



March 13, 2024

City of Fort Wayne Historic Preservation Commission  
200 E. Berry Street, Suite 320  
Fort Wayne, IN 46802

Re: Policy on Solar Collectors in Local Historic Districts

Dear Commissioners:

Interest is growing in placing solar collector panels, especially photovoltaic panels, on rooftops in the local historic districts, fueled by energy tax credit incentives. We understand that the Historic Preservation Commission (HPC) is discussing the potential impact of this emerging technology and its potential effect on historic resources. Parties representing historic preservation interests in West Central and Williams Woodland neighborhoods met recently to discuss the emerging issue regarding placement of solar collector panels in Local Historic Districts. On behalf of the West Central Neighborhood Association, we wish to endorse and report their observations and recommendations as the HPC considers their impact on historic resources in Fort Wayne's local historic districts.

We recall that the local HPC uses the Secretary of the Interior Standards for Historic Preservation as the basis for their own preservation guidelines and case decisions. As our local historic districts are also within National Register historic districts, it is sensible to align guidelines between the two entities. By their decisions, the HPC can maintain the historic character and integrity of the local districts and thus the National Register standing, ensuring owners can partake in financial incentive programs offered at the State and Federal levels. We believe this is a very important function of the HPC, and decisions that allow loss of historic fabric and character can jeopardize National Register listings.

These National Register/HPC guidelines essentially follow these goals, prioritized:

- 1) Preserve historic fabric, especially of character defining features as defined in the National Register Nomination. In Fort Wayne local historic districts, this includes both architecture and sites.
- 2) Restore documented historic features, based on evidence of previous existence. This would imply protecting the opportunity to restore unrestored historic character features.
- 3) New or undocumented additions being sympathetic to adjoining historic resources. This allows for new additions that do not remove, hide, or otherwise diminish historic resources, but instead reflect and coordinate with the character of the historic features in all their visual qualities.

In addition, the local HPC Guidelines instruct that "it is not appropriate to introduce contemporary equipment or incompatible site features, including, ....solar collectors ....in highly visible locations that compromise the historic character of the building, site, or the district. Locate such features unobtrusively, and screen them from public view."

The HPC Guidelines limit their jurisdiction to changes visible from public ways, including streets, sidewalks, and alleys. Automatically, this allows solar panel installation, along with a host of other non-sympathetic alterations anywhere on the property not visible from a driver/passengers/pedestrians on those public ways.

We believe these principles should apply to solar panel installations, same as with any new or undocumented addition to existing historic fabric. As with any legal restriction on property, not every property owner has conditions that provide both optimal solar collector orientation while also meeting the HPC requirements.

The character defining features on many local district structures are contained on the street side. Sometimes the alley sides have no contributing historic feature characteristics, either by initial design, or from insensitive alterations made before the local district was established. Where character-defining historic features are not adversely impacted, and when viewed solely from an alley, the HPC may wish to consider some latitude in allowing solar panel placement visible from an alley, where the panels do not become a dominant feature of the public view from the alley. An example might be an installation on a modern addition to a historic structure, where the solar collectors are integrated into the addition's architectural design. An additional example might be an alley side sloped rooftop installation on a non-historic garage or other secondary structure, especially when such a roof is seen from a steep angle from a narrow alley. In these cases, the panels do not diminish historic architectural resources and minimally affect the existing visual character of the place.

Alternately, we believe the Commission should be cautious with approvals that require or involve removal of historic or character-defining vegetation to create solar access. Intentional, contributing landscape features (not unintentional/default overgrown fence lines) should be given the same respect as historic structures in HPC decision making. Mature landscape vegetation is part of the history of the neighborhoods and its setting and is eligible for protection under the Fort Wayne Historic Preservation Ordinance.

We encourage the HPC to continue to follow the Secretary of the Interior Standards in conjunction with their current local HPC Guidelines in evaluating applications for Certificates of Appropriateness. We further encourage the Historic Preservation staff to promote awareness of the City Historic Preservation Ordinance, good preservation practices, and encourage quality restorative work in our historic districts.

Thank you for this opportunity to weigh in on the HPC's process.

Respectfully,



Joel R. Sauer, President  
West Central Neighborhood Association

cc: WCNA Board of Directors  
WCNA Historic Preservation Committee