City of Denton

City Hall
215 E. McKinney Street
Denton, Texas
www.cityofdenton.com

AGENDA INFORMATION SHEET

DEPARTMENT: Department of Development Services

DCM: Cassey Ogden

DATE: June 9, 2025

SUBJECT

Hold a public meeting and consider an application for a Certificate of Appropriateness, in accordance with Section 2.9.2 of the Denton Development Code, to replace old solar panels and add additional solar panels on the roof of an existing residence located at 2224 Houston Place, within the West Oak Area Historic District. The site is located on the north side of Houston Place east of Thomas Street. (COA25-0005, 2224 Houston Place, Cameron Robertson)

BACKGROUND

The applicant, CMS Renewable Contractors, on behalf of the property owner is requesting a Certificate of Appropriateness (COA) for the installation of 50 solar panels on the roof of 2224 Houston Place, replacing the 36 solar panels that currently are placed on the residence. The current configuration and number of solar panels were previously approved by the Historic Landmark Commission on December 12, 2022 (COA22-0017).

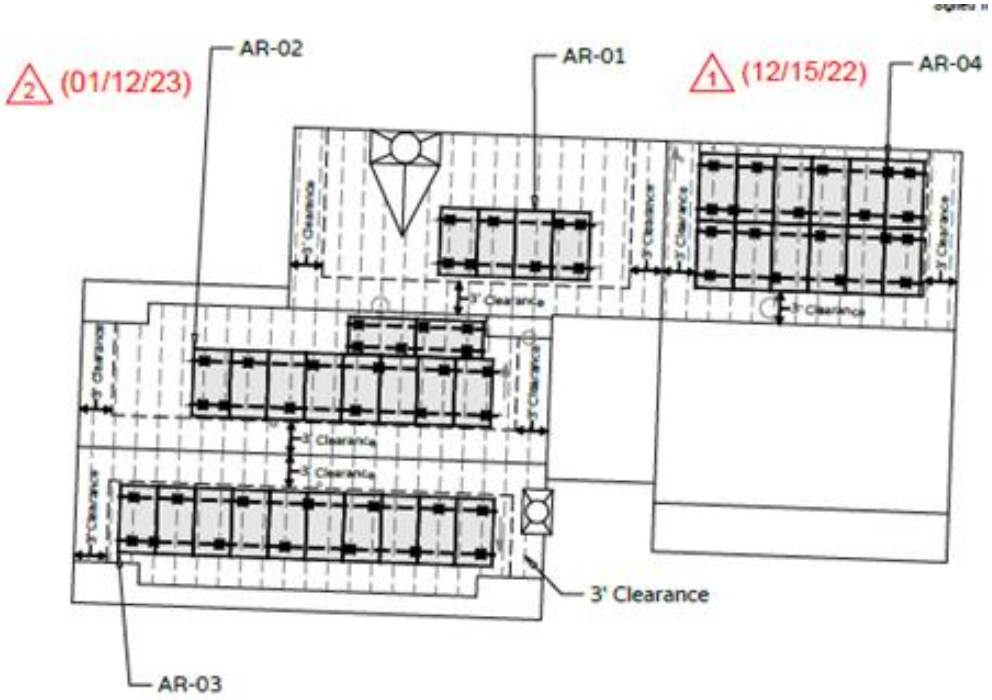

Figure 1: Existing Solar Panel Layout

The 50 proposed solar panels would be installed on the north and south sides of the second-story roof of the main residence, as well as the north side of the roof of the one-story, east wing of the residence. The reason for the replacement of the existing panels and the addition of 14 panels is that the current system is undersized for the property owner's existing energy usage and the energy costs have increased since their initial installation in 2023. Thus, the additional panels are needed to offset the consumption,

The panels outlined by a red border are the 14 additional panels requested as part of this COA. The remaining panels are the 36 existing panels that will be replaced.

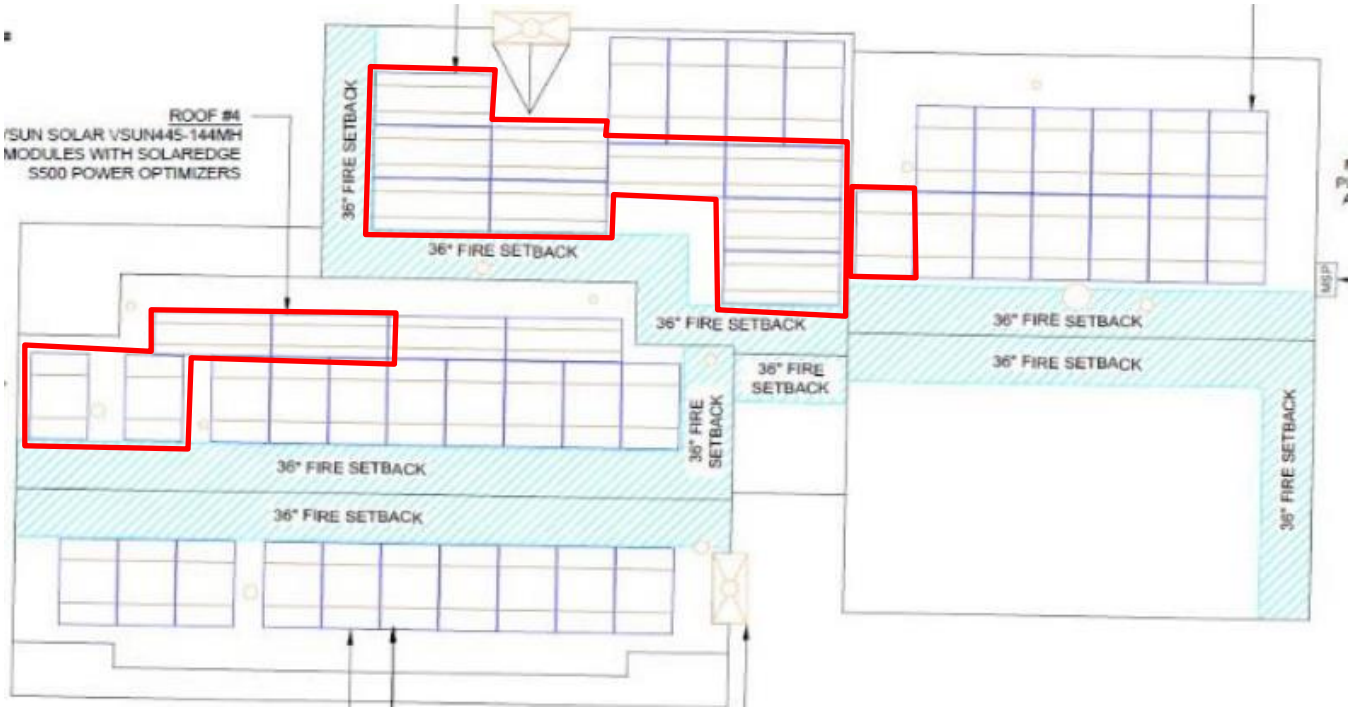

Figure 2: Proposed Solar Panel Layout

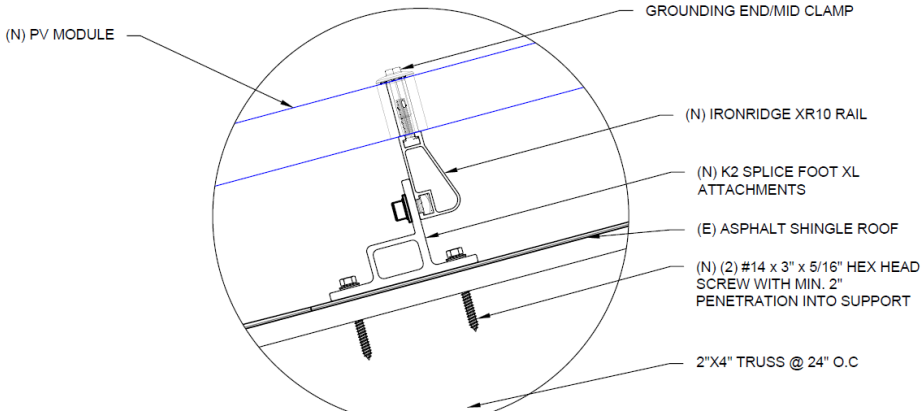

Figure 3: Solar Panel Detailing

The solar panels with their supporting equipment would rise a maximum of 8-inches from the roof surface. Refer to Exhibit 5 –Project Details for more detailed information about the proposed solar panel system.

The existing residence was constructed in 1940. The residence was built in the Colonial Revival Style and was once the home of Ernest S. Clifton, the former director of the English Department at the University of North Texas during the 1960s.

Section 4.9.3A of the DDC requires a COA for any exterior work on a building, structure or land within a Historic District:

> No person shall construct, reconstruct, alter, remodel, renovate, restore, demolish, raze, or maintain any building, structure or land with a Historic Landmark designation or a building, structure or land located in a locally designated Historic or Conservation District unless application is made for a Certificate of Appropriateness (COA) for said work and such a certificate is granted as provided in Subsection 2.9.2, and appropriate construction or demolition permits are obtained.

The HLC reviews COAs related to a historic building in terms of architectural compatibility, retention of significant architectural features, as well as compliance with The Secretary of Interior's Standards for the Treatment of Historic Properties. Additionally, the Denton Development Code (DDC) has other zoning regulations and design standards that are applicable with this application.

If the COA is approved by HLC, the next step for the applicant is to submit a permit application for the proposed solar panels. During the review of the permit application, staff will ensure that the dimensional and development standards of the DDC and the requirements of City Building Codes are met.

CONSIDERATIONS

Section 2.9.2 of the DDC specifies the HPO and the HLC shall review the proposed project for compliance with The Secretary of Interior's Standards for the Treatment of Historic Properties (The Standards), as well as any applicable guidelines adopted by the City and any guidelines provided in Subchapter 2.9, including the Secretary of Interior's Guidelines on Sustainability for Rehabilitating Historic Buildings for decisions related to renewable energy.

Section 4.9.6C of the DDC specifies the architectural requirements in the West Oak Area Historic District. Below is the relevant architectural requirement that applies to the subject application:

Roof Forms

a. **Skylights and Solar Panels**: The Historic Landmark Commission may allow skylights and solar panels on a building if their placement does not have an adverse effect on the architecture of a building or the district as a whole.
The proposed solar panels would be installed to be parallel to the roofline. The solar panels proposed for installation along the second-story roof and the north side, first-story roof, would not have an adverse effect on the architecture of the building nor the district. The solar panels would not be visible or would be minimally visible from the public right-of-way and would be placed on second-story and rear-facing slopes of the roof.

As previously stated, the proposed project is subject to review under the Standards for Rehabilitation. The Standards for Preservation, Restoration, and Reconstruction do not apply. Below are the Secretary of the Interior's Standards for Rehabilitation requirements.

Standards for Rehabilitation

Definition: *Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.*

1. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

   The proposed solar panels will not destroy historic materials nor spatial relationships that characterize the property. The proposed solar panels would be differentiated from the historic property with new materials and would not adversely affect the district and the view of the residence from Houston Place.

2. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

   The installation of the proposed solar panels, based on project details, would be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Additionally, the proposed project is subject to review under the Secretary of Interior's Guidelines on Sustainability for Rehabilitating Historic Buildings. These guidelines offer specific guidance on how to make historic buildings more sustainable in a manner that will preserve their historic character and that will meet The Secretary of the Interior's Standards for Rehabilitation. Recommendations related to solar technology are shown below:

- 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.
- 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 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.
- Installing a solar device on the historic building only after other locations have been investigated and determined infeasible.
- 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 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 solar roof panels horizontally -- flat or parallel to the roof—to reduce visibility

Based on the evaluation criteria stated above and an evaluation of the documentation submitted by the applicant, Staff believes that the installation of the proposed solar panels at 2224 Houston Place meets the Secretary of the Interior's Standards for Rehabilitation and Section 4.9.6C of the Denton Development Code.

PREVIOUS ACTION/REVIEW

- COA18-0004: Administratively Approved COA for window replacements.
- COA22-0017: The Historic Landmark Commission approved with conditions the installation of solar panels at the property, with the relocation of 12 proposed solar panels to the north side of the roof.

NEIGHBORHOOD MEETING
No neighborhood meeting was held.

OPTIONS
1. Approval as submitted
2. Approval subject to conditions
3. Deny
4. Continue the item

RECOMMENDATION
Staff recommends **approval** of the Certificate of Appropriateness request to install solar panels at 2224 Houston Place, as the proposed project meets the Secretary of the Interior's Standards for Rehabilitation and Section 4.9.6C of the Denton Development Code.

EXHIBITS:
1. Agenda Information Sheet
2. Site Location Map
3. West Oak Area Historic District Map
4. COA Application
5. Project Details
6. Solar Panel Discussion - HLC Agenda (April 10, 2023)

Respectfully submitted:
Tina Firgens, AICP
Deputy Director Development Services/
Planning Director

Prepared By:
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Historic Preservation Officer