

PHA Name : Housing Authority Of The City Of Dothan

PHA Code : AL007

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2023

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The Housing Authority of the City of Dothan (DHA) was granted flexibility and authority to develop policies in accordance with Moving to Work (MTW) for Expansion Agencies Operations Notice (Federal Register/ Vol. 85, NO. 168) FR/5994-N-05 outside the limitations of specific HUD regulations and provisions. The DHA was selected under the MTW Expansion, Cohort #3, Landlord Incentives.

The DHA is dedicated to developing and strengthening affordable housing opportunities that embrace best practices in a high-value organizational culture. The vision of DHA is committed to providing affordable housing services by implementing 21st-century technological approaches as a housing authority of the future. DHA lives up to its motto of Automate, Elevate, & Innovate as a progressive, high-performing PHA whose values support the agency's mission and vision, help define the organizational culture, and reflect DHA's purpose, four principles, and slogan, "You Are Our Why."

The flexibilities allowed through the Moving-to-Work Program will enable the DHA to:

- Further encourage greater self-sufficiency by streamlining processes;
- Increase housing choices for families through enacting policies that encourage landlord participation and increase units available to families within the local market; and
- Reduce administrative costs by reducing administrative burdens while increasing efficiency, resulting in increased cost-effectiveness.

Through the MTW initiatives and waiver requests, the DHA hopes to reduce administrative costs and increase its self-sufficiency effort. Through landlord monetary incentives, the DHA hopes to further housing choices and options for participating families. The agency is uniquely positioned to work effectively with HUD in this endeavor, meet the three statutory goals, and work with HUD Policy Development & Research (PD&R) during this Landlord Incentives study.

Cost-Effectiveness

DHA plans to use the Housing Assistance Payment (HAP) and Administrative Fee funding flexibly through the two HUD-identified activities under Cohort #3 Landlord Incentives for Vacancy Loss and Damage Claims Payments. These waivers will provide a monetary incentive for owners by addressing the statutory waiver identified in 24 CFR 982.313. In contrast, DHA could not make payments to owners for damages to units caused by tenants or payments to owners for unpaid rent. Additionally, the same issue with the statutory waiver identified in 24 CFR 982.311 (d) (1), and DHA could not make vacancy loss payments to owners. In addition to the two HUD-identified Landlord Incentives activities, DHA having discretion under the MTW program, will also provide the monetary incentives and reimbursements of a security deposit and signing bonuses. This will ultimately streamline the lease-up process for the PHA, owners, and HCV participants.

Self-Sufficiency

The DHA will implement the Moving through the Wiregrass with Purpose (MTWP) Program that will help HCV participants set goals and sustain motivation for moving to new homes, guiding families on the requirements of owners and selection of units. DHA's plans to combine the MTWP will provide mobility counseling on housing search, assist the families with background credit reviews, provide transportation to inspect units, help to negotiate rents, and provide information and follow-up counseling after participants move. The DHA plans to increase housing choices for HCV participants by utilizing mobility counseling services under the MTWP and the Small Area Fair Market Rent (SAFMR) payment standards. The goal of the MTWP is to provide a comprehensive approach to expanding housing opportunities for HCV participants and to increase landlord participation in the HCV Program. The MTWP will provide case management services, mobility and housing counseling, and the Ready to Rent (R2R) tenant education workshop certification for HCV participants. The R2R tenant education will reduce the barriers to affordable housing opportunities in high-opportunity areas due to poor credit, criminal backgrounds, and negative tenant histories.

DHA will eliminate the requirement to operate a mandatory Family Self-Sufficiency (FSS) Program by waiving this requirement in this submission. The HUD Birmingham Field Office approved DHA's new FSS Action Plan. DHA graduated two FSS participants in FY2022, and they received their escrow payments.

Housing Choice

DHA has launched its Landlord Marketing Outreach, Services, and Incentives Program to attract, recruit, and retain owners in the WMA. DHA has substantially improved its technological infrastructure, customer service, and communication with its HCV Program owners to meet the demand for affordable housing opportunities. The rebranding and marketing campaign of the HCV Program, targeting owners in affluent areas, will assist DHA with removing the "Section 8" stigma. Additionally, it will increase housing choice opportunities for families within those areas. This will allow DHA to expand housing opportunities by adding new owners to participate in the HCV Program. DHA has a Landlord Liaison on staff charged with continuously recruiting new owners and retaining current owners. The Landlord Liaison listens to landlord concerns, addresses red tape, utilizes administrative flexibilities, and offers monetary incentives to owners to accept HCV participants.

The removal of the bureaucratic red tape will develop better relationships between owners and DHA, which will lead to more

affordable housing choices for HCV participants. More owners equal more housing choices for HCV participants served by the WRVP. DHA will increase housing choices for HCV participants to live in areas of opportunities based on the Payment Standard housing subsidies of 100% or 110% of Fair Market Rents (FMR) in the traditional WMA areas and the Small Area Fair Market (SAFMR) for Houston, Geneva, and Henry counties. DHA also plans to increase housing choices by expanding housing opportunities and deconcentrating poverty for HCV participants by providing access to jobs, good schools, healthcare, a healthy environment, healthy foods, safe neighborhoods, and transportation services through the SAFMR payment standards.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

| 1. Tenant Rent Policies | |
|---|--|
| a. Tiered Rent (PH) | Not Currently Implemented |
| b. Tiered Rent (HCV) | Not Currently Implemented |
| c. Stepped Rent (PH) | Not Currently Implemented |
| d. Stepped Rent (HCV) | Not Currently Implemented |
| e. Minimum Rent (PH) | Not Currently Implemented |
| f. Minimum Rent (HCV) | Not Currently Implemented |
| g. Total Tenant Payment as a Percentage of Gross Income (PH) | Not Currently Implemented |
| h. Total Tenant Payment as a Percentage of Gross Income (HCV) | Not Currently Implemented |
| i. Alternative Utility Allowance (PH) | Not Currently Implemented |
| j. Alternative Utility Allowance (HCV) | Not Currently Implemented |
| k. Fixed Rents (PH) | Not Currently Implemented |
| l. Fixed Subsidy (HCV) | Not Currently Implemented |
| m. Utility Reimbursements (PH) | Not Currently Implemented |
| n. Utility Reimbursements (HCV) | Not Currently Implemented |
| o. Initial Rent Burden (HCV) | Not Currently Implemented |
| p. Imputed Income (PH) | Not Currently Implemented |
| q. Imputed Income (HCV) | Not Currently Implemented |
| r. Elimination of Deduction(s) (PH) | Not Currently Implemented |
| s. Elimination of Deduction(s) (HCV) | Not Currently Implemented |
| t. Standard Deductions (PH) | Not Currently Implemented |
| u. Standard Deductions (HCV) | Not Currently Implemented |
| v. Alternative Income Inclusions/Exclusions (PH) | Not Currently Implemented |
| w. Alternative Income Inclusions/Exclusions (HCV) | Not Currently Implemented |
| 2. Payment Standards and Rent Reasonableness | |
| a. Payment Standards- Small Area Fair Market Rents (HCV) | Not Currently Implemented |
| b. Payment Standards- Fair Market Rents (HCV) | Not Currently Implemented |
| c. Rent Reasonableness – Process (HCV) | Not Currently Implemented |
| d. Rent Reasonableness – Third-Party Requirement (HCV) | Not Currently Implemented |
| 3. Reexaminations | |
| a. Alternative Reexamination Schedule for Households (PH) | Not Currently Implemented |
| b. Alternative Reexamination Schedule for Households (HCV) | Not Currently Implemented |
| c. Self-Certification of Assets (PH) | Not Currently Implemented |
| d. Self-Certification of Assets (HCV) | Not Currently Implemented |
| 4. Landlord Leasing Incentives | |
| a. Vacancy Loss (HCV-Tenant-based Assistance) | Plan to Implement in the Submission Year |
| b. Damage Claims (HCV-Tenant-based Assistance) | Plan to Implement in the Submission Year |
| c. Other Landlord Incentives (HCV- Tenant-based Assistance) | Plan to Implement in the Submission Year |
| 5. Housing Quality Standards (HQS) | |
| a. Pre-Qualifying Unit Inspections (HCV) | Not Currently Implemented |
| b. Reasonable Penalty Payments for Landlords (HCV) | Not Currently Implemented |
| c. Third-Party Requirement (HCV) | Not Currently Implemented |
| d. Alternative Inspection Schedule (HCV) | Not Currently Implemented |
| 6. Short-Term Assistance | |
| a. Short-Term Assistance (PH) | Not Currently Implemented |
| b. Short-Term Assistance (HCV) | Not Currently Implemented |
| 7. Term-Limited Assistance | |
| a. Term-Limited Assistance (PH) | Not Currently Implemented |
| b. Term-Limited Assistance (HCV) | Not Currently Implemented |
| 8. Increase Elderly Age (PH & HCV) | |
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|---|--|
| Increase Elderly Age (PH & HCV) | Not Currently Implemented |
| 9. Project-Based Voucher Program Flexibilities | |
| a. Increase PBV Program Cap (HCV) | Not Currently Implemented |
| b. Increase PBV Project Cap (HCV) | Not Currently Implemented |
| c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV) | Not Currently Implemented |
| d. Alternative PBV Selection Process (HCV) | Not Currently Implemented |
| e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV) | Not Currently Implemented |
| f. Increase PBV HAP Contract Length (HCV) | Not Currently Implemented |
| g. Increase PBV Rent to Owner (HCV) | Not Currently Implemented |
| h. Limit Portability for PBV Units (HCV) | Not Currently Implemented |
| 10. Family Self-Sufficiency Program with MTW Flexibility | |
| a.PH Waive Operating a Required FSS Program (PH) | Plan to Implement in the Submission Year |
| a.HCV Waive Operating a Required FSS Program (HCV) | Plan to Implement in the Submission Year |
| b.PH Alternative Structure for Establishing Program Coordinating Committee (PH) | Not Currently Implemented |
| b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV) | Not Currently Implemented |
| c.PH Alternative Family Selection Procedures (PH) | Not Currently Implemented |
| c.HCV Alternative Family Selection Procedures (HCV) | Not Currently Implemented |
| d.PH Modify or Eliminate the Contract of Participation (PH) | Not Currently Implemented |
| d.HCV Modify or Eliminate the Contract of Participation (HCV) | Not Currently Implemented |
| e.PH Policies for Addressing Increases in Family Income (PH) | Not Currently Implemented |
| e.HCV Policies for Addressing Increases in Family Income (HCV) | Not Currently Implemented |
| 11. MTW Self-Sufficiency Program | |
| a.PH Alternative Family Selection Procedures (PH) | Not Currently Implemented |
| a.HCV Alternative Family Selection Procedures (HCV) | Not Currently Implemented |
| b.PH Policies for Addressing Increases in Family Income (PH) | Not Currently Implemented |
| b.HCV Policies for Addressing Increases in Family Income (HCV) | Not Currently Implemented |
| 12. Work Requirement | |
| a. Work Requirement (PH) | Not Currently Implemented |
| b. Work Requirement (HCV) | Not Currently Implemented |
| 13. Use of Public Housing as an Incentive for Economic Progress (PH) | |
| Use of Public Housing as an Incentive for Economic Progress (PH) | Not Currently Implemented |
| 14. Moving on Policy | |
| a. Waive Initial HQS Inspection Requirement (HCV) | Not Currently Implemented |
| b.PH Allow Income Calculations from Partner Agencies (PH) | Not Currently Implemented |
| b.HCV Allow Income Calculations from Partner Agencies (HCV) | Not Currently Implemented |
| c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH) | Not Currently Implemented |
| c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV) | Not Currently Implemented |
| 15. Acquisition without Prior HUD Approval (PH) | |
| Acquisition without Prior HUD Approval (PH) | Not Currently Implemented |
| 16. Deconcentration of Poverty in Public Housing Policy (PH) | |
| Deconcentration of Poverty in Public Housing Policy (PH) | Not Currently Implemented |
| 17. Local, Non-Traditional Activities | |
| a. Rental Subsidy Programs | Not Currently Implemented |
| b. Service Provision | Not Currently Implemented |

C. MTW Activities Plan that Housing Authority Of The City Of Dothan Plans to Implement in the Submission Year or Is Currently Implementing

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| 4.a. - Vacancy Loss (HCV-Tenant-based Assistance) |
| To incentivize an owner's continued participation in the HCV program, DHA will make a Vacancy Loss payment to the owner. DHA payments to an owner will be equal to no more than one month of the contract rent. The Vacancy Loss payment will be made to the owner when the next HAP contract is executed between the owner and the DHA. DHA will update its Administrative Plan to reflect the Vacancy Loss payment and owner incentive item. |
| This MTW activity serves the following statutory objectives: |
| Housing choice |
| This MTW activity has the following cost implications: |
| Increased expenditures |
| An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households. |
| The MTW activity applies to all assisted households |
| Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. |
| N/A |
| No hardship were requested in the most recent fiscal year. |
| In the prior year, under this activity, Housing Authority Of The City Of Dothan MTW agency |
| Received 0 hardship requests |
| Approved hardship requests |
| Denied hardship requests |
| There is\are hardship requests pending. |
| This policy applies to |
| To all units |
| The types of units policy applies to: |
| |
| Maximum payment to the landlord is |
| \$Up to one month's contract rent.. |
| 0 payments were issued under this policy y in the most recently completed PHA fiscal year. |
| \$0 issued under this policy in the most recently completed PHA fiscal year. |

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| 4.b. - Damage Claims (HCV-Tenant-based Assistance) |
| To incentivize an owner's continued participation in the HCV program, DHA may provide owners with a Damage Claim |

payment. If the HCV participant leaves the unit damaged, the amount of damage claims will not exceed the lesser of the cost of repairs or two months of contract rent. In implementing this activity, the HCV participant's security deposit must first be used to cover damages. DHA may provide up to two months of contract rent minus the security deposit to cover the remaining repairs. The Damage Claim payment will be made to an owner when the next HAP contract is executed between the owner and PHA. DHA will update its Administrative Plan to reflect the Damage Claim payment and owner incentive item.

This MTW activity serves the following statutory objectives:

Housing choice

This MTW activity has the following cost implications:

Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

N/A

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of The City Of Dothan MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This policy applies to

To all units

The types of units policy applies to:

Maximum payment to the landlord is

\$The amount of damage claims will not exceed the lesser of the cost of repairs or two months of contract rent..

0 payments were issued under this policy y in the most recently completed PHA fiscal year.

\$0 issued under this policy in the most recently completed PHA fiscal year.

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)

Signing Bonus

To incentivize new owners to join the HCV program, DHA will provide a Signing Bonus payment. DHA will also target incentive payments to owners leasing properties in high-opportunity neighborhoods or in areas located where vouchers are difficult to use, as defined in an agency's Administrative Plan. The owner's payments will equal no more than one month of the contract rent. The payment will be made to the owner when the HAP contract is executed between the and DHA. DHA will update its Administrative Plan to reflect the Signing Bonus payment and owner incentive item.

Application Free:

To incentivize new owners to join the HCV program, DHA will provide an Application Fee payment. DHA will also target incentive payments to owners leasing properties in high-opportunity neighborhoods or in areas located where vouchers are difficult to use, as defined in an agency's Administrative Plan. Payments made to the owner will be equal to no more than \$50.00. The payment will be made to the owner when the HAP contract is executed between the owner and DHA. DHA will update its Administrative Plan to reflect the Application Fee payment and owner incentive item.

Renter's Insurance

To incentivize new owners to join the HCV program, DHA will provide a Renter's Insurance payment. DHA will also target incentive payments to owners leasing properties in high-opportunity neighborhoods or in areas located where vouchers are difficult to use, as defined in an agency's Administrative Plan. Payments made on behalf of an HCV participant will equal no more than \$120.00 for a \$10.00 a month policy. The payment will be made on behalf of the HCV participant when the HAP contract is executed between the owner and DHA. DHA will update its Administrative Plan to reflect the Renter's Insurance payment and owner incentive item.

Security Deposit

To incentivize new owners to join the HCV program, DHA will provide a Security Deposit payment. DHA will also target incentive payments to owners leasing properties in high-opportunity neighborhoods or in areas located where vouchers are difficult to use, as defined in an agency's Administrative Plan. The owner's payments will equal no more than one month of the contract rent. The payment will be made to the owner when the HAP contract is executed between the owner and DHA. DHA will update its Administrative Plan to reflect the Security Deposit payment and owner incentive item.

This MTW activity serves the following statutory objectives:

Housing choice

This MTW activity has the following cost implications:

Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

N/A

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of The City Of Dothan MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This policy applies to To all units (Display selected and additional Pop up is complex logic.)

The types of units policy applies to:

Maximum payment to the landlord is

\$Signing Bonus: Up to one month's contract rent.

Application Fee: Payments made to the owner will equal no more than \$50.00.

Renter's Insurance: Payments made on an HCV participant's behalf will equal no more than \$120.00 for a \$10.00-a-month insurance policy.

Security Deposit: Up to one month's contract rent..

0 payments were issued under this policy y in the most recently completed PHA fiscal year.

\$0 issued under this policy in the most recently completed PHA fiscal year.

10.a.PH - Waive Operating a Required FSS Program (PH)

DHA will eliminate the requirement to operate a mandatory FSS Program by waiving this requirement for its Public Housing (PH) Program.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Self-sufficiency

This MTW activity has the following cost implications:

Neutral (no cost implications);Decreased revenue

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

N/A

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of The City Of Dothan MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

10.a.HCV - Waive Operating a Required FSS Program (HCV)

DHA will eliminate the requirement to operate a mandatory FSS Program by waiving this requirement for its Housing Choice Voucher (HCV) Program.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Self-sufficiency

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

N/A

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Housing Authority Of The City Of Dothan MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

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| D. | Safe Harbor Waivers. |
| D.1 | Safe Harbor Waivers seeking HUD Approval: No Safe Harbor Waivers are being requested. |

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|------------|--|
| E. | Agency-Specific Waiver(s). |
| E.1 | Agency-Specific Waiver(s) for HUD Approval: The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, Agency-Specific Waivers may be requested. No Agency-Specific Waivers are being requested. |
| E.2 | Agency-Specific Waiver(s) for which HUD Approval has been Received: MTW Agency does not have approved Agency-Specific Waivers |

| | |
|------------|--|
| F. | Public Housing Operating Subsidy Grant Reporting. |
| F.1 | Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency. |

| Federal Fiscal Year (FFY) | Total Operating Subsidy Authorized Amount | How Much PHA Disbursed by the 9/30 Reporting Period | Remaining Not Yet Disbursed | Deadline |
|----------------------------------|--|--|------------------------------------|-----------------|
| 2022 | \$457,578 | \$256,084 | \$201,494 | 2022-12-31 |

| | | |
|------------|---|---|
| G. | MTW Statutory Requirements. | |
| G.1 | 75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households. | |
| | Income Level | Number of Local, Non-Traditional Households Admitted in the Fiscal Year* |
| | 80%-50% Area Median Income | 108 |
| | 49%-30% Area Median Income | 476 |
| | Below 30% Area Median Income | 980 |
| | Total Local, Non-Traditional Households | 1,564 |

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

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|--|---|
| G.2 | Establishing Reasonable Rent Policy. |
| MTW agency established a rent reform policy to encourage employment and self-sufficiency | |

| | | |
|---|---|--|
| G.3 | Substantially the Same (STS) – Local, Non-Traditional. | |
| The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year. | 12 # of unit months | |
| The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year. | 12 # of unit months | |

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

| PROPERTY NAME/ ADDRESS | 0/1 BR | 2 BR | 3 BR | 4 BR | 5 BR | 6+ BR | TOTAL UNITS | POPULATION TYPE* | if 'Population Type' is Other | # of Section 504 Accessible (Mobility)** | # of Section 504 Accessible (Hearing/ Vision) | Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year? | What was the Total Amount of MTW Funds Invested into the Property? |
|------------------------|--------|------|------|------|------|-------|-------------|------------------|-------------------------------|--|---|---|--|
|------------------------|--------|------|------|------|------|-------|-------------|------------------|-------------------------------|--|---|---|--|

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| G.4 | Comparable Mix (by Family Size) – Local, Non-Traditional. |
| To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table. | |

| Family Size: | Occupied Number of Local, Non-Traditional units by Household Size |
|---------------------|--|
| 1 Person | 1,173 |
| 2 Person | 759 |
| 3 Person | 621 |
| 4 Person | 517 |
| 5 Person | 242 |
| 6+ Person | 138 |
| Totals | 3,450 |

| H. | Public Comment |
|-----------|---|
| | Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments. |
| | No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver |

| I. | Evaluations. |
|-----------|-----------------------|
| | No known evaluations. |