

## **South Carolina State Historic Preservation Office Policy on Proposed Replacement Windows In Review and Compliance Projects**



Replacement windows are often considered when working on a historic building. In consultation with the South Carolina Energy Office, we found that rehabilitation of historic windows (including repair & thermal upgrading) is similar in cost to historically compatible replacement windows, provides a quicker return on investment, and is more likely to last beyond the payback period. When an applicant is seeking federal assistance for replacement windows in a historic building, the South Carolina State Historic Preservation Office will consider the following in reviewing those cases.

### Funding and Review

When a project on a building that is listed in or eligible for listing in the National Register of Historic Places receives federal funding, such as through the American Recovery Reinvestment Act, the work must be reviewed to determine if it is compatible with the historic character of the building. The federal agency or designee (Agency) providing the funding is responsible for consulting with the State Historic Preservation Office (SHPO). This review process is known as Section 106 Review (Review) for the section of the National Historic Preservation Act that requires the consultation.

### Existing Window Condition

In many historic buildings, the windows are original or early features. In some cases, the windows were replaced in the past or were removed and the openings were enclosed with solid materials. The Agency must provide the SHPO with the age of the windows and any alterations. The Review is based on the existing conditions.

### Peeling Paint, Minor Deterioration, and Normal Aging

Typical deterioration on otherwise sound wood windows is often given as the reason to replace repairable windows. Peeling paint on a sound window is simply lack of maintenance and will not be accepted as justification for wholesale window replacement. Minor deterioration such as missing putty, sashes that are painted shut, or cracked window panes can easily be repaired. Natural aging, such as loose sashes or weathered sills, can also easily be addressed in a window rehabilitation project and will not be accepted as justification for wholesale replacement.

### Compatible Energy Upgrades

Where the windows are historic (original or more than 50 years old) and in repairable condition, compatible upgrades may include: retaining and repairing the window; caulking around the frame on the exterior and the interior; repair of historic exterior shutters or interior blinds; and/or adding a visually-clear low-E storm window on the interior or exterior. These upgrades result in a significant reduction in infiltration (outside air entering the building) and an increase in thermal performance. This type of work is usually compatible with the historic character of most historic buildings.

## **Policy on Proposed Replacement Windows In Review and Compliance Projects (continued)**

### Wholesale Replacement of Repairable Windows Is An “Adverse Effect”

If the historic windows remain and are repairable, then wholesale removal will adversely affect the historic character of the building in terms of the Review. This means that the Agency must consider ways to avoid or minimize this adverse effect and provide this documentation to the SHPO as part of consultation. Such documentation must include the above noted consideration of repair of the historic windows and energy upgrade items. Justify fully the reasons for rejecting the compatible upgrade items by explaining how each will not work in this case.

### Include Photographs As Part Of The Project Documentation

The documentation of the existing conditions that is required for Review includes photographs of areas where work will take place. Include photographs of all windows to be replaced. Project documentation that does not include photographs cannot be reviewed and the review will be placed on hold until the SHPO receives the necessary photographs. Digital photos printed at a high resolution on a good-quality color printer are acceptable. Provide no more than two (2) photographs per page. Number each photograph and identify the view on a site plan or by describing it on a label. Note that for the clarity of images needed for review, we are unable to accept documentation by fax or email.

### Resources / For More Information

National Park Service:

[Preservation Brief #3 – Conserving Energy in Historic Buildings](#)

[Preservation Brief #9 – The Repair of Historic Wooden Windows](#)

[Preservation Brief #13 – The Repair and Thermal Upgrading of Historic Steel Windows](#)

[Association for Preservation Technology International article, What Replacement Windows Can't Replace: The Real Cost of Removing Historic Windows \(PDF\)](#)

[California SHPO Window Repair and Retrofit web page](#)

[National Trust for Historic Preservation Historic Wood Windows Tip Sheet \(PDF\)](#)

[Old House Journal article, How to Restore Sash Windows](#)