

Received by e-mail 1-22-14

Hi Katie,

It is not likely that I will be able to attend in person. I would ask that you forward the following information to the committee members.

To the members of the Natural Resources and Energy Committee,  
The City of Burlington has the proud honor of being the home to 14 National Register Historic Districts, 23 individual buildings and 3 shipwrecks listed on the National Register, 1 pending nomination to the NR and 5 pending as districts for the Vermont State Register of Historic Resources. In all, we have over 4,000 individual resources that have been identified as historically sensitive. In addition, Burlington has been a Certified Local Government since 1992; this designation reflects a partnership between the National Park Service, the State of Vermont, and the City to protect and preserve our built environment. Design Review was initiated in the City in 1973; and our most recent Comprehensive Development Ordinance has specific standards relative to the treatment of historic properties. In both our Master Plan and our Comprehensive Development Ordinance, Burlington has demonstrated a commitment to the protection and preservation of our culture, history, and architecture.

The exemption from local review for energy facilities, particularly smaller (<10kw) installations raises concern about the potential for unintentional yet very real negative impacts to Burlington's historic resources and original building fabric. The concerns are threefold:

1. Loss of historic character— visual incompatibility. Solar panels (or wind turbines) placed in prominent locations or facades of buildings are likely to distract from the historic character of the structure, diminishing its historic integrity.
2. Loss to traditional building fabric. We have already seen loss of roofing slate with solar panel installation. Slate is one of the most character defining features of our older structures, and is typically lost when new equipment is placed.
3. Installations that are not reversible, thereby forever diminishing the character of the structure.

We ask that the committee consider these issues under S201 and S292 and allow for local municipal review in communities that have Design Review provisions in place (and have already made the conscious effort to protect its most sensitive historic buildings), or to require that applicants observe federal guidelines for the installation of energy devices as outlined in the Secretary of the Interior's Standards for Rehabilitation / Sustainability or similar document.

I have enclosed four photos:

1. A **good** example of a solar installation on a rear roof (historic building), hidden by a gabled dormer.

2. A **poor** example of a solar installation, where the roofline was changed, a dormer removed, and panels placed in a prominent location. This photo was taken in Woodstock.
3. Here is a turbine installed in Burlington atop a 1964 Phillips 66 Automotive Service Station. While the conversion to a restaurant was lauded, the installation of the turbine has raised concern about the loss of integrity to a state-registered structure that was featured in **Preservation Brief 46: *The Preservation and Reuse of Historic Gas Stations***.
4. This is a turbine (and solar) installation that required a height variance when installed in 2004. The potential that communities may now see these installed on parapets, turrets, and other prominent historic building features without any local review is very real.

Simply put, our oldest buildings provide a context and memory for our communities. They are also the most vulnerable to change. Please allow communities like Burlington and Woodstock to assure that efforts to increase building efficiency and to provide alternative energies do not destroy those very characteristics that make our communities memorable, singularly identifiable, and strong.

Cordially,



Mary O'Neil, AICP  
Senior Planner  
Coordinator, Certified Local Government Program  
[mcneil@burlingtonvt.gov](mailto:mcneil@burlingtonvt.gov)  
802.865.7188 office  
802.865.7556 direct  
802.865.7195 fax