



Oregon

John A. Kitzhaber, MD, Governor

Housing and Community Services

North Mall Office Building

725 Summer St NE, Suite B

Salem, OR 97301-1266

PHONE: (503) 986-2000

FAX: (503) 986-2020

TTY: (503) 986-2100

www.ohcs.oregon.gov



March 29, 2011

Mr. Kraig Ludwig
Energy Services Coordinator
Yamhill Community Action Partnership (YCAP)
800 NE Second Street
McMinnville, OR 97128

Dear Mr. Ludwig:

In regards to your State of Oregon – Weatherization Assistance [Oregon State] Plan for the United States Department of Energy (U.S. DOE) letter dated January 24, 2011, we, at Oregon Housing and Community services (OHCS), value your recommendations, testimony and general comments. In an effort to best serve Oregon's most vulnerable population, below are a few thoughts and response to YCAP's three general comments.

1. YCAP: *It is apparent the historical April 1st start-up date competes with late federal changes/notices coupled with the approval of the federal award that leaves very little time to allow public comment on the U.S. DOE State Plan. YCAP requests OHCS consider options to allow a minimum time frame of 30 days to prepare testimony and/or write comments on the U.S. DOE State Plan. Further, YCAP recommends OHCS partner with the subgrantees to focus on the development of the U.S. DOE State Plan prior to the release for public comment.*

1a. OHCS: Currently, OHCS does post the draft of the 2011-2012 Weatherization Oregon State Plan for U.S. DOE on our website. In addition to the OHCS Website, a minimum of three newspapers carry an advertisement informing when and where the Public Hearing for the Oregon State Plan to U.S. DOE will be. As you know, the purpose of the public hearings are to provide and opportunity for public comment, including our partners, on the rules proposed for the upcoming Weatherization Program State Plan for U.S. DOE by Oregon Housing and Community Services.


We strive to develop and improve upon our best practices. A 30 day partner review period of the Weatherization Oregon State Plan for U.S. DOE is an optimal goal. Unfortunately, the state and federal budget issues, as well as the federal program deadline changes, made it difficult to ideally finalize the draft of the 2011-2012 Oregon State Plan for U.S. DOE. In order to adapt to federal deadline changes and meet our partners' needs, one thought is for OHCS to set up more GoTo or Webinar meetings with our partners to discuss weatherization issues and development of the Oregon State Plan for U.S. DOE. Further discussion is needed between OHCS and our partners.



2. YCAP: *That OHCS continues to hold work sessions prior to, or post, OECA Quarterly Meetings, with only subgrantees present to work out program specific concerns. This would provide the network the opportunity to evaluate on an annual basis: State Plan Development, regulations, delivery and performance of weatherization services (similar to Energy Assistance Programs).*
- 2a. OHCS: We are interested in continuing work sessions with subgrantees prior/post OECA Quarterly Meetings. Again, an option is to consider continuing GoTo or Webinar meetings between OHCS and subgrantees to evaluate the development of Oregon State Plan for U.S. DOE, changes to regulations, and weatherization services.
3. YCAP: *That OHCS reproduce all written and oral comments received on the Plan [Weatherization Oregon State Plan for U.S. DOE] and include them in the final response back to the subgrantees.*
- 3a. OHCS: Currently, OHCS does post the draft of the Weatherization Oregon State Plan for U.S. DOE on our website. In addition, the Public Hearing Transcripts; public comments; and final Weatherization Oregon State Plan for U.S. DOE; are posted on the OHCS Website. We appreciate your suggestion. In the future, OHCS will post all answers to written and oral public comments on the OHCS Website. We would then intend follow-up with a round table discuss with our partners.

Again, I thank you for your contributions in this matter. If you have further questions or comments, please contact me at (503) 986-2067, via mail at the above address, or email: tim.zimmer@hcs.state.or.us

Best regards,



Tim Zimmer
Weatherization Program Coordinator
Oregon Housing and Community Services (OHCS)

cc: Lee Means, YCAP Executive Director
File



January 24, 2011

Tim Zimmer
Weatherization Statewide Program Coordinator
Oregon Housing and Community Services
725 Summer Street NE Suite B
Salem, Oregon 97301

Re: State of Oregon – Weatherization Assistance Plan for the US-DOE

It is YCAP's expectation that comments received on this Plan will be reviewed and seriously considered for potential changes to the Plan document as per the intent of a public comment requirement.

YCAP recommends the following general comments in reference to the US-DOE State Plan:

- It is apparent the historical April 1st start-up date competes with late Federal changes/notices coupled with the approval of the Federal award that leaves very little time to allow public comment on the USDOE State Plan. YCAP requests OHCS consider options to allow a minimum time frame of 30 days to prepare testimony and/or written comment on the USDOE State Plan. Further YCAP recommends OHCS partner with the subgrantee to focus on the development of the USDOE State Plan prior to the release for public comment.
- That OHCS continues to hold work sessions prior to or post OECA Quarterly meetings with only sub grantees present to work out program specific concerns. This would provide the network the opportunity to evaluate on an annual basis State Plan Development, regulations, delivery and performance of weatherization services. (Similar to Energy Assistance Programs)
- That OHCS reproduce all written and oral comments received on this Plan and include them in the final response back to the sub-grantees.

Please accept the following comments as additional written testimony in response to the Oregon DOE Weatherization Assistance Plan:

Section 1.06 Training and Technical Assistance, page 11-12

Comment: YCAP has been a strong supporter of training and technical assistance by providing staff time, resources to OECA, and peer exchange across the state. YCAP supports allocations to sub-grantees to allow flexibility to accomplishing local Training and Technical Assistance needs.

Section 2.20.2 Davis-Bacon Act Compliance, page 38-39

Comment: YCAP supports the US-DOE exemption for weatherization activities under ORS 137-30-015(3) (a) in the DOE Low-Income Weatherization Program.

The efforts of OHCS staff for providing the opportunity for program enhancement that serves the disadvantaged individuals of the State of Oregon is greatly appreciated.

If you would like further clarification of the comments, please feel free to contact me at 503-883-4174.

Respectfully Given,

Signature on file

Kraig Ludwig
Energy Services Coordinator

Cc: Lee Means, YCAP Executive Director

Email – Attachment sent January 24, 2011