

Window Applications to the HDC

Background:

Property owners have not been able to develop provisionally complete applications due to the inability of obtaining repair estimates.

- There is a small number of contractors with window repair expertise compared to the number of houses with historic windows that need repair. For steel windows, there are even fewer repair companies. The wait time for an estimate is very long.
- Contractors are often not willing to give estimates, which are time/labor intensive, as the majority of requests are from property owners that are only trying to fulfill the HDC application requirements.
- COVID restrictions are further limiting the accessibility of contractors to offer repair assessments as site visits may require time within the houses.
- In practice, the cost estimate requirement often places a higher level of responsibility on individual homeowners than larger commercial applicants, who typically enjoy the advantages of architects. The Commission has demonstrated that it is often satisfied by the assessment of licensed professionals, even when short of the “cost estimate” requirement.
- A cost comparison suggests an apples-to-apples dynamic that is not necessarily the basis under which COA decisions should be made under the Standards, and prioritizing costs sets an expectation that the Commission will make its decision on this basis
- Window repair is a different pathway than replacement, introducing different timeframes, expectations, and sensitivities to historic materials. The Commission’s approach should be based around the window problem and how it can be solved under the Standards, not centered on the business model of window replacement contractors which promise work complete in a short period of time. Restoration contractors, critical to the retention of historic fabric in our districts, cannot compete on this basis.
- If there are particular or unique circumstances that make cost an issue in a given case (similar to other unique building elements needing repair), for consistency the Commission should only consider cost in those cases
- When necessary, professional staff can provide cost ranges to the Commission for standard repairs of many elements; or at least provide enough information to the Commission to make a decision with respect to the “reasonableness” and “technical/economic feasibility” qualifications of 36 CFR 67.

Communication with local repair companies, and guidance from staff’s licensed architects, is ongoing so that all staff can gain a stronger understanding of window deterioration (sash and opening) for wood and steel windows, and make sound recommendations to the Commission regarding their character-defining qualities and ability to be *reasonably repairable* under the Standards.

Proposal:

Removing the requirement for contractor repair estimates for window replacements will give property owners the ability to submit provisionally complete applications, subject to staff confirming that they have received enough documentation to send a case to the Commission. Such “provisionally complete” applications must always meet two specific standards: (1) the necessary level of documentation for the Commission to understand existing conditions, and (2) a full understanding of the nature of proposed alterations, via drawings, narrative, cut sheets, or other submissions. The level of detail required to establish a necessary level of documentation varies greatly from case to case, and is dependent upon the type/scale of the project, and the nature of the intervention proposed.

Submissions would typically include (but not limited to):

- Photographs-interior/exterior
- Dimensions
- Material
- Condition: operable, square, paint, glazing, weather stripping, frame (sill/jambs), sash (bottom rail, rails, muntins, meeting rail)

Staff reports for the Commission would include consideration of the submitted materials and:

- Incorporate professional expertise in assessing/confirming the condition of the current windows and the reasonableness of their repair
- May include, to the extent feasible, on-site staff inspection of windows
- In certain cases, staff could still request that a contractor, or an architect hired by the applicant, submit their own assessments or cost estimates

Public-facing materials and “gatekeeping” communications will reinforce that character-defining windows will not typically be considered for replacement unless proven beyond repair.