



## MEMORANDUM

To: Historic Review Board  
From: Christina Robertson-Gardiner, Senior Planner  
RE: HRB Policy #12 Solar Panel- Background and Potential Revisions  
Date: March 15, 2024

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This memo provides an overview and preliminary guidance based on the November 2023 and February 2024 meetings and the recommendations of the Historic Review Board (HRB) regarding the potential revision of HRB policy #12 on solar panels. The Board will consider expanding the policy to include additional configurations that could be approved at a Type I staff-level review. Changes to accepted materials, size, color, and design are not part of this review- only the configurations (where the panels are located on the roof) would potentially be expanded to include additional locations allowed under a Type I review.

There does not seem to be a strong consensus on whether the policy should be amended or not. At the February 27, 2024 HRB meeting, Staff was asked to provide an overview or a "white paper" compiling the issues and discussions to date to help the HRB members figure out the next steps for this work plan item.

This is especially important as two of the work plan items for 2023-2025 have just been approved through the latest Certificated Local Government grants. #4 -Compatible Change: revising the definition for new construction in historic districts and #5 creating a standard draft of window conditions of approval for new construction projects. The Board will need to provide direction to staff on the order and timing of these projects soon.

The HRB will review this memo during the March 26, 2024 meeting. During the meeting, HRB members will discuss the content and decide whether to:

1. Proceed with a public outreach process and adopt revisions to HRB policy #12, or
2. Retain the current HRB policy #12 and continue to monitor the issue throughout the 2023-2025 work plan. The Board will table this work plan item and determine if they want to pursue additional changes in this or a future HRB work plan.



### **Purpose of Work Plan Item**

The increasing concern about climate change and the need for green energy is changing the conversation around solar panels and historic preservation, especially relating to their installation on publicly facing elevations. In the past, there was a view that all solar panels must be shielded from view to meet the Secretary of the Interior's standards for rehabilitation. However, with the growing awareness of the importance of renewable energy, there is a push to make it easier for homeowners to install solar panels, even on visible front gable roofs. Solar panels are increasingly being viewed as a temporary installation on historic buildings in order to meet national green energy goals.

This work plan item was inspired by a presentation from the National Association of Preservation Commissions' CAMP presentation in August 2023, as well as numerous HRB hearings regarding requests for installing solar panels on visible elevations over the past few years. The City of Denver recently revised its guidelines to meet the community's needs for historic preservation and support for solar energy in the state. They are included as an exhibit to this memo and have been used below to help illustrate what currently meets and does not meet HRB Policy #12

This approach considers solar technology to be a temporary installation rather than an alteration to the historic fabric of a building. It represents a concerted change in some preservationists' views on how to determine if and when a solar panel adversely affects a historic resource.

Generally, the Secretary of the Interior looks for approaches that limit the visible impact a solar panel has on the public views. Panels that are located on flat roofs, the rear elevations or on small accessory buildings clearly meet the intent. However, what happens when this more conservative approach blocks a community from a wider implementation of solar technology if the southern exposure of houses tended are on visible primary side elevations? That question drove much of the city of Denver's conversation. Other cities have chosen to retain the prohibition of solar panels on visible elevations and are waiting as the solar economy and technology evolves and matures.

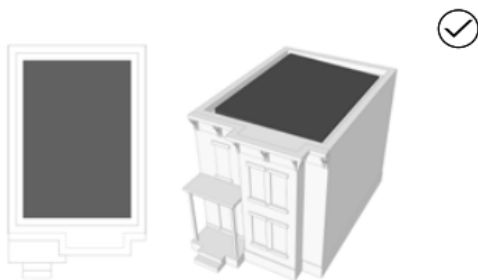
The proposed amendments are intended to provide further direction to homeowners to allow solar panels to be installed on visible front gable roofs through the standard building permit process without requiring applicants to submit for a Type III HRB review.



### HRB Policy #12 – Solar Panels.

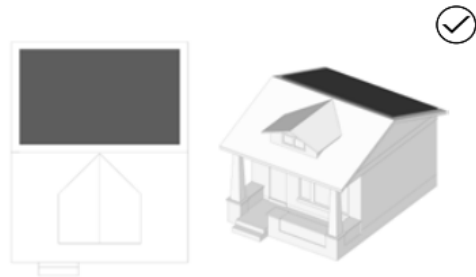
#### What configurations are currently allowed in Oregon City as a staff-level Type I review?

Sloped roof location: Solar panels are permitted on secondary facades of historic buildings and on accessory structures.



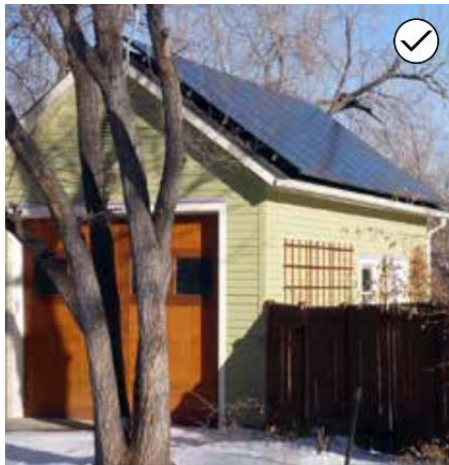
#### **SOLAR INSTALLATION ON A FLAT ROOF**

*Install solar panels in any configuration as long as the panels are entirely below the top of the parapet*



#### **SOLAR INSTALLATION ON A SIDE GABLE ROOF**

*Install solar panels on rear slope of roof*



*Install solar panels on accessory structures*



*Install solar panels on secondary facades.*

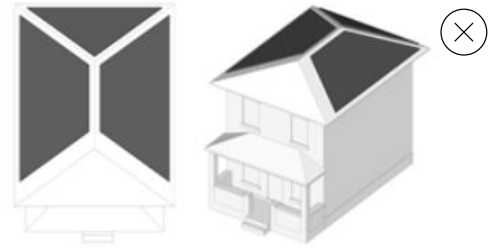


What configurations do not meet Policy #12 and must be reviewed through a Type III Historic Review Board meeting?



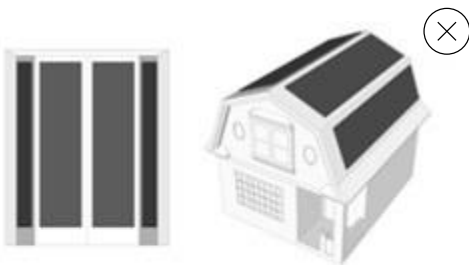
**SOLAR INSTALLATION ON A FRONT GABLE ROOF**

*Install solar panels on side slopes of roof and at least three feet back from the front eave of the building*



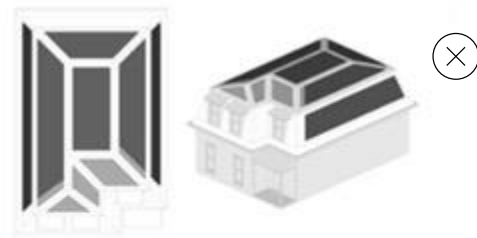
**SOLAR INSTALLATION ON A HIPPED ROOF**

*Install solar panels on side or rear slopes of roof and at least three feet back from the diagonal ridge at the front of the building*



**SOLAR INSTALLATION ON A GAMBREL ROOF**

*Install solar panels on side slopes of roof and at least three feet back from the front eave of the building.*



**SOLAR INSTALLATION ON A MANSARD ROOF**

*Install solar panels on side or rear slopes of roof. Solar panels may be installed on the low-slope at the front of the building (shown in gray hatch above) depending on visibility from the street.*



### Potential revisions to HRB Policy #12

The city of Denver allows the installation of solar panels on visible primary side elevations, provided they are set back 3 feet from the edge. The Historic Review Board may choose to implement the same 3 feet setback requirement or impose additional setbacks of 5-10 feet. The Board may also decide to restrict the installation of solar panels on only the back 2/3 of the roof plane and not allow them on the front 1/3 of the roof. If the board chooses to move forward with revision to the Solar Panel policy- below are the options the board may choose to adopt.

1. Solar panels on visible primary side elevations are allowed, provided they are set back 3 feet from the edge of the eave.
2. Solar panels on visible primary side elevations are allowed, provided they are set back 10 feet from the edge of the eave.
3. Solar panels on visible primary side elevations are allowed, provided they are not installed on the front 1/3 of a roof plane.
4. Another metric as determined by the Historic Review Board.

During the HRB meeting on March 26, 2024, the Board should review the options presented above to determine if there is a consensus for a revision to HRB policy #12. In the event that there is no consensus, it is recommended that the HRB table this work item for a later date.

### Exhibits

1. HRB Policy #12 Solar Panels
2. Updating Solar Guidelines- National Association of Preservation Commissions Presentation
3. City of Denver Solar Panel- excerpts
4. HRB Work plan 2023-2025- Adopted.