



District of Columbia Government  
Advisory Neighborhood Commission 6A  
P. O. Box 75115  
Washington, DC 20013



July 16, 2012

David Maloney  
State Historic Preservation Officer  
Historic Preservation Office, Office of Planning  
1100 Fourth Street SW, Suite E650  
Washington, DC 20024

Re: Proposed advertising on CaBi signs in Capitol Hill Historic District

Dear Mr. Maloney,

Advisory Neighborhood Commission 6A (ANC) requests a review by the Historic Preservation Office of the proposal from the District Department of Transportation to use the map boards at all the Capitol Bikeshare stations as commercial billboards. The proposal should be reviewed for adverse effects on historic districts, streetscapes, and parks. This request was adopted at a regularly scheduled and publicly announced meeting of the ANC, held on July 12, 2012. The quorum required is five, and the vote was adopted by 5-0-0.

We do not believe the Council by permitting the sale of advertising intended to abrogate historic district regulations. While we are glad to have as many CaBi stations as possible in our ANC, CaBi signboards can cause safety problems and, with the new proposal, may detract from the character of residential areas in historic districts.

For instance, a billboard at the CaBi station at the intersection of 13th and North Carolina, NE, would have an adverse effect on the historic district and wide historic streetscape, as well as views and enjoyment of Lincoln Park. The current signage is a threat to vehicle safety as drivers turn right to either continue on East Capitol Street by turning left, make an additional turn right to reach North Carolina Avenue, or proceed straight north on 13<sup>th</sup> Street. The choice has to be made immediately, in the presence of crossing pedestrians going to and from Lincoln Park, cyclists crossing to reach the CaBi station, and merging vehicles proceeding westbound on East Capitol from North Carolina. The confluence of choices and uncertainty is worsened by the distraction of a visually demanding, illuminated large sign on the CaBi station directly in front of drivers. Adding variable advertising will markedly increase the confusion.

Advertisements may be appropriate in commercial districts that are not in historic districts and, arguably, in commercial strips within historic districts. However, the proposal should be reviewed for conformity with preservation signage regulations and to determine whether it needs Section 9b review. We need information on what the practical effect of "consideration of neighborhood characteristics in the selection of advertisements for display" will mean. We need to know what specific standards will apply for the Capitol Hill Historic District.



Some of the DC regulatory language for signage in historic districts is:

2503.8 The visual impact of strong color, intense lighting, supergraphics, and other branding elements can be crucial in judging whether signage is appropriate for historic property. Standardized corporate branding, typically developed without regard to local character and context, is often not appropriate for historic buildings and districts and may need to be substantially modified to be compatible with a specific building or district.

2504.1 Signage shall be appropriate to the building, site, or historic district it will affect. Signage shall relate to, take advantage of, and be compatible with the building's particular composition, scale, design features, and architectural character. It shall be designed with sensitivity to adjacent historic properties, the landscape of historic sites, and the streetscape of historic districts, especially when placed in public space.

2504.3 Signs on historic property shall be primarily oriented toward and promote the pedestrian environment.

2504.7 Branding, color branding, or overpowering visual effects that detract from or overwhelm the architecture or historic character of a building or district are not permitted.

2505.3 The following sign types are typically not appropriate for historic buildings and districts:

- (a) Internally-illuminated, plastic-faced box or cabinet signs;
- (e) Prohibited signs, as defined in § 2506.

2506.1 Billboards and special signs as defined in § 2599 are not permitted on historic property. (From 2599: Billboard: A permanent signboard or structure on which lettering or images can be attached or posted, as further defined in the D.C. Building Code.)

2507.3 Sign size shall be consistent with the following criteria and considerations:

- (a) A sign shall be sized appropriately for its location on a building or site. Signage in a historic district should be generally consistent with the prevailing size of comparable signage in the district.
- (b) The maximum size and area limitations established by the D.C. Building Code apply to signs on historic property. Further limitations on size and area may be necessary to achieve compatibility with a historic property or district.
- (c) The appropriate size of a sign on historic property shall be determined by and tailored to the specific characteristics of the building or site, the location of the sign on the building or site, and if applicable, the character of the surrounding historic district.

2507.4 Sign material shall be consistent with the following criteria and considerations:

- (c) Shiny plastic and other sign materials and finishes that are not found on or are out of character with the affected building, district, or site are prohibited unless unusual circumstances make them clearly acceptable at the specific building or location.



2507.5 Sign copy shall be consistent with the following criteria and considerations:

(c) A sign listing services, goods, web sites, phone numbers, or other detailed information shall be no larger than three (3) square feet in size.

2508.1 Signs are not typically a prominent visual element on historic residential buildings. In order to preserve the character and setting of historic residential buildings, signage on these buildings and in historic residential areas shall not be visually intrusive, overwhelming, or incompatible with the significant historic characteristics of the particular building, site, and context.

There is a requirement for Section 106 review: I understand that your office's earlier Section 106 review of the Capital Bikeshare Program was conditioned upon further consultation regarding such advertisements.

Your careful evaluation and written response will be appreciated. It would be appropriate to consider different CaBi signs for historic districts, particularly in residential neighborhoods and park areas, much smaller and non-illuminated if permitted at all.

Respectfully,

David Holmes  
Chair

cc: Terry Bellamy, Director, DDoT  
Tommy Wells, Councilmember  
Phil Mendelson, Council Chair