Historic Preservation Policies & Procedures | Background

Section 106 of the National Historic Preservation Act (NHPA) requires Federal agencies, including the Department of Energy, to consider the effects of Federally funded projects on historic properties and to afford the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on such projects prior to the expenditure of any Federal funds.

The State Historic Preservation Office (SHPO) is a state governmental function created by the United States federal government in 1966 under Section 101 of the National Historic Preservation Act.

The State of Vermont SHPO office is responsible for administering and overseeing the NHPA (Section 106).

Vermont WAP Agencies are required to ensure that any federally funded work completed on a client’s property does not adversely affect an historic property/home.

At this time, the following grants/programs are federally funded:

- The Department of Energy Weatherization Grants
- The OEO Stove Program (DOE ARRA)

Historic Preservation Policies & Procedures | Required Actions

Work prescribed in homes receiving federal funds must either undergo a SHPO review or be listed as an exempt activity in SHPO’s “Document A—WAP Undertakings Exempt From Section 106 Review”. The content from this SHPO document is included on pages 2-4 of this TEC manual section for reference.

Whenever a measure is not listed within SHPO’s Document A, then it must be reviewed and approved by SHPO prior to installation. These reviews shall be initiated using SHPO’s “Appendix B: Project Review Form For Non-Exempt Activities For WAP Undertakings”. The content from this SHPO form is included on pages 5-6 of this TEC Manual Section for reference.

Record Keeping - Whenever a submission of SHPO’s Appendix B is required, the form shall be uploaded to the HES project file. The stored version of the form needs to include the response from the SHPO office.

Historic Preservation Policies & Procedures | Policy Exemptions

- HWAP and other non-federally funded programs are not subject to SHPO review.
EXEMPT ACTIVITIES FROM SHPO REVIEW

DOCUMENT A—WAP UNDERTAKINGS EXEMPT FROM SECTION 106 REVIEW

All Undertakings will be done in accordance with applicable local building codes or the International Building Code, where applicable. In accordance with 36 CFR 800.3(a)(1), the following Undertakings have been determined to have no potential to cause effects on historic properties:

A. Exterior Work

1) Air sealing of the building shell, including caulking, weather-stripping, and other air infiltration control measures on windows and doors, and installing thresholds in a manner that does not harm or obscure historic windows or trim.
2) Thermal insulation, such as non-toxic fiberglass and foil wrapped, in walls, floors, ceilings, attics, and foundations in a manner that does not harm or damage historic fabric.
3) Blown in wall insulation where no holes are drilled through exterior siding, or where holes have no permanent visible alteration to the structure
4) Removable film on windows (if the film is transparent), solar screens, or window louvers, in a manner that does not harm or obscure historic windows or trim.
5) Reflective roof coating in a manner that closely resembles the historic materials and form, or with materials that restore the original feature based on historic evidence, and in a manner that does not alter the roofline, or where not on a primary roof elevation or visible from the public right-of-way.
6) Storm windows or doors, and wood screen doors in a manner that does not harm or obscure historic windows or trim.
7) In-kind replacement or repair of primary windows, doors and door frames that closely resemble existing substrate and framing
8) Repair of minor roof and wall leaks prior to insulating attics or walls, provided repairs closely resemble existing surface composite
B. Interior Work

**Special Note:** Undertakings to interior spaces where the work will not be visible from the public right of way; no structural alterations are made; no demolition of walls, ceilings or floors occurs; no drop ceilings are added; or no walls are leveled with furring or moved, should be automatically excluded from SHPO review. This work includes:

1. **Energy efficiency work within the building shell:**
   
a. Thermal insulation in walls, floors, ceilings, attics, crawl spaces, ducts and foundations
b. Blown in wall insulation where no decorative plaster is damaged.
c. Plumbing work, including installation of water heaters
d. Electrical work, including improving lamp efficiency
e. Sealing air leaks using weather stripping, door sweeps, and caulk and sealing major air leaks associated with bypasses, ducts, air conditioning units, etc.
f. Repair or replace water heaters
g. Adding adjustable speed drives such as fans on air handling units, cooling tower fans, and pumps
h. Install insulation on water heater tanks and water heating pipes
i. Install solar water heating systems, provided the structure is not visible from the public right of way
j. Install waste heat recovery devices, including desuperheater water heaters, condensing heat exchangers, heat pump and water heating heat recovery systems, and other energy recovery equipment
k. Repair or replace electric motors and motor controls like variable speed drives
l. Incorporate other lighting technologies such as dimmable ballasts, day lighting controls, and occupant-controlled dimming
2. **Work on heating and cooling systems:**

   a. Clean, tune, repair or replace heating systems, including furnaces, oilers, heat pumps, vented space heaters, and wood stoves
   b. Clean, tune repair or replace cooling systems, including central air conditioners, window air conditioners, heat pumps, and evaporative coolers
   c. Install insulation on ducts and heating pipes
   d. Conduct other efficiency improvements on heating and cooling systems, including replacing standing pilot lights with electronic ignition devices and installing vent dampers
   e. Modify duct and pipe systems so heating and cooling systems operate efficiently and effectively, including adding return ducts, replace diffusers and registers, replace air filters, install thermostatic radiator controls on steam and hot water heating systems
   f. Install programmable thermostats, outdoor reset controls, UL listed energy management systems or building automation systems and other HVAC control systems

3. **Energy efficiency work affecting the electric base load of the property:**

   a. Convert incandescent lighting to fluorescent
   b. Add reflectors, LED exist signs, efficient HID fixtures, and occupancy (motion) sensors
   c. Replace refrigerators and other appliances

4. **Health and safety measures:**

   a. Installing fire, smoke or carbon dioxide detectors / alarms
   b. Repair or replace vent systems on fossil-fuel-fired heating systems and water heaters to ensure that combustion gasses draft safely to outside
   c. Install mechanical ventilation, in a manner not visible from the public right of way, to ensure adequate indoor air quality if house is air-sealed to building tightness limit

5. **Wood and Pellet Stove activities:**

   d. Replacement of an existing pellet stove and vent kit with a new stove and vent kit within a pre-existing opening (through the wall opening).
   e. Replacing an existing wood stove and its venting with a new wood stove and new venting into the pre-existing chimney (thimble).
   f. Installation of a pellet or wood stove in a building less than 45 years old.
   g. Installation of a pellet or wood stove in a mobile home.
   h. Installation of a pellet stove vent kit in a non-historic addition (addition is less than 45 years old).
APPENDIX B: PROJECT REVIEW FORM FOR NON-EXEMPT
ACTIVITIES FOR WAP UNDERTAKINGS

Vermont Division for Historic Preservation
Department of Energy/Office of Economic Opportunity
and WAP Undertakings

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies take into account the effects of federal actions on any historic property, including historic buildings and archaeological sites. To start the review process, please complete this form and submit it, with the information requested below, to the Division for Historic Preservation at ACCD.projectreview@vermont.gov.

1. Contact information:
   a. Wx Project Manager:
   b. Wx Agency:
   c. Email address:
   d. Phone number:

2. Application Information:
   a. Weatherization job number: Click or tap here to enter text.
   b. Project address: Click or tap here to enter text.

3. Please provide a short description of what is proposed during the Weatherization Project that needs SHPO review and approval: Click or tap here to enter text.

4. Project information:
   a. Project involves ground disturbance: Yes ☐ No ☐ N/A ☐
   b. Existing structures are more than forty-five (45) years old:
      Yes ☐ No ☐ N/A ☐
   c. Existing structures regardless of age are listed in the National Register of Historic Places or are part of an Historic District (check at orc.vermont.gov):
      Yes ☐ No ☐ Unknown ☐
   d. Would the pellet stove vent be visible on the outside of the building from the public right-of-way?:
      Yes ☐ No ☐

5. Please also submit:
   a. ☐ Project location map (can be annotated google map or similar)
   b. ☐ Site map (shows the areas of proposed ground disturbance)

Please email this form and supporting materials to ACCD.ProjectReview@vermont.gov and copy geoff.wilcox@vermont.gov
TO BE COMPLETED BY VDHP:

☐ Needs additional research because Historic Properties Affected
   ☐ Potential for Historic Architectural Properties to be affected – A Qualified Architectural Historian* will be required (*please see pre-approved list of consultants)

☐ Determination of Eligibility for National Register required
   Comments: Click or tap here to enter text.

☐ Potential for Archeological Historic Properties to be affected – a Qualified Archeological Consultant* will be required (*please see pre-approved list of consultants)
   ☐ Archaeological Resource Assessment (ARA) required
   ☐ Phase 1 archaeological investigation required
   Comments: Click or tap here to enter text.

☐ Approved with No Historic Properties Affected
   ☐ No Historic Resource Present in Area of Potential Effect
   ☐ Work will have No Effect on Historic Resource
   Comments: Click or tap here to enter text.

☐ Approved as No Adverse Effect
   ☐ Approved with Concurrence of with Archaeology Resource Assessment
   ☐ Approved with Concurrence of with Phase 1 archaeology

☐ Adverse Effect
   ☐ Project MOA or other agreement docs required
   Date Executed: Click or tap to enter a date.
   ☐ Treatment Plan required
   Comments on treatment: Click or tap here to enter text.

X: __________________________________________

For: Vermont Division for Historic Preservation