

Historic Districts Coalition

November 3, 2012

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

SUBJECT: Historic Districts Coalition Comments on Proposed New Outdoor Sign Regulations,
published in the *DC Register* on August 17, 2012

Dear Ms. Kelly:

The Historic Districts Coalition (the Coalition) is an informal alliance of persons and organizations representing Washington, D.C.'s historic districts—those that have been designated under the provisions of the Historic Landmark and Historic District Protection Act of 1978 (D.C. Public Law 2-144)—as well as others interested in historic preservation, including residents of undesignated neighborhoods and representatives of neighborhood organizations, historic preservation organizations, and preservation-related businesses.

The following Coalition affiliates have endorsed the comments in this letter:

The Committee of 100 on the Federal City
Historic Chevy Chase DC
The Dupont Circle Conservancy
The Citizens Association of Georgetown
Historic Takoma

George Clark, Chair
Charles Cadwell, President
Thomas Bower, President
Jennifer M. Aitemus, President
Lorraine Pearsall, Vice President

The Coalition wishes to thank Mayor Vincent C. Gray and you and your team in the District of Columbia Department of Transportation (DDOT) for the opportunity to review and comment on the proposed new outdoor sign regulations published in the *DC Register* on Friday, August 17, 2012. You have clearly stated the purpose of these new regulations in Chapter 1, section 100.2. Your overall work brings order and clarity to the sign permitting process, and your inclusion of the Schedule of Infractions and Fines (more than 14 pages in Section 1201 of Chapter 12) helps make clear to anyone who takes the time to read these proposed regulations their importance in helping ensure personal safety, control litter and blight, and foster the

overall good appearance of streets, buildings, and open spaces, both public and private, in the nation's capital and our hometown.

The Coalition has the following recommendations for your consideration:

- Chapter 4: Signs Subject to Review by the Historic Preservation [Review] Board, appropriately addresses most signage issues related to individual landmarks and historic districts. Despite DC Council approval of such signs, we remain concerned, however, about the adverse impact of special signs in the downtown area when such signs are immediately across the street from a major individual historic landmark.
- Chapter 5: Chinatown District Review Procedures, notes in Section 500.2 that "Signs subject to this chapter shall be subject to the review and recommendation of the Office of Planning (OP)." Because the boundary identification of the Chinatown neighborhood includes part of the Downtown Historic District, we recommend that the Historic Preservation Office, which is part of OP, be specifically mentioned in the review process for signs requested within the historic district that falls within Chinatown. Where appropriate, the Historic Preservation Review Board should also be involved in the sign review and the approval process for this area.
- While not specifically mentioned, the Coalition assumes that temporary signs such as those for yard or Christmas tree sales, are covered by Chapter 6: Signs on Public Space, Section 605.4, and that as temporary signs, they do not need a permit, per Section 605.7. Further, Section 605.4 states that such temporary signs must be removed no later than 30 days following the event. HDC believes that 30 days is much too generous and that your team should consider stating that such signs be removed no later than 7 days following the activity they promoted.
- The Coalition also feels strongly that you need to address signs put up under the general heading of "free speech," such as those placed on public utility poles every 2 and 4 years promoting candidates for public office in the District of Columbia. We assume these signs are covered by Chapter 6. For clarity's sake the Coalition believes that "free speech" signs as a genre, need to be specifically mentioned in the appropriate place in this chapter or in the proper chapter if we are incorrect in our assumption about Chapter 6. As with our recommendation for yard and Christmas tree signs, we urge DDOT to use the opportunity of this sign regulations update as a vehicle to stress the importance of prompt sign removal following elections.
- The Coalition recommends that in a short statement at the beginning of Chapter 12, you state clearly that it is every DC citizen's responsibility to notify the appropriate DC government agency or official of any case where a sign may have been installed without a permit or may be inappropriate for the permit covering it. DDOT, OP, and the Department of Consumer & Regulatory Affairs do not have the personnel resources to monitor proper sign installation citywide, and citizen help will go a long way in combating sign blight.

- Finally, the Coalition recommends that given DDOT's responsibility for implementing this proposed rulemaking, it should ask in its 2014 Budget request for the resources to hire at least one Inspector to help with its enforcement.

The Coalition again thanks your office for this opportunity to comment.

Richard Busch

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