

Kentucky Housing Corporation

Weatherization Public Guidance

November 16, 2023

KHC Program Notice 08-2023

1. **Subject:** SHPO Reviews – Policy Change

Guidance: The U.S. Department of Energy (DOE), Kentucky Heritage Council, the Kentucky Energy and Environment Cabinet, and Kentucky Housing Corporation (KHC) signed an amendment to the Programmatic Agreement that governs how the Kentucky weatherization network handles historical properties. This public notice will re-issue the policy that governs historical properties, which requires all dwellings (including manufactured housing) over 50 years in age or in historical neighborhoods must be submitted to KHC for review and submission the Kentucky Heritage Council. Properties under 50 years old and not in historical neighborhoods are not subject to this guidance.

Effective immediately, manufactured housing (e.g. mobile homes) is excluded from a SHPO review. Units in which all the weatherization measures meet the following exemptions may proceed without a SHPO review. If any measure is identified that does not meet the following exemptions, a SHPO review under the current process is required.

Exert from the Programmatic Agreement with DOE:

Exterior Work. *Except for the following modifications, all properties, excluding manufactured housing (e.g. mobile homes), that are 50 years or older require consultation with the SHPO. Additionally, for any undertakings involving any type of ground disturbance, the results of a preliminary records review from the outside consultant is required.*

- 1) *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.*
- 2) *Thermal insulation, such as non-toxic fiberglass and foil wrapped, in walls, floors, ceilings, attics, and foundations in a manner that does not harm or damage historic fabric.*
- 3) *Blown in wall insulation where no holes are drilled through exterior siding, or where holes have no permanent visible alteration to the structure.*
- 4) *Removable film on windows (if the film is transparent), solar screens, or window louvers, in a manner that does not harm or obscure historic windows or trim.*

- 5) *Reflective roof coating in a manner that closely resembles the historic materials and form, or with materials that restore the original feature based on historic evidence, and in a manner that does not alter the roofline, or where not on a primary roof elevation or visible from the public right-of-way.*
- 6) *Storm windows or doors, and wood screen doors in a manner that does not harm or obscure historic windows or trim.*
- 7) *In-kind replacement or repair of primary windows, doors and door frames, so long as the windows, doors or door frames resemble existing substrate and framing.*
- 8) *Repair of minor roof and wall leaks prior to insulating attics or walls, provided repairs closely resemble existing surface composite.*

Interior Work. *Any properties with proposed interior work that fall into the following modifications under this section will not require a submission to SHPO.*

Interior modifications found to have no potential adverse effects to the historic properties include undertakings to interior spaces where the work will not be visible from the public right of way; no structural alterations are made; no demolition of walls, ceilings or floors occurs; no drop ceilings are added; or no walls are leveled with furring or moved. These interior modifications include the following:

1. Energy efficiency work within the building shell:

- a. *Thermal insulation in walls, floors, ceilings, attics, crawl spaces, ducts and foundations*
- b. *Blown in wall insulation where no decorative plaster is damaged.*
- c. *Plumbing work, including installation of water heaters, as long as there are no known archeological sites within 500 feet of the project area footprint that are documented as eligible or listed on the National Register of Historic Places.*
- d. *Electrical work, including improving lamp efficiency.*
- e. *Sealing air leaks using weather stripping, door sweeps, and caulk and sealing major air leaks associated with bypasses, ducts, air conditioning units, etc.*
- f. *Repair or replace water heaters.*
- g. *Adding adjustable speed drives such as fans on air handling units, cooling tower fans, and pumps*
- h. *Install insulation on water heater tanks and water heating pipes.*
- i. *Install waste heat recovery devices, including desuperheater water heaters, condensing heat exchangers, heat pump and water heating heat recovery systems, and other energy recovery equipment.*
- j. *Repair or replace electric motors and motor controls like variable speed drives.*
- k. *Incorporate other lighting technologies such as dimmable ballasts, day lighting controls, and occupant-controlled dimming.*

2. Work on heating and cooling systems:

- a. *Clean, tune, repair or replace heating systems, including furnaces, oilers, heat pumps, vented space heaters, and wood stoves.*
- b. *Clean, tune repair or replace cooling systems, including central air conditioners, window air conditioners, heat pumps, and evaporative coolers.*
- c. *Install insulation on ducts and heating pipes.*
- d. *Conduct other efficiency improvements on heating and cooling systems, including replacing standing pilot lights with electronic ignition devices and installing vent dampers.*
- e. *Modify duct and pipe systems so heating and cooling systems operate efficiently and effectively, including adding return ducts, replace diffusers and registers, replace air filters, install thermostatic radiator controls on steam and hot water heating systems, provided the property is not considered individually eligible or listed on the National Register of Historic Places, or the property does not fall within a National Register eligible or listed district.*
- f. *Install programmable thermostats, outdoor reset controls, UL listed energy management systems or building automation systems and other HVAC control systems.*

3. Energy efficiency work affecting the electric base load of the property:

- a. *Convert incandescent lighting to fluorescent.*
- b. *Add reflectors, LED exist signs, efficient HID fixtures, and occupancy (motion) sensors.*
- c. *Replace refrigerators and other appliances.*

4. Health and safety measures

- a. *Installing fire, smoke or carbon dioxide detectors / alarms*
- b. *Repair or replace vent systems on fossil-fuel-fired heating systems and water heaters to ensure that combustion gasses draft safely to outside, provided the property is not considered individually eligible or listed on the National Register of Historic Places, or the property does not fall within a National Register eligible or listed district.*
- c. *Install mechanical ventilation, in a manner not visible from the public right of way, to ensure adequate indoor air quality if house is air-sealed to building tightness limit.*

In summary, any retrofits that fall outside of the above exemptions will need to use the current KHC/SHPO submission process. If any subgrantee discovers evidence of archaeological sites (e.g. skeletal remains), all work should cease. Call the coroner; the Kentucky Heritage Council; tribes, if applicable; and KHC. The weatherization Section 106 form is still required for each property.

2. Subject: Retrofit Installer Training – Policy Clarification

Guidance: Retrofit Installer Training is required for any weatherization crew or contractor who is installing weatherization measures. Furthermore, to clarify, passing the certification test for Retrofit Installer is not required for continued employment (contracting) in the weatherization program. However, if any crew or contractor wants to act in a crew leader role, they must pass the Retrofit Installer certification test and the crew leader certification.

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