



**CT WAP Weatherization Guidance No. 6**

**Effective Date: September 9, 2010**

**Updated: April 1, 2022**

**Compliance with SHPO-CT WAP-OPM Historic Preservation Agreement**

The purpose of this guidance is to address updated compliance and implementation of the Department Of Energy's policies for Historic Preservation and the Programmatic Agreement signed by the State Historic Preservation Office (SHPO), the CT WAP (CT WAP) and the Office of Policy and Management (OPM) in August, 2010. These regulations apply to CT WAP Weatherization programs and supersede Guidance no. 5 on Historic Preservation.

**Note:** Effective 12/1/2020- 12/31/2030 CT executed an amendment to the programmatic agreement between the United States Department of Energy, The Connecticut Office of Policy and Management, The Connecticut Department of Energy and Environmental Protection and the Connecticut State Historical Preservation Office regarding EECEBG, SEP and WAP undertakings.

**CT-WAP Compliance with Historic Preservation Programmatic Agreement**

CT WAP has entered into an agreement with OPM and the SHPO to facilitate compliance with Historic Preservation. This agreement categorically excludes the following housing stock from review:

- Homes built less than 50 years ago
- Manufactured or Mobile Homes

Additionally, for homes that were built 50 or more years ago, many routine weatherization procedures are exempt from further review by the SHPO prior to work. It is CT WAP's recommendation that audits be performed on all homes prior to submittal to SHPO to determine the scope of work and see whether it is subject to further inquiry. Most of the work subject to further inquiry will involve windows and doors installed on homes built 50 or more years ago. Please see the attached Historic Preservation Compliance Chart or Appendix A for further clarification.

**Procedures for Homes Not Exempt from SHPO Review**

For homes not excluded from SHPO review, the following must be submitted to the SHPO via either e-mail or hard copy:

- At least one recent clear photograph showing the full front of the property (this may not be a photograph from a website like Vision Appraisal)
- The full street address of the property including street number and town

- The measures to be performed on the home
- The date of construction

All information should be sent to [shpo@ct.gov](mailto:shpo@ct.gov) and your monitor must be cc-ed. It *must* also utilize the following subject line:

“(state agency) (community action agency) – program acronym (e.g. CT WAP – CRT – DOE-WAP)”

If you wish to submit paper copies, all documents should be submitted to the attention of Mr. David Bahlman and the address for submittal is as follows:

Historic Preservation  
1 Constitution Plaza, Second Floor  
Hartford, CT 06103

After submittal, the SHPO will review the property to determine if weatherization will affect the state’s cultural resources.

The agency will then receive a letter in response from the SHPO stating their findings, which **must** be kept in the client file along with copies of all documentation submitted to the SHPO for review.

Should a property not excluded from review be deemed historic by the SHPO, the agency **must** work with CT WAP to come to a solution that is both compliant with the SHPO and in line with the policies of the DOE Weatherization Program.

## **Appendix A**

### **WAP SEP and EECBG Undertakings Exempt From Section 106 Review**

#### **A. Category 1 - No Consultation Required**

The U.S. Department of Energy, the Connecticut Office of Policy and Management, the Connecticut CT WAP, and the State Historic Preservation Office have concluded that the following undertakings do not have the potential to cause effects on historic properties per 36 CFR § 800.3(a)(1):

- All energy efficiency and Health and Safety measures affecting buildings less than fifty years in age

#### **Exterior Work:**

- Energy audits and feasibility studies
- Weatherization of Manufactured or Mobile Homes
- Caulking and weather-stripping around doors and windows in a manner that does not harm or obscure historic windows or trim.
- Water conservation measures – like low flow faucets, toilets, shower heads, urinals – and distribution device controls

- Repairing or replacing in kind existing driveways, parking areas, and walkways with materials of similar appearance
- Excavating to gain access to existing underground utilities to repair or replace them, provided that the work is performed consistent with previous conditions and excavations are confined to existing utility trenches
- Ventilating crawl spaces
- Removable film on windows (if the film is transparent)

**Interior Work – Insulation and Air Sealing:**

- Thermal insulation installation in walls, floors and ceilings (excluding spray foam insulation)
- Duct sealing, insulation, repair or in-kind replacement
- Attic insulation with proper ventilation
- Rim and Band joist insulation
- Water heater tank and pipe insulation
- Sealing air leaks using weather stripping, door sweeps, and caulk and sealing major air leaks associated with bypasses, ducts, air conditioning units, etc.

**Interior Work – Heating Ventilation and Air Conditioning (HVAC) and Water Heating Systems:**

- Installation, repair or replacement of adjustable speed drives (such as fans on air handling units), cooling tower fans, and pumps
- Replacement of existing HVAC equipment including pumps, motors, boilers, chillers, cooling towers, air handling units, package units, condensers, compressors, heat exchangers that do not require a change to existing ducting, plumbing, electrical, controls or a new location
- Clean, tune, or repair HVAC systems, including furnaces, oilers, heat pumps, vented space heaters, and wood stoves.
- Replacement or repair of window unit air conditioners and heat pumps
- Replacement of standing pilot lights with electronic ignition devices and installation of vent dampers on HVAC systems
- Replacement of air diffusers and registers
- Replacement of air filters
- Installation of thermostatic radiator controls on steam and hot water heating systems
- Adding or replacing existing building controls systems including HVAC control systems and the replacement of building-wide pneumatic controls with digital controls, thermostats, dampers, and other individual sensors like smoke detectors and carbon monoxide detectors (wired or non-wired)
- Installation of non-hardwired devices including photo-controls, occupancy sensors, carbon dioxide, thermostats, humidity, light meters and other building control sensors, provided the work conforms with applicable state and local permitting requirements
- Hot water tank replacement that does not require a visible new supply or venting

**Lighting Efficiency Measures:**

- Appliance replacement (upgrade to EnergyStar appliances)
- Compact fluorescent light bulbs
- Energy efficient light fixtures, including ballasts

- LED light fixtures and exit signs
- Upgrade exterior lighting (replacement with metal halide bulbs, LEDs, or others) along with ballasts, sensors and energy storage devices not visible from any public right of way
- Incorporate lighting technologies such as dimmable ballasts, day lighting controls, and occupant controlled dimming

**Health and safety measures:**

- Repair or replace vent systems on existing fossil-fuel-fired heating systems and water heaters to ensure that combustion gasses draft safely to outside