



MEMORANDUM

DATE: February 12, 2018

TO: Planning Commission

FROM: Kevin Jackson, Planning Director

SUBJECT: Consideration of a Resolution Recommending Revisions to the Interim Design Guidelines related to Window Replacements.

AGENDA ITEM NUMBER 9

RECOMMENDATION:

Adopt the proposed resolution (Attachment A, pages 5-6) to revise the City of Piedmont Interim Design Guidelines section C.1 Window Replacement Guidelines, to make technical corrections and to add criteria calling for window reveals that are consistent with the original architecture.

BACKGROUND:

Upon the Planning Commission's recommendation, the City Council first adopted the City's Window Replacement Policy in May 2001. The policy was developed as a way of augmenting the Residential Design Review Guidelines as a response to emerging technologies and to provide guidance to the Planning Commission, staff, property owners and their contractors. The policy was updated in 2003, in part to address vinyl window products, and was incorporated into the Interim Design Guidelines in March 2017.

In recent years, staff has seen an increase in the number of applications for "retrofit" window replacements. "Retrofit" window replacements are those in which the existing window sash is removed, but the existing window frame is kept in place. The replacement window package, the new frame and sash, is inserted into the existing frame. This eliminates the need to remove wall material in order to remove the existing frame from the wall studs, thereby potentially saving the property owner time and money. However, this construction technique oftentimes results in windows that are not consistent with architectural style of the house or building.

A majority of Piedmont homes were constructed prior to World War II in architectural styles common to that time period, including: Victorian, Shingle, Craftsman, Arts & Crafts, American Foursquare, Colonial Revival, Tudor Revival, Italianate, Prairie, French Eclectic, Spanish Eclectic, and Monterey Colonial. A characteristic common to these and other architectural styles is a window construction in which the window plane is set back from the exterior wall surface. In addition to providing the windows protection from moisture, the intended effect is to give the exterior walls the appearance of depth or thickness.

The dimension a window sash is set back from the exterior wall surface is called a window "reveal." A reveal provides for an interplay of sunlight upon the wall and shadow cast upon the window that helps define the massing of a building and the openings within that massing. Without the reveal, with

the window plane being flush with the exterior wall surface, the exterior wall surface tends to appear as a skin, something less substantial than the solid stateliness characteristic of the traditional architectural styles of the first half of the twentieth century.

Retrofit window replacements always bring the plane of the window sash closer to that of the exterior wall. Well-designed and manufactured retrofit window inserts minimize the reduction in the reveal so that the result is consistent with the original architectural style. Other retrofit window products result in the elimination of the reveal, or in the worst cases, result in windows that protrude from the exterior wall surface. Photographic examples of reveals of original windows, new windows and replacement windows are provided in Attachment B, pages 7-10.

DISCUSSION:

In order to help ensure that window replacements, and new windows, are consistent with the original architecture of the building, staff is recommending revisions to the City's Window Replacement Guidelines, to the Window and Door Design Review Permit application, and to the standard conditions of approval.

Window Replacement Guidelines

In addition to some clarifications and technical revisions, the Window Replacement Guidelines would be revised to add a criterion that would permit new and replacement windows, including retrofit replacement windows, upon the condition that the reveal of the new or replacement window shall be a minimum 75% of the reveal of the original windows on the building. The revised Window Replacement Guidelines are provided in Exhibit A to Attachment A, page 6. The guidelines are provided to property owners, their contractors and design professionals at the public works counter and through the City's website.

Design Review Permit Application

The guidelines are housed within the Interim Design Guidelines and are attached to the application for Window and Door Design Review Permit, which has been revised so that the applicant must initial that they have read and understand the Window Replacement Guidelines. The application form will also require the submittal of existing reveal dimensions and a proposed window section specific to the building rather than a generic section from the manufacturer specifications, which normally do not include dimensions.

Standard Conditions of Approval

In addition to revising the Window Replacement Guidelines, staff is recommending that two standard conditions be applied to permit applications that include new and/or replacement windows, as follows:

1. **Window Recess.** All new and replacement windows shall have a minimum reveal of [insert dimension] inches measured from the exterior wall surface to the face of window sash in order to maintain consistency with the original architecture, as required by the City's Design Guidelines and Window Replacement Policy. Window details shall be submitted for review and approval at the time of building permit application.
2. **Pre-construction Inspection.** Prior to the commencement of window fabrication, the installer shall schedule a pre-construction inspection with the Building Department to review

the approved installation criteria, such as the minimum window reveal, window trim if any, and window sill projection if any.

While the Window Replacement Guidelines are proposed to include a standard that the new reveal be at least 75% of the original reveal, the standard condition of approval will include an exact dimension for the new reveal that is based on the specific building being modified. The planner reviewing the application will ensure that the information in the application is complete and, prior to taking action on the application, will inspect conditions during a site visit.

Normally, a window replacement project requires only one inspection during the building permit process: the final inspection, a point after which construction has already been completed. To help ensure that construction is completed in accordance with the approved plans and all conditions of approval, planning staff has worked with the Chief Building Official to draft the second condition of approval listed above. This condition requires that the window installer meet with the Building Official prior to the ordering and manufacture of the window product in order to help prevent construction that is not in compliance with the approved plans, the conditions of approval, and ultimately the City's Design Guidelines.

The conditions of approval are always included in decision letters mailed to property owners and their design professionals, and attached to the approved permit drawings.

CALIFORNIA ENVIRONMENTAL QUALITY ACT:

The adoption of revised Interim Design Guidelines is not subject to the California Environmental Quality Act (CEQA) because it is not a project within the meaning of CEQA and it can be seen with certainty that there is no possibility that the adoption of revised Interim Design Guidelines may have a significant effect on the environment. (Public Resources Code section 21065; CEQA Guidelines, 14 Cal. Code of Regs. Sections 15061(b)(3), 15378.) Additionally, to the extent that the adoption of revised Interim Design guidelines may be considered a project under CEQA, the adoption of such Interim Design Guidelines is exempt under Section 15301 of the CEQA Guidelines, because the Design Guidelines concern the permitting, repair, and alteration of existing public or private structures, and such permitting, repair, and alteration involves negligible or no expansion of an existing use.

REVIEW BY CITY ATTORNEY:

The proposed modifications to the Interim Design Guidelines, and the CEQA determinations have been reviewed and approved by the City Attorney.

COMMISSION ACTION:

The Commission may take action to recommend adoption of a revised section C.1 Window Replacement Guidelines of the Interim Design Guidelines. Alternatively, the Commission may continue the hearing and consideration of the guidelines to a future hearing.

COUNCIL ACTION:

Once the Planning Commission has made a recommendation to the City Council, staff will schedule the consideration of that recommendation at a future City Council meeting. The City Council is the decision-making body for the adoption of revisions to the Interim Design Guidelines.

CONCLUSION:

There are many benefits to replacing existing windows including the improvement of functionality and/or insulation. There are many window products on the market that both enable owners to improve their homes and buildings, and provide compliance with the City's Design Guidelines, particularly those that call for new construction to be consistent with the original architecture. Retrofit windows are a relatively new technology favored by many property owners when considering convenience and cost. However, evidence indicates that not all retrofit window products and installations result in a project in compliance with the City's Interim Design Guidelines. To ensure that windows are installed correctly and mitigate the need for owners to correct noncompliant window installations, staff recommends revisions to Interim Design Guidelines section C.1, Window Replacement Guidelines. In addition, staff recommends two standard conditions of approval for window installations and changes to the application for Window and Door Design Review Permit that correlate to the revised Guidelines.

ATTACHMENTS:

- A Pages 5-6 Proposed Resolution No. __ amending Interim Design Guidelines section C.1, Window Replacement Guidelines
- B Pages 7-10 Photograph Examples of Original, New and Replacement Windows

RESOLUTION No. _____

**RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF PIEDMONT
RECOMMENDING THAT THE CITY COUNCIL ADOPT REVISIONS TO THE
INTERIM DESIGN GUIDELINES RELATED TO WINDOW REPLACEMENTS;**

WHEREAS, in May of 2001, the City Council adopted the City's Window Policy as a way of providing guidance to the Planning Commission and staff in the design review approval of replacement windows. The policy was developed as a way of augmenting the Residential Design Review Guidelines in order to respond to new window technologies. The Policy was updated by the City Council on July 7, 2003; and

WHEREAS, the City's Window Policy was incorporated as section C.1 into the City of Piedmont Interim Design Guidelines, which were adopted by the City Council on March 20, 2017; and

WHEREAS, the City intends to update and expand its design guidelines in 2018; presently, the Interim Design Guidelines serve as the Design Guidelines for the City; and

WHEREAS, these Guidelines are an essential part of implementing Chapter 17, Planning and Land Use; and

WHEREAS, construction technologies related to window installations and replacements have evolved and revisions to the City's policies giving guidance on how such technologies might meet the City's design guidelines evolving will benefit property owners, their design and construction professionals, City staff and the Planning Commission; and

WHEREAS, the adoption of the proposed revisions to the Interim Design Guidelines is not subject to the California Environmental Quality Act (CEQA) because it is not a project within the meaning of CEQA, as it can be seen with certainty that there is no possibility that the adoption of revised Interim Design Guidelines may have a significant effect on the environment. (Public Resources Code section 21065; CEQA Guidelines, 14 Cal. Code of Regs. Sections 15061(b)(3), 15378.). To the extent that the adoption of revised Interim Design guidelines may be considered a project under CEQA, the adoption of such Interim Design Guidelines is exempt under Section 15301 of the CEQA Guidelines, because the Design Guidelines concern the permitting, repair, and alteration of existing public or private structures, and such permitting, repair, and alteration involves negligible or no expansion of an existing use.

NOW, THEREFORE, the Planning Commission of the City of Piedmont resolves that:

SECTION 1. Recitals. The above recitals are correct and are incorporated into this Resolution as findings of the Planning Commission.

SECTION 2. Recommendation -- Interim Design Guidelines. The Planning Commission recommends that the City Council adopt the revisions to Interim Design Guidelines section C.1, Window Replacement, as set forth in Exhibit A, attached.

SECTION 3. All portions of this resolution are severable. If an individual component of this Resolution is adjudged by a court to be invalid and unenforceable, then the remaining portions will continue in effect.

[END OF DOCUMENT]

**CITY OF PIEDMONT
SUPPLEMENTAL DESIGN GUIDELINES**

SUBJECT: Window Replacement

PURPOSE: The following guidelines are intended to provide direction to the Planning Commission and staff when reviewing window replacement projects, and to provide guidance to owners and their designers in preparing plans for the replacement of windows. *The intended result is that windows that are consistent with the original architecture of the building.*

GUIDELINES: The City of Piedmont has provided criteria in the Residential Design Review Guidelines concerning the design of new and replacement windows of projects that are proposing additions or remodeling. However, the following additional guidelines are intended to provide the Planning Commission and staff direction when considering window replacement projects:

1. Consideration shall be given to the compatibility of design and long-term quality and durability rather than actual material composition of replacement windows as the primary focus in applications requesting window replacements.
2. Permit new windows that have the same or greater architectural compatibility to the design of the *residence building* and the existing windows. Window hierarchy shall be considered, including differences of design between primary windows that may have a greater level of detail (divided lights, increased size, and special treatments such as arches) and secondary windows. These differences in design should reflect consistency in window proportions, operation, trim, and the use of materials that appear to be the same.
3. *Permit new and replacement windows, including retrofit replacement windows, upon the condition that the reveal of the new or replacement window shall be a minimum 75% of the reveal of the original windows on the building. Retrofit windows are a replacement window in which the existing window sash is removed and a new window frame and sash is inserted into the original window frame. A window reveal is the dimension between the exterior wall surface and the window sash.*
4. Permit window replacements in applications where there is a mix of windows, provided that the window materials and designs are consistent on ~~any~~ *all* elevations that ~~is~~ *are* visible from a private or public street, and all of the windows on the ~~house~~ *building* are painted ~~the same~~ *with a similar* color ~~scheme~~; and the difference in window treatments is not readily visible and the resulting overall appearance is not a “hodge-podge.”
5. Permit window replacements in applications where there is already a mix of windows, provided that the windows that are proposed to be replaced are non-original windows and that the proposed windows more closely replicate or simulate the original window on the ~~house~~ *building*.
6. Prohibit the use of vinyl window products unless they are paintable.
7. Support the use of energy efficient windows.
8. Simulated divided-light-grilles are acceptable if they are three-dimensional.

PROCEDURE: Review all window replacement applications in accordance with the Criteria and Standards of Section 17.66.060 of the City Code, the Residential Design Review Guidelines, and this policy.

Rev. __/__/2018

Examples of Windows Original and Replacement

Original windows demonstrating a reveal:



The windows on the Beaux Arts house on the left and the Tudor house on the right have deep reveals indicative of masonry walls and heavy timber construction.



Window reveals on a Tudor house (left) and Colonial Revival house (right) give a sense of thickness to the walls that characterize the stateliness of these architectural styles and the quality of the original construction.

New and Replacement Windows that are Consistent with the Original Architecture



The replacement windows on the Dutch Colonial (left) and Colonial Revival (right) houses retain an appropriate reveal.



The reveal is noticeable on the windows of a newly constructed Craftsman style addition (left), a remodeled Dutch Colonial (center), and a replacement for a Spanish Eclectic house.

New and Replacement Windows that are NOT Consistent with the Original Architecture



On this Swiss Chalet style house, the window on the right is original and has significant reveal, but the window on the left is a replacement and has no reveal.



The retrofit replacement windows on a Ranch style house (left) and Spanish Eclectic house (right) provide no reveal.



These retrofit replacement windows protrude outward from the original framing, a condition that would never have been part of the original construction.



This upper level addition onto a shingled bungalow provides a good example of how window details can be a critical component of architectural consistency. Notice that the original ground-floor windows are set back from the wall surface for a reveal that gives thickness to the walls. In contrast, the new windows of the second story addition are set flush with the wall surface, creating a sense that windows and shingles are part of a skin applied to the framing of the house.