

APPENDIX C

**PROGRAMATIC AGREEMENT
BETWEEN THE VIRGINIA
STATE HISTORIC PRESERVATION OFFICE,
THE CITY OF COLONIAL HEIGHTS, AND THE
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
FOR THE ADMINISTRATION OF CDBG-FUNDED ACTIVITIES BY THE CITY OF
COLONIAL HEIGHTS, VIRGINIA**

WHEREAS, the City of Colonial Heights (City), Commonwealth of Virginia, proposes to administer a Home Repair Program (Program) funded with Community Development Block Grant (CDBG) moneys from the U. S. Department of Housing and Urban Development (HUD); and

WHEREAS, as the administering agency for the above programs, in accordance with 24 CFR Part 58.1, the City of Colonial Heights is responsible for certifying compliance with the National Environmental Policy Act (NEPA) of 1969, and with 36 CFR Part 800 of the regulations implementing Section 106 of the National Historic Preservation Act (NHPA); and

WHEREAS, the City has determined in consultation with the SHPO that the target area will serve as the Area of Potential Effects (APE) for activities funded through the Program;

WHEREAS, the City has determined in consultation with the SHPO that the APE contains at least two districts eligible for listing on the National Register of Historic Places and that administration of said Program may have an effect on historic properties; and

WHEREAS, the City has consulted with the Virginia State Historic Preservation Office (SHPO) and both parties agree that because the Program will not fund either demolition or new construction and since the funded repair costs will not exceed \$5000, the City can more efficiently carry out its Section 106 review responsibilities if a Programmatic Agreement (Agreement) is used to streamline the administrative process and identify activities which can be exempted from Section 106 review because they are likely to have minimal impact on historic properties; and

WHEREAS, the City has notified the Advisory Council on Historic Preservation (ACHP) of its intent to enter into a Programmatic Agreement and has invited the ACHP to participate in consultation and the ACHP has accepted; and

WHEREAS, the principles set forth in the ACHP's Policy Statement on Affordable Housing and Historic Preservation (Policy Statement, Appendix 1) are incorporated herein and will be taken into consideration by all parties when carrying out the stipulations of this Programmatic Agreement; and

WHEREAS, the definitions given in Appendix 2 are applicable throughout this Agreement.

NOW, THEREFORE, the City, the SHPO and ACHP 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 funded with CDBG money through the City.

STIPULATIONS

I. REHABILITATION

A. The City will consult with the SHPO about each individual rehabilitation project funded with CDBG funds with the following exceptions:

1. Rehabilitation of properties constructed less than 50 years ago. In such cases, the work may proceed without the SHPO's review.
2. Rehabilitation work consisting only of activities listed in Appendix 3. If the rehabilitation of a property consists only of those activities listed in Appendix 3, then the City and the SHPO agree that the project has minimal potential to impact historic properties and no review by the SHPO is necessary.

II. RECORDKEEPING

- A. The City will maintain written records of consultation on all activities carried out under this Agreement. For activities not requiring consultation with the SHPO, the City will note in the appropriate project file a description of the activity and the justification for exclusion from SHPO review. Upon written request from SHPO, the City will provide the SHPO an opportunity to inspect the documentation for projects carried out under this Agreement.
- B. For all activities requiring SHPO review, the City will fully complete, per the instructions, a Project Review Application Form and submit the form and all required attendant material to the SHPO for review and comment. No activities to be carried out under this Agreement are to commence until the SHPO has had an opportunity to comment, as necessary, and those comments are considered by the City.
- C. This agreement will remain in effect for five years from the date of the last signature, after which time it may be renewed by the concurrence of both signatory parties.

III. PUBLIC PARTICIPATION AND CONSULTATION

- A. In accordance with HUD requirements under federal regulation 24 CFR 91.105, the City of Colonial Heights adopted a Citizen Participation Plan (CPP) that sets forth the City's policies and procedures for citizen participation under the five-year Consolidated Plan and subsequent Action Plans. The CPP applies to all City departments involved in the Consolidated Plan development, selection and administrative processes.
- B. The City will encourage citizen participation in any future amendments to the Consolidated Plan, the Consolidated Annual Performance and Evaluation Report (CAPER), the CPP and any amendments to it. A neighborhood participation meeting will be convened each year prior to the development of the next year's Annual Action Plan to review and comment on program performance and direction including the effects of the program activities on historic properties. The City will notify neighborhood residents and invite input by appropriate communication means.

- B. In conjunction with its National Environmental Policy Act compliance, the City will annually advertise the Section 106 review activity covered by this Agreement and invite public comment through its Notice of Intent to Request Release of Funds Notice.

IV. DISPUTE RESOLUTION

- A. Should any party to this Agreement object in writing to the City regarding any activity carried out or proposed with respect to the Undertaking or implementation of this Agreement, the City will consult with the objecting party to resolve the objection. If after initiating such consultation the City determines that the objection cannot be resolved through consultation, the City will forward all documentation relevant to the objection to the ACHP, including the City's proposed response to the objection. Within thirty (30) days after receipt of all pertinent documentation, the ACHP will exercise one of the following options:
 1. Advise the City that the ACHP concurs with the City's proposed response to the objection, whereupon the City will respond to the objection accordingly;
 2. Provide the City with recommendations, which the City will take into account in reaching a final decision regarding its response to the objection; or
 3. Notify the City that the objection will be referred for comment pursuant to 36 CFR Part 800.7(a)(4), and proceed to refer the objection and comment. The City will take the resulting comment into account in accordance with 36 CFR Part 800.7(c)(4) and Section 110(I) of NHPA.
- B. Should the ACHP not exercise one of the above options within thirty (30) days after receipt of all pertinent documentation, the City may assume the ACHP's concurrence in its proposed response to the objection.

C. The City will take into account any ACHP recommendation or comment provided in accordance with this stipulation with reference only to the subject of the objection; the City's responsibility to carry out all other measures covered under this Agreement that are not the subjects of the objection will remain unchanged.

D. At any time during implementation of the activities covered in this Agreement, should an objection pertaining to this Agreement or the effect of any activity on historic properties be raised by a member of the public, the City will notify the parties to this Agreement and take the objection into account, consulting with the objector and, should the objector so request, with any of the parties to this Agreement to resolve the objection.

V. AMENDMENT

A. Any party to this Agreement may request that it be amended by providing a written request for such amendment to the other signatories whereupon all parties will consult in accordance with 36 CFR 800.13 to consider such an amendment.

B. Any resulting amendments shall be developed in writing as an attachment to this document and shall be executed immediately upon consensus.

VI. TERMINATION

A. If the City determines that it cannot implement the terms of this Agreement, or if the SHPO or ACHP determines that the Agreement is not being properly implemented, the City, the SHPO or the ACHP may propose to the other parties that it be terminated.

B. Termination shall include the submission of any outstanding documentation on any work done up to and including the date of termination.

C. A party proposing to terminate this Agreement shall so notify all parties to the Agreement, explaining the reasons for termination and affording them at least thirty (30) days to consult and seek alternatives to termination.

D. Should such consultation fail and the Agreement be terminated, the City shall comply with 36 CFR Parts 800.3 through 800.6 with regard to the activities covered by this Agreement.

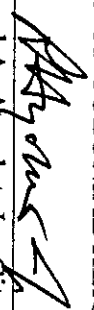
VII. DURATION OF THE AGREEMENT

This Agreement will continue in full force and effect until five years after the date of the last signature. At any time in the sixth-month period prior to such date, the City may request the SHPO and the ACHP to consider an extension or modification of this Agreement. No extension or modification will be effective unless all parties to the Agreement have agreed with it in writing.


Execution of this Programmatic Agreement and implementation of the provisions herein shall be evidence that the City of Colonial Heights has satisfied its Section 106 responsibilities for all individual undertakings subject to the review of this Agreement.

SIGNATORIES:

CITY OF COLONIAL HEIGHTS

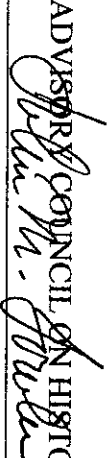

Richard A. Anzolut, Jr., City Manager, Colonial Heights, VA

9/15/05
Date


Kathleen Kilpatrick, State Historic Preservation Officer


Kathleen Kilpatrick, State Historic Preservation Officer

9/13/05
Date


ADVISED BY COUNCIL ON HISTORIC PRESERVATION

John M. Fowler, Executive Director

10/11/05
Date

APPENDIX 1

ACHP Policy Statement on Affordable Housing and Historic Preservation

The National Historic Preservation Act of 1966 (NHPA) mandates preservation of the historical and cultural foundations of the Nation as a living part of community life and development in order to provide the American people with a sense of orientation.

It further states that increased knowledge about historic resources, establishment of a better means to identify and administer them, and encouragement of their preservation will not only improve planning and execution of Federal and federally assisted projects and but also assist economic growth and development.

Toward that end, NHPA directs the Federal Government to foster conditions under which modern society and prehistoric and historic resources can exist in productive harmony and "fulfill the social, economic, and other requirements of present and future generations."

Federal agencies that assist in the construction and rehabilitation of housing, most notably the Department of Housing and Urban Development (HUD) and the Department of Agriculture, are tasked with meeting Americans basic needs for safe, decent and affordable housing. Historic properties have played a vital role in fulfilling this objective; this must continue.

It is, however, important that Federal and State agencies, local governments, housing providers, and the preservation community in general actively seek ways to reconcile national historic preservation goals with the special economic and social needs associated with affordable housing, given that this is now one of the Nation's most pressing challenges.

In issuing this policy statement, ACHP seeks to promote a new, flexible approach toward affordable housing and historic preservation which is embodied in the following Implementation Principles. State Historic Preservation Officers (SHPOs), Federal and State agencies, and local governments involved in the administration of the Section 106 review process for affordable housing projects funded or assisted by Federal agencies are encouraged to use these principles as a framework for Section 106 consultation and local historic preservation planning.

ACHP also encourages HUD, in consultation with the national preservation community, including the National Conference of State Historic Preservation Officers, the National Park Service, and the National Trust for Historic Preservation, to develop comprehensive historic preservation training programs for HUD staff, State, county, and local officials, and housing providers who implement affordable housing projects.

Such training should advance the Implementation Principles and the initiatives outlined in the Secretary of HUD's May 5, 1995, Historic Preservation Directive, focusing on:

- 1) improving coordination of Section 106 reviews;
- 2) evaluating the National Register eligibility of historic properties;
- 3) applying the Secretary's Standards;
- 4) providing technical assistance for routine maintenance and repairs to historic buildings;
- 5) developing financial packages for affordable housing projects; and
- 6) integrating historic preservation into Consolidated Plan Documents and local comprehensive plans.

Implementation Principles

1. Section 106 reviews for affordable housing projects should place principal emphasis on broad-based consensus reflecting the interests, desires, and values of affected communities, neighborhoods, and residents. Consensus-building should be facilitated through training, education, and consultation focused on historic preservation values, collaborative planning, and dispute resolution.

2. Identification of historic properties and evaluation of their eligibility for the National Register for Historic Places should include discussions with the local community and neighborhood residents to ensure that their views concerning architectural and historic significance and traditional and cultural values receive full consideration by the Federal agency, State, county, or local government, and the SHPO.
3. When assessing the effects of affordable housing projects on historic properties, consultation should focus not just on individual buildings which may contribute to a historic district but on the overall historic preservation potentials of the broader community, neighborhood, or "target area." This practice will ensure proper consideration is given to the cumulative impacts of projects within a designated area. Historic preservation issues should be related to social and economic development, housing, safety, and programmatic issues integral to community viability.
4. Plans and specifications for rehabilitation, new construction, and abatement of hazardous conditions associated with affordable housing projects should adhere to the recommended approaches in The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, when feasible. When economic or design constraints preclude application of the Standards, consulting parties may develop alternative design guidelines tailored to the district or neighborhood to preserve historic materials and spaces to the maximum extent feasible. Alternative guidelines shall be incorporated into executed Memoranda of Agreement or Programmatic Agreements.
5. Proposals for non-emergency demolitions of historic properties should include adequate background documentation to demonstrate to the SHPO and/or ACHP that rehabilitation is not economically or structurally feasible, or that retention of such properties would jeopardize the implementation of an affordable housing project.
6. The Section 106 review process for affordable housing rehabilitation projects and abatement of hazardous conditions should emphasize treatment of exteriors and be limited to significant interior features and spaces that contribute to the property's eligibility for the National Register, unless otherwise agreed to by all consulting parties.
7. Where appropriate, Section 106 reviews for affordable housing projects should be conducted in conjunction with the Historic Rehabilitation Tax Credits and other State and local administrative reviews to ensure consistency of reviews and to minimize delays. When Section 106 reviews for affordable housing projects precede other related reviews, applicants who are seeking Historic Tax Credits are encouraged to seek the advice of the SHPO and to obtain early review by the National Park Service to assure final eligibility for the Historic Rehabilitation Tax Credit.
8. Archeological investigations should not be required for affordable housing projects which are limited to rehabilitation and require minimal ground disturbance activities.
9. State, county, and local governments are encouraged to develop Programmatic Agreements that promote creative solutions to implement affordable housing projects and to streamline Section 106 reviews through the exemption of categories of routine activities; the adoption of "treatment and design protocols" for rehabilitation and infill new construction; and the delegation of Section 106 reviews to qualified preservation professionals employed by the local community.
10. Certified local governments and/or communities that employ qualified preservation professionals, as set forth in The Secretary of the Interior's Professional Qualification Standards should be allowed to conduct Section 106 reviews on behalf of ACHP and/or the SHPO for affordable housing projects when the local government and/or community has executed a Programmatic Agreement with ACHP and the SHPO.

Updated December 20, 2002

Retrieved 8/23/05 from <http://www.achp.gov/afford.html>

APPENDIX 2

DEFINITIONS

AREA OF POTENTIAL EFFECTS – The geographic area or areas within which an undertaking may cause changes in the character or use of historic properties, if any such properties exist there. This always includes the actual site of the undertaking, and may also include other areas where the undertaking will cause changes in land use, traffic patterns, or other aspects that could affect historic properties.

HISTORIC PROPERTY – Any property that falls in one or more of the following categories:

- It is a contributing property in a *historic area eligible for listing* in the National Register of Historic Places.
- It is a contributing property in a *historic district listed* in the National Register of Historic Places.
- It is *individually eligible* for listing or is *individually listed* in the National Register of Historic Places.

NON-HISTORIC PROPERTY – Any property that falls into one or more of the following categories:

- Is a *non-contributing property* located in an historic area that is either eligible for listing in the National Register of Historic Places, or is listed in the National Register of Historic Places.
- Is not located within an historic district either eligible for listing or listed on the National Register of Historic Places and is not *individually listed on or eligible for listing* on the National Register of Historic Places.

NATIONAL REGISTER – The National Register of Historic Places maintained by the Secretary of the Interior.

NATIONAL REGISTER CRITERIA FOR EVALUATION – The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association. The criteria established by the Secretary of the Interior for use in evaluating the eligibility of properties for the National Register (36CFR Part 60). These criteria are used by the City, SHPO, and Keeper of the National Register to evaluate properties (other than areas of the National Park System and National Historic Landmarks) for the National Register. These criteria are worded in a manner to provide for a wide diversity of resources. The following are the actual National Register Criteria for Evaluation.

Criterion A: Properties that are associated with events that have made a significant contribution to the broad patterns of our history;

Criterion B: Properties that are associated with the lives of persons significant in our past;

Criterion C: Properties that embody the distinctive characteristics of a type, period, or method of construction, that represent the work of a master, or that possess high artistic value, or that represent a significant and distinguishable entity whose components may lack individual distinction;

Criterion D: Properties that have yielded, or may be likely to yield, information important in prehistory or history.

Criteria consideration: Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However,

such properties shall qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- (a) a religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- (b) a building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- (c) a birthplace or grave of a historical figure of outstanding importance if there is no other appropriate site or building directly associated with his productive life; or
- (d) a cemetery that derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- (e) a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- (f) a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- (g) a property achieving significance within the past 50 years if it is of exceptional importance.

STATE HISTORIC PRESERVATION OFFICER – The official appointed or designated pursuant to Section 101 (b)(1) of the Act to administer the State Historic Preservation program or a representative designated to act for the State Historic Preservation Officer. For purposes of this Agreement, the State Historic Preservation Officer shall refer to the Director and staff of the Virginia Department of Historic Resources.

UNDERTAKING – A project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval.

APPENDIX 3

ACTIVITIES EXCLUDED FROM SHPO REVIEW

The following activities have limited potential to affect historic properties and therefore review by the SHPO is not required. All work on historic properties must meet the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and be consistent with the Preservation Briefs.

Glossary

In-kind replacement: The term in-kind replacement is defined as installation of a new element to replace an historic element (i.e. over 50 years old) that is either missing or too deteriorated to repair that exactly matches the original element in all respects, including design, material, dimensions, configuration and detailing. Repair of an original element should always be the preferred alternative. In-kind replacement should be considered only if repair is not an option.

Preservation Briefs: To meet the Standards, work carried out on historic properties must be done according to the Preservation Briefs, a series of leaflets compiled by the National Park Service, which provide technical information about working on historic properties. They can be found on the Internet at <http://www.cr.nps.gov/hps/lps/briefs/presbhom.htm>, where they may be downloaded.

Standards: *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Historic Landscapes.* According to the Section 106 regulations, work carried out on historic properties must meet *The Secretary of the Interior's Standards for the Treatment of Historic Properties* to avoid an adverse effect (see the Section 106 regulations, 36 CFR Part 800, section 800.5(a)(2)(ii) – the regulations can be found on the web site of the Advisory Council on Historic Preservation, at www.achp.gov). Please refer to information on meeting the Standards at <http://www2.cr.nps.gov/lps/standguide/index.htm>.

EXEMPT ACTIVITIES

1. Site Work
 - a) Streets, driveways, alleys, and parking areas. Repairs, line painting, resurfacing, and maintenance of existing streets, alleys, sidewalks, and curbs, providing that a change in width, historical surface material, vertical alignment, or drainage will not result. Repair of existing concrete or asphalt surfaces for curbs, gutters, and retaining walls is also exempt.
 - b) Site improvements. Maintenance and repair of existing landscape features, including planting, fences, walkways, and statuary (Note: installation or replacement of these features is considered to be new construction and is subject to review). Maintenance, repair, and in-kind replacement of street lights, traffic signals, and traffic signs. Repairs to, or in-kind replacement of walks, driveways, and steps, provided it does not involve the removal of historic materials;
 - c) Park and playground equipment. Repair or comparable replacement of existing park and playground equipment, excluding buildings.
 - d) Temporary structures. Installation of temporary construction-related structures (not to be in place for more than two years) including scaffolding, barriers, screening, fences, protective walkways, signage, office trailers or restrooms.
 - e) Vegetation. The pruning of overgrown trees and shrubs and the removal of dead trees.
2. Exterior Rehabilitation
 - a) Foundations. Below-grade repair of brick or stone foundations and repairs to all other types of foundations. Underpinning of the front facade shall be accomplished by setting the underpinning material at least two (2) inches behind the outer face of the piers.
 - b) Windows and doors. Repair of windows and doors, including caulking and weather stripping of existing window or door frames, and installation of new clear

glass in existing sashes or doors, including retrofitting for double and triple glazing, and replacement of glazing putty. Installation of exterior storm windows and doors, provided they conform to the shape and size of the historic windows and doors, and that the meeting rails of storm windows coincide with that of existing sash, and that their installation will not permanently damage historic elements. Installation of door or window locks or electronic security apparatus. If historic door locks are present, they can be disabled but should not be removed.

c) Walls and Siding. Repair of wall or siding material or in-kind replacement of deteriorated siding or trim.

d) Paint.

- Removal of exterior paint by non-destructive means, limited to hand scraping, low pressure water wash (less than 200 p.s.i.), or paint-removal chemicals, provided that the removal method is consistent with the provisions of 24 C.F.R. Part 35, "Lead-Based Poisoning Prevention in Certain Residential Structures," including § 35.140, "Prohibited methods of paint removal."

- All lead paint abatement done in accordance with Chapter 18 of HUD's *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*, "Lead Hazard Control and Historic Preservation" and carried out in accordance with *Preservation Brief #37: Appropriate Methods for Reducing Lead Paint Hazards in Historic Housing*.

- Application of exterior paint to previously painted surfaces when no historic decorative paint schemes, such as graining, stenciling, marbling, etc., are to be covered.

e) Porches. Repair or in-kind replacement of existing porch elements, such as columns, flooring, floor joists, ceilings, railing, balusters and balustrades, and lattice.

f) Roofing. Repair or in-kind replacement of roof cladding and sheeting, flashing, gutters, soffits, and downspouts with no change in roof pitch or configuration. Repair or re-framing of structural roof elements as required to improve the drainage and durability of the roof as long as the appearance of the roof lines visible from the front elevation and from other prominent, visible points (for example, the exposed side façade on a corner lot) is not affected. New installation of gutters and down spouts, as long as this does not damage historic materials or require removal of historic features.

g) Wheelchair ramps. Repair of existing wheelchair ramps, unless the ramps are to be replaced or substantially modified. Installation of new wheelchair ramps, when the following considerations apply:

- The ramp will not be a permanent addition to the property;
- No historic fabric will be permanently damaged in the installation or use of the ramp;
- Every reasonable effort will be made to construct and finish the ramp in a manner that will result in a minimal amount of visual and physical impact on the property, through design considerations, use of materials, and painting wooden ramps whenever possible.

h) Repointing. Repair or repointing of chimneys or other masonry features with the design, size, shape, materials, and repointing to match the original in color, texture, and tooling, and, for historic properties, following the recommended approaches in Preservation Brief No. 2 *Repointing Mortar Joints in Historic Brick Buildings*.

i) Signs and Awnings. Repair or in-kind replacement of existing signs or awnings.

j) Mechanical systems. Placement and installation of exterior HVAC mechanical units and vents not on the front elevation that will not permanently damage historic fabric.

k) Basement bulkhead doors. Replacement or repair of basement bulkhead doors and installation of basement bulkhead doors not on the front elevation.

l) Lighting. Repair or in-kind replacement of existing exterior light fixtures.

- m) Mothballing. Securing or mothballing a property by boarding over window and door openings, making temporary roof repairs, and/or ventilating the building. For historic buildings, mothballing procedures should follow Preservation Brief No. 31, “Mothballing Historic Buildings.”

3. Interior Rehabilitation

- a) Mechanical systems. Installation, replacement or repair of plumbing, HVAC systems and units, electrical wiring and fire protection systems, provided no structural alterations or damage to historic material are involved. Included are restroom improvements for handicapped access, provided the work is contained within the existing restroom walls. For historic properties, work must be done according to the preservation briefs and there should be no intrusion into the primary spaces of the building.
- b) Interior surfaces. Repair or in-kind replacement of interior surface treatment, such as floors, walls, ceilings, plaster and woodwork. If covering historic features, such as wood floors, then carpet or sheet goods (linoleum or vinyl) shall be installed in a reversible manner, either through tacking or with an underlayment so historic floors shall not be irreversibly damaged.
- c) Paint. Application of interior paint provided no historic decorative treatments are covered. Lead paint abatement done in accordance with Chapter 18 of HUD’s *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*, “Lead Hazard Control and Historic Preservation” and carried out in accordance with *Preservation Brief #37: Appropriate Methods for Reducing Lead Paint Hazards in Historic Housing*.
- d) Kitchens. Repair or replacement of kitchen cabinets, counters, and appliances – provided the work is contained in the existing kitchen and significant historic fabric will not be damaged or removed.
- e) Bathrooms. Replacement of bathroom facilities and fixtures – provided the work is contained within the existing bathroom and will not involve damage to significant historic fabric.
- f) Insulation. Installation of non-spray insulation in ceilings and attic spaces.
- g) Basement. Installation or repair of concrete basement floor in an existing basement provided no historic materials are damaged or concealed.
- h) Radon abatement. Provided the treatment to prevent the entry of radon gas into the building is through the basement floor and does not damage or conceal any historic material.
- i) Asbestos removal. Provided it does not involve removal or alteration of significant historic elements.