

For SHPO Use Only. Case # _____

REQUEST FOR SHPO COMMENT AND CONSULTATION ON A FEDERAL UNDERTAKING

Submit one copy with each undertaking for which our comment is requested. Please print or type. Return to:
Wisconsin Historical Society, Division of Historic Preservation, Office of Preservation Planning, 816 State Street, Madison, WI 53706
Please Check All Boxes and Include All of the Following Information, as Applicable.

I. GENERAL INFORMATION

- This is a new submittal.
- This is supplemental information relating to Case #: _____, and title: _____
- This project is being undertaken pursuant to the terms and conditions of a programmatic or other interagency agreement. The title of the agreement is _____
- a. Federal Agency Jurisdiction (Agency providing funds, assistance, license, permit): _____
- b. Federal Agency Contact Person: _____ Phone: _____
- c. Project Contact Person: _____ Phone: _____
- d. Return Address: _____ Zip Code: _____
- e. Email Address: _____
- f. Project Name: _____
- g. Project Street Address: _____
- h. County: _____ City: _____ Zip Code: _____
- i. Project Location: Township _____, Range _____, E/W (circle one), Section _____, Quarter Sections _____
- j. Project Narrative Description—Attach Information as Necessary.
- k. Area of Potential Effect (APE). Attach Copy of U.S.G.S. 7.5 Minute Topographic Quadrangle showing APE.

II. IDENTIFICATION OF HISTORIC PROPERTIES

- Historic Properties are located within the project APE per 36 CFR 800.4. Attach supporting materials.
- Historic Properties are not located within the project APE per 36 CFR 800.4. Attach supporting materials.

III. FINDINGS

- No historic properties will be affected (i.e., none is present or there are historic properties present but the project will have no effect upon them). Attach necessary documentation, as described at 36 CFR 800.11.
- The proposed undertaking will have no adverse effect on one or more historic properties located within the project APE under 36 CFR 800.5. Attach necessary documentation, as described at 36 CFR 800.11.
- The proposed undertaking will result in an adverse effect to one or more historic properties and the applicant, or other federally authorized representative, will consult with the SHPO and other consulting parties to resolve the adverse effect per 36 CFR 800.6. Attach supporting documentation as described at 36 CFR 800.11 with a proposed plan to resolve adverse effect(s).

Authorized Signature: _____ Date: _____

Type or print name: _____

IV. STATE HISTORIC PRESERVATION OFFICE COMMENTS

- Agree with the finding in section III above.
- Object to the finding for reasons indicated in attached letter.
- Cannot review until information is sent as follows: _____

Authorized Signature: _____ Date: _____

Working from the Form: Selected Details for the Wisconsin § 106-submittal process

Following are explanatory materials on selected items from the Submittal Form involving key issues of the Wisconsin § 106 Review Process.

Part I. GENERAL INFORMATION

You must provide all requested information that is applicable to you and your project. Incomplete materials will be returned to you, possibly causing unnecessary delay to your project.

Your Area of Potential Effect (APE), Part I. k.

You must articulate an APE (or APEs) of sufficient magnitude to address all historic property issues that may arise through your project. Depending upon your project, there may be one or two APEs.

First, for ground disturbing projects that will not permanently alter the appearance of the project area, consideration must be given to known and unknown archeological sites that may lie under the surface of the ground and that may be affected, if not adversely affected, by the proposed undertaking. In this case, the logical APE would describe the footprint of all of the area proposed for ground disturbance.

Second, for projects that may permanently alter the appearance of the project area, a different APE may be necessary to speak to the effects, or adverse effects, to historic properties. For example, if the project involves renovation of an historic building or other structure, then the APE is the building or structure itself. If the project involves altering the appearance of the landscape, then the APE must be defined as that area within which permanent alterations may affect the use, character, setting or physical appearance of an historic property.

When you have defined the nature and extent of your project, and, therefore, are able to determine the APE(s), you must include as part of your submittal materials a copy of a USGS topographic map clearly showing the boundary of each APE. You may submit additional descriptive material as necessary.

II. IDENTIFICATION OF HISTORIC PROPERTIES

You—the federal agency authority—must determine whether your undertaking, as defined by federal law, has the potential to affect a historic property. Thus, you must ascertain whether there are historic properties located within your APE(s)—as you determined earlier.

Identification of historic properties can be as straightforward as recognizing that the building you plan to renovate is listed in the NRHP. Or, identification may involve hiring a qualified archeologist and/or architectural historian to survey your APE physically to identify or locate archeological sites, buildings, other structures or landscapes that are eligible for listing in or are listed in the NRHP.

To begin to answer the question of “What’s there?”, you may consider existing database information maintained by the WHS, as well as data maintained by Native American Communities, Tribes and Nations, local historical societies, local preservation commissions, local, regional or national historic preservation organizations, or the National Park Service.

You may examine other sources of information to assist you in your determination of whether there are historic properties within your APE. For example, if your APE has been subject to prior extensive ground disturbing activities—greater in magnitude than your current project proposal, then no archeological survey would be necessary since there would be no intact archeological deposits within the APE. If you decide to do no archeological investigation based on this situation, then you must provide suitable documentation with your submittal to support your claim. Such documentation may include previous project descriptions that demonstrate the amount of ground-disturbing activity, local transportation department or state Department of Transportation road or highway cut/fill records and maps, and other similar substantive information.

Project area soils analysis may help determine whether an archeological survey is warranted. The project area may be comprised of hydric soils or post-settlement alluvium. In either case, depending upon the depth of project excavation relative to the depth of any buried potential habitation or use horizon, an archeological survey may be unnecessary. If an analysis of soil types within the APE is used to inform your decision about the necessity of an archeological survey, then you must submit materials detailing your results.

It may be that your APE has been surveyed for historic properties in the past. If so, please provide sufficient information to us so that we may locate previous reports in our archives. If we cannot obtain copies of these reports, then we will notify you in writing, requesting that you forward copies to us for our review.

Based on your APE background research, you may decide that you require the services of a qualified archeologist or architectural historian (the Secretary of the Interior has promulgated federal regulations defining “qualifications” at: <http://www2.cr.nps.gov/laws/ProfQual83.htm>) to assist you with determining whether a formal survey of your APE may be necessary to locate historic properties. Of course, you may wish to contract with a qualified professional to conduct all underlying research and to assist you with your determination.

To help you locate the appropriate professionals for your project, we maintain lists of qualified archeologists (http://www.wisconsinhistory.org/arch/preserve/index.html#consult_list) and architectural historians. You may be able to locate other qualified individuals through professional societies like the American Institute of Architects (AIA web site is: <http://www.aiaaccess.com/consumer/>) or the Wisconsin Archeological Survey (WAS).

With your project submittal, you must include information either identifying all historic properties located within your APE or supporting the conclusion that there are no historic properties within your APE. If qualified professionals are involved with this identification process, formal reports describing the techniques involved, scope of work carried out, other methodologies employed, results and conclusions must be included as part of your submittal materials. We request that archeological reports conform to the WAS guidelines, available on request from the WAS.

We encourage you to work with qualified professionals when in doubt and when necessary.

Please note: The WHS Division of Historic Preservation does not offer archeological or architectural survey services.

III. FINDINGS

Based on your work identifying historic properties within your project APE, the nature of your project and comments you have received from consulting and other parties, you must make a determination of one of four possible findings: "no historic properties within the APE", "no effect", "no adverse effect" or "adverse effect". You or those conducting research on your behalf must have a detailed understanding of how these conclusions may be reached with respect to all of the factors informing the § 106-review process. In this regard, the ACHP and the National Park Service web sites (<http://www.achp.gov/work106.html> and <http://www.cr.nps.gov/nr/publications/bulletins.htm> respectively) contain essential information for you.

First, the results of your historic property survey may be negative. That is, the professionals carrying out the survey have determined that there are no historic properties listed in or eligible for listing in the NRHP within your project APE(s). In this case, you submit the formal report supporting this conclusion with your review materials to our office for review and comments.

Second, your project may have "no effect" on any historic properties. This may be due to the nature of your project. For example, ground disturbing will occur in areas of prior ground disturbance such that no archeological sites will be effected; and, because there will be no permanent changes to the appearance of the APE after completion of the project, no buildings, other structures, or landscapes that may be present within your project APE will be affected. Or, you may be repairing damage to a building with in-kind replacement materials resulting in no net change to the property. All of these are "no effect" findings.

Third, your project may have "no adverse effect" on historic properties. Again, several bases exist to support this conclusion. You may be renovating a listed building. In this case, while the work you propose may affect the building (for example your plan includes replacement of bathroom fixtures or the HVAC system), this action will not cause an adverse effect.

Depending upon the nature of your project, it may be that a determination of "no adverse effect" is reached through mutual agreement of all consulting parties through the creation of an agreement document. This agreement document would detail specific conditions to resolve minor adverse effects with affirmative conditions such that the assessment of the overall undertaking would not result in a finding of "adverse effect". There are no clear guidelines for this variety of "no adverse effect" determination. This situation may be considered on a case-by-case basis. As well, this outcome may be reached through negotiation after you submit your § 106-review materials.

Fourth, your project may have an adverse effect on historic properties within your APE. You must identify the adverse effects. You may specify a plan to address these adverse affects through mitigation. Also, you may describe project alternatives that would not result in adverse effects to historic properties, stating why these alternatives were rejected.

However, when your project causes an adverse effect to historic properties, a formal memorandum of agreement (MOA) must be negotiated, drafted, and executed between all necessary consulting parties, any parties invited by you and the SHPO to participate, and any other parties having responsibilities under the terms of the agreement. Finally, the ACHP shall be invited to participate in consultation.

NHPA and ACHP Regulations Notes

You must ensure that all appropriate parties, including the public, be afforded every opportunity to comment on your undertaking—in a manner appropriate to the size and scope of the undertaking, its likelihood to affect historic properties, and to the extent to which it actually may affect historic properties. Consultation is required at every major decision-making point in the § 106-review process.

Submitting your project review materials to our office does not mean necessarily that you have complied with all provisions of the NHPA or the ACHP's regulations. You must ensure that you have fulfilled your responsibilities in accordance with all relevant local, state and federal laws, rules and regulations.

*Model Agreement
sent from Chap
on 5/28/04*

Programmatic Agreement
Between the City of COMMUNITY,
A Community Development Block Grant Entitlement Community,
And The State Historic Preservation Office,
Wisconsin Historical Society

WHEREAS, The City of COMMUNITY (hereinafter COMMUNITY) which is the recipient of a Community Development Block Grant (hereinafter CDBG), disbursed by the United States Department of Housing and Urban Development (hereinafter HUD), now and may in the future administer programs or serve as the responsible entity for a grant recipient under one or more programs which are funded, permitted, assisted or otherwise authorized through the CDBG program statutes that authorize the CDBG Community to assume HUD's environmental responsibilities in accordance with the procedures set forth in 24 CFR Part 58.

WHEREAS, COMMUNITY has determined that the implementation of individual undertakings (hereinafter Undertakings) of the CDBG programs may have an effect on properties included in, or eligible for inclusion in, the National Register of Historic Places (hereinafter NRHP), pursuant to Section 106 of the National Historic Preservation Act of 1966 (16 USC 470f) and the Advisory Council on Historic Preservation's implementing regulations at (36 CFR Part 800); and

WHEREAS, the definitions given in 36 CFR § 800.16 are applicable throughout this Programmatic Agreement (hereinafter PA); and

WHEREAS, the State Historic Preservation Office (hereinafter SHPO) and COMMUNITY agree that this PA does not pertain to any Undertaking pursuant to the NHPA and the ACHP's implementing regulations at 36 CFR Part 800 over which a Tribal Historic Preservation Officer (THPO), established pursuant to § 101 (d)(2) of the National Historic Preservation Act of 1966 and further described at 36 CFR § 800.2 (c), retains jurisdiction; and

WHEREAS, this PA does not constitute a Program Alternative pursuant to 36 CFR § 800.14, but clarifies an expedited process, per 36 CFR § 800.3(g), between COMMUNITY and the SHPO to carry out the provisions of 36 CFR §§ 800.3 through 800.5; and

WHEREAS, "The Wisconsin NHPA § 106 Submittal Process" web site (located on the Internet at: http://www.wisconsinhistory.org/hp/protecting/106_intro.asp) (hereinafter Wisconsin Process) is referenced in and applicable throughout this PA;

WHEREAS, Appendix A, titled "Undertakings Exempt from Further Review," is part of and applicable throughout this PA; and

NOW THEREFORE, COMMUNITY and the SHPO agree that COMMUNITY Undertakings shall be implemented in accordance with the following stipulations in order to take into account the effect(s) of the Undertakings on historic properties.

Stipulations

A. Personnel

1. COMMUNITY will designate a single staff person or consultant (hereinafter Staff) to ensure that all provisions of this PA are carried out, to sign all project submittal forms, per the Wisconsin Process, and to be the contact point with the SHPO for all matters concerning this PA.
2. COMMUNITY will notify the SHPO annually with the name and contact information of the Staff.
3. COMMUNITY will notify the SHPO of any proposed Staff changes. If, at any time through the duration of this PA, COMMUNITY does not have Staff in place to carry out the review, then COMMUNITY and the SHPO shall consult to develop alternative administrative procedures for implementing the PA.
4. COMMUNITY understands that it may be required to enlist the services of qualified professionals, as defined by the National Park Service at 36 CFR Part 61, in order to carryout its responsibilities under the terms of this PA.

B. Categorical Exclusions

1. Non-Ground-Disturbing Undertakings
 - a. Properties that are less than 50 years old are considered not eligible for listing on the National Register of Historic Places and are exempt from review under this PA.
 - b. Undertakings where there is a property within the project APE that is 50 years old or older but that previously has been determined not eligible for listing on the NRHP are exempt from review under this PA.
 - c. Undertakings listed in Appendix A involving any property that is listed on the NRHP or is eligible for listing on the NRHP will be considered to have no effect and are exempt from review under this PA.
 - d. With respect to exempt Undertakings, Part B. I. Sections a. and b. above, if COMMUNITY believes that a property may be eligible for listing on the NRHP, then that property-specific Undertaking shall not be exempt and shall be reviewed pursuant to Part C. below.
 - e. COMMUNITY shall retain comprehensive project files for the aforementioned projects so that it may provide adequate documentation to the

Council should a request be received from the public. Also, this documentation shall be made available to the SHPO upon request.

2. Ground-Disturbing Undertakings

a. For Undertakings that may disturb ½ acre of ground or less, COMMUNITY shall consult the Wisconsin Inventory of Historic Places (Wisconsin Archeological and Historical Resources Database—hereinafter WisAHRD) to determine whether there is a known historic or prehistoric archeological site within the APE. If there is no known archeological site within the APE, then the Undertaking may proceed without further review, unless the provisions of Part B. 1. above apply.

b. An Undertaking that may disturb ground that has been disturbed previously to a degree greater than currently proposed is exempt. Agricultural disturbance (including plowing and other cultivation-related activities) is not considered to be ground disturbance for the purposes of this PA.

c. With respect to 2. a. above, if COMMUNITY believes that an archeological site that may be eligible for listing on the NRHP or that is listed on the NRHP may be affected by an Undertaking, then that site-specific Undertaking shall be reviewed pursuant to Part C. below.

d. COMMUNITY shall retain comprehensive project files for 2. a. and b. above so that it may provide adequate documentation to the ACHP should the public make such a request.

e. If a known archeological site is located within the project area, then the Undertaking is not excluded from review and COMMUNITY shall carryout the provisions prescribed in C below and in the Wisconsin Process.

C. Non-Excluded Undertakings

1. Non-Ground-Disturbing Undertakings

a. Prior to commencing any Undertaking that may affect a property either listed on the NRHP or eligible for listing on the NRHP COMMUNITY shall comply with the following provisions and procedures and shall satisfy the provisions of the Wisconsin Process by completing and submitting to the SHPO the Request for SHPO Comment and Consultation on a Federal Undertaking form (hereinafter Submittal Form) in accordance with the Guidelines.

b. If the property within the project APE is recorded in the WisAHRD and has not been formally evaluated by the SHPO, then COMMUNITY shall carryout the provisions of the Wisconsin Process.

c. If a property is listed on the NRHP, or previously was determined eligible for listing on the NRHP, or is determined eligible for listing on the NRHP through COMMUNITY's evaluation, then COMMUNITY will continue with the project review pursuant to the terms prescribed in the Wisconsin Process.

2. **Ground-Disturbing Undertakings:**

For Undertakings that may affect more than ½ acre of ground, or that are not otherwise excluded from review pursuant to the terms of this PA, COMMUNITY shall carryout the provisions prescribed in the Wisconsin Process.

D. SHPO Review of Project Submittals

1. The SHPO shall review all project submittals pursuant to the terms outlined in this PA and as prescribed in the Wisconsin Process.

2. If the SHPO believes that a specific Undertaking, as defined in Part B. 1 a. through c., or Part B. 2. a. and b. above, may affect a property that is eligible for listing on the NRHP, then it shall notify COMMUNITY requesting that it review the project-specific Undertaking pursuant the terms of this PA and as described in the Wisconsin Process. Upon receipt of such request from the SHPO, COMMUNITY shall review the project-specific Undertaking pursuant to part C. above.

E. Emergencies

COMMUNITY from time to time may conduct Undertakings in response to natural and man-made disasters, including, but not limited to, floods, tornadoes, fire, explosion, contaminated wells, mold contamination, and lead-based paint hazards in homes where children under 6 years of age are present. Such Undertakings may be exempt from federal environmental review requirements, per 24 CFR 58.34(a)(10). If COMMUNITY requires an Undertaking in response to such an emergency, then 36 CFR § 800.12 (b) through (d) shall apply.

F. Documentation

1. Documentation required by the SHPO for consultation per the provisions of this PA may include written descriptions of the project and affected historic properties, reports demonstrating that properties are eligible for listing in the NRHP, and maps showing APEs.

2. All documentation generated for review purposes under the terms of this PA shall meet the requirements of the Wisconsin Process, and the provisions of 36 CFR § 800.11.

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G. Technical Assistance

The SHPO will notify COMMUNITY of training opportunities and technical assistance to COMMUNITY and help develop training for its grantees in areas of mutual concern and need.

H. Monitoring

1. COMMUNITY shall retain documentation concerning all Undertakings carried out pursuant to this PA for a period of three years.

2. COMMUNITY, when requested, will provide the SHPO a report summarizing the Undertakings carried out pursuant to this PA.

3. COMMUNITY shall make available to the SHPO upon request all historic-review-related documentation for projects undertaken pursuant to the provisions of this PA. This periodic review may be carried out to evaluate the adequacy of the provisions of this PA and to assess COMMUNITY compliance with the terms of this PA.

I. Other Laws, Rules, Regulations

1. No provision of this PA, whether express or implied, is intended or designed to exempt either COMMUNITY or the SHPO from their respective obligations, duties and responsibilities pursuant to any provisions of the NHPA § 106 and/or the ACHP's implementing regulations at 36 CFR Part 800 not specifically referenced herein, or the provisions of any other federal, state, or local law, regulation, rule or ordinance not specifically referenced herein.

2. COMMUNITY understands that it may be required to contact and/or consult with individuals, groups and/or units of government including Native American Nations or Tribes throughout the NHPA § 106 review process, consistent with and pursuant to provisions of the NHPA § 106 and the ACHP's regulations at 36 CFR Part 800 not otherwise referenced herein.

3. It is the responsibility of COMMUNITY and the SHPO independently to recognize, understand and carryout each of their respective obligations, duties and responsibilities under the NHPA § 106 and the ACHP's regulations at 36 CFR Part 800 not otherwise referenced herein.

J. Amendments

This PA may be amended if COMMUNITY and the SHPO decide in consultation that the

terms need to be revised, updated or changed for any reason.

K. Termination

1. Either COMMUNITY or the SHPO may terminate this PA by providing written notice describing the reason(s) for termination to the other party. This PA shall remain in effect for 30 days from receipt of notice to terminate. COMMUNITY or the SHPO shall consult prior to actual termination to resolve the written reasons for termination and if possible, to amend the PA accordingly or seek other actions that would prevent termination.

2. In the event that this PA is terminated, then COMMUNITY will comply with the NHPA, 36 CFR Part 800 and the Wisconsin § 106 Submittal Process for any Undertakings that may affect historic properties.

L. Sunset Provision

1. This PA shall remain in force for five years from the date of the final signature unless the PA is terminated or superseded by another PA.

2. Within six months prior to the expiration of this PA, COMMUNITY and the SHPO agree to meet to negotiate terms for a new PA, extension of the terms of the existing PA, or reversion to the specific provisions of the NHPA and 36 CFR Part 800.

U.S. Department of Housing and Urban Development, COMMUNITY Representative

By: _____ Date: _____
[NAME]

Title: [TITLE]

The Wisconsin State Historic Preservation Office, State Historic Preservation Officer

By: _____ Date: _____
Michael E. Stevens

Title: Administrator, Division of Historic Preservation
Wisconsin Historical Society

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Appendix A:
Undertakings Exempt from Further Review

UNDERTAKINGS EXEMPT FROM FURTHER REVIEW

General Guidance: Any activity that repairs or replaces existing installations is generally permitted without review by the State Historical Society. Any activity that modifies, enlarges or diminishes an installation may have an effect on its historic character and must be reviewed by SHS.

Non-Construction Work

- 1) Acquisition of properties when there is assurance by the Department that historic structures and buildings will be secured and protected from vandalism, arson, and the elements, pending their rehabilitation, disposal, or reuse.
- 2) Architectural and engineering fees and other non-construction fees and costs.
- 3) Rental or purchase of vehicles or other motorized equipment.
- 4) Rental and installation of scaffolding.
- 5) Temporary bracing or shoring as part of stabilization, provided that it is installed without permanent damage to the building site.

Site Work

- 6) Installation of temporary, reversible barriers such as chain link fences and polyethylene sheeting and tarps.
- 7) Repair, line painting, resurfacing, and maintenance of existing street, alleys, sidewalks, and curbs, provided that no change in width, surface, vertical alignment, or drainage will result.
- 8) Maintenance, repair, and in-kind replacement of existing landscape features, including plantings, fences, walkways, and statuary.
- 9) Upgrading, replacement, and repair of existing utility service lines and sewer systems, as long as work is confined to existing, disturbed (due to initial installation of the utility corridors or rights-of-way).
- 10) Maintenance, repair, and in-kind replacement of street lights, traffic signals, and traffic signs.

Building Exterior

- 11) Repair or partial replacement of porches, cornices, exterior siding, doors balustrades, stairs, or other trim when the repair or replacement is done in-kind and matches the appearance of the material being replaced.
- 12) Repair of existing wheelchair ramps, and the installation of temporary ramps.
- 13) Foundation repair and replacement of cast-in-place concrete.
- 14) Removal of exterior paint by non-destructive means, limited to:
 - A) hand scraping;
 - B) low-pressure water less than 600 p.s.i.;
 - C) heat plates or hot air guns;
 - D) chemical paint removers, if the cleaning contract requires that the chemicals be tested on the surfaces to ensure that no damage will result.
- 15) Exterior painting of wood siding, features and trim.
- 16) Exterior painting of brickwork, if existing surfaces are already painted.
- 17) Repair or in-kind installation of roofing, gutters, and down spouts.
- 18) Window repair, including caulking and weather-stripping of existing window frames, installation of new, clear glass in existing sashes, and replacement glazing compound in existing sashes.
- 19) Installation of storm windows as follows:
 - A) Glass and screen replacement in existing storm window units.
 - B) New wood or baked-enamel-finished metal storm windows, installed on the exterior, provided that they:
 - i) completely fill the original window openings with glazed window units;
 - ii) match the meeting rail (or other major division) pattern of the primary window; and,
 - iii) do not protrude beyond the face of the building.
 - C) New interior storm windows, provided that they:
 - i) completely fill the original interior window opening with glazing;
 - ii) do not cause damage to the original interior trim;
 - iii) match the meeting rail (or other major division) pattern of the primary window; and,
 - iv) are designed to seal completely so as to protect the primary window from

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condensation damage.

- 20) Replacement of primary (non-storm) windows, provided that they:
 - A) completely fill the original window opening with glazing;
 - B) do not cause damage to the original interior trim; and,
 - C) match the meeting rail (or other major division) pattern of the existing windows.
- 21) Installation of storm doors on elevations not facing streets, if the storm doors are undecorated and have a painted finish. (Decorated storm doors include those with false metal hinges, scalloped windows, applied window muntins, and stamped metal to imitate framing members).
- 22) Caulking and weather-stripping with compatibly colored materials.
- 23) Repair or in-kind replacement of signs and awnings.

Building Interior

- 24) Finishing of unfinished basement or attics.
- 25) Repair of existing interior walls. (Note: this exemption applies to limited repair of wall surfaces only. removal and replacement of entire wall surfaces, and reconstruction of walls is subject to SHS review).
- 26) Installation of smoke detectors and carbon monoxide detector devices.
- 27) Application of new drywall over plaster surfaces if:
 - A) interior trim and features are removed and re-applied in original locations over the new drywall; and,
 - B) no decorative plasterwork exists on the wall surfaces.
- 28) Repair and refinishing of interior floors.
- 29) Replacement of floors in-kind when original floors have been damaged beyond repair.
- 30) Installation of wallpaper.
- 31) Installation of carpeting, provided that installation does not damage any underlying, wood, stone, or terrazzo floor surfaces.
- 32) Replacement of vinyl or similar floor coverings.
- 33) Repair or installation of new basement floors.

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34) Kitchen and bathroom remodeling, if no walls, windows, or doors are altered.

Mechanical, Electrical and Plumbing Systems

35) Installation of new furnaces and water heaters, if:

- A) the work utilizes the existing heat distribution system; and,
- B) does not result in installation or relocation of chimneys or condenser units.

36) Upgrading, repair and replacement of electrical systems and plumbing systems and fixtures (Note that removal of original electrical features, and the installation of new electrical fixtures, is subject to SHS review).

37) Asbestos abatement activities that do not involve removal or alteration of interior decorative features.