



January 16, 2017

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Re: Assessment of Verizon Signs memorandum.

Dear Director Shaw,

We have just received from ANC 2C the November 9, 2016 DC Office of Planning's (OP) Assessment of Verizon Signs memorandum.

The review your office conducted is wholly inadequate, for two reasons:

First, while OP's legislative mandate was to assess the adverse impact of the operation of these digital signs on the Verizon Center and the surrounding neighborhood, OP gathered no information about the digital billboard's impact, adverse or otherwise, and its report contains none. The report is devoid of any data from field observations, photographs or video, objective surveys of residents and businesses, assessment of property values or any other of the important factors relevant to a serious professional review.

Second, in lieu of gathering the facts about impact, the report proceeds on the apparent assumption that impact can be evaluated just by reading the Comprehensive Plan and the Zoning Regulations. And in so doing, it relies on the baseless proposition that the Plan's characterization of Gallery Place as part of an "Entertainment District"¹ and "Art and Entertainment District"² sanctions digital billboards in the area and implies that they are not inconsistent with the Plan. In fact, there is simply no support in the Comprehensive Plan for allowing digital billboards, which are neither art nor entertainment, in this or any other area, let alone ignoring their impact on other uses. On the contrary, the Plan's discussion of Gallery Place/Penn Quarter as a Policy Focus area³ emphasizes among other uses the area's expanding residential uses, with which digital billboards are *prima facie* incompatible.

The effects of the massive ad-spewing, light polluting machines installed at the Verizon Center deserve a much closer look than the one block radius to which you confined your review, especially in light of the assessment's completely ignoring frequently voiced complaints of residents and office owners.

¹ Policy ED-2.3.6

² Policy CW-2.2.1.

³ CW-2.2. Gallery Place/Penn Quarter.

A credible report would:

1. Examine the effects of the billboards on the offices and workers *as required in the authorizing Graphics and Entertainment Congressional Review Emergency Amendment Act of 2012*, especially those businesses and civic institutions directly affected -- the Terrell building, the Monaco Hotel, the entire SE corner of the MLK Library, the National Portrait Gallery and American Art Museum, and businesses along 7th Street in close proximity to them;
2. Acknowledge that machines this large can be seen and have an impact on buildings from much farther away than one block – in an open landscape the two largest Verizon machines could be seen for a distance of up to seven miles -- and cause considerable distraction for those trying to work or reside in the mixed use Gallery Place neighborhood;
3. Ascertain and evaluate the effects of bounced light on either residences or offices;
4. Examine property values through residential and office property sales data before and after the installation of these signs;
5. Conduct an objective survey of, and interviews with, residents and businesses located within view of these billboards;
6. Conduct research about best practices in billboard control through the experience of hundreds of American cities that have enacted tighter controls or bans on new billboard construction;
7. Consider the growing body of research on negative effects of exposure to LED lights; and
8. Consider the impact of full motion video (FMV) at the Verizon Center, its ban throughout most cities and the promise by the billboard industry's stated policy on this matter, as noted in the study you cite as justification for a standard of digital billboard location to residences, *Planning and Design Review of Illuminated and Electron Signs* by Martin Rendl for the city of Toronto:

The Outdoor Advertising Association of America commits in its Code of Industry Principles that messages "on standard-size digital billboards will be static messages and the content shall not include animated, flashing, scrolling, intermittent or full motion video elements (outside established entertainment areas)." Most of the digital billboards in major cities display only static images that change at different intervals.


In his letter of July 5, 2016, CM Phil Mendelson, Chairman of the DC City Council, called on you to assess the impact of jumbotron permits; and on January 6, 2017, CMs Mendelson, Cheh and Silverman asked you to apply the Nationals Park legislation limiting full motion video at this location. The Committee of 100 concurs with both requests and we call on the city to prohibit the use of FMV at this location in line with the decision at Nationals Park.

OP's perfunctory and inadequate assessment of the effects of the electronic billboard machines at the Verizon Center feeds public cynicism about planning in our city, and it calls into question the DC government's diligence in objectively and thoroughly reviewing projects owned by special interests, in this case, Monumental Sports and Entertainment. In summary, this "assessment" should be rejected as the basis for re-permitting the Verizon Center billboards. We call on you to withdraw this document and to conduct a credible and objective study of this issue as we urged you to do in our memo of May 20, 2016.

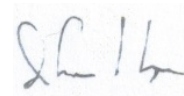
Sincerely yours,



Stephen A. Hansen, Chair



Meg Maguire, Vice Chair



Larry Hargrove, Trustee

Cc: Mayor Muriel Bowser; Melinda Bolling, DCRA; Leif Dormsjo, DDOT; DC City Council