

Testimony of Erin Palmer, ANC 4B02 Commissioner
Historic Preservation Review Board
Historic Preservation Office
October 3, 2019

RE: Written Testimony in Support of Concept/Solar Panels on Front Elevation, HPA 19-439, 6824 5th Street NW

Thank you for taking the time to hear from Commissioners and the public today about Mr. Preister's solar panel application. My name is Erin Palmer, and I am the Advisory Neighborhood Commissioner for Single Member District 4B02 in Takoma.

On June 24, 2019, Advisory Neighborhood Commission 4B adopted a unanimous Resolution in support of this application, and on September 23, 2019, the Commission adopted a unanimous Resolution supporting the adoption of 21st Century guidance for installing solar panels in historic districts. I have attached both Resolutions to my written testimony.

Mr. Preister's proposed solar panel installation has limited visual impact. As you are aware, the current proposed installation consists of 12 solar panels on the front gable of the residence. The design has changed to include a different racking system, which provides a sleeker, less obtrusive look and allows the array to blend in with the roof. Furthermore, the visual impact of these panels would be minimized because of the building's elevated location from the street and sidewalk, the building's height, the gray roof, and neighborhood trees.

Mr. Preister's proposed installation is substantially similar in both execution and impact to an installation approved by the Historic Preservation Review Board in January 2019 at 500 Dahlia Street, NW. Denying Mr. Preister's application would be based on an inconsistent and arbitrary application of what is considered objectionably visible.

Solar panel installations should be treated similarly to other technologies that have become commonplace building add-ons that are visible on contributing structures within historic districts. These include gas and

electricity meters, window air-conditioning units, air conditioning condenser units, and rain barrels. For example, rather than simply disallowing electric and gas service wherever visible from the street, guidelines were established for determining how and where to locate new or expanded meters to ensure that changes remain as compatible as possible with the character of historic properties. Solar panel installations are temporary and reversible features, and they should be treated similarly. They do not permanently alter the roof shape or any existing structure, and it is possible for buildings with solar panel installations to retain the original roof features and finish.

Climate considerations require a different approach to the visibility of solar panel installations. The District has recently passed a renewable energy requirement that is more aggressive than any state in the county, requiring 100% renewable energy by 2032. This includes a 10% local solar requirement, which means the solar panels must be installed within the District. Installation of solar panels reduces demand for conventionally generated electric power, thereby reducing environmentally damaging carbon emissions that are aggravating climate change. Installation of solar panels adheres to the spirit of legislation unanimously passed by the DC Council to move DC's power grid to entirely renewable energy sources by 2032.

Mr. Preister has spent countless hours meticulously restoring his home. It is beautiful. A recent appraisal of the home noted that Mr. Preister had extended the life of the house by 100 years through his time, attention, hard work, and love of his home, including installation of steel beams in two critical locations of the house. The appraisal also noted, however, that the lack of energy efficiency in DC could not guarantee the viability of the District as a place to live in 100 years.

I'm not sure what we are preserving if we don't take serious efforts to stem climate change, in part through a more sensible approach to solar panel installations in historic districts.

Thank you for your time and consideration.



Government of the District of Columbia Advisory Neighborhood Commission 4B

RESOLUTION #4B-19-0601

**Supporting Installation of Roof Solar Panels at 6824 5th Street, NW,
H.P.A. No. 19-439
Adopted June 24, 2019**

Advisory Neighborhood Commission 4B takes note of the following:

- Steve Preister, the owner of 6824 5th Street, NW, (the Applicant), with plans prepared by Solenergi, seeks to install 12 solar panels on the front (East) gable of his house in the Takoma Park Historic District: 6 panels on the south side of the front attic dormer and 6 panels on the north side of the front attic dormer. These panels will complement the existing 11 panels previously installed by Solenergi on the front of the house: 4 panels on the dormer roof; 2 panels above the dormer roof; and 5 panels on the front porch roof. The existing and new panels are a color similar to the sixty-year gray shingles on the house's roof.
- Currently, there are 24 panels at the rear portion of the roof facing west, which were installed by Vivint Solar approximately 7 years ago, and which are visible from Aspen Street, NW, as well as the 11 panels installed by Solenergi on the front of the house (as described above), which are visible from 5th Street, NW. While the Historic Preservation Review Board approved installation of these 11 panels on the front of the house, it did not approve a previous application for installation of the 12 panels on the front gable. *See* Historic Preservation Review Board, 6824 5th Street NW, H.P.A. No. 18-618 (Sept. 27, 2018). Advisory Neighborhood Commission 4B did not take a position at that time. One Historic Preservation Review Board member encouraged Mr. Preister to reapply to the Board for approval of these panels if the DC Council passed the proposed plan to move DC's power grid to entirely renewable energy sources by 2032 (as discussed below).
- In the Historic Preservation Review Board's subsequent case, 500 Dahlia Street, NW, H.P.A. No. P19-123 (Jan. 31, 2019), also in the Takoma Park Historic District and supported unanimously by Advisory Neighborhood Commission 4B, the Board approved an installation similar to the current proposed installation, noting that it was not discordant or incompatible with the Historic District. Advisory Neighborhood

Commission 4B believes the current proposed installation is substantially similar in both execution and impact, and would not be discordant or incompatible with the Takoma Park Historic District, the boundaries of which lie entirely within 4B.

- The current proposed installation consists of 12 solar panels on the front gable of the residence. The design has changed significantly from the proposal considered by the Historic Preservation Review Board in September 2018 to include a different racking system (SnapNrack, as opposed to IronRidge), which includes an Array Skirt. This design provides a sleeker, less obtrusive look and allows the array to blend in with the roof. Furthermore, the visual impact of these panels would be minimized because of the building's elevated location from the street and sidewalk, the building's height, the gray roof, and neighborhood trees. The proposed panels do not perceptibly alter the massing, height, or roofline of the home, as seen from the public street view.
- Prior to the Historic Preservation Review Board's previous approval of the 11 panels on the front of the house, every resident on the 6800 block of 5th Street, NW, supported installation of panels on the front gable at 6824 5th Street, NW. Prior to the meeting of Advisory Neighborhood Commission 4B on June 24, 2019, Mr. Preister again canvassed all neighbors on the 6800 block of 5th Street, NW, and support was again unanimous.
- One of the purposes of the Historic Landmark and Historic District Protection Act (the Act) is “[t]o retain *and enhance* those properties which contribute to the character of the historic district and to *encourage their adaptation for current use.*” D.C. Code § 6-1101(b)(1)(A) (emphasis added). Solar panels are “increasing in popularity and effectiveness” in the residential market and would enhance the property while encouraging its adaption to current climate considerations. DC Historic Preservation Review Board, *Sustainability Guide for Existing and Historic Properties* at 34.
- The proposed solar panels are a temporary, reversible installation. They do not permanently alter the roof shape or any existing structure, and the building will retain the original roof features and finish. See D.C. Code § 6-1101(b)(1)(B) (describing one of the purposes of the Act as “assur[ing] that alterations of existing structures are compatible with the character of the historic district.”); District of Columbia, Historic Preservation guidelines, *Roofs on Historic Buildings* at 11 (describing the importance of protecting the “character of the roof” when “altering roof shapes, materials, elements and details”). Solar panel technology is constantly changing and improving, and solar panels are therefore designed as a temporary feature.

- Installation of solar panels reduces demand for conventionally generated electric power, thereby reducing environmentally damaging carbon emissions that are aggravating climate change. Installation of solar panels adheres to the spirit of legislation unanimously passed by the DC Council to move DC's power grid to entirely renewable energy sources by 2032. If we do not preserve our planet against the catastrophic impact of climate change, we will not be able to historically preserve anything.
- The appraisal of Mr. Preister's home at 6824 5th Street, NW, noted that Mr. Preister had extended the life of the house by 100 years through his meticulous restoration of the home, including installation of steel beams in two critical locations of the house. The appraisal also noted, however, that the lack of energy efficiency in DC could not guarantee the viability of the District as a place to live in 100 years.

RESOLVED:

- That Advisory Neighborhood Commission 4B supports the Applicant's application to the Historic Preservation Review Board to install 12 solar panels on the front (East) gable of 6824 5th Street, NW, and recommends that the Historic Preservation Review Board approve the application.

FURTHER RESOLVED:

That the Commission designates Commissioner Erin Palmer, ANC 4B02, to represent the Commission in all matters relating to this resolution.

FURTHER RESOLVED:

That, in the event the designated representative Commissioner cannot carry out their representative duties for any reason, the Commission authorizes the Chair to designate another Commissioner to represent the Commission in all matters relating to this resolution.

FURTHER RESOLVED:

That, consistent with DC Code § 1-309, only actions of the full Commission voting in a properly noticed public meeting have standing and carry great weight. The actions, positions, and opinions of individual commissioners, insofar as they may be contradictory to or otherwise inconsistent with the expressed position of the full Commission in a properly adopted resolution or letter, have no standing and cannot be considered as in any way associated with the Commission.

ADOPTED by a show of hands vote at a regular public meeting (notice of which was properly given, and at which a quorum of eight of nine members was present) on June 24, 2019, by a vote of 8 yes, 0 no, 0 abstain.



Government of the District of Columbia Advisory Neighborhood Commission 4B

RESOLUTION #4B-19-0903 **Supporting Adoption of 21st Century Guidance** **for Installing Solar in Historic Districts** **Adopted September 23, 2019**

Advisory Neighborhood Commission 4B takes note of the following:

- In 2016, the District’s Department of Energy and Environment issued a Request for Applications seeking entities to create “green building historic preservation guidelines to help meet the ambitious goals related to green buildings set out in the Mayor’s Sustainable DC Plan.”¹
- The Historic Preservation Office of the District of Columbia Office of Planning published a proposed *Sustainability Guide for Older and Historic Buildings* in June 2019.²
- The June 2019 proposed *Sustainability Guide* contains guidelines as related to solar roof installations, which provide that such installations:
 1. Retain original character-defining roof features and finish materials.
 2. Install green roofs and solar panels so that they do not result in a perceptible change in the building’s massing, height or roofline, as seen from public street view, and do not cover or obscure distinctive roof features or finishes on primary elevations.

¹ “Notice of Funding Availability - Green Building Case Studies and Green Building Historic Preservation Guidelines,” *available at* <https://doee.dc.gov/node/1208810>.

² See Office of Planning, *Sustainability Guide for Older and Historic Buildings* (June 2019), *available at* https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/SustainabilityGuidelines_June28_2019.pdf.

3. *For buildings with flat roofs, locate green roofs and solar installations back from the front edge of the roof (and from the exposed side edge for corner properties) to minimize their visibility from public street view.*
4. *For buildings with sloped roofs, locate solar installations on secondary elevations to minimize their visibility from public street view, away from roof edges and ridges. Use low-profile panels set flush with the roof and in a complementary color with the roof finish to avoid a discordant or visually obtrusive appearance.*
5. Conduit for connections to electric meters should be run inside the building or in a manner that is not prominent on a primary elevation.
6. Refer to the DC Historic Preservation Design *Guidelines Roofs on Historic Buildings and Design Considerations for Roof Decks and Roof Additions.*

Sustainability Guide at 41 (emphasis added).

- The June 2019 proposed *Sustainability Guide* lays out several principles for “achieving compatible alterations for green retrofits on historic properties.” The following principles are particularly relevant to solar panel installations:
 - Visibility or Prominence from the Street: “[A]lterations on primary elevations prominently visible from a street should be more carefully considered.”
 - Temporary and Additive Change vs. Permanent and Destructive Change: “Alterations that are temporary or easily reversible with a minimized degree of demolition to the existing building have less of a lasting impact on the character of a historic property than changes that permanently change, damage, or remove important features.”
 - Achieving a Reasonable Balance: “Adapting old buildings requires a thoughtful consideration of practical needs along with the environmental and civic benefits of protecting architectural and historical characteristics valued by the community.”

Sustainability Guide at 2.

- In addition, the June 2019 proposed *Sustainability Guide* purports to recognize the need to balance the District’s historic preservation law — which establishes a process to ensure “historic properties are retained

and enhanced, to ensure that changes are compatible with the character of designated buildings, and to encourage the adaptation of historic property for current use” — with the District’s “commit[ment] to being a national leader in green building and sustainability practices,” including “a major reduction in energy use and greenhouse gas emissions [and] an increase in renewable energy sources.” *Sustainability Guide* at 1.³

Advisory Neighborhood Commission 4B understands that the proposed *Sustainability Guide* has gone through several revisions and may be subject to additional modification. The Commission further takes note of the following:

- Solar panel technology has evolved and improved significantly over the last decade, resulting in tremendous growth for the solar industry — the District alone is now home to approximately 5,000 different solar installations.⁴ As the technology has matured, more attractive, lower-profile, and less obtrusive systems have become commercially available.
- Solar panel installations are intentionally designed to be temporary and reversible features. They do not permanently alter the roof shape or any existing structure, and it is possible for buildings with solar panel installations to retain the original roof features and finish.⁵
- Other modern building materials and technologies are allowed on our historic buildings due to practical considerations. For example, asphalt shingles were not an original feature on many early twentieth-century homes, but over time they have become ubiquitous on contributing structures in our historic districts. They are accepted as a commonplace, low-cost building material, and the historic preservation guidelines regarding roofs on historic buildings expressly permit “economic feasibility” as a consideration for using non-historic roofing materials.⁶

³ See also Historic Landmark and Historic District Protection Act, D.C. Code § 6-1101(b)(1)(A) (providing one of the purposes of the Act is “[t]o retain *and enhance* those properties which contribute to the character of the historic district and to *encourage their adaptation for current use.*” (emphasis added)).

⁴ Solar Energy Industries Association, “Solar Spotlight – Washington DC” (June 2019), available at <https://www.seia.org/state-solar-policy/washington-dc-solar>.

⁵ See Office of Planning, *Roofs on Historic Buildings* at 14 (2010), available at <https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/DC%20Roof%20Guidelines%20SW.pdf> (describing the importance of protecting the “character of the roof” when “altering roof shapes, materials, elements and details”).

⁶ *Id.*

Likewise, steep cost declines are making solar a cost-reducing source of energy for District home and business owners [payback periods in our city are among the lowest in the nation].⁷

- Over time, other technologies have emerged to become commonplace building add-ons that are visible on contributing structures in our historic districts, such as gas and electricity meters, window air-conditioning units, air-conditioning condenser units, and rain barrels. Rather than simply disallowing electric and gas service wherever visible from the street, however, guidelines were established for determining how and where to locate new or expanded meters to ensure that changes remain as compatible as possible with the character of historic properties.⁸
- Our historic districts are not and were never intended to require that contributing buildings be preserved in their exact original state. As noted above, our historic districts are expressly expected to blend building preservation with allowance (and encouragement) to adapt to the needs of the modern era.
- “Prominence” from the street is an overly capricious standard for assessing the appropriateness of proposed solar installations. Our constituents and our Commission are confused over the Historic Preservation Review Board’s acceptance of certain recent applicants while rejecting others. Advisory Neighborhood Commission 4B fears the subjectivity of the current process is unnecessarily open to biases.
- The District has recently passed a renewable energy requirement that is more aggressive than any state in the county, requiring 100% renewable energy by 2032. This includes a 10% local solar requirement, which means the solar systems must be installed within the District. *Sustainability Guide* at 34. Installation of solar panels reduces demand for conventionally generated electric power, thereby reducing environmentally damaging carbon emissions that are aggravating climate change. Installation of solar panels adheres to the spirit of legislation unanimously passed by the DC Council to move DC’s power grid to entirely renewable energy sources by 2032.

⁷ Sunrun, “Economics of Solar Energy,” *available at* <https://www.sunrun.com/solar-lease/cost-of-solar/solar-energy-economics>.

⁸ See Office of Planning, *Design Guidelines for Utility Meters* (2012), *available at* <https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/Design%20Guidelines%20for%20Utility%20Meters%2001%202013.pdf>.

- At the same time, the number of properties in the District deemed historic continues to grow and now approaches 30,000 — a total that represents over 20% of all properties in the city.⁹
- If we do not preserve our planet against the catastrophic impact of climate change, we will not be able to historically preserve anything. Failure to actively pursue measures to effect a major reduction in energy use and greenhouse gas emissions and an increase in renewable energy sources will have devastating and irreversible effects on the viability of the District as a place to live.

RESOLVED:

- That Advisory Neighborhood Commission 4B calls on the Historic Preservation Office of the District of Columbia Office of Planning to enact a framework in its proposed *Sustainability Guide for Older and Historic Buildings* that recognizes that solar panel installations are not permanent alterations, but rather are temporary and reversible.
- That Advisory Neighborhood Commission 4B calls on the Historic Preservation Office of the District of Columbia Office of Planning to provide greater flexibility as to the visibility of solar panel installations in historic districts in light of the temporary and reversible nature of such installations and urgent climate considerations, including removing any language limiting placements to secondary elevations or recommending placement away from roof edges.
- That Advisory Neighborhood Commission 4B recommends that, for proposed roof-top solar installations that would be visible from the street, the Historic Preservation Office and Historic Preservation Review Board’s primary charge should be focused on refining and optimizing the design of solar panel installations and minimizing the contrast between solar panels and roofing materials.
- That Advisory Neighborhood Commission 4B recommends that even solar installations visible from the street should, by default, be considered unobtrusive minor alterations that are delegated to review by the Historic Preservation Office. These projects should require approval by the Historic Preservation Review Board only upon the request of either the Historic Preservation Office or the affected Advisory Neighborhood Commission.

⁹ Greater Greater Washington, “DC designated 3,000 properties as historic in the last 5 years, and more are coming” (Sept. 17, 2018), *available at* <https://ggwash.org/view/69120/dc-designated-3000-properties-as-historic-in-the-last-5-years-and-more-coming>.

- That Advisory Neighborhood Commission 4B calls on the Historic Preservation Office of the District of Columbia Office of Planning to require consideration of urgent climate considerations (and not just “practical needs”) in any design principle relating to “achieving a reasonable balance” with historic preservation.

FURTHER RESOLVED:

That the Commission designates Commissioner Geoff Bromaghim, ANC 4B07, and Erin Palmer, ANC 4B02, to represent the Commission in all matters relating to this Resolution.

FURTHER RESOLVED:

That, in the event the designated representative Commissioner cannot carry out their representative duties for any reason, the Commission authorizes the Chair to designate another Commissioner to represent the Commission in all matter relating to this Resolution.

FURTHER RESOLVED:

Consistent with DC Code § 1-309, only actions of the full Commission voting in a properly noticed public meeting have standing and carry great weight. The actions, positions, and opinions of individual commissioners, insofar as they may be contradictory to or otherwise inconsistent with the expressed position of the full Commission in a properly adopted resolution or letter, have no standing and cannot be considered as in any way associated with the Commission.

ADOPTED by show of hands vote at a regular public meeting (notice of which was properly given, and at which a quorum of seven of nine members was present) on September 23, 2019, by a vote of 7 yes, 0 no, 0 abstain.