

**National Low Income Housing Coalition
National Housing Trust Fund
Model Allocation Plan for Georgia
March 2016**

The National Housing Trust Fund (NHTF) will be implemented in 2016, making new funds available for the production, preservation, rehabilitation, and operation of rental housing that is affordable to extremely low income households, those with incomes at or below 30% of the area median. The National Low Income Housing Coalition (NLIHC) is engaged in a multi-pronged strategy to assure that implementation is successful and the funds are used for maximum effectiveness.

The purpose of this paper is to inform Georgia housing and homeless advocates what the NHTF statute and regulations require for the NHTF Allocation Plan and the importance of your participation in influencing the content of Georgia's NHTF Allocation Plan.

The NHTF is a block grant to the 50 states, the District of Columbia, Puerto Rico, and U.S. territories that is administered by the HUD Office of Community Planning and Development. There are two conditions that each state must meet in order to receive its NHTF allocation:

- The state must designate an entity to administer the NHTF and notify the HUD Secretary of the administering entity; and
- The state must prepare and submit a NHTF Allocation Plan to HUD.

The person in charge of Georgia's NHTF Allocation Plan is:

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Although Ms. Knowles is officially listed on HUD's website, the person actually involved on a day-to-day basis might be someone else at GHFA.

This paper is based on NLIHC's interpretation of the statute that created the NHTF and the NHTF Interim Rule issued by HUD. Material that is specific to Georgia is gleaned from:

- State of Georgia's 2013-2017 Consolidated Plan and 2015 Annual Action Plan
<https://www.hudexchange.info/consolidated-plan/con-plans-aaps-capers/>,
- State of Georgia's 2015 Qualified Allocation Plan
https://www.dca.ga.gov/housing/HousingDevelopment/programs/documents/2015QualifiedAllocationPlan_001.pdf.

The paper also contains NLIHC's recommendations for what ideal NHTF Allocation Plans should include. For sake of clarity, some sections are marked **ST** for statute, **REG** for regulation, and **REC** for recommendation.

Tentative Timeline for 2016

- February 18: Fannie Mae and Freddie Mac, the Government Sponsored Entities, filed annual reports with SEC that cite total amount of funding for NHTF for 2016.
- Late March-Early April: HUD publishes NHTF Allocation Plan guidance.
- Mid-April: HUD publishes NHTF allocation to states in *Federal Register*. NLIHC estimates that Georgia will receive **\$3,340,000**.
- April-May: Georgia Housing Finance Agency (GHFA) develops Allocation Plan following its Consolidated Plan (ConPlan) citizen participation procedures, including at least a 30-day comment period. (see ConPlan Citizen Participation Requirements starting on page 12 of this paper.)
- June: GHFA submits Allocation Plan to HUD, which has 45 days to review. The plan is automatically approved after 45 days if HUD does not comment.
- Summer: When HUD Secretary Castro wants to distribute NHTF funds.

Key facts about the NHTF Allocation Plan

- The NHTF Allocation Plan is part of the Annual Action Plan (REG) that Georgia must submit as an update to your 2013-2017 ConPlan. The ConPlan and the Annual Action Plan must be submitted to HUD for Georgia to receive your annual allocations of CDBG, HOME, HOPWA, ESG, and now NHTF funds.
- Georgia's last Annual Action Plan was submitted on May 15, 2015.
- The Georgia Department of Community Affairs is responsible for submitting the ConPlan and Annual Action Plans. The GHFA appears to be a part of the Georgia Department of Community Affairs and not a separate agency as housing finance agencies are in many other states. Hopefully, this will make including the NHTF Allocation Plan in the Annual Action Plan go smoothly.
- Georgia's state ConPlan only covers non-entitlement jurisdictions that do not do their own ConPlans. Most people are more familiar with their local jurisdictions' ConPlans. NHTF advocates have to become knowledgeable about your state ConPlan and the state's process for seeking public input on its ConPlan. Remember that the state ConPlan is an incomplete representation of housing and homelessness in the state because it does not include the entitlement jurisdictions.
- HUD has announced that in 2016 the NHTF Allocation Plan will be submitted as a "substantial amendment" to the Annual Action Plan. A "substantial amendment" requires a 30 day comment period. The NHTF Allocation Plan likely will be submitted at a different time than the Annual Action Plan because the annual funding for the NHTF will become known at a time that differs from that of the other block grants.
- Typically, ConPlans and Annual Action Plans are submitted via HUD's IDIS electronic system. However, until the IDIS system is adapted to receive the NHTF Allocation Plan, it is expected that it will be submitted as a PDF document.
- The NHTF rule does not directly address the approval process for Allocation Plans. However, as part of the ConPlan, we infer that the same standards that apply to HUD's approval of ConPlans apply to HUD's approval of NHTF Allocation Plans. After the ConPlan is submitted, HUD has 45 days to review and reject it. HUD can reject a ConPlan for several reasons, including being incomplete or failing to meet public participation requirements. If HUD does not act, the plan is accepted.

Important definitions for the NHTF Allocation Plan

- **Grantee (ST)**. The state entity that prepares the Allocation Plan, receives the NHTF dollars from HUD, and administers the NHTF in the state. The Grantee for Georgia is the GHFA.

- **Subgrantee (REG).** Local jurisdiction that GHFA could designate to administer the NHTF for a city or county.
- **Eligible Recipient (ST).** The organization or agency that submits an application to the GHFA or subgrantee for funds to carry out a NHTF project in the state or locality.

NLIHC’s recommendations and assumptions

NLIHC is making the following recommendations and assumptions. All are REC:

- Advocates will seek the deepest possible affordability for rents in NHTF-assisted units and the longest possible periods of affordability.
- All funds in the first year will be used for rental housing and none for homeownership activities.
- All funds will be distributed by GHFA to eligible recipients with no funds going to subgrantees. The allocation in 2016 will be too small to justify subgrantees.
- All funds in first year should be used to expand ELI rental housing and have maximum impact. NHTF must not be used to supplant other federal or state funds. Please minimize using NHTF for preservation of existing federally assisted housing, including in the context of Choice Neighborhood or RAD projects.
- In order to maximize affordability, projects with as little debt service as possible are preferred. Therefore, the preferred forms of assistance are grants or no interest loans.
- Given the small amount of money available in the first year, NLIHC recommends focusing on projects with the most impact, as opposed to distributing small amounts of money to many projects.

NHTF Allocation Plan elements

The interim rule for the NHTF lists the elements that must be included in the NHTF Allocation Plan. They are:

1. Description of distribution of funds (ST)
2. Application requirements (REG)
3. Criteria for selection of applications submitted by eligible recipients. Criteria must meet State’s priority housing needs in the ConPlan (ST)
4. State’s maximum per-unit development subsidy limit for housing assisted with funds for all areas of state (REG)
5. If funds are to be used for first-time homebuyers, identify applicable resale and recapture provisions (REG)
6. Decision on distribution of funds through grants to subgrantees and/or to select applications from eligible recipient (REG)
7. If distributing directly to selected applicants, the priority for funding that will be placed on:
 - a. Geographic diversity (ST);
 - b. Applicant’s ability to obligate funds and undertake eligible activities in a timely manner (ST);
 - c. For rental housing, extent to which project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low income families (ST/REG);
 - d. For rental housing, the duration of the units’ affordability period (ST);
 - e. Merits of the applications in meeting State’s priority housing needs (ST); and
 - f. Extent to which applicant makes use of non-federal funding sources (ST).
8. Description of eligible activities and eligibility requirements for recipients (ST)
9. Certification by each recipient that NHTF-assisted housing units will comply with NHTF requirements (ST)

10. Performance goals and benchmarks consistent with State’s proposed accomplishments (ST)
11. Rehabilitation standards that NHTF-assisted projects must meet (REG)
12. Resale and recapture guidelines if funds used for first-time homebuyers (REG)
13. NHTF affordable homeownership limits (REG).
14. Preferences or limitations to a particular segment of ELI or VLI population (REG)
15. Requirements and conditions under which existing project debt may be refinanced (REG)

Model Allocation Plan for Georgia

To the best of our ability, NLIHC has attempted to discern from the NHTF Interim rule, other HUD documents, the State ConPlan and Annual Action Plan, and State QAP what should be included in Georgia’s NHTF Allocation Plan. HUD is supposed to issue NHTF Allocation Plan guidance, but this guidance has been delayed several times in the last five months.

1. Description of distribution of funds.

ALL REC

GHFA will prepare a Request for Proposals (RFP) that will describe in detail eligible applicants, eligible activities, what an application is to include, when and where applications are to be submitted, the criteria by which applications will be evaluated, who will review the applications, and when grant awards are to be made.

The RFP will indicate what Georgia has determined to be the priority housing need(s) it intends to address based on the outcome of its citizen participation process and priority needs indicated in its current ConPlan. The RFP can also reference other needs assessments that show statewide housing needs.

GHFA will convene an application review panel composed of state officials and at least two private citizens representing the housing and homeless advocacy community who are not affiliated in any way with any applicant.

GHFA will determine which applications are responsive to the application requirements and present those to the members of the application review panel. The panel members will independently review each application and rate it according to the published criteria. The panel will then meet as a group to reconcile their scores and settle on agreed upon recipients.

GHFA will be responsible for executing contracts.

2. Application requirements.

ALL REC

GHFA will detail the application requirements in the Request for Proposals (RFPs). They can include, but are not limited to:

- Project information similar to that required for LIHTC applications.
- How the project responds to priority housing need that the state intends to address.
- How the project responds to the six priority factors dictated by the statute.
- Description of how NHTF-assisted units will be integrated with units with higher income targeting.
- Description of how the project affirmatively furthers fair housing.

- Description of the plan and methods for achieving affordability (rent at no more than 30% of household income) for households at 30% AMI, 20% AMI, and 10% AMI.
- Description of tenant recruitment and selection process.
- Definition of a successful resident; description of services and subsidies that will be provided to maximize resident success.
- Applicant credentials to carry out project, including evidence of successful completion and operation of similar projects.

3. Criteria for selection of applications submitted by eligible recipients. Criteria must meet State’s priority housing needs.

ALL REC

- a. Threshold criteria
 - Responsiveness to application requirements
 - Project reflects priority housing need(s) found in ConPlan that the state intends to address. The high priority need listed in the 2013-2017 GA ConPlan that is relevant to the NHTF for 2016 is:
 - Affordable Rental Housing for ELI, Large Families, Families with Children, Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions, Persons with HIV/AIDS and their Families, Victims of Domestic Violence. NOTE: GA emphasizes its obligation to comply with the Olmstead decree to move people with disabilities from institutions to community-based settings.
- b. Final criteria
 - Rating on the six priority factors dictated by statute
 - Rating based on creativity and innovation
 - Rating based on feasibility
 - Rating on potential for resident success
 - Rating based on applicant credentials

4. State’s maximum per-unit development subsidy limit for housing assisted with funds for all areas of state.

The state must establish maximum limitations on total amount of NHTF funds that can be invested per-unit to develop “non-luxury” housing with adjustments for number of bedrooms and location. Limits must be reasonable and based on actual costs (REG). HUD has indicated that it will be issuing guidance on the per-unit development subsidy limit for the NHTF. The limit is likely to be higher than it is for units produced with HOME funds recognizing that the deeper targeting for NHTF units will require higher levels of subsidy.

5. If funds are to be used for first-time homebuyers, identify applicable resale and recapture provisions.

REC: NLIHC recommends using all funds for rental housing in the first year, so possible Allocation Plan language is: “Georgia does not intend to use any funds for homebuyer activities in the 2016 funding cycle.”

6. *Decision on distribution of funds through grants to subgrantees and/or to select applications from eligible recipients.*

REC: NLIHC recommends that all funds be distributed by the grantee to eligible recipients in the first year, so possible Allocation Plan language is: "Georgia does not intend to make grants to subgrantees in the 2016 funding cycle."

7. *The priority for funding that will be placed on six priority factors for funding for eligible applicants.*

Determination of recipients based on applicant's total maximum points = 100.

- a. *Geographic diversity (ST). (Maximum points = 0)* Given the relatively small amount of money available in the first year, NLIHC recommends focusing on projects with the most impact, as opposed to distributing small amounts of money to many projects (REC).
- b. *Applicant's ability to obligate funds and undertake eligible activities in a timely manner (ST). (Maximum points = 10)* While the statute and regulations refers to an applicant's ability to "obligate (ST and REG)" funds, obligate is not defined. The regulation refers to the "commitment (REG)" of funds.
 - GHFA must "commit" its NHTF funds within 2 years (ST and REG), and expend within 5 years (REG).
 - Factor b concerns the ability of the applicant/potential recipient. The regulation defines "commitment" for eligible recipients as:
 - For new construction or rehabilitation of rental housing, to start construction within 12 months of date of contract between the recipient and GHFA (REG).
 - For acquisition of rental housing, receipt of title to the property within 6 months of the date of contract between the recipient and GHFA (REG).
- c. *For rental housing, the extent to which the project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low income families (REG). Statute says "extent to which rents...are affordable, especially for ELI families" (ST). (Maximum points = 40)*
 - "Affordable to extremely low income families" is defined as families not paying more than 30% of their household income for housing costs, including utilities (REC).
 - Project-based rental assistance includes, but is not limited to, unit-based rental assistance, operating subsidies, cross-subsidization of rents within the project.
 - Up to 33% may be used for operating cost assistance and operating cost assistance reserves for NHTF-assisted units (REG). NOTE: HUD intends to issue guidance on operating costs for the NHTF in the next year.
- d. *For rental housing, the duration of the units' affordability period (ST) (Maximum points = 15)*
 - Minimum affordability period of 30 years is a threshold requirement (REG).
 - The extent to which a project exceeds the 30-year minimum determines its duration points, to a maximum of 15 points for projects that commit to affordability in perpetuity (REC).
- e. *Merits (ST) of the applications in meeting priority housing needs of the State (REG) (Maximum points = 25)*

- Meeting Georgia’s priority housing needs, as identified in the State ConPlan, is a threshold requirement. The priority housing needs identified in the 2013-2107 ConPlan that are relevant to the NHTF for 2016 are:
 - Affordable Rental Housing for ELI, Large Families, Families with Children, Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions, Persons with HIV/AIDS and their Families, Victims of Domestic Violence. NOTE: GA emphasizes its obligation to comply with the Olmstead decree to move people with disabilities from institutions to community-based settings.
- The extent to which a project meets the needs of the lowest income households within the state’s priority housing needs (REC), to a maximum of 25 points.
- Examples (REC):
 - Projects that serve people with special needs or who are homeless, or ex-offenders.
 - Projects that are affordable to households with incomes less than 15% AMI or whose sole income is SSI.
 - Projects proposed by nonprofits.
 - Phased rehabilitation projects that do not cause displacement.

f. *Extent to which application makes use of non-federal funding sources (ST). (Maximum points = 10)*

- Extent to which application makes use of state and local publicly-controlled funds and/or land donated by state or local government to achieve deep affordability for ELI households (REC).
- Extent to which application makes use of private funds or in-kind commitments, including land donated by state or local government to achieve deep affordability for ELI households (REC).

8. Eligible Activities and eligibility requirements for recipients.

The primary purpose of the NHTF is to support the creation or preservation of rental housing that is affordable to extremely low income households. NHTF funds will be focused on those activities that produce, acquire, or rehab rental housing for the benefit of these households.

NLIHC recommends that eligible activities be limited to:

- The production and rehabilitation of rental housing affordable to extremely low income households (ST).
- Up to 33% for operating cost assistance and operating cost assistance reserves (REG).
 - May only be provided to rental housing acquired, rehabilitated, reconstructed, or newly constructed with NHTF funds (REG).
 - Includes costs for insurance, utilities, real property taxes, and maintenance, and scheduled payments to a reserve for replacing major systems (REG).

REC: “Georgia does not intend to permit NHTF funds to be used for homeownership activities or for the new construction, rehabilitation, or preservation of federally assisted housing in the 2016 funding cycle.”

An eligible recipient is an organization, agency, or other entity, including a for-profit or nonprofit entity (ST) or public housing agency (REG).

Consider limiting eligible recipients to nonprofits in the first year or limit for-profits to those that limit profits or rate of return to investors (REC).

An eligible recipient must:

- Have demonstrated experience and capacity to conduct an eligible NHTF activity as evidenced by its ability to:
 - Own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development (ST) ; and
 - Serve low income households and special needs populations, such as homeless families and people with disabilities (REC)
- Demonstrate the ability and financial capacity to undertake, comply and manage the eligible activity (ST);
- Demonstrate familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs (ST); and
- Must make acceptable assurances to the GHFA that it will comply with NHTF program requirements during the entire period that begins upon the recipient being selected to receive NHTF funds and ends at the conclusion of all NHTF-funded activities (ST).

9. Certification by each recipient that NHTF-assisted housing units will comply with NHTF requirements.

GHFA requires each eligible recipient to certify that housing units assisted with NHTF funds will comply with all NHTF requirements (ST). The certification must include (REC):

- The number of units in a NHTF-assisted project by income group: extremely low income, very low income, moderate, and above moderate (REC);
- A statement declaring that all tenants of a NHTF-assisted development meet the income limits as required by Program guidelines (REC); and
- A statement declaring that recipient will comply with rent limits, determined to be no more than 30 percent of 30 percent of the area median income (REC).

10. Performance goals and benchmarks consistent with State's proposed accomplishments.

This section also refers to the state's ConPlan in which accomplishments are detailed in the affordable housing section of the strategic plan. The state must specify the number of extremely low income families and homeless persons for whom the state will provide affordable rental housing. Affordable rents are defined as not exceeding the greater of 30% of the federal poverty line or 30% of 30% AMI (REG).

GA's 2013-2017 ConPlan calls for constructing 1800 rental housing units and rehabbing another 100 units; seven ELI households would be assisted.

To achieve maximum affordability, an Allocation Plan can set performance goals about (REC):

- how many extremely low income families and homeless with have affordable housing with affordability defined as 30% of household income (REC) or
- how many families or persons will have rents set at 30% of 20% AMI or 30% of 10% AMI (REC).

11. Rehabilitation standards that NHTF-assisted projects must meet.

GHFA must establish rehabilitation standards for all NHTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The description of the standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes (REG).

Standards must address, at a minimum (REG): Health and safety; major systems; lead-based paint; accessibility; disaster mitigation; state and local codes, ordinances, and zoning; uniform physical condition standards, capital needs assessment (REG).

GHFA should ensure that it has taken all reasonable steps to minimize the displacement of residents as the result of rehabilitation activities. Recipients who propose phased rehabilitation activities that support no displacement should be given preference (such activities should accordingly receive more points when considering the merits of an application (REC). See 7(d) of the Allocation Plan).

12. Resale and recapture guidelines if funds used for first-time homebuyers.

REC: NLIHC recommends using all funds for rental housing in the first year, so possible Allocation Plan language could be: "The State does not intend to use any funds for homebuyer activities in the 2016 funding cycle."

13. NHTF affordable homeownership limits.

REC: NLIHC recommends using all funds for rental housing in the first year, so possible Allocation Plan language could be: "The State does not intend to use any funds for homebuyer activities in the 2016 funding cycle."

14. Preferences or limitations to a particular segment of ELI population

GHFA will limit or give preference to a particular segment of the extremely low income population based on the State's priority housing needs as described in the State's consolidated plan and Annual Action Plan.

The high priority need listed in the 2013-2017 GA ConPlan that are relevant to the NHTF for 2016 are:

- Affordable Rental Housing for ELI, Large Families, Families with Children, Elderly, Frail Elderly, Persons with Mental Disabilities, Persons with Physical Disabilities, Persons with Developmental Disabilities, Persons with Alcohol or Other Addictions, Persons with HIV/AIDS and their Families, Victims of Domestic Violence. NOTE: GA emphasizes its obligation to comply with the Olmstead decree to move people with disabilities from institutions to community-based settings.

Any such preference or limitation will be memorialized in the written agreement between the State and eligible recipient (REG).

Any limitation or preference must not violate nondiscrimination requirements. Federal fair housing requirements, including the duty to affirmatively further fair housing, are applicable to the NHTF program. A limitation does not violate nondiscrimination requirements if the housing project also receives funding from a federal program that limits eligibility to a particular segment of the population (e.g. Housing Opportunity for Persons Living with AIDS program, the Section 202 and Section 811 programs). (REG)

15. Requirements and conditions under which existing project debt may be refinanced.

GHFA may permit the use of NHTF funds toward the cost of fully or partially refinancing existing debt on a multifamily rental property provided the following conditions are met (REG):

- The new investment is being made to create additional affordable units (REC);
- The housing has not been previously financed with NHTF funds (REC)
- A review of the management practices of the applicant must demonstrate that the proposed rehabilitation is not the result of disinvestment in the property by any entity involved in the application for NHTF funds (REC);
- A review of the proposed operating budget for the project must demonstrate that both the cost of refinancing and rehabilitation of the project can be met and still result in units affordable to NHTF-eligible tenants for a period of 30 years or the term of the refinancing, whichever is longer (REC); and
- The activity does not involve the refinancing of a multifamily loan made or insured by any state or federal program, including the CDBG Program, unless additional affordable units will be income-restricted to extremely low-income households (REC).

CONPLAN CITIZEN PARTICIPATION REQUIREMENTS

The Public Participation Plan.

There must be a written public participation plan that describes a state’s or local subgrantee’s policies and procedures for involving lower income people in the ConPlan process.

The public participation plan must "provide for" and "encourage" public involvement in drafting the ConPlan or Annual Action Plan, any "Substantial Amendment" to it, and the Annual Performance Report.

- The public participation plan must encourage involvement by low income people, especially those living in low income neighborhoods and areas where funds might be spent.
- States and local subgrantees are "expected to take whatever actions are appropriate" to encourage involvement by people of color, people with limited English proficiency, disabled people, and residents of public and assisted housing.

Public Hearings

The law requires public hearings at all stages of the process. At a minimum, hearings must give the public a chance to identify housing needs, review proposed uses of funds, and comment on the past use of funds.

The ConPlan regulations require a public hearing specifically to get public views on housing and community development needs. This housing needs hearing must take place before a Proposed ConPlan or Proposed Annual Action Plan is published for public comment.

The ConPlan regulations only require states to have one public hearing and localities to have two public hearings. For local subgrantees, but not states, that second public hearing must be during the development of the ConPlan.

- There must be "adequate" public notice of upcoming hearings.

- The ConPlan regulations declare, "Publishing small print notices in the newspaper a few days before the hearing is not adequate notice".
- The ConPlan regulations add, "two weeks' notice is adequate".
- Hearings must be held at times convenient to people who are likely to be affected.
- Hearings must be held in places easy for lower income people to get to.
- Where there are a significant number of people with limited English proficiency, the public participation plan must say how they can be involved.

The Proposed ConPlan or Proposed Annual Action Plan

- Complete copies of the Proposed ConPlan or Proposed Annual Action Plan must be in public places, such as libraries.
- A "reasonable number" of copies of a Proposed ConPlan or Proposed Annual Action Plan must be provided for free.
- The public must have at least 30 days to review and comment on the Proposed ConPlan or Proposed Annual Action Plan.
- The state or local subgrantee must "consider" these comments.
- A summary of public comments must be attached to the Final ConPlan or Final Annual Action Plan, along with an explanation why public suggestions were not used.

General Public Participation Provisions

- A copy of the Final ConPlan or Annual Action Plan must be available to the public.
- States and local subgrantees must respond in writing within 15 days to written complaints.
- Access to information must be reasonable and timely.
- There must be reasonable notice that standard ConPlan or Annual Action Plan documents are available for people to review and make comments about.
- The public must be able to review records from the last five years.
- For local subgrantees (not states) the public must have "reasonable and timely" access to local meetings (such as Community Advisory Committee meetings, City Council subcommittee meetings, etc.).

CONPLAN CITIZEN PARTICIPATION IN GEORGIA

For the 2013-2017 Georgia ConPlan, the Department of Community Affairs:

- Conducted an on-line survey that was disseminated widely and held open for 30 days; 526 people responded
- Held three public hearings in different parts of the state and webinar for people who could not attend a public hearing. They were advertised in 11 newspapers. A total of six people spoke at the public hearings; 65 people participated in the webinar.
- The draft plan was made available for 30 days. Its availability was advertised in 12 newspapers. Five comments were received.