**Amendment to the Standards & Guidelines, November 2024:**

Providence Historic District Commission ("PHDC" or "Commission") review of projects and staff administrative review.

PHDC reviews shall conform with: RI General Laws 45-24.1-4
City of Providence Zoning Ordinance
Standards & Guidelines adopted by the PHDC

**Review Procedures**

SIGNIFICANCE OF HISTORIC RESOURCES

The local historic districts (LHDs) comprise of varying architectural and historical significance from the PHDC's perspective. Cases are reviewed holistically, as each resource has its own unique characteristics. For years, the PHDC has used the terms "singular," "contributing," and "non-contributing." This amendment clarifies these definitions to assist in guiding owners and applicants to the PHDC's expectations for maintenance and development.

Review of "Singular Buildings"

"Singular buildings" are those buildings referenced in RI General Laws 45-24.1-4 as "a structure, or its appurtenances, which the PHDC deems so valuable to the city, town, state, or nation, that the loss of that structure will be a great loss to the city, town, state, or nation." Singular buildings in historic districts include: individual buildings listed on the National Register of Historic Places; individual buildings designated as National Historic Landmarks; significant groups of buildings in National Historic Landmark districts; and other buildings that qualify under RIGL 45-24.1-4.

The PHDC will review all projects involving singular buildings except for those defined under the Repair/Replacement and Minor Alteration categories.

Applicants for projects at singular buildings shall consult with PHDC staff before applying for review. The application will require written documentation and may include photo documentation, line-drawings showing plan, elevations and architectural details, historical/architectural background, and any other relevant information deemed necessary by the PHDC.

Review of "Contributing Buildings"

"Contributing buildings" supplement the overall significance of historic districts as documented in the National Register of Historic Places. Contributing buildings constitute the majority of structures in the historic districts. The PHDC will review demolitions and Major Alterations of contributing buildings. The PHDC also will review new construction projects.

Staff will review projects that are not visible from the public right-of-way, window replacement projects that conform with the PHDC's window replacement standards, solar projects that conform with the PHDC's solar energy systems standards, and applications within the Repair/Replacement and Minor Alteration categories.

Applicants for projects at contributing buildings shall consult with PHDC staff before applying for review. Staff will advise applicants about the written documentation required which may include

photo documentation, line-drawings showing plan, elevations and architectural details, historical/architectural background, and any other relevant information deemed necessary by the PHDC.

Staff is empowered to approve projects that meet the PHDC's standards and guidelines. In the event the staff review does not affirm compliance with the PHDC's standards and guidelines or the Chair's consent, the project review shall be forwarded to the PHDC.

Staff shall submit a list of approvals granted to the Commission at its regular meetings.

Review of "Non-Contributing Buildings"

Non-contributing buildings are buildings less than fifty years old and/or evaluated in National Register documentation as not contributing to the significance of the historic district.

The PHDC will review demolitions of non-contributing buildings. The PHDC will also review alterations that propose highly visible intrusions in the surrounding historic district.

Staff will review all other projects at non-contributing buildings. Applicants for projects at non-contributing buildings shall consult with PHDC staff. Staff will advise applicants about the written documentation required. Staff is only empowered to approve projects that meet the PHDC's standards and guidelines. In the event the staff review does not affirm compliance with the PHDC's standards and guidelines or the Chair's consent, project review shall be forwarded to the PHDC.

Staff shall submit a list of approvals granted to the PHDC at its regular meetings.

Review of projects also subject to review by the RI Historical Preservation Commission

Under state and federal laws, the RIHPHC reviews projects at historic properties that receive state or federal funding, tax credits, or other public assistance. PHDC staff will review projects in Providence historic districts that are subject to review by the RIHPHC. Staff reserves the right to send any such applications to the PHDC for review.

**WINDOW REPLACEMENT POLICY**

The PHDC frequently receives window replacement applications. Applicants request window replacement to improve energy efficiency and to mitigate lead hazard, although aesthetics are another common consideration. Windows are a character defining element and are important to the overall architectural character of a property. Over the past 25 years the PHDC's response to these requests has evolved.

In the past, the PHDC deemed single-pane wooden windows as the only appropriate replacement. Of course, for many years, wooden windows were the only windows available. A healthy local carpentry tradition allowed for easy installation and inexpensive matching replacement fabrication. Lead paint was not a concern.

In the years since, multi-pane windows made from aluminum, vinyl, and composite have proliferated. Although multi-pane insulated windows were first introduced in the 1930s, they did not become prevalent until the 1970s. Before, most single-pane windows required wooden or metal storm-windows as a matter of necessity. Metal storm-windows are not architecturally or aesthetically significant. In fact, some applicants have requested insulated replacement windows just to remove the "ugly" storm windows.

While storm windows are undeniably unaesthetic, they also protected older wooden windows from deterioration. A guiding element in historic preservation is that original or significant fabric should be retained for as long as viable. When such fabric is no longer viable, it should be replaced with materials that closely match in presentation. As technology has evolved, insulated windows have become more typical. At first, there were "sash-pack kits" that allowed for just the sash to be replaced within the existing window opening. Once widely available, these kits are increasingly rare. Window companies have moved away from sash-pack kits due to difficult installation, particularly in older properties where openings are out of square and plumb. Instead, window companies started to produce "frame-within-a-frame" window replacement units. These units allow for easier installation and come clad in aluminum or vinyl, eliminating the need for painting. As building technology has evolved, the PHDC has accepted these window replacement units in most situations, so long as the loss of glass area is less than a total of three inches.

<u>Review of Window Replacements</u>

The PHDC will review window replacement projects at singular buildings.

PHDC Staff will review window replacement projects at contributing buildings and non-contributing buildings, and for projects subject to review by the RI Historical Preservation Commission

Applicants for window replacement projects shall consult with PHDC staff. Staff will advise applicants about the written documentation required. A survey of existing conditions, line drawings showing a typical existing window and typical proposed window, and cut drawings for both windows at the head, meeting rails, and sill will be provided. Physical samples may be required, as well as a list of offsite locations where the window has been previously installed.

Staff is only empowered to approve projects that meet the PHDC's standards and guidelines. In the event the staff review does not affirm compliance with the PHDC's standards and guidelines, the project review shall be forwarded to the PHDC.

Applications that do not meet the procedural requirements will be considered incomplete and automatically withdrawn after 60 days

Staff shall submit a list of approvals issued to the PHDC at its regular meetings.

**Window Replacement Guidelines**

Historic windows are significant architectural features, and the PHDC encourages preservation and repair, when possible, especially on singular buildings. Some historic buildings have unique individual window features that are significant design focal points; these are difficult to replace and should be preserved in most cases.

The PHDC recognizes that sometimes it is necessary to replace windows, especially to comply with lead-hazard and energy regulations and/or to support affordable housing goals. PHDC review is intended to be flexible in order to accommodate these public policies.

Window replacements should match original/historic windows as closely as possible. Replacement windows are evaluated in part by details including their overall size and configuration; sash dimensions of rails, stiles, and muntins; retention of the historic ratio of clear glass to frame; and preservation of non-sash historic elements such as decorative casings, panels, and window caps.

Replacement window products that have been documented and approved by the PHDC are preferred, and staff will advise applicants about which products that best replicate the types of windows being replaced.

New window products not previously reviewed by the PHDC may be submitted to the PHDC for review. If judged appropriate, staff may approve subsequent applications.

The following window products have been approved by the PHDC on previous installations and may be acceptable for staff approval (this list is subject to change). It is important to note that historical windows vary in size and details, and the previously approved replacement window products also vary in detail depending on particular product models. PHDC staff will advise applicants which approved products are most suitable depending on the windows being replaced.

- Anderson
- Boston Sash
- Brosco
- Kolbe
- Marvin
- Pella
- Trimline

**MINOR ALTERATIONS: MECHANICAL & COMMUNICATIONS EQUIPMENT**

**SOLAR ENERGY SYSTEMS**
**Solar Panels, Heat Collectors and Photovoltaic Systems**

**INTRODUCTION**
In 2013, with Sustainable Providence, the City of Providence released sustainability goals to move Providence forward in six key areas: waste, food, transportation, water, energy, and land use & development. Furthermore, retrofitting homes for energy efficiency is part of a global initiative towards energy conservation. For the PHDC, these conditions have resulted in a sharp increase in applications for solar energy systems installation.

Sustainable Providence specifically identifies the West Side Solar program as a successful initiative to introduce solar energy to primarily historic properties in the West End. The success of the program has created interest in expanding the program throughout the City. In response, the PHDC adopted the following regulations regarding the appropriateness of solar panel installations within the City's local historic districts. Of particular concern are those buildings with primary elevations that face south. The PHDC's Standards & Guidelines make the installation of publicly visible solar panels difficult to approve because such installations generally have an adverse effect on either the historic structure and/or the historic district. This policy is in keeping with the National Park Service's Standards, the national guideline for historic district commissions. To allow both of these worthy initiatives, historic preservation and energy conservation, to continue, the PHDC has amended their Standards & Guidelines as follows.

**SUSTAINABILITY**
Before implementing any energy conservation measures to enhance the sustainability of a historic building, the existing energy-efficient characteristics of the building should be assessed. Buildings are more than their individual components. The design, materials, type of construction, size, shape, site orientation, surrounding landscape and climate all play a role in how buildings perform. Historic building construction methods and materials often maximized natural sources of heating, lighting and ventilation to respond to local climatic conditions. The key to a successful rehabilitation project is to identify and understand any lost original and existing energy-efficient aspects of the historic building. Rehabilitation projects should also identify and understand a historic building's character-defining architectural features to ensure they are preserved. The most sustainable building may be one that already exists. Thus, good preservation practice is often synonymous with sustainability. There are numerous treatments- traditional as well as new technological innovations- to help a historic building operate even more efficiently.

Increasingly strict energy standards and code requirements may dictate that some of these treatments be implemented as part of a rehabilitation project of any size or type of building. Whether a historic building is rehabilitated for a new or a continuing use, it is important to utilize the building's inherently sustainable qualities as they were intended. It is equally important that they function effectively together with any new measures undertaken to further improve energy efficiency.

| Recommended | Not Recommended |
|---|---|
| Considering on-site, solar technology only after implementing all appropriate treatments to improve energy efficiency of the building, which often have greater life-cycle cost benefit than on-site renewable energy. | Installing on-site, solar technology without first implementing all appropriate treatments to the building to improve its energy efficiency. |
| Analyzing whether solar technology can be used successfully and will benefit a historic building without compromising its character or the character of the site or the surrounding historic district. | Installing a solar device without first analyzing its potential benefit or whether it will negatively impact the character of the historic building or site or the surrounding historic district. |
| Installing a solar device in a compatible location on the site or on a non-historic building or addition where it will have minimal impact on the historic building and its site. | Placing a solar device in a highly-visible location where it will negatively impact the historic building and its site. |
| Installing a solar device on the historic building only after other locations have been investigated and determined infeasible. | Installing a solar device on the historic building without first considering other locations. |
| Installing a low-profile solar device on the historic building so that it is not visible or only minimally visible from the public right of way: for example, on a flat roof and set back to take advantage of a parapet or other roof feature to screen solar panels from view; or on a secondary slope of a roof, out of view from the public right of way. | Installing a solar device in a prominent location on the building where it will negatively impact its historic character. |
| Installing a solar device on the historic building in a manner that does not damage historic roofing material or negatively impact the building's historic character and is reversible. | Installing a solar device on the historic building in a manner that damages historic roofing material or replaces it with an incompatible material and is not reversible. |
| | Removing historic roof features to install solar panels. |
| | Altering a historic, character-defining roof slope to install solar panels. |
| | Installing solar devices that are not reversible. |
| Installing solar roof panels horizontally—flat or parallel to the roof—to reduce visibility. | Placing solar roof panels vertically where they are highly visible and will negatively impact the historic character of the building. |
| Investigating off-site, renewable energy options when installing on-site solar devices that would negatively impact the historic character of the building or site. | |

**GENERAL GUIDELINES for Solar Panels, Heat Collectors and Photovoltaic Systems**

In the historic districts, the greatest potential for using solar panels to heat water or to generate electricity will be on buildings with large flat roofs, high parapets, or roof configurations that allow solar panels to be installed with limited or no visibility from the public rights-of-way. All solar panel installations must be considered on a case-by-case basis recognizing that the best option will depend on the characteristics of the property under consideration. When considering retrofitting measures, historic building owners should keep in mind that there are no permanent solutions. One can only meet the standards being applied today with today's materials and techniques. In the future, it is likely that the standards and the technologies will change and a new retrofitting plan may be necessary. Thus, owners of historic buildings should limit retrofitting measures to those that achieve reasonable energy savings at reasonable costs, with the least intrusion or impact on the character of the building.

**Review of solar installation on Singular Buildings**
The PHDC will review solar installation projects at singular buildings.

PHDC staff will review solar installation projects at contributing buildings and non-contributing buildings; and also projects subject to review by the RI Historical Preservation Commission.

Applicants for approval of solar installation projects shall consult with PHDC staff. Staff will advise applicants about the written documentation required. A survey of existing conditions and line drawings showing the proposed installation layout will be provided.

Staff is only empowered to approve projects that meet the PHDC's standards and guidelines. In the event the staff review does not affirm compliance with the PHDC's standards and guidelines, project review shall be forwarded to the PHDC.

Staff shall submit a list of approvals granted to the PHDC at its regular meetings.

**Review of buildings with a flat roof (historic building, non-contributing existing building, or new construction)**

1. On buildings with a flat roof, solar panels may be installed at a low angle so that they are out of view from the public right-of-way adjacent to the building. In cases where a proposal meets these requirements and is deemed to have no adverse effect by the RI Historical Preservation & Heritage Commission (when such review is required), PHDC review will be conducted at an administrative level by staff. Nothing will prevent staff from forwarding the application to the PHDC for review if warranted.

2. On buildings with a sloped roof (historic building, non-contributing existing building, or new construction) where solar panels are to be installed on a secondary elevation, not visible from the public right-of-way:
   A. Panel layout shall be sympathetic or appropriate to the design and scale of the building. Rectangular configurations are preferred, with ample setback from edge of roof, dormers, chimneys, etc.; Panels shall be installed parallel to the existing roof slope and matched as closely as possible to the roof plane;
   B. Panels shall be installed without destroying or replacing original or historic materials or significantly compromising or altering the building's structural integrity;
   C. Panels shall be compatible in color to existing roofing insofar as possible;
   D. Installation of panels shall be as inconspicuous as possible;
   E. Installation shall be reversible. Panels shall be removed when no longer viable or functioning and roofing restored to pre-existing conditions; and,
   F. In cases where a proposal meets these requirements and is deemed to have no adverse effect by the RI Historical Preservation & Heritage Commission (when such review is required), PHDC review will be conducted at an administrative level by staff. Nothing will prevent staff from forwarding the application to the PHDC for review if warranted.

3. On buildings with a sloped roof (historic building, non-contributing existing building, or new construction) where solar panels are to be installed on a primary elevation, or any elevation that is highly visible from the public rights-of-ways, additional factors must be taken into consideration. For most historic properties, locating solar panels on the primary elevation is the least desirable option because it will have the greatest adverse effect on the district's and property's character defining features, as well as its effect on the historic streetscape.

Solar panels may be installed in side or rear yards, but may not exceed 8 feet in height. Freestanding or detached on-site solar panels should be installed in locations that minimize visibility from the public right-of-way. These systems should be screened from the public right-of-way with materials found elsewhere in the district such as fencing or vegetation of suitable scale for the district and setting. Placement and design should not detract from the historic character of the site or destroy historic landscape features or materials. Solar panels are not permitted in front yards.

Only installations where the proposed solar array is not visually intrusive, or highly visible, from the public right-of-way will be considered appropriate. Solar panels that are visually intrusive interact negatively with the historic structure resulting from an incompatibility with the subject property's architectural character, scale, roof slope, color compatibility with the existing historic roofing materials, placement of the building on subject lot, or the grade of the right-of-way as it exists at the property. Applications for installation on primary elevations, in addition to the foregoing, must also meet each of the requirements and considerations of paragraph #2 (A through F), above.

In applying this Standard for Solar Energy Systems, the PHDC may consider whether there are mitigating circumstances that reduce the visual impact of the proposed solar installation. Such circumstances might include locating equipment on a secondary elevation with a set-back from the primary elevation; or it might also include a limited relationship between the property and surrounding historic properties.