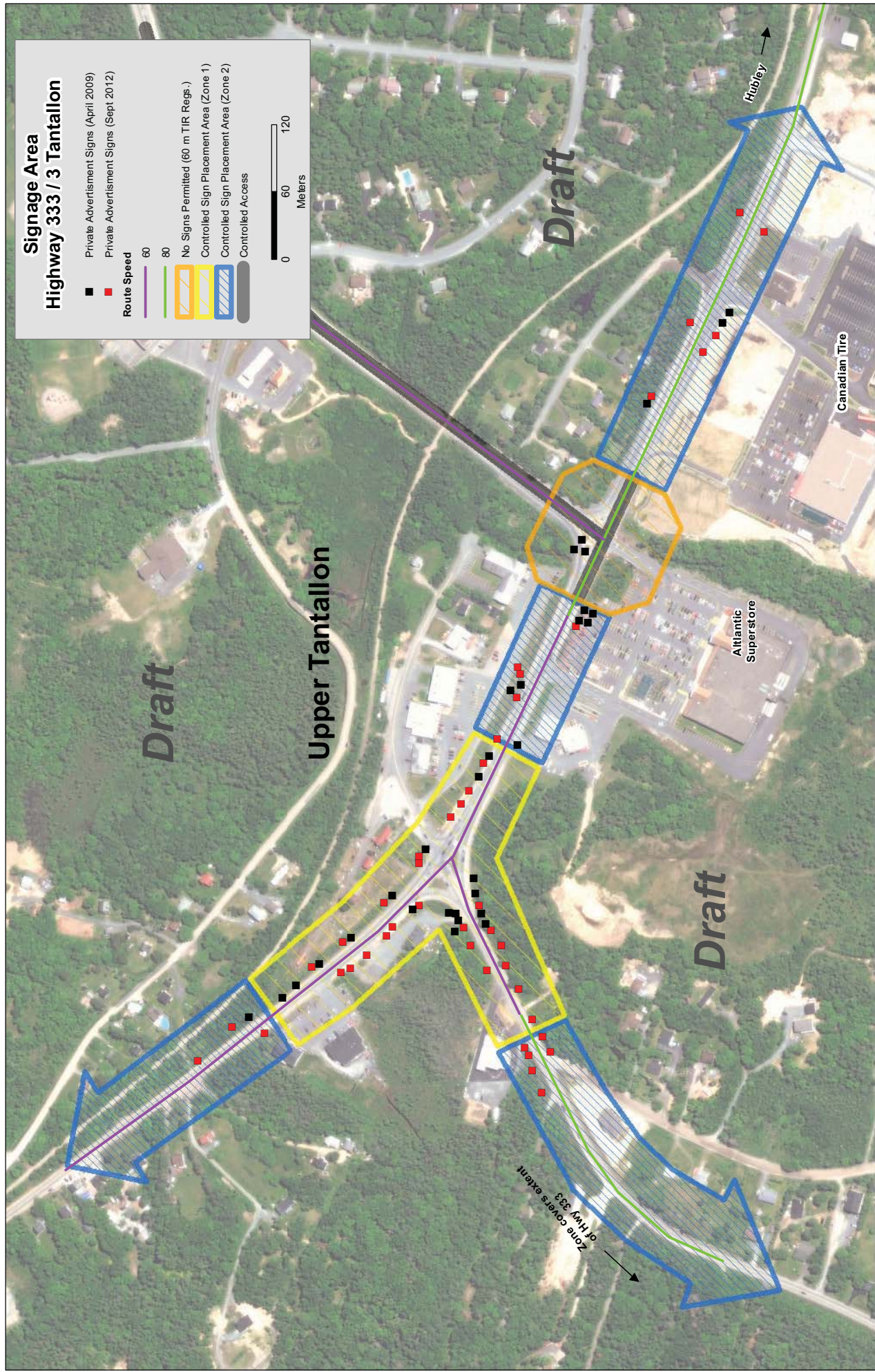
Signage Area Highway 333 Prospect Road

- Private Advertisement Signs (Sept 2012)
- Private Advertisement Signs (April 2009)

Highway Speed

- 40
- 70
- 80
- 100
- No Signs Permitted (60 m TIR Reg.)
- Controlled Sign Placement Area (Zone 1)
- Controlled Sign Placement Area (Zone 2)
- Controlled Access

0 280 560 Meters



PUBLIC MEETING NOTES

Managing Advertising Signage on Provincial Secondary Roads Highway 333 Pilot - Peggy's Cove Gateways

PUBLIC MEETING

July 19th 2012

Tantallon Public Library

Following a Presentation by HRM staff the following questions were explored:

- 1.) What are the most important elements of a signage program?
- 2.) Are there any challenges in implementing a signage program? How can the challenges be addressed?
- 3.) What is the best role for the community in implementing a signage program?

DISCUSSION*:

**HRM responses are in italics.*

How will this proposed by-law relate to existing HRM temporary signage by-law?

The proposed by-law will not affect HRM's signage regulations. It is separate and will apply only to specific, identified sign management areas at the two identified Peggy's Cove gateways at Tantallon and Prospect.

The pilot project will apply to advertising signs within the Provincial Road ROW at these two locations. These two signage management zones would permit signs according to the standards under the new sign by-law. Enforcement outside of these zones will fall to the Province under the Provincial Highways Act and to HRM under the Temporary Sign by-law (for Municipal roads).

HRM does not allow signage on controlled road ROW's although there is some allowance for temporary sandwich board signs to be placed directly in front of the business. This includes Hammonds Plains Road, a Municipal road since 2006. HRM permits and regulates signage on private property. Signs must be located directly in front of the business.

The by-law would allow businesses to install directional signage (at the gateways).

Sandwich boards on secondary roads are not effective as the driver needs to slow down to actually read them. They are more effective for pedestrians in urban areas.

One resident counted 9 signs on power poles and 11 additional signs in the vicinity of Redmond's Hardware. Are the sandwich boards on Hammonds Plains Road here allowed? *Yes, if they hold a permit and meet all regulatory requirements.*

Many of us in the community, including businesses, are in favour of doing something about "signage pollution". Community has been concerned about this for a long time. Suggestion was made to not allow signage on roads abutting open water, where scenic views would be affected.

When considering boundaries let's consider extending to Exit 5 at highway 103, otherwise we will simply move the problem. There is also a serious safety issue, because of the numerous signs, on the stretch between the 213 and 333.

The legislation does enable Municipalities to adopt By-laws for all secondary roads, however, HRM is only looking at the two identified pilot areas. The program has to be sustainable and affordable for the Municipality to manage and enforce. However, the role of the Province in enforcing existing signage standards along secondary roads (all roads outside of the two zones) is important. HRM and the Province must work together on this. With respect to the Tantallon area we will need to look closely at where the boundaries of the zone should fall so that the core problem and opportunity areas are addressed. We may need to look at a larger zone here.

There has been a long history of work by TIANS to find a solution to sign clutter. After three years a Provincial Plan was drafted (2001 TIANS report) but rejected following adversity from some businesses and politicians. We feel that DOT refused to get involved in enforcement so the Plan never got off the ground. We now have another opportunity to do something. Residents and tourists are "put out" by sign clutter. Even businesses are not happy and want better. We need to understand the purpose of these signs – are they even effective?

Signs should provide directions to drivers and not be used for promotional advertising. The purpose needs to be directional. Suggestion was made that QR (quick response) codes are being used more and more to link people to digital info quickly. *Could this be an opportunity? Maybe something the tourism association and Chamber could explore further?*

Some feel that the importance of signs has decreased due to the internet. Others feel that signs are still important and that drivers (including tour buses) still rely on (directional) signage.

There are businesses that need signs such as retail shops and tourism businesses. However, we need design, location, and overall permitting parameters. It can no longer be a "free-for-all". Blunose Accounting estimates that 25% of their business comes from signage and supports new regulations to support signage on private property (if it's designed well). Strongly in support of design guidelines consistent with a "Village" feel. HRM should also consider allowing pylon

signs in the Tantallon area. HRM should be reviewing standards for all signs (in HRM ROW and on private property) to enable businesses to advertise and stay viable.

Most businesses in the room (and tourism and chamber group) are in favour of standardized signage on the roadway. It creates an equal playing field and makes the rules clear.

We need to consider that drivers are coming from two possible directions (Prospect and Tantallon). Does this mean two signs per business? What about a maximum distance for directional signs. *Is it 15 kms 25 kms 35 kms?*

How will we restrict signs on the larger 333 loop? *There will be a need for the Province to do its part to enforce non-compliant signs. HRM will be responsible for managing signs in the two designated zones. By providing a legal option for signage in the ROW the hope is that businesses will not continue to put up illegal signs.*

Some businesses will object to change and others can't afford to make changes. The goal should be to have broad and collective community support for a signage plan. It comes down to businesses wanting to attract business and a signage program that can enable that. Communication with businesses will be important early on and throughout the program's implementation.

Signs are still very important to many businesses. Community way-finding signage should also be considered. This is something that the Tourism association and Chamber might consider longer-term.

Community branding to promote a "look-and-feel" for the Village has been proposed through the HRM Tantallon Visioning project. Bluenose Coast Tourism group has also developed a branding and visual image strategy which is being rolled out in Chester. Portraying a positive and cohesive "image" for the community is important.

What about the question of tourism signs versus general business signs?

Most businesses on the loop - estimate 70% - are tourism-related. Defining what businesses serve tourists and which don't can be difficult. Many feel that allowing only tourism businesses only is too exclusionary and not in keeping with what the community wants. The main concern is that we have good standards.

Tourism directional signage is the most widely accepted and universal sign standard used by communities across North America. However, discussions to date between HRM staff and the ad-hoc stakeholder committee have shown support for a broader business-oriented directional signage program. Making the call as to what is "tourism-related" puts subjectivity into the regulation which is probably not where we want to go. The by-law should have clear standards and requirements and be free from judgement calls.

Will non-profit organizations and churches (for example) be permitted to have signs?

This is something that will need to be explored further but if the organization (or attraction for that matter) needs directional signage then it makes sense that it would be permitted.

What about the question of directional signs versus promotional signs?

Signs should be directional and that should be their core function. Roger Brooks, contracted by the Bluenose Coast Tourism group, and universal best practice, says that wording, messaging, colors, etc. should be clear and concise – business or organization’s name, directional arrow and distance/kms.

Most in the room feel that signs should be directional for local businesses not promotional signs. This would exclude some of the existing businesses who are advertising on these roads but most would be permitted.

Will we have separate signs for each business or one standard with 4-5 businesses on it?

One standard with consistent color, lettering, etc. is the norm for communities and cities who implement uniform directional signage programs. Otherwise we are talking about non-uniform promotional advertising signage.

Will signs be on both sides of the road at the Tantallon intersection(s)? *All of the logistics and parameters around design, installation, location, etc. will need to be explored through the By-law. We will consider having further focussed consultation with business owners to work through some of these parameters.*

Is promotional signage (including non-local businesses) a legitimate use of the road ROW?

Promotion is a big kettle of fish, however, there is a strong argument against permitting promotional advertising signs and lots of precedent from other cities and communities.

Majority feel that business-oriented directional signage is a better option and would be more widely supported. We want this program to be positive for the community and for business. *This is not about prohibiting, it’s about permitting functional, well-designed signs.*

In terms of universal design standards could we have more than one standard, for example colors and/or symbols to decipher between tourist and other business? *Maybe we could have a different standard for seasonal business versus year-round operations. Yes, we can explore these options.*

On the other hand, too much uniformity can create a boring landscape. It might also be good to allow for some creativity in design and business branding like logos.

Can we consider a site for a group sign kiosk in an area where drivers can pull over to get their bearings? *The Bluenose Coast Tourism alliance has completed a marketing assessment with funding from the NS Government which looks at wayfinding, among other tools, to increase tourism benefits for communities along the south shore:*

<http://www.baychamber.ca/home/content/view/87/47/>

What are the implementation challenges?

The program needs to be affordable including for the business owner. Permit fees are reasonable but they must be affordable. Businesses need an incentive to support this.

Management and enforcement will fall to HRM. The funds to deliver the program will need to come largely from permitting fees. HRM will not be hiring more by-law officers to focus on signage and it is unlikely that the Province has resources. Therefore, we need to be realistic about what we can achieve. Designated sign zones can be manageable.

We need to consider maintenance issues such as graffiti and overall sign upkeep. HRM Vending by-law requires businesses to remove graffiti in three days. Some jurisdictions charge a small annual maintenance fee.

Probably everyone here would support a well-managed signage program but not everyone is here tonight. There will always be those who don't follow the rules. Enforcement needs to be in place to deliver the message that non-compliant signs will be removed.

Enforcement also needs to be efficient so that non-compliance is dealt with in a timely manner. If businesses don't feel that any consequences will follow they will continue with status quo. No point in developing any by-law if we can't manage it. We need a "carrot" to assist with implementation and compliance. What will make this attractive for business owners? Can there be assistance with on-line marketing or a central signage and information kiosk?

There is some concern that the area outside of the two management zones will become more cluttered with signs. How will we address this spin-off effect?

There is a general concern that HRM will not have the resources to manage this. Comment was made that the existing "Welcome to our Community" signs are a mess.

Is there a supporting role for the community? The community could have a "watch-dog" kind of role to monitor and communicate which would assist HRM (and the Province) in enforcement efforts. *An appropriate partnership between HRM and the community will be considered.*

Communication to the business community during the launch of the program and ongoing throughout its implementation will be important. People need to know what's happening and feel interested in supporting it.

This is a community issue that needs a community-driven solution. At the end of the day, if community and business don't support it we won't have the impact we want. Enforcement only goes so far. The enforcement of many of HRM's current by-laws is complaint driven. This is a more reactive result. We would like to have a more pro-active program where businesses "buy-in" to the program and ultimately benefit from it through better signs and a more positive community image.

When does a pilot not be a pilot, in other words, how committed is HRM to this over time?

Council has committed to exploring the highway signage issue by looking at the two gateway areas. These have been identified as priority areas largely because of the ongoing work and advocacy of the community tourism and chamber groups who have been working on this for several years. Managing (and permitting) signage on Provincial roadways is certainly an uncharted territory for the Municipality. The resulting program needs to be addressed strategically so that implementation is affordable and sustainable.

It can be reasonably assumed that the By-law will be subject to tweaking over time. For example, should the boundaries or the standards need to be changed it could be done through administrative order (decision of HRM Council) as opposed to a public hearing.

Another thing we should keep in mind is that implementation will not happen overnight nor will compliance. It will take time to roll this program out and get the resources and processes in place to administer it. For example we will need to notify businesses and the community that changes will take place and allow a reasonable amount of time for businesses to remove non-compliant signs. Legally, there are processes and precedence that we need to consider in terms of notifying sign owners before removal or clean-up happens. This should be factored into our expectations. With this said, we are moving forward with the goal of having a by-law in place by end of year and program roll-out in the early part of next year.