



**CITIZENS ASSOCIATION  
of GEORGETOWN**

November 3, 2012

Ms. Alice Kelly  
Manager, Policy Branch  
Policy, Planning and Sustainability Administration  
District Department of Transportation  
55 M Street SE, 5th Floor  
Washington DC 20003

Dear Ms. Kelly,

The Citizens Association of Georgetown (CAG) is appreciative of the opportunity to review and comment on the proposed regulations issued by the District of Columbia Department of Transportation (DDOT) concerning outdoor signs on August 17, 2012. CAG appreciates the efforts of DDOT and others to draft these proposed rules and believes they bring needed clarity to the issues relating to outdoor signage in DC.

CAG has already added its support to comments submitted by the Historic Districts Coalition in a letter dated November 3, 2012. However, given the unique treatment of the historic neighborhood of Georgetown under these proposed rules, CAG wishes to submit the following additional comments:

- CAG approves of proposed Section 304 "Prohibited Signs" as it addresses many of the concerns that Georgetown residents have over the proliferation of neon signs, light-emitting diode signs ("LED"), and the use of televisions. CAG recommends that in addition to this enumerated list of prohibited signs, that this section also state that all signs must comport with the guidelines issued by the Old Georgetown Board (OGB).
- CAG approves of the provisions of Section 305, particularly the provisions establishing a limit on the size of signs in windows that abut or overlook a street or public way. CAG has been concerned over the proliferation of large signs covering all or nearly all of a window of commercial establishments in Georgetown. However, CAG suggests that the final rules clarify that these rules govern all signs visible from the street or public way including signs that are set-back from the window.
- CAG believes the proposed regulations as written are ambiguous as to the division of labor between the Commission of Fine Arts ("CFA") and the DC Historic Preservation Review Board ("HPRB"). It has been the practice of the two agencies that the HPRB would defer to the CFA on any permanent project that falls into the CFA's jurisdiction. Alternatively, CFA generally defers to HPRB on any temporary change (primarily signage) that will be removed in 60 days. CAG believes this arrangement works well. However, as written the proposed regulations appear to require HPRB approval for all projects subject to its jurisdiction, regardless of whether the project is also subject to CFA review.

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- CAG recommends the proposed regulations be redrafted to clearly state that any proposed change to a building within Georgetown that will last 60 days or more shall be reviewed by the CFA unless the CFA has no jurisdiction (i.e. the change is not visible from a public street or thoroughfare) and that HPRB will review all temporary changes and any project not subject to CFA review.
- CAG recommends that the proposed regulations be amended to clearly state that nothing in Chapter 3 restricts the CFA from applying more strict standards than are enumerated in that chapter.
- CAG believes that the time constraints applied to the CFA for its review contained in Section 303.3 are far too short and could result many permits being issued without the necessary CFA review. As written, the city may be forced to issue a permit if the CFA does not return a response in 45 days. However, since the CFA only meets once a month, and not at all in August, it is quite common for an application to require more than 45 days to be approved by the CFA. Thus this provision could provide a loophole for applicants to avoid the requirement to obtain CFA approval by employing simple dilatory tactics. CAG recommends that this time limit should either be removed or significantly extended.
- With regards to the proposed rules governing free standing signs on public space contained in Section 606, CAG feels strongly that as written they would have a significant detrimental effect in Georgetown. The proposed rules would allow sandwich boards on Georgetown streets so long as they would leave at least 6 feet of sidewalk clear. Given the large crowds attracted to Georgetown, many with strollers or large shopping bags, six feet of clearance is far too small. CAG feels strongly that sandwich boards should be prohibited entirely throughout Georgetown. Additionally, CAG is aware that in Alexandria, Virginia the city is authorized to confiscate sandwich boards found on the sidewalk in violation of the city's regulations. CAG recommends that DDOT adopt a similar rule. This would significantly improve the effectiveness of enforcement.
- CAG feels strongly that the key to the effectiveness of these rules is enforcement. This is particularly true considering the broader scope of the proposed rules compared to the current rules. For that reason, CAG would like to reiterate its support of the Historic Districts Coalition's recommendation that DDOT request additional funds to hire one or more inspectors to provide for enforcement of these rules.

CAG thanks DDOT again for the opportunity to comment on the proposed rules.

Sincerely,

  
 Jennifer Altemus  
 President