5-Year PHA Plan (for All PHAs)

U.S. Department of Housing and Urban Development Office of Public and Indian Housing

OMB No. 2577-0226 Expires: 02/29/2016

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

| PHA Name: Housi | ng Authority of | f the County of Sacramento | | PHA Code: _C | A007 |
|---|--|---|--|--|--|
| PHA Plan for Fiscal Ye PHA Plan Submission T | | (MM/YYYY):01/2020 ar Plan Submission [| Revised 5-Year Plan Submission | | |
| A PHA must identify the and proposed PHA Plan a reasonably obtain additional submissions. At a minimum | specific location are available for an information num, PHAs must are strongly expression. | on(s) where the proposed PHA P r inspection by the public. Addi n on the PHA policies contained st post PHA Plans, including upon couraged to post complete PHA | , PHAs must have the elements liste lan, PHA Plan Elements, and all inf tionally, the PHA must provide info in the standard Annual Plan, but ex- lates, at each Asset Management Pr A Plans on their official websites. P | formation relevant to ormation on how the p cluded from their stre oject (AMP) and main | the public houblic may amlined n office or c |
| The 2019 Mid-Year PH | A Annual Plai | ı is available for viewing at the | following locations: | | |
| Main Administrative C 801 12th Street, Sacram | | 14 | Resident Advisory Bo 1725 K Street, Sacram | | |
| Housing Choice Vouch 630 I Street, Sacrament | | Housing Application Office | Sacramento Public L 828 I Street, Sacramen | | |
| · | eck box if subm | nitting a Joint PHA Plan and com Program(s) in the | plete table below) Program(s) not in the | No. of Units in | No. of Units in Each Progra |
| Participating PHAs | Code | Consortia | Consortia | PH | HCV |
| Lead PHA: | | | | | |
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| В. | 5-Year Plan. Required for all PHAs completing this form. |
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| B.1 | Mission. State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. |
| | Our mission is to revitalize communities, provide affordable housing opportunities and to serve as the Housing Authority for the City and County of Sacramento. |
| B.2 | Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years. |
| В.3 | Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. |
| B.4 | Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. |
| B.5 | Significant Amendment or Modification . Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan. |
| B.6 | Resident Advisory Board (RAB) Comments. |
| | (a) Did the RAB(s) provide comments to the 5-Year PHA Plan? |
| | Y N □ □ |
| | (b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. |
| B.7 | Certification by State or Local Officials. |
| | Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. |

Instructions for Preparation of Form HUD-50075-5Y 5-Year PHA Plan for All PHAs

A. PHA Information 24 CFR §903.23(4)(e)

A.1 Include the full PHA Name, PHA Code, , PHA Fiscal Year Beginning (MM/YYYY), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table.

B. 5-Year Plan.

- B.1 Mission. State the PHA's mission for serving the needs of low- income, very low- income, and extremely low- income families in the PHA's jurisdiction for the next five years. (24 CFR §903.6(a)(1))
- **B.2** Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years. (24 CFR §903.6(b)(1)) For Qualified PHAs only, if at any time a PHA proposes to take units offline for modernization, then that action requires a significant amendment to the PHA's 5-Year Plan.
- **B.3 Progress Report**. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. (24 CFR §903.6(b)(2))
- **B.4 Violence Against Women Act (VAWA) Goals.** Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR §903.6(a)(3))
- **B.5 Significant Amendment or Modification.** Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

B.6 Resident Advisory Board (RAB) comments.

- (a) Did the public or RAB provide comments?
- (b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.17(a), 24 CFR §903.19)

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low-income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average .76 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

B.1 Mission. State the PHA's mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA's jurisdiction for the next five years.

Our mission is to revitalize communities, provide affordable housing opportunities and to serve as the Housing Authority for the City and County of Sacramento.

B.2 Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.

There is a shortage of affordable rental housing for all eligible populations.

Goal 1: Maximize the current resources for housing programs

<u>Objective 1:</u> Maintain occupancy at no less than 97% (adjusted for units in modernization) each calendar year

Objective 2: Increase voucher utilization of available housing choice vouchers

<u>Objective 3:</u> Annually assess the policies regarding the Administrative Plan (Admin Plan) and Admissions and Continued Occupancy Policies (ACOP)

Goal 2: Increase the inventory of affordable housing units

Objective 1: Apply for additional State and Federal rental subsidies for tenant based rental assistance programs including but not limited to additional Veterans Affairs Supportive Housing (VASH) vouchers, Mainstream vouchers, Family Unification Program vouchers (FUP), Rental Assistance Demonstration (RAD) conversions, and the Choice Neighborhood Initiative (CNI)

<u>Objective 2:</u> Leverage affordable housing resources in the community through public/private partnerships for the creation of mixed use and mixed income housing.

<u>Objective 3:</u> Continue to assess the Housing Authority inventory to identify potential for disposition/demolition and mixed finance housing opportunities.

Goal 3: Improve the Public Housing Assessment System Score to achieve a high performer score

<u>Objective 1:</u> Increase the Score under the Management Assessment Subsystem (MASS), Physical Assessment Subsystem (PASS), Financial Assessment Subsystem (FASS), and Capital Fund Subsystems (CFSS) of the PHAS

Goal 4: Meet the Section Eight Management Assessment Program (SEMAP) criteria to maintain a high performer rating

Objective 1: Maintain documentation that the quality control samples of applicants reaching the top of the waiting list and of admissions show that at least 99% of the families in the samples were selected from the waiting list for admission in accordance with the policies and met the selection criteria that determined their places on the waiting list and their order of selection

<u>Objective 2:</u> Maintain documentation which shows that the quality control sample of tenant files shows at least 98% of the units sampled.

<u>Objective 3:</u> The Housing Authority's quality control sample of tenant files show that at the time of admission and reexamination, the PHA properly obtained third party verification of adjusted income or documented why third party verification was not available; used the verification

information in determining adjusted income; properly attributed allowances for expenses; and, where the family is responsible for utilities under the lease, the Housing Authority used the appropriate utility allowances for the unit leased in determining the gross rent for at least 95% of the files sampled.

<u>Objective 4:</u> Conduct a review of utility rate data obtained within the last 12 months, and adjust the utility allowance schedule, if necessary.

<u>Objective 5:</u> Maintain documentation that a qualified PHA staff person re-inspected a minimum acceptable sample of units during the fiscal year as appropriate.

<u>Objective 6:</u> Maintain documentation that shows that the PHA took actions indicated in its written policy to encourage participation by owners outside areas of poverty and minority, including at least 2 outreach events/meetings.

<u>Objective 7:</u> Conduct and complete a reexamination for each participating family at least every 12 months.

<u>Objective 8:</u> Maintain the required number of active participants in the Family Self Sufficiency Program.

Goal 5: Improve the Quality of Assisted Housing

<u>Objective 1:</u> Update the Admissions and Continued Occupancy Policy to implement the any new statutory or regulatory requirements and update any existing regulations.

Objective 2: Expand on the resident training program to include multi-skilled workers to promptly repair and maintain units that become vacant on a regular basis for faster and more efficient turnover of units, including the establishment of a highly skilled workforce to complete capital repairs.

<u>Objective 3:</u> Expand the supply of assisted housing by reducing the amount of public housing vacancies, not to exceed an adjusted vacancy rate of no more than 2%.

Objective 4: Evaluate internal procedures to minimize fraud within Housing Authority programs.

<u>Objective 5:</u> Abate or encapsulate lead based paint, and relocate all families with children under six, who are in immediate proximity to lead based paint, to unaffected units.

<u>Objective 6:</u> Assure that carbon monoxide detectors are operable and exist in every federally assisted unit.

<u>Objective 7</u>: Convert all of Public Housing to a Section 8 platform utilizing HUD's Rental Assistance Demonstration (RAD) program or Demolition/Disposition application to utilize a mix of public and private dollars to fund necessary residential and site improvements.

Goal 6: Provide an improved living environment

<u>Objective 1:</u> Pro-actively market the HCV program to attract new landlords to house HCV families in high opportunity areas in order to deconcentrate poverty.

<u>Objective 2:</u> Implement public housing security improvements, such as increasing lighting, video surveillance, resident identification cards, utilizing afterhours quiet time(What is this?), tenant participation with Resident Associations, and crime prevention through environmental design features;

<u>Objective 3:</u> Redevelop public housing and other properties through public/private partnerships, with updated or new amenities for residents, such as public spaces and parking

<u>Objective 4:</u> Work with outside agencies to adopt supportive services to allow elderly tenants to age in place.

<u>Objective 5:</u> Promote public and private partnerships with the use of Capital funds to accelerate modernization projects and initiate mixed finance redevelopment opportunities with various HUD programs such as RAD, CNI, and disposition/demolition programs.

<u>Objective 6:</u> Enforce non-smoking policy and establish or continue to coordinate with Resident Advisory Board (RAB) and community programs for smoking cessation.

Objective 7: Encourage and support the formation of resident associations.

Goal 7: Encourage Self-Sufficiency

<u>Objective 1:</u> Establish and maintain relationships with community partners for educational, child care, health care, homeownership, financial literacy/management, budgeting, and other services for opportunities to promote self-sufficiency.

<u>Objective 2:</u> Assist tenants in training and employment opportunities by promoting and monitoring all contractors to comply with Section 3 requirements.

<u>Objective 3:</u> Develop a robust Section 3 program which includes a system to track Section 3 efforts and results.

<u>Objective 4:</u> Establish a Section 3 Registry for businesses to find potential low income individuals for employment opportunities.

Objective 5: Continued marketing efforts to develop the Family Self Sufficiency programs.

Goal 8: Improve operational efficiency in the Housing Choice Voucher Program

<u>Objective 1:</u> Continue to pro-actively develop relationships with housing partners to recruit and retain landlords.

<u>Objective 2:</u> Increase efforts to lease up VASH vouchers for qualifying homeless veterans by pursuing operational efficiency; and absorb VASH vouchers once a veteran has completed his/her service plan.

<u>Objective 3:</u> Adopt policy changes/updates under the VASH project based voucher program to provide for greater efficiencies and services for veteran participants.

Objective 4: Adopt policy changes and updates to better reflect budget and market conditions. Such change, include but are not limited to, changes regarding new admissions, lease up policies (such as adopting a Lease In Place policy under tight rental market conditions and reduced lease up rates), changes in family composition, additions to the household/voucher, continued participation, absence from the assisted dwelling unit, timing of HQS inspections, hardship waivers, maximizing budget authority, waiting list management, lottery systems for placement or termination, and any other administrative efficiencies.

Objective 5: Review the HCV Administrative Plan for possible changes and updates to increase efficiency and consistency with HUD statutory and regulatory changes, including but not limited to HOTMA regulations. In addition, develop continued efficiencies while transitioning public housing to the Rental Assistance Demonstration (RAD) program under the HCV project based voucher platform.

Goal 9: Increase assisted housing choices:

<u>Objective 1:</u> Conduct proactive outreach efforts to potential voucher landlords and build relationships with other governmental agencies, landlords, non-profits, and other businesses to partner to increase options for low-income residents.

<u>Objective 2:</u> Provide information on the feasibility of homeownership, and other affordable housing options to increase the housing choices for public housing residents.

<u>Objective 3:</u> Increase the number of project-based units in order to increase the housing choices for participants.

Objective 4: Provide Housing Choice Voucher mobility counseling when appropriate.

<u>Objective 5:</u> Assess all preferences to determine whether preferences meet the current needs of the Sacramento County, and adjust preferences, as needed.

<u>Objective 6:</u> Assess and implement policies and procedures, where necessary, to ensure the needs of housing residents are being met within the properties.

<u>Objective 7:</u> Inform Public Housing and HCV residents of latest HUD policy and guideline changes.

Goal 10: Promote self-sufficiency and asset development of assisted households

<u>Objective 1:</u> Increase the number and percentage of employed persons in assisted families by conducting annual activities such as job fairs and job training events.

Objective 2: Engage supportive service providers to improve assistance recipients' employability.

<u>Objective 3:</u> Encourage residents of public housing and participants of the HCV program to join the Resident Trainee program.

<u>Objective 4:</u> Encourage residents of the Resident Trainee Program to pursue Agency positions for employment.

<u>Objective 5:</u> Engage supportive service providers to increase independence of the elderly or disabled households by continually attracting and providing supportive services.

<u>Objective 6:</u> Provide measures and opportunities to increase the income of residents to complement de-concentration and income-mixing.

<u>Objective 7:</u> Evaluate the need and the feasibility of the HUD "Step Up" program to provide jobs and job training opportunities on HUD-assisted construction projects to residents of public housing and other low-income people.

<u>Objective 8:</u> Pursue grant opportunities to fund self-sufficiency coordinator positions through HUD grants or other available sources.

Goal 11: Ensure equal opportunity and affirmatively further fair housing

<u>Objective 1:</u> Undertake affirmative measures to ensure equal access to assisted housing regardless of race, color, religion, sex, national origin, creed, age, actual or perceived sexual orientation, gender identity, history of domestic violence, marital status, familial status, HIV infection and disability.

<u>Objective 2:</u> Continue to implement the Section 504 and ADA transition plans and provide regular/updated training to staff.

<u>Objective 3:</u> Train and implement Limited English Proficiency (LEP) training with all staff and to non-English speaking and/or Limited English Proficiency speaking groups with an interpreter available on federal and state fair housing laws.

Objective 4: Implement the action plan set forth in the Fair Housing Analysis of Impediments.

Objective 5: Develop a Homelessness Prevention Initiative that includes management's utilization of emergency rental assistance, financial management tools and supportive living services such as mental health and other wellness programs with the focus on those high risk individuals, such as the homeless, youth, domestic violence victims, human trafficking survivors and the elderly.

Goal 12: Increase customer satisfaction

<u>Objective 1:</u> Automate more functions to provide increased quality of service such as web-based applications, increase web capabilities, portals and interactive voice response systems

Objective 2: Continue to pay landlords via electronic deposit into their account.

Objective 3: Increase the number residents paying rent through electronic transfer, i.e. Rent Cafe

<u>Objective 4:</u> Launch and market the resident portal for HCV participants to utilize the portal to complete their annual recertifications and inform staff of changes in income or household composition. Continued upgrades to the applicant and landlord portals.

<u>Objective</u> 5: Continued increase in customer satisfaction related to Housing Authority call center and HCV lobby.

Goal 13: Improve the delivery of hosing through cost effective office management and operational efficiency:

<u>Objective 1:</u> Continue to automate major operation components of electronic software such as work order processing and tracking, materials, inventory, and fixed assets to improve the efficiency and accuracy of financial accounting and reporting.

<u>Objective 2:</u> Continue to upgrade the computer network infrastructure with faster, more reliable, and redundant connections to increase overall productivity

<u>Objective 3:</u> Implement a content management system for more efficient retrieval of documents stored electronically on the network

<u>Objective 4:</u> Update or revise policies, including but not limited to changes on admissions, continued occupancy, management, rent collections, write offs, inspections, no smoking, occupancy guidelines, citizen sponsors, transfers, waiting lists, and self-sufficiency to improve the management of public housing and create healthier communities

<u>Objective 5:</u> Increase operational efficiencies through consultation with the Resident Advisory Board and other resident organizations to comply with regulatory/statutory requirements and/or the requirement to establish discretionary policies

Objective 6: Evaluate the conversion of some or all geographic waitlists to site-based waitlists

<u>Objective 7:</u> Review updated HUD regulations to adopt changes meant to reduce administrative costs, increase program efficiency, improve tenant benefits, or foster self-sufficiency

Objective 8: Continue to implement energy efficient cost saving measures on all properties

<u>Objective 9:</u> Work with community departments and higher education programs to pursue options to provide improvement to the quality of housing, living environment, and service programs

B.3 Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

Progress Report on Mission and Goals

The PHA continues to provide quality housing that is affordable to the low, very low, and extremely low-income households. Strategies pursued by the PHA as outlined in the 5 Year PHA plan were successful and allowed the authority to meet our mission to continue to promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination.

Goal: Increase the availability of decent, safe, and affordable housing

Progress: The Choice Neighborhoods Implementation grant for \$30 million for the Housing Authority of the County of Sacramento will transform the current development into a 487 unit mixed-income community with public, workforce, and market rate housing.

The PHA plans to increase available decent, safe and affordable housing by issuing Request for Proposals (RFPs) for Project based vouchers in 2020. This not only increases the availability of housing, but also increases housing choices.

Goal: Improve the quality of assisted housing

Progress: The PHA staff attended the following training in 2018 to improve the quality of service for the operations, maintenance and administration of assisted housing:

- Quality Control
- Evidence Training
- Uniform Physical Condition Standard (UPCS)
- Tax Credit
- Rent Calculation
- Mental Health First Aid Training
- Fair Housing
- Family Self Sufficiency
- Fire Life Safety

Goal: Increase assisted housing choices

Progress:

- The PHA continues to conduct proactive outreach and build relationships with other governmental agencies, landlords, non-profits, and other businesses to partner to increase options for low-income residents.
- The PHA continues to research the feasibility of changes to homeownership, and other affordable housing options to increase the housing choices for public housing residents.
- The PHA is increasing the number of project-based units in order to increase the housing choices for participants. This is becoming increasingly important as the market tightens and there is less available rental housing stock.

Goal: Improve community quality of life and economic vitality

Progress:

The PHA has a Resident Service Department that includes one Family Self Sufficiency Coordinator for HCV and one for public housing that provide resources, referrals, goal setting for participants and residents seeking economic self-sufficiency, access to a variety of programs, and supportive services. The PHA has refined its processes to help residents identify the critical needs and coordinate them across the supportive services through resident services. The PHA continues to expand services pending the availability of financial resources and awarding of funds for the coordinator position.

The PHA linked, provided, and participants achieved the following services through its Resident Opportunity for Self Sufficiency - Family Self Sufficiency (FSS) program in 2018:

- Twenty participants referrals for Health Care Services
- Ten participants received transportation services to enable service provision/employment
- Six participants successfully graduated the FSS program
- One participants graduated and purchased a home
- One participants earned her GED
- Outreached to 881 residents
- 70 FSS participants were referred to jobs
- 40 participants completed financial literacy/management workshops
- 318 Participants completed one on one financial counseling
- Four participants completed homeownership counseling
- Two participants opened bank accounts
- Seven FSS participants successfully graduated in 2018
- Two FSS participants purchased homes, one participant purchased a home from SHRA's Welcome Home Program
- HCV FSS partnered up with Golden 1 and Neighbor Works to provide financial workshop series to participants on a monthly basis
- A total of 34 events were sent out to all HCV FSS participants which included workshops, hiring events and career fairs
- One FSS participants completed their Bachelor's degrees
- Six participants received transportation services to enable service provision and employment assistance.
- Forty Four percent of HCV FSS participants have accumulated escrow balances and maintained steady employment for more than one year
- Twelve participants are projected to graduate in 2019

Goal: Ensure Equal Opportunity to Housing for all Americans

Progress:

- The PHA continues to take affirmative measures to ensure that access to assisted housing is provided regardless of race, color, religion, national origin, sex, familial status, disability, sexual orientation, and gender identity.
- The PHA uses its updated Language Access Plan, to provide information and forms to individuals and with limited English speaking skills.
- Continues to ensure that fair housing efforts continue to be implemented.
- **B.4** Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking.

The Violence Against Women Act (VAWA) goals are included throughout our Administrative Plan (Admin Plan) and the Admissions and Continued Occupancy Policy (ACOP) located in the following chapters in our policies:

- CHAPTER 28 VIOLENCE AGAINST WOMEN ACT & DOMESTIC VIOLENCE (Admin Plan)
- Chapter 17: Violence Against Women Act & Domestic Violence (ACOP)
- **B.5 Significant Amendment or Modification**. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

Significant Amendment and Substantial Deviation/Modification

The PHA hereby defines "substantial deviation" and "significant amendment/modification" as any change in policy which significantly and substantially alters the Authority's stated mission and the persons the Authority serves. This would include admissions preferences, demolition and/or disposition activities, and conversion programs. Discretionary or administrative amendments consistent with the Authority's stated overall mission and basic objectives will not be considered substantial deviations or significant modifications.

If a significant amendment and/or substantial deviation/modification occur, the public process will include: consultation with the Resident Advisory Board, a public comment period, public notification of where and how the proposed change can be reviewed, and the approval by the Housing Authority Boards.

The Housing Authority of the County of Sacramento is also including its definition of substantial deviation to the PHA Plan to include the following language:

Significant Amendment Definition

As part of the Rental Assistance Demonstration (RAD), Housing Authority of the County of Sacramento is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a. The decision to convert to Project Based Voucher Assistance;
- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- d. Changes to the financing structure for each approved RAD conversion.

B.6 Resident Advisory Board (RAB) Comments.

Updated after Public Hearing on September 4, 2019.

B.7 Certification by State or Local Officials.

Submitted after approved by governing Boards on September 18, 2019.