



## Committee of the Whole

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**Meeting Date:** June 8, 2021  
**Submitted by:** Chris Traini, P.Eng., County Engineer  
**SUBJECT:** LED-EMBEDDED TRAFFIC SIGNS (LETS)

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### **BACKGROUND:**

LED-embedded traffic signs, or LETS, are a sign technology being used in other jurisdictions but only rarely across Ontario. There has been some desire to consider LETS in Middlesex County, specifically for stop signs at locations in Southwest Middlesex and Strathroy-Caradoc due to perceived concerns with intersection safety.

### **ANALYSIS:**

#### **REGULATORY SIGNS**

Stop signs and all regulatory signs in Ontario are defined in Regulation 615 under the Highway Traffic Act. Design of regulatory signs are prescriptive so that from place to place across the province the same signs can be used by the police to enforce the rules of the road. Middlesex OPP are currently reviewing their authority to enforce and uphold any charges laid under the Highway Traffic Act for regulatory signs not meeting the standards as defined in the legislation.

Middlesex County regularly uses the Ontario Traffic Manual for guidance on all signs on County roads. Book 5 of the Ontario Traffic Manual is the reference for regulatory signage which was recently reviewed for potential revisions. Although LED-embedded signs were reviewed, the committee did not make changes to the manual and are not likely to consider adding LETS to the guidelines until the Highway Traffic Act and Regulation 615 are amended.

The County insurer, Intact Municipal Entities, was consulted and they expressed concern with the County erecting regulatory signage not in compliance with the provincial legislation. Not only are there concerns with potential liability at any location where these signs may be used, but also at other locations where the signs are not

installed and the absence of policies or guidelines for their use. Due to LETS not being permitted under the Highway Traffic Act and the impact of joint and several liability in Ontario Middlesex County may be exposed to significant liability risk for the use of this type of signage.

### **LED-EMBEDDED STOP SIGNS RECOMMENDED PRACTICE**

The Transportation Association of Canada has published a guideline of recommended practices for the use of LETS and specifically for LED-embedded stop signs. The guideline gives direction for the proper use of LETS and provides guidance on warrants for installation as well as what other measures should be exhausted before this type of signage is utilized.

It is clear that the use of LETS should be limited as they can create a distraction to drivers and potentially limit the effectiveness of similar regular stop signs. As with any safety measure, the guideline clearly recommends that these signs be strictly managed through sound engineering and rational decision-making.

### **LED-EMBEDDED TRAFFIC SIGNS (LETS) IN MIDDLESEX COUNTY**

The County does not currently have any LED-embedded signage of any type and the issues noted above create serious concern by the County Engineer that it would be premature to utilize this technology without a policy to govern where they should be installed. Even more concerning is the uncertainty of the ability of the police to enforce modified stop signs.

Ideally the Highway Traffic Act and associated regulations would be amended prior to the County installing LED-embedded stop signs due to significant liability risk. However if County Council decides to move forward with the installation of LETS at a minimum a sound engineering safety policy providing conditions and warrants for where these signs should be used should be established, and the policy should be developed in association with the Middlesex OPP.

It would be appropriate for a letter to be sent to the Middlesex County MPPs to ask for their support for the inclusion of LED-embedded signage as an amendment to Regulation 615 under the Highway Traffic Act so that municipalities can take advantage of this technology without significantly increased liability risk.

### **RECOMMENDATION:**

That until such time as Ontario Regulation 615: Signs and the Highway Traffic Act are amended to permit stop signs to be modified to include light-emitting-diodes that LED-embedded traffic signs not be installed at intersections under the jurisdiction of Middlesex County.