

The Unionville Historic District
And
Properties Commission

Guidelines for Construction and
Alterations

(Adopted July 7, 2016)

Introduction

The Unionville Historic District and Properties Commission has been established to preserve and protect the many distinctive architectural features and phases of our historic industrial village. At the same time, the Commission recognizes that Unionville continues to grow and to thrive, and that we do not live in a museum. Therefore, the Commission's goal is to preserve, protect, and retain the existing architectural features of historical buildings that make the community a warm and welcoming one. A community that people will want to live in, that adapts as the community changes and grows, while helping to tell the story of our village, and honor those who built it. Please note that the Commission's authority is limited to decisions that govern only those features, buildings or parts of buildings that are visible from a public street, way or place. The Commission has no jurisdiction over paint color or landscaping, for example.

The Unionville Historic District and Properties Commission has voted to establish the following Standards and Guidelines for altering properties within the district and additional properties designated as historic.

- Standards

The standards are national ones, set by the United States Department of the Interior, National Park Service. While the national standards are separated into four categories—preservation, rehabilitation, restoration and reconstruction—this Commission has focused on the standards most applicable to our community, the Standards for Rehabilitation. (Page 15)

[See Appendix of this document for the full text of all national standards.]

- Guidelines

The specific guidelines that follow are based on the National Standards for Rehabilitation. These guidelines, which will be reviewed annually, will help the Commission to judge the appropriateness of proposed modifications to historic properties and provide a basis for consistency in these decisions over time. These guidelines will help property owners make decisions about altering specific features of their historic property. **The main theme is to "identify, retain and preserve" historic features.** In general, when bringing an old building up to modern, functional use, or in constructing a new facility, the Commission will provide support and resources that will assist the property owner in retaining the architectural character of the building and of the neighborhood.

Last Updated: June 2, 2022

Table of Contents

Issuing a Certificate of Appropriateness	page 4
Guidelines for Exterior Architectural Elements	5
Foundations	5
Frame Walls	5
Low-maintenance Siding	5
Masonry Walls	6
Sandblasting, water blasting, caustic chemicals, torch	6
Trim and decorative features	6
Doors	7
Windows	8
Porches and Steps	8
Roofs	9
Chimneys	9
Outbuildings	9
Other Important Considerations	10
Signs	10
Lighting Fixtures	10
Fences and Walls	10
Technology	10
Public Spaces	11
Appendix: National Standards for Preservation, Rehabilitation, Restoration, and Reconstruction	12

Issuing a Certificate of Appropriateness

To alter one or more exterior architectural elements under the guidelines below, the property owner and the UHDPC will complete the following process:

1. The property owner completes an Application for Certificate of Appropriateness. The form can be picked up at the Town Hall or downloaded from the Town of Farmington's website.
2. The property owner submits the completed form with the requested materials (listed on the form) to the UHDPC, Farmington Town Hall, 1 Monteith Drive, Farmington, CT 06032.
3. After receiving an Application for Certificate of Appropriateness, the UHDPC will hold a public hearing on the application. Written notification of the date of the hearing will be sent to the property owner.
4. Applications for Certificates of Appropriateness require the posting of a sign on the subject property for the 7 days prior to the public hearing. A \$35. deposit is required for such signs, refundable upon return of the sign.
5. At the public hearing, the property owner will have the opportunity to speak and to answer any questions of the UHDPC members.
6. The UHDPC will render its decision following the public hearing. Written notification of the issuance or denial of the Certificate of Appropriateness will be sent to the property owner.

Guidelines for Exterior Architectural Elements

Additional information regarding the appropriate treatment of each architectural element may be found on the National Park Service website using the web-links below.

Preservation Briefs provide guidance on preserving, rehabilitating, and restoring historic buildings.

<http://www.nps.gov/tps/how-to-preserve/briefs.htm>

Preservation Technical Notes provide case studies in historic preservation, rehabilitation and restoration.

<http://www.nps.gov/tps/how-to-preserve/tech-notes.htm>

Foundations

Make every reasonable effort to maintain the original appearance of the foundation material. For stone foundations, avoid patching with stones that are not generally the same size, shape and color as the original. For brick or stone foundations, use mortar the same color and strength as the original. Avoid over-mortaring joints or tooling to a profile inconsistent with the original.

Frame Walls

For clapboard, shingle and other wood siding and decorative elements, retain and restore the original materials whenever possible. Protect and preserve wood features by providing proper drainage. Avoid removing existing materials like clapboard or shingles because these are a major part of the building's texture.

When materials must be replaced or repaired due to the deterioration of the original, use material that duplicates the old as closely as possible. Avoid resurfacing frame buildings with material that changes the textural appearance of the original building.

Low-Maintenance Siding

Low-maintenance siding such as aluminum or vinyl clapboards, asbestos or asphalt shingles is a product of the mid-20th century and, therefore, is inappropriate for use on most historic buildings in Unionville. However, there are property owners who may wish to use low-maintenance siding on their homes, and there may be valid reasons for using these materials. In this situation, the Commission will consider applications that use low-maintenance siding in such a way that it preserves the architectural integrity of the structure.

Masonry Walls

Retain the original masonry and mortar without using surface treatment. Avoid applying water repellent coatings unless their use has been carefully studied and recommended for a specific problem. These materials are often unnecessary and can, in fact, hasten deterioration by trapping moisture in the masonry.

If re-pointing is necessary, duplicate the original mortar joint in color, texture, size and profile. Avoid re-pointing with mortar of high Portland cement content which can create a bond stronger than the original material. This may result in differing coefficients of expansion and cause cracking of existing joints.

Clean masonry using the gentlest method available, such as low-pressure water and detergents and natural bristle brushes. Avoid sandblasting or using harsh chemicals, which may react with masonry. These methods destroy the material's natural ability to repel water.

Repair or replace deteriorated masonry and stucco with materials that match the original. Removing damaged or deteriorated paint only to the next sound layer using the gentlest method possible (e.g. hand scraping) prior to repainting is recommended.

Avoid the use of artificial materials, such as simulated brick or stone siding, since these may not have been available at the time of construction and will give the structure an artificial appearance.

Sandblasting, water blasting, caustic chemicals and torching

Cleaning, treating and maintaining historic foundations, siding, roofs and metal should be done using the gentlest means possible. Certain chemicals, high-power water blasting, sand blasting, and use of propane or butane torches can permanently destroy historic materials. These methods should not be used on old masonry, wood or metal.

The recommendation for treating painted wood surfaces, for example, is to first establish whether repainting is actually needed. Gentle washing may be sufficient. If paint removal is necessary, remove damaged paint to the next sound layer by the gentlest techniques (hot air guns, electric heat plates, hand scraping and hand sanding).

Trim and decorative features

Cornices, brackets, columns, posts, balusters, window and door trim:

Original trim pieces should be repaired and retained if at all possible because they provide an essential part of the building's character and appearance. If severely deteriorated, replace or reconstruct by patching or piecing-in. If an entire feature is too damaged to repair, use photos or physical evidence to reproduce a

replacement and use the same type of materials whenever possible. A substitute material may be considered if it provides the same appearance. Avoid cladding window and door trim with artificial siding.

Ornamental metal work: Architectural metal features are important to the unique character of a building and its surroundings. Every effort should be made to clean, repair and restore them. Metal stairways, railings, fences, gutters and downspouts need different treatments for cleaning, repairing, and restoring, depending on the type of metal. Soft metals (lead, tin, and copper) can be scratched if blasting methods are used to clean them. Appropriate chemicals are recommended. Hard metals (steel, cast iron, and wrought iron) may be cleaned with low-pressure grit blasting, after testing first, if gentler wire brushing and hand scraping are not effective.

When repairing or reinforcing metal work, patch or splice with the same metal material when possible. A compatible substitute material may be considered if it results in the same visual appearance.

When replacing an entire metal feature if the original is too deteriorated, for example, window sash or porch steps, a compatible substitute may be considered.

Ornamental Masonry: Decorative masonry features such as brick corbelling, bonding patterns, mortaring, and cornices help define the unique character and appearance of an historic building. It is recommended to make every effort to repair and retain the original.

Cleaning of masonry surfaces should be undertaken only when there is heavy soiling or deterioration. Use the gentlest cleaning methods possible: low-pressure water, detergents and natural bristle brushes. Avoid using liquids (water or chemicals) to clean when there is danger of freezing temperatures.

Repair by patching or piecing-in with the same material if possible. Substitution of compatible materials will be considered if there is extensive damage, or if complete replacement is necessary.

Shutters: Research the original design of a structure to determine whether or not shutters were used. (Note: shutters came into use at the end of the 18th century to provide insulation and privacy and were often used on older buildings.) If used, restore the originals or replace with original material and hardware. Avoid using pre-fabricated or mass-produced shutters made of aluminum or vinyl.

Doors

Primary doors: Make every effort to maintain the original “main entrance” to a building. Typically it is the key focal point of the street façade and may be highly original and unique to the building. Avoid relocating or installing new doors into the primary elevation of the building. New entrances should be located to the

sides or rear of the building, not visible from the street. Make every reasonable effort to retain original door design including panels, lights and hardware. If replacement is required, duplicate the original design in form and material.

Secondary doors: Maintain the original placement of secondary doors. If new doors must be introduced, avoid locating them where they would destroy the original composition or symmetry of the façade.

Storm doors: Storm doors are 20th century additions to reduce heat loss. When used, select storm doors that are as unobtrusive as possible in relation to the main door. Wood-frame storm doors are recommended for historic buildings. If a metal frame storm door must be used, select a frame color that is the same color as the door trim. The surface of metal frame doors may be roughened to take paint that will match the door trim color. Select a design and arrangement of lights that complement the design of the door. Avoid the use of grilles or scrolls that are inappropriate to the design or character of the building.

Windows

The windows of a historic building help define the significance and character of the time. The shape, frame, muntins, and numbers of panes help define the character of the building. Windows should be retained and repaired whenever possible. When not possible, select replacement windows that best mimic the historical characteristics of the building, window colors should be matched to remaining windows as closely as possible. Archival pictures are an excellent way of determining such characteristics.

Historic Glass: Existing historic glass should be retained to the extent possible, or replace with newly manufactured or salvaged glass with similar characteristics.

In walls: Retain the existing window sash. If replacement is required, respect the stylistic period of the building by selecting a matching sash design, muntins, and number of windowpanes. Avoid creating new window openings.

In dormers: Retain all dormer windows in their original style, including the arrangement of windowpanes and the sash detail. Avoid creating dormers in roofs where none were originally in order to retain the historical integrity of the building.

Storm windows: If a building has existing storm windows (wood or metal), preserve and retain the existing units. If storm windows must be installed, preference should be given to interior storm windows, however, if that is not feasible, use a metal window that covers the entire window opening and that matches the existing trim. It may be necessary to paint the unit to match the trim. Avoid using bright aluminum colors. Triple track storm windows are the most common, cost efficient, and available in numerous sizes.

Porches and Steps

Remember that porches and steps that were added later often reflect evolving architectural styles, and are important to the building's history. Retain porches and steps in their existing form and match the historical character of the building in material, scale, and design. Avoid stripping or covering porches that have original materials or features like handrails, balusters, columns, brackets, or decorations made of wood, metal, tile, or masonry. Repair and replace deteriorated architectural features with new material that duplicates the old as closely as possible. Avoid enclosing porches and steps. If it is necessary to enclose a porch, enclose it inside the existing columns and railings in a way that preserves the original form and character of the building. Additional porches and steps may be constructed, and existing porches and steps may be extended, however, when visible from the street line, should match the existing style.

Roofs

Forms and features: Make every attempt to retain the original roof form, including gables and eaves, hips, and dormers. Retain the original features like cupolas, cornices, brackets, cresting, and weathervanes. Avoid the introduction of forms inappropriate to the original design, like oversized dormers and skylights.

Material: Replace deteriorated roofing material with the same material originally used. If new material must be used, select one that matches the original in composition, shape, texture and color. Avoid using material that is very light or very bright or in a tone that detracts from the character of the building or neighborhood.

Gutters and downspouts: Retain the original gutters and downspouts. If replacement is necessary, use materials that are similar in form and color to the existing materials. Avoid introducing new gutters and downspouts.

Roof-top equipment: When installing TV antennae, air conditioners, exhaust fans, vents and solar collectors, choose a location where they cannot be seen from the street. If solar collectors must face the street (south) for efficiency, mount them in a way that minimizes their profile and makes them as inconspicuous as possible.

Chimneys

Retain the original height and form, number and location of chimneys because they are important links to the historical development of the structure. Avoid adding new chimneys or false chimneys.

Outbuildings

Garage, carriage house, barn, shed: Outbuildings often contribute significantly to the history of the property. Therefore, they should be treated with the same

respect as the major structure. Follow any guidelines listed above. For barns, consult with the CT Trust for Historic Preservation Historic Barns project. Demolition of historic outbuildings should be avoided.

Other Important Considerations

Signs

Directional signs, street and traffic signs, advertising, identifying signs

Town Planning and Zoning regulations provide guidelines for size, material, location and illumination of signs. Signs in the Unionville Historic District should be constructed of materials and in styles that complement the character of the historical and architectural features of the district. A variety of styles, colors and materials is encouraged, rather than one homogeneous look for signs. The goal is to reflect the diversity of architectural styles and time periods represented by the buildings and features in the district.

Lighting Fixtures

Exterior building lights, streetlights, sign lighting

Lighting fixtures can add an enlivening decorative element to buildings and streetscapes in the district. Historic Unionville did not have highly decorative lighting in its public areas or on its residences. Lighting fixtures should complement the building or streetscapes in the district, rather than attempt to create an historical appearance that never existed.

Fences and Walls

Wooden fences, stonewalls, stone and wooden retaining walls

Wooden fences and stonewalls were an essential feature of the Unionville landscape. Original fences and walls should be repaired and restored whenever possible. Where fences or walls have to be replaced or placed where they did not exist historically, take care to use appropriate historical materials. Analyze existing fences and walls (and photographs and other visual sources) in order to duplicate the appearance of the original elements.

Decorative and retaining walls: When similar materials can not be used to repair or replace failing walls, alternative materials and methods, may be considered, that match the existing material or historically accurate material.

Technology

Satellite dishes, cable connections, transformers, and utility panels

Technology is an important part of contemporary life. However, technology components are not compatible with the character of the Historic District. With creative and thoughtful planning, locate technology components in areas that do

not show from the public view, or screen these elements from view.

Electric Vehicle Charges: Whenever possible, electric vehicle chargers shall be placed toward the rear of the building, so as not to be visible from the street. If a charger can not be located on the side or rear, it may be screened from view of the street.

Renewable Energy Systems

Pursuant to CT Statute: “No application for a Certificate of Appropriateness for an exterior architectural feature, such as a solar energy system, designed for the utilization of renewable resources, shall be denied unless the Commission finds that the feature cannot be installed without substantially impairing the historic character and appearance of the District. A Certificate of Appropriateness for such a feature may include stipulations requiring design modifications and limitations on the location of the feature that do not significantly impair its effectiveness.”

Public Spaces

Parks, street furniture, monuments, statuary

The appearance of public spaces falls within the jurisdiction of the historic district because the district is responsible for maintaining the character of streetscapes. These elements – parks, statues, furniture – can enrich the unique character of the district. The elements do not need to copy historical pieces, but they should complement the materials, details and forms within the district.

Parking

Pursuant to Connecticut State Statutes: In passing upon appropriateness as to parking, the commission shall take into consideration the size of such parking area, the visibility of cars parked therein, the closeness of such area to adjacent buildings and other similar factors. It is recommended that parking be screened from the street when feasible.

APPENDIX

For the latest information on the SOI Standards, please visit
<https://www.nps.gov/tps/standards.htm>

The Secretary of the Interior's Standards for the Treatment of Historic Properties

The Secretary of the Interior's Standards for the Treatment of Historic Properties are common sense principles in non-technical language. They were developed to help protect our nation's irreplaceable cultural resources by promoting consistent preservation practices.

The Standards may be applied to all properties listed in the National Register of Historic Places: buildings, sites, structures, objects, and districts.

The Standards are a series of concepts about maintaining, repairing and replacing historic materials, as well as designing new additions or making alterations. They cannot, in and of themselves, be used to make decisions about which features of a historic property should be preserved and which might be changed. But once an appropriate treatment is selected, the Standards provide philosophical consistency to the work.

There are Standards for four distinct, but interrelated, approaches to the treatment of historic properties--preservation, rehabilitation, restoration, and reconstruction.

Preservation focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time. (Protection and Stabilization have now been consolidated under this treatment.)

Rehabilitation acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.

Restoration depicts a property at a particular period of time in its history, while removing evidence of other periods.

Reconstruction re-creates vanished or non-surviving portions of a property for interpretive purposes.

Standards for Preservation

PRESERVATION IS DEFINED as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. New exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project.

1. A property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces, and spatial relationships. Where a treatment and use have not been identified, a property will be protected and, if necessary, stabilized until additional work may be undertaken.
2. The historic character of a property will be retained and preserved. The replacement of intact or repairable historic 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. Work needed to stabilize, consolidate, and conserve existing historic materials and features will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
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. The existing condition of historic features will be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material will match the old in composition, design, color, and texture.
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.

Preservation as a Treatment

When the property's distinctive materials, features, and spaces are essentially intact and thus convey the historic significance without extensive repair or

replacement; when depiction at a particular period of time is not appropriate; and when a continuing or new use does not require additions or extensive alterations, Preservation may be considered as a treatment.

Standards for Rehabilitation

REHABILITATION IS DEFINED AS the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features, which convey its historical, cultural, or architectural values.

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 will 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 such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Rehabilitation as a Treatment

When repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular period of time is not appropriate, Rehabilitation may be considered as a treatment.

Standards for Restoration

RESTORATION IS DEFINED AS the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.

1. A property will be used as it was historically or be given a new use, which reflects the property's restoration period.
2. Materials and features from the restoration period will be retained and preserved. The removal of materials or alteration of features, spaces, and spatial relationships that characterize the period will not be undertaken.
3. Each property will be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate and conserve materials and features from the restoration period will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
4. Materials, features, spaces, and finishes that characterize other historical periods will be documented prior to their alteration or removal.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the restoration period will be preserved.
6. Deteriorated features from the restoration period 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.
7. Replacement of missing features from the restoration period will be substantiated by documentary and physical evidence. A false sense of history will not be created by adding conjectural features, features from other properties, or by combining features that never existed together historically.
8. 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.
9. Archeological resources affected by a project will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
10. Designs that were never executed historically will not be constructed.

Restoration as a Treatment

When the property's design, architectural, or historical significance during a particular period of time outweighs the potential loss of extant materials, features, spaces, and finishes that characterize other historical periods; when there is substantial physical and documentary evidence for the work; and when contemporary alterations and additions are not planned, Restoration may be considered as a treatment. Prior to undertaking work, a particular period of time, i.e., the restoration period, should be selected and justified, and a documentation plan for Restoration developed.

Standards for Reconstruction

RECONSTRUCTION IS DEFINED AS the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.

1. Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property.
2. Reconstruction of a landscape, building, structure, or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts, which are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.
3. Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.
4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture.
5. A reconstruction will be clearly identified as a contemporary re-creation.
6. Designs that were never executed historically will not be constructed.

Reconstruction as a Treatment

When a contemporary depiction is required to understand and interpret a property's historic value (including the re-creation of missing components in a historic district or site); when no other property with the same associative value has survived; and when sufficient historical documentation exists to ensure an accurate reproduction, Reconstruction may be considered as a treatment.

When the Standards are Regulatory

The Secretary of the Interior is responsible for establishing professional standards and providing advice on the preservation and protection of all cultural resources listed in or eligible for the National Register of Historic Places.

The Secretary of the Interior's Standards for the Treatment of Historic Properties, apply to all proposed development grant-in-aid projects assisted through the National Historic Preservation Fund, and are intended to be applied to a wide variety of resource types, including buildings, sites, structures, objects, and districts. These Standards, revised in 1992, were codified as 36 CFR Part 68 in the July 12, 1995 Federal Register (Vol. 60, No. 133). They replace the 1978 and 1983 versions of 36 CFR 68 entitled "The Secretary of the Interior's Standards for Historic Preservation Projects."

The Secretary of the Interior's Standards for the Treatment of Historic Properties may be used by anyone planning and undertaking work on historic properties, even if grant-in-aid funds are not being sought. Please note that another regulation, 36 CFR 67, focuses on "certified historic structures" as defined by the IRS Code of 1986. The "Standards for Rehabilitation" cited in 36 CFR 67 should always be used when property owners are seeking certification for Federal tax benefits.