

## APPENDIX A

### HUD-FUNDED CDBG PROGRAMS EXEMPT ACTIVITIES

As noted in Section II (1)(c): If activities are limited solely to those activities listed in Appendix A then such activities are considered exempt from this Programmatic Agreement. This determination is made in consultation with the Recipient and VDHP through submittal of the Preliminary Review Form to VDHP for concurrence and for VDHP and Agency files. No further review is required.

The following activities will not require review by the SHPO or Council:

1. **Non-Historic Buildings and Structures.** Rehabilitation of non-historic buildings and structures, (i.e. those less than 50 years old), except when alteration to the existing building or structure may impact a surrounding historic district. **New construction is not an exempt activity.**
2. **Mechanical, Electrical, Plumbing (MEP) Systems.** Repair, replacement and installation of MEP systems provided that such work does not involve ground disturbance, alter or permanently change the appearance of the interior or the exterior of the building, affect character-defining features of the building, or require the installation of new ducts through the interior: electrical work; plumbing pipes and fixtures; heating system improvements; installation of fire and smoke detectors; ventilation systems; and bathroom improvements where work is contained within the existing bathroom. Please refer to Preservation Briefs 24: *Heating, Ventilating, and Cooling Historic Buildings: Problems & Recommended Approaches*, and other technical briefs, as appropriate, for guidance.
3. **Exterior painting.** Repainting of exterior surfaces provided that destructive surface preparation treatments, including, but not limited to waterblasting, sandblasting, destructive sanding and chemical cleaning are not used. Please refer to Preservation Briefs 10: *Exterior Paint Problems on Historic Woodwork*, and other technical briefs, as appropriate, for guidance.
4. **Exterior Repairs.** Repair or partial replacement of deteriorated porches, cornices, exterior siding, doors, balustrades, stairs, or other trim when the repair or replacement is done in-kind to closely match existing material and form and does not involve ground disturbance. The removal of distinctive materials or alterations of features, spaces, and spatial relationships that characterize a property will be avoided. Please refer to Preservation Briefs 47: *Maintaining the Exterior of Small & Medium Size Historic Buildings*, and other technical briefs, as appropriate, for guidance.
5. **Windows.** Caulking; weatherstripping; reglazing and repainting of windows; installation of new window jambs or jamb liners; repair, replacement or installation of storm windows (exterior, interior, metal or wood) provided they match the historic shape and size of the historic prime windows and that the meeting rail coincides with that of the prime window. Color should match trim, if possible.

**Replacement windows is not an exempt activity.** If replacement windows are being proposed, the Consultant must provide a statement as to the condition of existing windows, why the existing windows cannot be retained, and/or cost considerations of retaining existing windows vs. installing replacements, and rationale for the design and selection of new windows, along with how these will meet the Secretary of the Interior's *Standards for Rehabilitation*.

6. **Roof Repair.** Roof repair of historic roofing with material that closely matches the existing design and form. When repairing existing roofing, corrugated fiberglass roofing is not appropriate.

**Replacement of non-historic roofing is not an exempt activity.** Preservation Briefs 4: *Roofing for Historic Buildings*, and other technical briefs, as appropriate, for guidance.

7. **Gutters.** Repair, replacement or installation of gutters and above ground downspouts.
8. **Insulation.** Insulation in ceilings, attic, and basement spaces provided it is installed with appropriate vapor barriers, such as the following:
  - a) 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.
  - b) Thermal insulation, such as non-toxic fiberglass and foil-wrapped, in walls, floors, ceilings, attics, and foundations of wood-framed structures in a manner that does not harm or damage historic fabric and a mechanical ventilation system is present to direct moisture out of the building.
  - c) Dense-pack cellulose wall insulation in wood frame structures where no holes are drilled through exterior siding or where holes have no permanent visible alteration to the structure, and a mechanical ventilation system is present to direct moisture out of the building.
9. **Interior Surfaces (floors, walls, ceilings).** Repainting, refinishing, repapering, replacing sheetrock with sheetrock, replacing failing asbestos-containing plaster with traditional plaster system or veneer plaster on gypsum board, laying carpet or sheet flooring, or replacement of suspended ceiling tile.
10. **Interior Trim.** Repairing and retaining interior historic trim and features including doors, baseboards, chair rails, wainscoting, paneling, cornice trim, fireplace mantels, stair balusters, newel posts, window and door casings and other decorative features or replacement of flat stock trim.
11. **Site Improvements.** Repair of existing roads, driveways, sidewalks, parking lots and curbs, if repairs are done with like material, and there are no changes in dimension or configuration of these features. Repair of fencing when work is done in-kind to closely match existing material and form.
12. **Interior Floor Plan.** Removal or alteration of non-historic interior walls.
13. **Underground Utilities.** Emergency repair of water, gas, electric, storm and waste water systems if it occurs within the original trench or footprint.
14. **Lead Paint Abatement.** Interior lead paint abatement when it is limited to washing, scraping and repainting, wallpapering, and chemical stripping of lead-painted surfaces, installation of new window jambs or jamb liners, installation of metal panning in window wells, and replacement of flat stock trim. Exterior Lead Paint Abatement that includes scraping and repainting of exterior wood and masonry surfaces, so long as treatments follow established protocols and best practices as established by EPA Renovation, Repair & Painting Program (RRP Rule) and Vermont Essential Maintenance Practices – Lead Law Compliance. Please refer to Preservation Briefs 37: *Appropriate Methods of Reducing Lead-Paint Hazards in Historic Housing*, and other technical briefs, as appropriate, for guidance.

15. **Asbestos Abatement.** Necessary removal of asbestos found in MEP and ventilation pipe joints provided it does not involve the removal of contributing historic elements.

**Removal of Asbestos is not an exempt activity.**

16. **Minor Ground Disturbance due to Maintenance Activity.** Soil disturbance to a depth of six (6) inches or less within an area of 100 square feet or less is permissible.
17. **Plantings.** Planting of grass, flowers, shrubs, or bushes in existing gardens or landscaped areas.
18. **Test Holes and Wells.** Structural test borings, well drilling and monitoring activities that do not require a temporary or permanent new access road to a site.