



Department of

ECONOMIC AND COMMUNITY DEVELOPMENT

## Environmental Review

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## ITINERARY

The goals for today's presentation

- NHPA 1966
- What is Environmental Review?
- Definitions
- What is the Environmental Review process?
- How to fill out the Project Review Form
- National Park Service's Secretary of the Interiors Standards (State adopted guidelines)
- Q & A

## 1.) Preserve historic fabric



## 2.) Efficient review process



**PROJECT REVIEW COVER FORM**

# Project Review Form

1. This information relates to a previously submitted project.

You do not need to complete the rest of the form if you have been previously issued a SHPO Project Number. Please attach information to this form and submit.

SHPO Project Number \_\_\_\_\_  
(Not all previously submitted projects will have project numbers)

Project Address \_\_\_\_\_  
(Street Address and City or Town)

2. This is a new Project.  If you have checked this box, it is necessary to complete ALL entries on this form.

Project Name \_\_\_\_\_

Project Location \_\_\_\_\_  
Include street number, street name, and or Route Number. If no street address exists give closest intersection.

City or Town \_\_\_\_\_  
In addition to the village or hamlet name (if appropriate), the municipality must be included here.

County \_\_\_\_\_  
If the undertaking includes multiple addresses, please attach a list to this form.

Date of Construction (for existing structures) \_\_\_\_\_

**PROJECT DESCRIPTION SUMMARY (include full description in attachment):**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**TYPE OF REVIEW REQUESTED**

a. Does this undertaking involve funding or permit approval from a State or Federal Agency?

Yes  No

Agency Name/Contact	Type of Permit/Approval	State	Federal
_____	_____	<input type="checkbox"/>	<input type="checkbox"/>
_____	_____	<input type="checkbox"/>	<input type="checkbox"/>
_____	_____	<input type="checkbox"/>	<input type="checkbox"/>

b. Have you consulted the SHPO and UCONN Dodd Center files to determine the presence or absence of previously identified cultural resources within or adjacent to the project area?

Yes  No

If yes:  
Was the project site wholly or partially located within an identified archeologically sensitive area?  Yes  No

Does the project site involve or is it substantially contiguous to a property listed or recommended for listing in the CT State or National Registers of Historic Places?  Yes  No

Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older?  Yes  No

## National Historic Preservation Act of 1966

### Section 1

(b) The Congress finds and declares that —

(1) the spirit and direction of the Nation are founded upon and reflected in its historic heritage;

(2) the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people;

(3) historic properties significant to the Nation's heritage are being lost or substantially altered, often inadvertently, with increasing frequency;

(4) the preservation of this irreplaceable heritage is in the public interest so that its vital legacy of cultural, educational, aesthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans;

## What is Environmental Review?

An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards



**Section 106** of the National Historic Preservation Act of 1966-Federal Law

**CEPA** - The Connecticut Environmental Policy Act- State Law

**Lead Paint Abatement** – State Mandate



## Triggers

**Federal Permit and/or**

**Federal Funds and/or**

**State funds**

+

**Used in a way that might affect historic  
resources**

=

**Environmental Review**

## Definitions

**Section 106** of the National Historic Preservation Act of 1966-Federal Law

**CEPA** - The Connecticut Environmental Policy Act- State Law

**Lead Paint Abatement** – State Mandate

## Definitions

**Section 106** - Cultural Resource Review under federal law ([National Historic Preservation Act-Section 106](#)) involves providing technical guidance and professional advice on the potential impact of publicly funded, assisted, licensed or permitted projects on the state's historic, architectural and archaeological resources. This responsibility of the State Historic Preservation Office (SHPO) is discharged in two steps: (1) identification of significant historic, architectural and archaeological resources; and (2) advisory assistance to promote compatibility between new development and preservation of the state's cultural heritage. Annually, the SHPO reviews 2000-2500 federal projects, a majority of which are implemented with no impact to cultural resources.

## Definitions

**CEPA CT Environmental Policy Act** - The State Historic Preservation Office (SHPO), is a mandated review agency for state-sponsored undertakings under the authority and regulations of the Connecticut Environmental Policy Act. Section 22a-1a-3 (a) (4) of the implementing regulations specifies that consideration of environmental significance shall include an evaluation concerning the "disruption or alteration" of a historic, architectural, or archaeological resource or its setting. The SHPO staff work with the Connecticut Office of Policy and Management and other state agencies in order to integrate cultural resource consideration as a component of state agency project planning efforts.

## Definitions

Lead Abatement - When a property 50 years old or older requires lead abatement, the Connecticut Department of Health Services Lead Poisoning Prevention and Control Regulations mandate that the State's Historic Preservation Office ("SHPO") determine whether the building, structure or site is historic in order to provide guidance on appropriate abatement techniques. The SHPO reviews lead abatement projects for compliance with the Secretary of the Interior's [Standards for Rehabilitation of Historic Buildings](#).

# Definitions

**Historic Property:**

In the Section 106 process, a historic property is a prehistoric or historic district, site, building, structure, or object included in or eligible for inclusion in the National Register of Historic Places. This term includes artifacts, records, and remains that are related to and located within these National Register properties. The term also includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization, so long as that property also meets the criteria for listing in the National Register.

**The National Register of Historic Places:**

The National Register of Historic Places is the nation's official list of properties recognized for their significance in American history, architecture, archaeology, engineering, and culture. It is administered by the National Park Service, which is part of the Department of the Interior.

**Undertaking:**

Undertaking means 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.

**APE** - The area of potential effect is defined as the area in which eligible properties may be affected by the undertaking, including direct effects (such as destruction of the property) and indirect effects (such as visual, audible, and atmospheric changes which affect the character and setting of the property). The area of potential effect may include historic properties that are well beyond the limits of the undertaking.

**Effect:**

Effect means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register for Historic Places.

**Adverse Effect:**

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

## Definitions

**National Register of Historic Places** - To be eligible for listing on the National Register individually or as a contributing resource to a district, the site has to have significant architectural or historic substance. The 4 criterion for the NR are:

- **Criterion A**, "Event," the property must make a contribution to the major pattern of American history.
- **Criterion B**, "Person," is associated with significant people of the American past.
- **Criterion C**, "Design/Construction," concerns the distinctive characteristics of the building by its architecture and construction, including having great artistic value or being the work of a master.
- **Criterion D**, "Information potential," is satisfied if the property has yielded or may be likely to yield information important to prehistory or history.

## Definitions

### **National Register of Historic Places district**

Individual listing is generally easier to determine than contributing to a district. In a district, we look for themes within a period of significance, either in the built environment or the developmental architectural history of a place.

A building may not be eligible on its own, but may be as a contributing resource to a district.



# What is Section 106?

## **Section 106**

*[16 U.S.C. 470f — Advisory Council on Historic Preservation, comment on Federal undertakings]*

The head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register.

The head of any such Federal agency shall afford the Advisory Council on Historic Preservation established under Title II of this Act a reasonable opportunity to comment with regard to such undertaking.

# What does that mean?

Section 106 requires Federal agencies – prior to taking action to implement an undertaking – to do two things:

**1. Take into account the effects of their undertaking on historic properties.**

For the purposes of Section 106, historic properties are limited to those that are listed on or eligible for listing on the **National Register of Historic Places**.

**2. Afford the Advisory Council on Historic Preservation a reasonable opportunity to comment regarding such an undertaking.**

The NHPA also created the **Advisory Council on Historic Preservation** to advise the President and Congress on historic preservation matters and to review actions under Section 106.

# Who is the ACHP?

## The Advisory Council on Historic Preservation.

They are an independent federal agency that promotes the preservation, enhancement and sustainable use of our nation's diverse historic resources, and advises the President and the Congress on national historic preservation policy. They are there to ensure the integrity of other Federal agency activities and the integrity of the Section 106 process.

Under certain circumstances, the Federal agency must invite the Council to consult or must seek the Council's review of certain findings. The Council may also elect to participate in review on its own initiative or at the request of other parties. But the Council will generally be involved only when necessary to opine on disputes among other parties and when it believes it necessary in order to ensure that the purposes of Section 106 and NHPA are being met.  
[36 CFR § 800.2(b)(1)]

Even if the Council is not formally involved in review of a project, participants in the process are encouraged to seek advice and guidance from the Council in resolving questions.

The Council is authorized by Section 211 of NHPA to issue regulations to govern the implementation of Section 106.

These regulations, “Protection of Historic Properties” (36 CFR Part 800), establish the process that Federal agencies must follow in order to take into account the effects of their undertakings on historic properties and provide the Council its required opportunity to comment.

# Section 106 Process

**Step 1: Initiation of the consultation process**

**Step 2: Identification of historic properties**

**Step 3: Assessment of adverse effects**

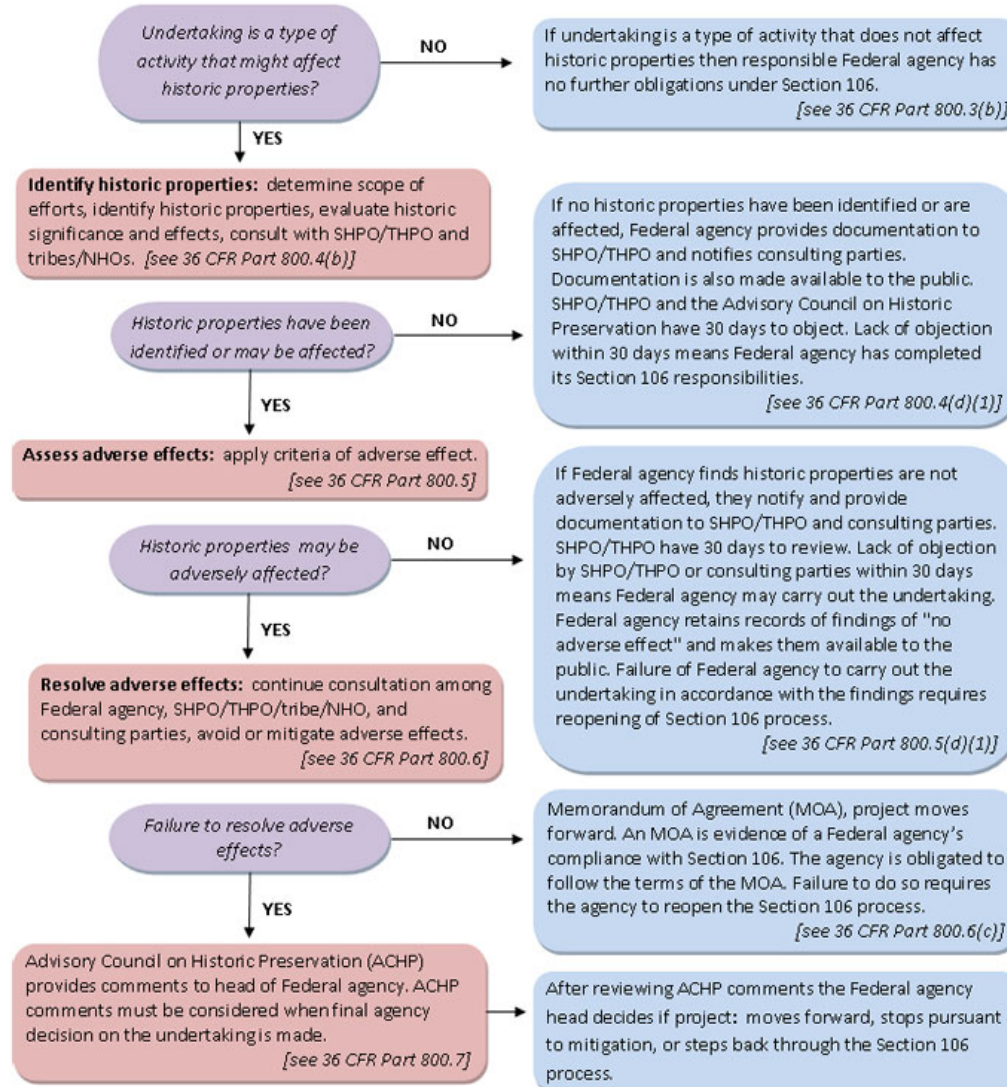
**Step 4: Resolution of adverse effects**

# Section 106 Process

## Possible outcomes

- 1.) No Historic Properties Affected
- 2.) No Adverse Effects to Historic Properties
- 3.) No Adverse Effects to Historic Properties with Conditions
- 4.) Adverse Effect

**Section 106 process initiated by Federal Agency:** establish undertaking, identify appropriate SHPO, THPO, Tribe, NHO and other consulting parties to include the public, also notify and plan to involve the public. [see 36 CFR Part 800.3]





## Section 106 process

The purpose of the first step in the process is to determine whether the Federal activity in question is subject to Section 106 and, if so, who should be consulted during the review.

- It is the responsibility of the Federal agency with jurisdiction over an undertaking to comply with Section 106. That includes all agencies of the executive branch.
- A Federal agency's responsibility to comply with Section 106 **cannot be delegated to others, with very few exceptions** specified by Federal statute. For instance, the Department of Housing and Urban Development (HUD) is permitted by statute to delegate its Section 106 responsibilities to local governments in certain programs, including the Community Development Block Grant Program, Emergency Shelter Grant Program, and the HOME Program. For undertakings funded by these programs, the local community functions as the Federal agency for Section 106 purposes.
- In fulfilling their responsibilities under Section 106, agencies can use the services of applicants or consultants to prepare information, analyses, and recommendations. However, an agency must independently make, and is legally responsible for, the findings and determinations required by the Council's regulations.
- Section 106 requires completion of the review process "prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license."

# Step 1: Initiating the Section 106 process

The first action that an agency takes to initiate the Section 106 process is to determine whether the project, activity, or program in question constitutes an “**undertaking.**”

In other words, is there Federal involvement (funds, ownership, permits, etc.)

If an activity is an undertaking, the agency then determines whether it is “a type of activity that has the **potential** to cause **effects** on historic properties.”

Effect means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register for Historic Places.

If so:

Notify SHPO/THPO

Identify tribes and other consulting parties

Plan to involve the public

Involve local government with jurisdiction

Move to Step 2: Identification of historic properties

If not, the process ends.

## Step 2: Identification of historic properties by Federal Agencies

- Determine the APE (area of potential effects) and Identify historic properties (National Register, NRE)
- Identify historic properties (National Register, NRE)
- Sources of information that may be consulted:
  - Historic Resource Inventories
  - [www.nrhp.focus.nps.gov](http://www.nrhp.focus.nps.gov) – National Register Database
  - [www.lhdct.org](http://www.lhdct.org) – Local Historic District/Property Database
  - [www.bing.com/maps](http://www.bing.com/maps)
  - [www.google.com/earth](http://www.google.com/earth)
  - [www.historicmapworks.com/](http://www.historicmapworks.com/)
- If so:
  - Consult with SHPO/THPO, tribes and other consulting parties
  - Involve the public.
  - Historic properties affected, move to Step 3: Assessment of adverse effects

If no historic properties are present/affected, the process ends.

## Step 3: Assessment of adverse effects

Once the agency determines that historic properties may be affected by an undertaking, the agency proceeds with Step 3 of the Section 106 process, assessing adverse effects. The purpose of this step is to ascertain the nature of the project's impact on the historic properties, particularly whether the properties will be adversely affected. Agencies do this by applying criteria of adverse effect prior to making a formal finding of "no adverse effect" or "adverse effect."

### Examples of Adverse Effects

Physical destruction

Inappropriate alterations

Moving an historic property

Visual or auditory intrusions that diminish the historic setting

Archaeological excavations

Demolition by neglect

Unrestricted transfer of federal property

### **Criteria of adverse effect**

The Council's criteria of adverse effect are found at Section 800.5(a)(1) of the regulations. According to the criteria, an adverse effect occurs when the integrity of the historic property may be diminished by the undertaking through alteration of the characteristics that qualify the property for the National Register. Such alteration can be caused directly as a result of the undertaking or be an indirect consequence.

***Criteria of adverse effect. An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. . . . [36 CFR § 800.5(a)(1)]***

If so:

Consult with SHPO/THPO, tribes and other consulting parties

Involve the public.

Historic properties adversely effected, move to Step 4: Resolution of adverse effects

If no historic properties are adversely affected, the process ends.

## Step 4: Resolution of adverse effects

After a finding has been made that an undertaking may have an adverse effect on historic properties within the area of potential effects, the agency proceeds with Step 4 of the process, resolving adverse effects. In this step, the agency works with the consulting parties to seek a solution that accommodates the needs of all concerned, serves the public interest, and ideally promotes the protection and enhancement of our historic resources.

The usual result is a Memorandum of Agreement (MOA) that spells out the measures agreed upon by the agency and the consulting parties, identifies who is responsible for carrying them out, and provides documentary evidence that the agency has met the requirements of Section 106. If agreement cannot be reached, then the Council issues formal comments on the undertaking. The head of the agency must take these comments under consideration before proceeding.

## Step 4: Resolution of adverse effects

### Avoidance, Alternatives and Mitigation

Avoidance includes:

- moving the undertaking to an alternative site;
- using an alternative design;
- pursuing an alternative to the undertaking; or
- no undertaking at all.

## Step 4: Resolution of adverse effects

### Avoidance, Alternatives and Mitigation

Mitigation includes:

- moving the historic property;
- documentation;
- limiting the magnitude of the undertaking; or
- recovering data from an archeological site through controlled excavation prior to destruction of all or part of the site.



## Step 4: Resolution of adverse effects

Guidance on when data recovery is appropriate mitigation and how such work should be carried out can be found in the Council's *Recommended Approach for Consultation on Recovery of Significant Information from Archeological Sites*, located on our web site at [www.achp.gov/archguide.html](http://www.achp.gov/archguide.html).

This guidance also includes a model MOA format to assist in practical application of the guidance.

Documentation as mitigation under Section 106 also fulfills the agency's independent responsibility to document historic properties in accordance with Section 110(b) of NHPA. Section 110(b) requires that agencies document historic properties before they are substantially altered or demolished as a result of Federal action or assistance.

# Step 4: Resolution of adverse effects

## Steps in resolving adverse effects

1. Prepare documentation (36 CFR Part 800.11)
2. Notify ACHP of adverse effect (Appendix A) and invite them to participate in the consultation
3. Inform consulting parties
4. Provide the public an opportunity to comment
5. Negotiate agreement that takes into account consulting party views
6. Secure concurrence and signature of Agreement (MOA or PA)
7. File Agreement with ACHP
8. Carry out all stipulations of Agreement.

## Step 4: Resolution of adverse effects

### **Accepting loss of historic property**

There are instances in which no alternatives to avoid or minimize adverse effects are feasible. However, the benefits of the undertaking may justify accepting the loss of a historic property or some of its significant characteristics. The participants of the Section 106 process may agree that this is the case and develop an MOA accordingly. Usually some compensatory mitigation measures – such as marketing, data recovery, or documentation – are provided for when loss is accepted.

# Step 4: Resolution of adverse effects

## Notifying the Council

Whenever there is a finding of adverse effect, the agency is required to notify the Council and provide documentation on the project. [36 CFR § 800.6(a)(1)] This notification must include a request that the Council participate in consultation

when:

- the agency wants the Council to participate;
- the undertaking has an adverse effect upon a National Historic Landmark; or
- a Programmatic Agreement under § 800.14(b) will be prepared. [36 CFR § 800.6(a)(1)(i)]

A Programmatic Agreement (PA) is a type of agreement document that can be used to address the adverse effects of complex project situations or of multiple undertakings. Rather than simply set forth avoidance or mitigation measures as in an MOA, a PA establishes a process for how affected historic properties will be addressed which differs from the standard Section 106 review process. Notice to the Council at this stage is extremely important, as it provides the basis for the Council to decide whether it wishes to enter the consultation process. Failure of an agency to notify the Council is a serious procedural flaw, as it denies the Council the opportunity to join at the outset the consultation to resolve adverse effects.



# Department of ECONOMIC AND COMMUNITY DEVELOPMENT



## PROJECT REVIEW COVER FORM

1. This information relates to a previously submitted project.

You do not need to complete the rest of the form if you have been previously issued a SHPO Project Number. Please attach information to this form and submit.

SHPO Project Number \_\_\_\_\_  
(Not all previously submitted projects will have project numbers)

Project Address \_\_\_\_\_  
(Street Address and City or Town)

2. This is a new Project.

If you have checked this box, it is necessary to complete ALL entries on this form.

Project Name \_\_\_\_\_

Project Location \_\_\_\_\_  
Include street number, street name, and or Route Number. If no street address exists give closest intersection.

City or Town \_\_\_\_\_  
In addition to the village or hamlet name (if appropriate), the municipality must be included here.

County \_\_\_\_\_  
If the undertaking includes multiple addresses, please attach a list to this form.

Date of Construction (for existing structures) \_\_\_\_\_

**PROJECT DESCRIPTION SUMMARY (include full description in attachment):**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**TYPE OF REVIEW REQUESTED**

a. Does this undertaking involve funding or permit approval from a State or Federal Agency?

Yes  No

Agency Name/Contact	Type of Permit/Approval	State	Federal
_____	_____	<input type="checkbox"/>	<input type="checkbox"/>
_____	_____	<input type="checkbox"/>	<input type="checkbox"/>
_____	_____	<input type="checkbox"/>	<input type="checkbox"/>

b. Have you consulted the SHPO and UCONN Dodd Center files to determine the presence or absence of previously identified cultural resources within or adjacent to the project area?

Yes No

If yes:  
Was the project site wholly or partially located within an identified archeologically sensitive area?  Yes  No

Does the project site involve or is it substantially contiguous to a property listed or recommended for listing in the CT State or National Registers of Historic Places?  Yes  No

Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older?  Yes  No

Clear description of project

Funding source (State or Federal)

Is the property listed or eligible for listing?



# Department of ECONOMIC AND COMMUNITY DEVELOPMENT



## PROJECT REVIEW COVER FORM

The Historic Preservation Review Process in Connecticut Cultural Resource Review under the National Historic Preservation Act – Section 106 <http://www.achp.gov/106summary.html> involves providing technical guidance and professional advice on the potential impact of publicly funded, assisted, licensed or permitted projects on the state's historic, architectural and archaeological resources. This responsibility of the State Historic Preservation Office (SHPO) is discharged in two steps: (1) identification of significant historic, architectural and archaeological resources; and (2) advisory assistance to promote compatibility between new development and preservation of the state's cultural heritage.

Project review is conducted in two stages. First, the SHPO assesses affected properties to determine whether or not they are listed or eligible for listing in the Connecticut State or National Registers of Historic Places. If so, it is deemed "historic" and worthy of protection and the second stage of review is undertaken. The project is reviewed to evaluate its impact on the properties significant materials and character. Where adverse effects are identified, alternatives are explored to avoid, or reduce project impacts; where this is unsuccessful, mitigation measures are developed and formal agreement documents are prepared stipulating these measures. For more information and guidance, please see our website at: <http://www.cultureandtourism.org/cct/cwp/view.asp?a=3933&q=293820>

### ALL PROJECTS SUBMITTED FOR REVIEW MUST INCLUDE THE FOLLOWING MATERIALS\*:

- PROJECT DESCRIPTION** Please attach a full description of the work that will be undertaken as a result of this project. Portions of environmental statements or project applications may be included. The project boundary of the project should be clearly defined\*\*
- PROJECT MAP** This should include the precise location of the project – preferably a clear color image showing the nearest streets or roadways as well as all portions of the project. Tax maps, Sanborn maps and USGS quadrangle maps are all acceptable, but Bing and Google Earth are also accepted if the information provided is clear and well labeled. The project boundary should be clearly defined on the map and affected legal parcels should be identified.
- PHOTOGRAPHS** Clear, current images of the property should be submitted. Black and white photocopies will not be accepted. Include images of the areas where the proposed work will take place. May require: exterior elevations, detailed photos of elements to be repaired/replaced (windows, doors, porches, etc.) All photos should be clearly labeled.

For Existing Structures	Yes	N/A	Comments
Property Card	<input type="checkbox"/>	<input type="checkbox"/>	
For New Construction	Yes	N/A	Comments
Project plans or limits of construction (if available)	<input type="checkbox"/>	<input type="checkbox"/>	
If project is located in a Historic District include renderings or elevation drawings of the proposed structure	<input type="checkbox"/>	<input type="checkbox"/>	
Soils Maps <a href="http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm">http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm</a>	<input type="checkbox"/>	<input type="checkbox"/>	
Historic Maps <a href="http://maec.lib.uconn.edu">http://maec.lib.uconn.edu</a>	<input type="checkbox"/>	<input type="checkbox"/>	
For non-building-related projects (dams, culverts, bridge repair, etc)	Yes	N/S	Comments
Property Card	<input type="checkbox"/>	<input type="checkbox"/>	
Soils Map (see above)	<input type="checkbox"/>	<input type="checkbox"/>	
Historic Maps (see above)	<input type="checkbox"/>	<input type="checkbox"/>	

**PROJECT CONTACT**  
 Name \_\_\_\_\_ Title \_\_\_\_\_  
 Firm/Agency \_\_\_\_\_  
 Address \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
 Phone \_\_\_\_\_ Cell \_\_\_\_\_ Fax \_\_\_\_\_  
 Email \_\_\_\_\_

\*Note that the SHPO's ability to complete a timely project review depends largely on the quality of the materials submitted.  
\*\* Please be sure to include the project name and location on each page of your submission.

Property card (<http://www.vgsi.com/http://www.equalitycama.com/>)

Maps

Photographs

# Secretary of the Interior's *Standards for the Treatment of Historic Properties*

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in a such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

## Contact info

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[www.ct.gov/ecd](http://www.ct.gov/ecd) Click “Historic” and scroll down to  
“Environmental Review”