



**Historic Preservation Services**

**Community Development & Neighborhood Services**

281 North College Avenue  
P.O. Box 580  
Fort Collins, CO 80522.0580

**970.416.4250**

[preservation@fcgov.com](mailto:preservation@fcgov.com)

[www.fcgov.com/historicpreservation](http://www.fcgov.com/historicpreservation)

**MEMORANDUM**

Date: April 17, 2024  
To: Interested Parties  
Through: Paul Sizemore, Director of Community Development & Neighborhood Services  
Maren Bzdek, Manager, Historic Preservation Services  
From: Historic Preservation Commission

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Subject: Administrative Interpretation of Section 14-53 of the Municipal Code regarding the installation of solar technology on historic resources.

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**BOTTOM LINE**

This adopted policy expands the circumstances in which owners of designated historic properties can install solar technology when subject to the City of Fort Collins project review requirements in Municipal Code 14-53, pertaining to City Landmarks or other properties that qualify as an “historic resource” as defined in Municipal Code 14-3. While maintaining a grounding in existing guidance from the federal government regarding the installation of solar technology on historic resources, it also seeks to better balance the City’s ambitious climate action goals with historic preservation concerns in a manner that does not damage or detract from the character of the community’s important historic places.

**BACKGROUND**

The City of Fort Collins (the City) prioritizes climate action and climate resiliency through its adopted plans and policies, including the [Our Climate Future](#) plan adopted by City Council in 2021 and periodic adoption of current iterations of the International Energy Conservation Code (IECC). In relation to historic and cultural resources, the City recognizes that:

1. Climate change represents an existential threat to cultural resources across the globe, including here in Fort Collins, and;
2. Renewable energy sources are a critical component of reducing the emission of greenhouse gasses that cause climate change, and;
3. Renewable energy technologies such as solar collection can typically be incorporated into historic properties without causing harm to the cultural resources on those properties.

The City has adopted the federal [\*U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties\*](#) as the basis for approving or denying projects on properties that qualify as historic resources under Municipal Code 14-3 "Historic resources" (Adopted under Municipal Code 14-53). The National Park Service has issued guidance under the Rehabilitation treatment method related to installing solar technology on historic buildings. That documentation includes:

- Interpreting the Standards Bulletin 52: "Incorporating Solar Panels in a Rehabilitation Project," <https://www.nps.gov/orgs/1739/upload/its-52-incorporating-solar-panels.pdf>
- "Solar Panels on Historic Properties," <https://www.nps.gov/orgs/1739/solar-panels-on-historic-properties.htm>

The City has also adopted rigorous energy performance standards for both new and existing buildings as part of the City's climate action plan, [\*Our Climate Future\*](#), adopted by City Council on March 16, 2021, and periodic adoption of current iterations of the IECC. Among the supporting actions are various tools, programs, and regulations to support an expansion of solar energy collection on private property.

In October 2022, the Historic Preservation Commission adopted a climate-related work plan initiative that remains in effect in the 2024 work plan. The initiative called for strengthening the connection of preservation work to the community's climate resilience work, with recognition that a focus on methods for maintaining and improving ongoing energy performance of historic buildings would be necessary.

## **POLICY STATEMENT**

As a result of the need for aggressive climate action to mitigate threats to cultural resources, and evolving understandings on the importance of historic integrity as traditionally interpreted, the City of Fort Collins makes the following statements related to solar installations on historic resources:

1. Standards: The federal *U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties* (the Standards), and supporting guidelines for solar technology, will remain a consideration for decision-making on historic resources in city limits or owned by the City of Fort Collins, consistent with Municipal Code 14-53. This policy refers only to historic properties and projects for which Rehabilitation has been selected as the primary treatment method and over which the City of Fort Collins has review authority under its Municipal and Land Use Codes. The Rehabilitation treatment is applied to alterations, maintenance needs, and additions in adaptive reuse scenarios where historic character is maintained while also prioritizing evolving needs and uses. In cases where Preservation, Restoration, or Reconstruction are the appropriate/selected treatment method for an historic property, solar technology applied to contributing resources on the property will generally remain inappropriate and unlikely to be approved.
2. Staff vs. HPC Review: In general, solar installations that comply with this policy will be reviewed by staff and reported to the HPC via the Staff Activity Report as indicated under each provision below. Staff may still refer solar installations to the HPC for approval in cases where this policy is not clearly met, or other cases consistent with the policy and current practice in referring project reviews to the HPC.
3. Character-Defining Features – Character-defining features are those physical features of an historic property that must be present to convey whatever historical or architectural importance has been identified for the property. This will be identified by City staff and may be identified in the property's historic survey or historic designation nomination form. In relation to solar, this may include landscape elements such as historic trees. In

general, the removal of historic trees to improve solar collection potential will not be approved under this policy due to both the historic and environmental value of a mature urban forest.

4. Sloped Roof Solar Installations - Photovoltaic: In general, for sloped roofs, flush-mounted rooftop photovoltaic solar panels will be allowed on all non-street-facing roof slopes of historic buildings or structures, provided that any *character-defining features* of the property are not removed, damaged, or obscured by such an installation.
  - a. To be approved administratively by City staff, installations on sloped roofs must:
    - i. Be on a non-street-facing elevation of a primary building (rear or non-street-facing side) or on an accessory structure; and
    - ii. Be flush-mounted, with the plane of the solar collection system flush with the roof surface; and
    - iii. Be no more than eight (8) inches from the surface of the roof and set back at least eight (8) inches from the roof edge and ridgeline.
  - b. Street-Facing Roof Slopes – Properties Built Before 1950: In cases where an historic property was constructed prior to 1950, and ideal roof slopes for solar collection face to the street (i.e., a property on the north side of a street with a primary roof slope facing south), solar panels facing public streets may be permitted *if* it is demonstrated via a solar collection analysis that the property has no viable alternative for solar collection other than the street-facing slope. Such an analysis should demonstrate that preservation-preferred alternatives such as location on an accessory structure, or less visible roof slope on the primary structure, cannot provide sufficient energy to meet current IECC and Solar Tax Credit guidelines for minimum system sizes for new construction of that building type (commercial vs. residential).

<b>Historic Residential (Single-family, Duplex, etc.)</b>	<ul style="list-style-type: none"> <li>- <i>Dwelling of 2000ft<sup>2</sup> or less</i>: Allow at least 150ft<sup>2</sup> of solar panels on roof, minus code-required exemptions.</li> <li>- <i>Dwelling of more than 2000ft<sup>2</sup></i>: Allow at least 300ft<sup>2</sup> of solar panels on roof, minus code-required exemptions</li> <li>- Character-defining features remain protected.</li> </ul>
<b>Historic Commercial (commercial, office, apartments, houses of worship, etc.)</b>	<ul style="list-style-type: none"> <li>- Allow at least 40% roof coverage, minus code-required exemptions.</li> <li>- Character-defining features remain protected.</li> </ul>

Approval of visible solar installations in these cases would remain subject to the condition that any *character-defining features* of the property are not removed, damaged, or obscured by such an installation. For example, in rare cases where the roofing material itself is a character-defining feature (typically wood shingle or clay tile), solar may not be an appropriate treatment to overlay that slope, at least on publicly-visible roof slopes. Approval that meets the guidelines in this provision will generally be approved administratively by City staff.

- c. Street-Facing Roof Slopes – Properties Built 1950 or later: In cases where an historic property was constructed after 1950, and ideal roof slopes for solar collection face to the street (i.e., a property on the north side of a street with a primary roof slope facing south), flush-mounted solar panels facing public streets are permitted and will generally be approved administratively by City staff. Approval of visible solar collection systems in these cases would remain subject to the following conditions:

- i. Any *character-defining features* of the property are not removed, damaged, or obscured by such an installation.
  - ii. Be flush-mounted, with the plane of the solar collection system flush with the roof surface; and
  - iii. Be no more than eight (8) inches from the surface of the roof and set back at least eight (8) inches from the roof edge and ridgeline.
- 5. Flat, Mansard, and Parapeted Roofs: In general, for flat roofs, with or without a parapet, or for flat portions of mansard roofs, solar installations will be allowed even if visible, with the following provisions.
  - a. When solar systems are mounted flush with (or parallel to) the flat roof slope, installations:
    - i. Must be set back from the roof edge or mansard hip by at least eight (8) inches and extend no more than eight (8) inches above the roof; and
    - ii. Will not be required to provide any screening via a parapet, etc.; and
    - iii. Can be approved administratively by City staff.
  - b. When rooftop solar is not flush-mounted, installations:
    - i. Will extend no more than five (5) feet above the top of the highest point of the roof (regardless of any parapet); and
    - ii. Setting the solar energy system back from the roof edges facing the street two (2) feet for each foot of solar energy system height above the roof surface or a parapet, whichever is higher; and
    - iii. Will be referred to the Historic Preservation Commission for approval.

Flush mounting and/or screening behind an existing parapet (if present) remains encouraged in all contexts.

6. Solar Tiles: In general, solar roof tiles (i.e., solar collection devices that mimic roof shingles) will be permitted on historic resources constructed in 1950 or later as acceptable partial or complete substitute material for asphalt shingle roofing (or similar historic roofing material such as rolled asphalt, or non-historic roofing materials such as stone-coated metal, synthetic, etc.) and can be approved administratively by City staff if consistent with this policy provision.
  - a. Solar tiles may also be approved on properties dating from prior to 1950 as a *partial* substitute on rear or side (non-street-facing) elevations.
  - b. Approval of solar tiles on pre-1950 buildings on street-facing elevations will be subject to the approval process outlined in item 4a above, but will generally be approved administratively by City staff.
  - c. It should be noted that available solar tile products on the market at the time of this policy document's drafting typically only produce approximately 30% of the power of equivalently sized photovoltaic systems.
7. Batteries: Solar installations will often be coupled with household/commercial battery installations. In general, these will be acceptable when placed on the interior (garage, etc.) where Historic Preservation review does not apply. A primary concern for exterior installations is the potential for batteries flush-mounted over brick, wood, or stucco siding to damage, or create damaging conditions for, historic material (i.e., trapping moisture, creating condensation, etc.). In general, exterior-mounted batteries should be located on non-historic building elevations (i.e., on a non-historic addition, non-historic structure, etc.) and can be approved by City staff in those circumstances.

## AVAILABLE FINANCIAL INCENTIVES

In most cases, solar installations on historic properties (both solar collection and batteries) will not qualify for historic preservation incentives such as the Colorado [Historic Tax Credit](#) or the Federal [Historic Tax Credit](#). However, property owners may be interested in installing solar as part of a rehabilitation project for which they are seeking support from those historic tax credit programs. In that event, solar installations will be required to meet the preservation standards for those programs and may be subject to greater restrictions than are outlined in this City policy memorandum. *Please consult with City Historic Preservation staff and/or the staff of those state/federal programs before beginning a project if intending to leverage these preservation incentives at the same time as a solar installation.*

The City of Fort Collins also offers several incentives through Utilities for all property owners, including those with historic properties. Those include solar and battery storage rebates for residential and commercial properties. For more information, see the links below:

- Solar & Battery Storage Rebates (see the Incentives tab): <https://www.fcgov.com/utilities/residential/renewables/solar-rebates/>
- Residential Battery Storage Program: <https://www.fcgov.com/utilities/residential-battery-storage-program>