

**PROGRAMMATIC AGREEMENT  
BETWEEN  
THE MICHIGAN STATE HISTORIC PRESERVATION OFFICER AND  
THE CITY OF GRAND RAPIDS, MICHIGAN  
REGARDING ADMINISTRATION OF CERTAIN  
HOUSING AND COMMUNITY DEVELOPMENT PROGRAMS FUNDED BY THE  
U. S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

**WHEREAS**, the U.S. Department of Housing and Urban Development (HUD) provides grant funding to the City of Grand Rapids, Michigan (City); and

**WHEREAS**, HUD regulations at 24 CFR § 58 impart statutory authorities that permit certain entities to assume HUD's environmental responsibilities for various HUD programs; and

**WHEREAS**, the City proposes to administer the following programs (collectively, Program) with funds from the Department of Housing and Urban Development (HUD):  
Community Development Block Grant (CDBG) Program, except for emergency lead hazard reduction activities;  
HOME Investment Partnerships Program (HOME), except for emergency lead hazard reduction activities;  
Emergency Shelter Grant (ESG) Program; and  
American Dream Downpayment Initiative (ADDI) Program

**WHEREAS**, the City's Program encompasses the following activities: single family and multi-family rehabilitation; new construction; site improvements; demolition; public improvements and public infrastructure; commercial rehabilitation; and handicapped accessibility under statutes that authorize HUD to provide for the assumption of environmental review responsibilities by recipients in accordance with HUD's Environmental Review Procedures as set forth in 24 CFR § 58; and

**WHEREAS**, the City has determined that the administration of its Program may have an effect on properties included in or eligible for inclusion in the National Register of Historic Places and has consulted with the Michigan State Historic Preservation Officer (SHPO) pursuant to 36 CFR § 800.14(b) of the regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470f), and Section 110(f) of the same Act (16 U.S.C. 470h-2(f)); and

**WHEREAS**, in accordance with 36 CFR 800.14(v)(4), this Programmatic Agreement (Agreement) is considered a prototype agreement not requiring the Advisory Council for Historic Preservation (Council) to sign the Agreement; and

**WHEREAS**, on February 7, 2006, the Council declined to participate in the Agreement; and

**WHEREAS**, the Grand Rapids Historic Preservation Commission (Commission) has participated in consultation and has been invited to concur in this Agreement; and

**WHEREAS**, the definitions given in Appendix A are applicable throughout this Agreement;

**NOW, THEREFORE**, the City and the SHPO agree that the Program shall be administered in accordance with the following stipulations to satisfy the City's Section 106 responsibilities for all individual undertakings of the program.

## STIPULATIONS

The City shall ensure that the following measures are carried out:

### I. APPLICABILITY

This Programmatic Agreement shall be limited to the following programs:

- A. CDBG Program, except for emergency lead hazard reduction activities
- B. HOME Program, except for emergency lead hazard reduction activities
- C. ESG Program
- D. ADDI Program

### II. QUALIFIED PERSONNEL

- A. The City shall employ staff person(s) or contract with consultants having professional qualifications in anthropology, archaeology, architectural history, history, historic architecture, historic preservation, planning or related fields, as specified in the Secretary of the Interior's *Historic Preservation Professional Qualification Standards* (48 FR 44738-39, September 29, 1983). Such qualified staff (Preservation Specialist) shall be responsible for administering those terms of this Agreement that require their particular expertise and coordinating with appropriate City departments, authorities and organizations regarding Program assisted activities.
  - 1. If there is a change of staff in the Preservation Specialist position, the City shall notify the SHPO within fifteen (15) calendar days of the change and shall provide the SHPO with documentation of the new staff person's qualifications in anthropology, archaeology, architectural history, history, historic architecture, historic preservation, planning, or related fields, as specified in the Secretary of the Interior's *Historic Preservation Professional Qualification Standards*, (48 FR 44738-39, September 29, 1983).
  - 2. If the City determines that it cannot employ qualified staff to administer the terms of this Agreement, it must follow regular Section 106 procedures, which include forwarding documentation to the SHPO for review.
- B. The Commission shall assist the City in the identification and evaluation of historic properties covered under the terms of the Agreement. The Commission is determined qualified pursuant to Section 5.394 of Chapter 68 of the Code of the City of Grand Rapids, Historic Preservation Commission.

### III. IDENTIFICATION AND EVALUATION

- A. In consultation with the SHPO, the City shall determine appropriate measures and the proposed schedule for updating the 1981 Grand Rapids Central City Survey of historic districts, sites, buildings, structures and objects that meet the criteria for listing in the National Register of Historic Places (hereinafter "properties"). The City shall submit proposals for carrying out the updated survey to the SHPO for review and approval prior to initiating survey activities.
- B. The Preservation Specialist may consult the Commission regarding the identification and evaluation of historic properties covered under the terms of the Agreement.
- C. Properties fifty (50) years of age or older that may be affected by projects covered in this Agreement shall be evaluated by the Preservation Specialist, to determine if the property meets the criteria for listing in the National Register of Historic Places, either individually or as contributing to a historic district. If the Preservation Specialist and the Commission agree that that the property meets the criteria, the City can proceed to implement projects in accordance with this Agreement.

- D. If the Preservation Specialist and the Program Staff do not agree regarding the eligibility of a property, the City shall consult with the SHPO.
- E. If the City disagrees with the SHPO's recommendation, the City shall request a formal determination of eligibility from the Keeper of the National Register pursuant to 36 CFR § 800.4(c)(2).

#### IV. EXEMPT ACTIVITIES

The Program activities listed in Appendix B have limited potential to affect historic properties and do not require further review from the SHPO and the Council when receiving Program assistance. The City shall retain individual project files for each project reviewed in accordance with this stipulation as verification that the scope of work was limited to these activities.

#### V. TREATMENT OF HISTORIC PROPERTIES

The City shall ensure that all properties listed in the National Register, eligible for listing in the National Register, or determined eligible for listing in the National Register of Historic Places, are treated in accordance with the following stipulations.

##### A. Property Acquisitions

1. Upon the acquisition of a historic property using Program funds, the city shall secure, stabilize and preserve that historic property pending its disposal. The methods used to secure and stabilize properties shall adhere to the Secretary of the Interior's *Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards)* and *Preservation Brief 31, Mothballing Historic Buildings* (U.S. Department of the Interior, National Park Service, September 1993).
2. Prior to the transfer or lease of historic properties acquired with Program funds, the City shall consult with the SHPO to determine the need for a preservation easement. If it is determined that a preservation easement is necessary, the City shall submit the proposed preservation easement in the case of sale of property, or lease agreement, to the SHPO for review and approval. If the SHPO does not approve the proposed preservation easement, the City shall request the Council's comments in accordance with 36 CFR § 800.5.

##### B. Rehabilitation and Public Improvement Projects

1. The City shall ensure that all residential rehabilitation and commercial rehabilitation projects involving historic properties are carried out in accordance with the *Standards*. The Preservation Specialist shall review and approve all plans and specifications or work write-up prior to the initiation of project activities.
2. The City shall ensure that site improvement projects impacting historic properties or historic districts, to include sidewalk improvement projects, driveway projects, repaving of streets, curb and gutter work, traffic calming projects, installation of landscaping, street lighting, street signage, and street furniture and other infrastructure improvements, adhere to the *Standards*. Site improvement projects affecting historic parks shall meet the standards in *Draft Guidelines for the Treatment of Historic Landscapes* (National Park Service, 1992).
3. If the *Standards* cannot be met, the proposed treatment of the property is not rehabilitation, or if the contemplated action could otherwise have an adverse effect on such properties, the City shall consult with the SHPO and notify the Council prior to taking any action. Once the comments of the SHPO are obtained, the City shall request the Council's comments in accordance with 36 CFR § 800.5.

4. The City shall retain individual project files that contain work descriptions, the comments of the SHPO, written authorization of the Preservation Specialist, before and after photographs, and the comments of the Commission in individual project files. Before and after photographs shall be used as evidence of the City's proper application of the *Standards*. Site improvement projects for sidewalks, streets, and curb and gutter repair or replacement shall not require before and after photographs. All files shall be retained for a minimum of three (3) years following project implementation.

#### C. Relocation of Historic Properties.

1. Prior to the relocation of contributing buildings within historic districts, into or out of historic districts, or the relocation of individual historic buildings, the City shall consult with the SHPO to identify an acceptable alternate site, preferably within the same historic district. The new site shall be compatible with the historic structure being moved in terms of adjoining structures and uses.
2. If the SHPO approves the alternate site, the City shall ensure that the property is moved by qualified movers in accordance with approaches recommended in *Moving Historic Buildings* (John Obed Curtis, 1979). Once the property is relocated, the City, in consultation with the Commission, shall reevaluate the National Register eligibility of the property.
3. If the SHPO objects to the proposed alternate site, the City and the SHPO shall consult per Stipulation XIV.

#### D. Handicapped Accessibility

1. The City shall explore alternative methods for providing handicapped accessibility to historic buildings in accordance with the Americans with Disabilities Act (ADA) regulations and other local, State, and Federal requirements for accessibility. To the extent feasible, handicapped access shall be placed on secondary elevations for historic buildings and shall not result in the removal of a historic building's significant architectural features. The design of handicap accessible features shall be consistent with the *Standards*, National Park Service Preservation *Brief No. 32: Making Historic Properties Accessible* (Thomas C. Jester and Sharon C. Park, 1993), and the Department of Interior pamphlet entitled *Preserving the Past and Making it Accessible for People with Disabilities*, (Thomas C. Jester, revised, 1996).
2. The City shall retain documentation regarding alternatives as part of the individual project files.
3. The City shall consult with the SHPO, including submitting documentation of alternate methods of creating handicapped access, when such projects will have an adverse effect on the historic and/or architectural character of a national register eligible or listed resource.

#### E. Demolition of Historic Properties

1. The City shall proceed with the demolition of properties determined ineligible for listing in the National Register of Historic Places in accordance with Stipulation IV without further review.
2. Prior to the demolition of historic properties not covered under emergency demolitions in Stipulation V.E.3., the City shall forward the following documentation to the SHPO for review and comment:
  - a) Location and description of the building;

- b) A SHPO inventory card and photographs of all elevations and significant architectural elements;
- c) Reasons for demolition, including documentation of code violations and structural damage and deterioration, as summarized by the Neighborhood Improvement Department, market conditions and cost of rehabilitation versus new construction, etc., and an explanation of why rehabilitation is neither prudent or feasible;
- d) A structural report by a qualified structural engineer with experience with historic building structural systems or a qualified architect meeting the Secretary of the Interior's *Historic Preservation Professional Qualification Standards* (48 FR 44738-39, September 29, 1983);
- e) A summary of efforts undertaken by the City to rehabilitate and reuse the property;
- f) A summary of alternatives to demolition that were considered and why they were not feasible;
- g) A brief history of the property including a statement of the historic and/or architectural significance of the resource which meet the criteria for listing in the National Register of Historic Places, and a written opinion regarding the historic significance of the building from the Commission;
- h) Measures taken to solicit public comment and copies of public comments;
- i) Proposed mitigation measures which shall be included in a "two party" MOA; and
- j) The SHPO shall review the documentation submitted, and within thirty (30) days of receipt of adequate documentation, shall sign the MOA or object in writing to the proposed demolition. If the SHPO objects to the proposed demolition, the City and the SHPO shall consult per Stipulation XIV.

### 3. Emergency Demolitions

- a) When the City determines that the emergency demolition of historic properties is required to comply with Chapter 140 Housing Code or Chapter 131 General Building Regulations of the Code of the City of Grand Rapids to avoid an imminent threat to the health and safety of residents, and federal funds are used for the demolition, the City shall forward documentation to the SHPO by express mail with a request for comments within five (5) business days. Documentation should include:
  - 1) the address of the property and the nature of the emergency,
  - 2) recent photographs of the property;
  - 3) a signed copy of the local order requiring that emergency demolition commence within thirty (30) calendar days or less; and
  - 4) a SHPO inventory form or other documentation regarding the National Register eligibility of the property.
- b) The SHPO shall notify the City in writing within five (5) business days following receipt of adequate documentation whether it approves the emergency demolition and what, if any, mitigation measures must be implemented prior to demolition (i.e. recordation, architectural salvage, etc.). The City shall ensure that, to the extent feasible, all mitigation measures are implemented and appropriate documentation forwarded to the SHPO within fourteen (14) calendar days following the completion of demolition activities.
- c) If the SHPO objects to the emergency demolition, the City and the SHPO shall consult per Stipulation XIV.

## VI. NEW CONSTRUCTION AND ADDITIONS

- A. The City may proceed with new construction of residential or commercial structures on properties determined ineligible for listing in the National Register of Historic Places without further review.
- B. Proposals for new construction and additions within or adjacent to a historic district, or adjacent to historic properties, shall be developed in accordance with the guidelines contained in the *Standards* and in consultation with the SHPO.
- C. Except as provided in Stipulation VI.D. below, final plans and specifications for infill construction shall be submitted to the SHPO for review and comment prior to the commencement of construction activities. The SHPO shall have thirty (30) days from the date of the receipt to review and comment on the final plans and specifications.
- D. If the SHPO approves a prototype(s) design for infill construction within a specific historic district, the City may request review and approval of construction projects using the prototype design without further review of the design documents. If the approved prototype(s) cannot be adhered to in the specific historic district, the City shall submit a modified design to the SHPO for review and approval.

## VII. REDEVELOPMENT PROJECTS

- A. The City shall consult with the SHPO during the preparation of redevelopment or urban renewal plans for a neighborhood, historic district, or target area. The City shall afford the SHPO an opportunity to comment on the document at the earliest stage possible when it becomes known that HUD funding will be used for the project. The SHPO shall evaluate the potential effect that the goals, objectives and implementation strategy of the plan will have on historic properties. The SHPO's comments shall be integrated into the plan or referenced in the document before it is submitted for required local administrative reviews.
- B. The City, in consultation with the SHPO, shall determine whether the redevelopment or urban renewal plan should be implemented under the terms of this Programmatic Agreement or whether a project specific MOA should be developed in accordance with 36 CFR 800.6. The City shall notify the Council of the SHPO's determination and, if appropriate, provide the Council with background documentation to initiate the consultation process.

## VIII. ARCHEOLOGICAL RESOURCES

In the event that major ground disturbance activities are planned as part of a rehabilitation, new construction, or site improvement project, the City, in consultation with the SHPO, shall determine whether the project site contains archeological resources.

- A. The City's archeological survey and SHPO inventory forms shall be reviewed to determine the location of National Register eligible resources on project site.
- B. If the SHPO determines that an archeological survey is required, the City shall hire qualified archeologists (meeting the Secretary of the Interior's *Historic Preservation Professional Qualification Standards* (48 FR 44716, September 29, 1983)) to assist in the identification, evaluation and treatment of eligible archeological sites.
- C. If archeological resources are identified which meet the criteria for listing in the National Register of Historic Places, they shall be avoided or preserved in place, if feasible.
- D. If the City determines that it is unfeasible to preserve or avoid archeological resources, the City shall consult with the SHPO to develop a treatment plan consistent with the Council's publication, *Treatment of Archeological Properties*. The City shall ensure that the plan is implemented by a qualified archeologist once it is approved by the SHPO.

## **IX. PUBLIC PARTICIPATION**

- A. Each year the City shall conduct a minimum of one (1) public hearing and comment period on the activities covered under this Agreement. An announcement of the public hearing and public comment period shall be provided in notices published in the Grand Rapids Press. The notice shall inform the public how it can access information on specific Program activities and provide comments or concerns about the effect of activities on historic properties. A copy of said notice shall be provided to all historic district associations, neighborhood associations, the Grand Rapids Historic Preservation Commission, and the SHPO.
1. The public hearing may be incorporated into another meeting held by the City. However, the issues outlined in Stipulation IX.A.2 and Stipulation IX.A.3 must be specifically addressed at such meeting.
  2. The public hearing and comment period, shall address planned activities for the following fiscal year from July 1 – June 30. The draft Annual Plan shall provide general information on the amount of funding for CDBG, HOME, ADDI, and ESG, the types of activities to be undertaken, and to the extent known, information on historic properties that may be affected by these activities.
  3. The public hearing and comment period shall also address the performance of programs and the Programmatic Agreement. During the comment period, the City's Consolidated Annual Performance and Evaluation Report (CAPER) covering CDBG, HOME, and ESG activities, as well as the Programmatic Agreement, shall be available for public inspection. The public shall also be invited to submit comments to the SHPO and the Council regarding the effectiveness of the Agreement.
- B. At any time during the implementation of the measures stipulated in this Agreement, should an objection to any such measure or its manner of implementation be raised by a member of the public, the City shall take the objection into account and consult as needed with the objecting party, the SHPO, or the Council to resolve the objection.

## **X. ADMINISTRATIVE COORDINATION**

- A. The City's internal review procedures will ensure that activities under the Program are implemented in accordance with the terms of this Agreement. The procedures outline how historic preservation reviews will be coordinated and the documentation to be retained in individual project files. A copy of the procedures will be filed with the SHPO within 90 days of the execution of this Agreement.
- B. The City shall ensure that federal funds are not committed or spent on historic properties before the completion of the Section 106 review.
- C. SHPO staff shall provide technical assistance, consultation and training on a periodic basis and as requested by the City in order to assist in carrying out the terms of this Agreement. The City, assisted by the SHPO, shall provide guidance documents to assist in complying with the terms of the Agreement.

## **XI. MONITORING**

- A. The City shall prepare annual reports summarizing Program activities carried out pursuant to the terms of the Agreement. The City shall forward copies of this report to the SHPO, the Council and other parties who may so request. The first report shall be submitted on August 31, 2007 for the period starting with the execution of this Agreement through June 30, 2007. Subsequent reports shall be submitted each August 31st thereafter for the previous July – June fiscal year.

- B. The City shall retain individual project files that contain determinations of eligibility, the comments of the SHPO, written authorization from the Preservation Specialist, specifications and work write-ups, before and after photographs and other pertinent documentation, for at least three (3) years following the completion of the Program activity. Site improvement projects for sidewalks, streets, curb and gutter repair or replacement shall not require before and after photographs.
- C. The City shall set up a meeting with the SHPO in March 2007, to determine how the City is complying with the terms of the Agreement and what, if any, modifications are required to improve compliance with the PA.
- D. A meeting among the parties to the Agreement shall be scheduled in July 2010 to determine whether the Agreement should be extended beyond December 31, 2010. The public shall be notified of this meeting and shall be invited to submit comments to the SHPO and Council regarding the effectiveness of the Agreement prior to the scheduled meeting.

## **XII. PREPARATION OF THE NEW COMPREHENSIVE PLAN**

A copy of the City's 2002 Master Plan shall be provided to the SHPO. The SHPO may provide comments on the historic preservation provisions contained in the Master Plan to the City. If comments are received, the City shall take them into consideration should that document be amended.

## **XIII. COORDINATION WITH OTHER FEDERAL PROGRAMS**

Should HUD or another Federal agency provide financial assistance to the City to assist with the implementation of housing and community development projects, they may satisfy their Section 106 compliance responsibilities by accepting and complying with the terms of this Agreement. The City, or the Federal agency, shall notify the SHPO and the Council in writing of its intent to adhere to this Agreement in lieu of case-by-case Section 106 reviews.

## **XIV. DISPUTE RESOLUTION**

- A. If the City Program staff disagree with the Preservation Specialist regarding the eligibility of a property or an area, whether an activity is exempt from review, the proposed treatment of an historic property, or any other provision of this Agreement, the City shall consult with the SHPO. The SHPO shall review the issue referred by the City and comment within thirty (30) calendar days.
- B. If the City does not agree with the SHPO's comments, pursuant to 36 CFR § 800.7(b), the City shall forward all documentation relevant to the dispute to the Council. Within forty-five (45) calendar days following the receipt of adequate documentation, the Council shall either:
  - 1. Provide the City with recommendations, which the City shall take into account in reaching a final decision regarding the dispute (36 CFR § 800.7(b)); or
  - 2. Notify the City that it shall comment pursuant to 36 CFR § 800.7(c), and proceed to comment. Any Council comment provided in response to such a request shall be taken into account by the City in accordance with 36 CFR § 800.7(c)(4) with reference to the subject of the dispute.
- C. The Council's responses to such request shall be taken into account by the City in accordance with 36 CFR § 800.7(c) with reference only to the subject of dispute; the City's responsibility to carry out all actions under this Agreement that are not the subject of the dispute shall remain unchanged.

## **XV. TERM OF AGREEMENT**

This Agreement shall take effect on the date it is signed by all parties and shall continue in full force and effect until December 31, 2010, unless otherwise terminated or extended. At any time in the six-month period prior to this date

the City may request the Council and the SHPO in writing to review the City's Program and consider an extension or modification to this Agreement. No extension or modification shall be effective unless all parties to the Agreement have agreed to it in writing.

**XVI. AMENDMENT**

Any party to this Agreement may request that it be amended, whereupon the parties shall consult in accordance with 36 CFR § 800.6(c)(7) to consider such an amendment.

**XVII. TERMINATION**

Any party to this Agreement may terminate it by providing thirty (30) calendar days notice to the other parties, provided that the parties shall consult during the period prior to termination to seek agreement on amendments or other actions that would avoid termination. In the event of termination, the City shall comply with 36 CFR § 800.4 through 800.6 with regard to individual undertakings covered by this Agreement.

Execution and implementation of this Agreement evidences that the City has afforded the Council a reasonable opportunity to comment on the program and that the City has taken into account the effects of the program on historic properties.

MICHIGAN STATE HISTORIC PRESERVATION OFFICER

By: Brian D. Conway Date: 7/31/06  
Brian D. Conway, SHPO

CITY OF GRAND RAPIDS

By: [Signature] Date: 8/14/06  
George E. Heartwell, Mayor

Attest: Mary Therese Hegarty Date: 8-16-06  
Mary Therese Hegarty  
City Clerk

Concur:  
GRAND RAPIDS HISTORIC PRESERVATION COMMISSION

By: [Signature] Date: 7-19-06  
Erin Gravelyn, Chair

APPROVED FOR MAYOR'S SIGNATURE

[Signature]  
DEPARTMENT OF LAW

## APPENDIX A

### DEFINITIONS AND ABBREVIATIONS

ADDI	American Dream Downpayment Initiative
ADVERSE EFFECT	The altering of a property in a manner that would diminish its integrity or alter the characteristics that qualify the property for inclusion in the National Register of Historic Places
CDBG	Community Development Block Grant
COMMISSION	The City of Grand Rapids Historic Preservation Commission
COUNCIL	The Advisory Council on Historic Preservation, an independent Federal agency that advises the President and Congress on historic preservation matters
ESG	Emergency Shelter Grants
HISTORIC PROPERTY	As set forth in 36 CFR § 800, any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places
HOME	HOME Investment Partnerships Program
HUD	The United States Department of Housing and Urban Development
MOA	Memorandum of Agreement
NATIONAL REGISTER	The basic inventory of historic resources in the United States maintained by the Secretary of the Interior, also known as the National Register of Historic Places
PRESERVATION SPECIALIST	The City staff member who meets the professional qualifications as specified in the Secretary of the Interior's <i>Historic Preservation Professional Qualification Standards</i> , (48 FR 44738-9, September 29, 1983)
PROGRAM	Refers to all activities funded by HUD specifically covered by this Programmatic Agreement
SECTION 106	Refers to the section of the National Historic Preservation Act of 1966 and its resulting review process designed to ensure that impacts on historic properties are taken into account during Federal project planning and execution
SHPO	The Michigan State Historic Preservation Officer

STANDARDS

The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings published at 36 CFR § 67

UNDERTAKING

A project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency

## APPENDIX B

### PROGRAM ACTIVITIES NOT REQUIRING REVIEW

#### A. Site Improvements

1. Reconstruction of roads where no change in width, surface materials, surface treatments, or vertical alignments of drainage is to occur.
2. Repair/replacement of existing curbs and sidewalks when located outside of designated historic districts.
3. Repair/replacement of water, gas, storm, and/or sewer lines if it occurs within the dimensions of the original trench and permanent impacts upon surface treatments or landscape features which contribute to the historic or architectural significance of the resource are avoided.
4. Tree plantings.
5. Repainting parking spaces or streets
6. Items that require immediate attention to correct a threat to health or safety.
7. Installation of required public improvements under the American with Disabilities Act (ADA), if the design was previously approved by the SHPO.
8. Installation of detectable warnings required by the ADA.

#### B. Interior Rehabilitation

The following may proceed without review if permanent impacts upon interior elements or surface treatments that contribute to the historic or architectural significance of the buildings are avoided.

1. All plumbing rehab/replacement - includes pipes and fixtures.
2. Repair, replacement or cleaning of existing water heaters, heating systems (including ductwork and piping) and other appliances.
3. Electrical work.
4. Restroom improvements for handicapped access - provided that work is contained within the existing restroom.
5. Interior surface treatments (floors, walls, ceilings, and woodwork) provided the work is restricted to repainting, refinishing, re-papering, or laying carpet or linoleum and the feature is not significant to the integrity of the property.
6. Installation of insulation provided it is restricted to attics and crawl spaces, upper surfaces of existing ceilings and the ceilings are not dropped, and proper vapor barriers are used.
7. Repair or replacement of concrete basement floors and interior basement walls.
8. Installation of new kitchen and bath appliances, cabinets, counters, tubs, sinks and toilets.

9. Installation of smoke or carbon monoxide alarms.
10. Replacement of door locks.

**C. Exterior Rehabilitation**

1. Caulking, weather stripping and replacement of window glass with glass of the same surface qualities (color, texture, and reflectivity).
2. Installation or replacement of gutters and downspouts (if the color is historically appropriate for the period and style of the historic resource).
3. Flat or shallow pitch roof repair/replacement (shallow pitch is understood to have a rise-to-run ratio equal to or less than 3 inches to 12 inches), with no part of the surface of the roof visible from the ground.
4. New storm windows - provided they conform to shape and size of historic windows and that the meeting rail coincides with that of the existing sash. Color should match trim; mill finish aluminum is not acceptable.
5. Repair or repainting of existing storm windows.
6. In-kind replacement - the new features/items shall duplicate the material, dimensions, configuration and detailing of the existing of the following:
  - a) Porches – including railings, posts/columns, brackets, cornices, steps, and flooring
  - b) Roofs
  - c) Siding
  - d) Exterior architectural details and features
  - e) Windows - including the frame, panes and sash
  - f) Doors
  - g) Cellar/bulkhead doors
7. Painting previously painted surfaces.
8. Repair or replacement of existing wheelchair ramps.
9. Repair, replace, or install new sidewalks or driveways located outside of designated historic districts.
10. Repair or replacement of chimneys with the same material, dimensions, and design.