

Washington Parking Association
Comments on proposed sign regulations
December 14, 2014

- 1) Section 606 provides that signs in public spaces can be up to 10 square feet, except signs for parking facilities (606.6) and valet parking services (606.2) cannot exceed 6 square feet. Shouldn't this size be consistent at 10 sq. ft.?
- 2) Section 723.4 (referring to current 24DCMR609) limits the size of the information signs at the entrance to parking facilities ("menu boards") to twenty square feet (20 sq. ft.). 24DCMR609 has no size limitations.

Notwithstanding the provisions of the proposed regulations, please confirm that any existing menu board sign conforming to the current 24DCMR609 will be *grandfathered in* as authorized even if that sign would no longer be permitted under the proposed regulations.

Furthermore, the proposed size limitation for a menu board sign is unnecessary and unrealistic. The size of the sign is unique to the physical limitations of the facility and the best way to present the information to drivers entering the facility. Typically, these signs are currently 8'x4' or even 10'x5'. There's a lot of information to present and the letters must be large enough to read from what can be a significant distance from the sign to the customers. There was no need for a size restriction in the previous regulations and there shouldn't be one here. If there must be a size restriction, given the specific and unique nature and location of these signs, the maximum should be 50 square feet,

- 3) Notwithstanding the provisions of the proposed regulations, please confirm that existing signs permanently attached to commercial buildings, e.g. "Park" signs, will be *grandfathered in* as authorized even if that sign would no longer be permitted under the proposed regulations.
- 4) Section 603(application process) should have specific provisions for permits requested under Section 606.6 and 606.2. Unlike the other signs covered under 606, the 606.6 signs are generic and related to the specific parking operator. Permits for "Special Events" required under 606.2 are being handled on-line today. Permits under 606.6 should be issued, on-line with multiple permits accepted under a single application, and while the permit number is specific to a single sign, that sign should be transferable from one location to another.

Many parking facility operators have a number of locations and many 606.6 signs are generic, not site specific. It would be most efficient and economical if an operator could in one on-line application seek the number of permits needed for multiple locations. Furthermore, as long as the permit is both

assigned to a single corporate entity and the permit number is included on the sign, the operator should be allowed to move a sign from one location to another as required. (If necessary, the operator can report where each sign is and update the information if it is moved.)

Several companies are involved with both facility and valet parking and are already familiar with DDOT's current system for valet parking permits. The Washington Parking Association would like to work closely with DDOT in developing the most efficient and economical process for requesting and receiving permits for 606.6 and 606.2 signs.

If you have any questions or need additional information, please contact David Julyan at 202/367-0800 or dsjulyan@me.com.

Thank you for your consideration.