

# Alaska Criminal Justice Commission

## Meeting Summary

September 24, 2018

9:30 AM

Snowden Training Center, Anchorage Alaska

And Audio-teleconference

Commissioners Present: Greg Razo, Jahna Lindemuth, Brenda Stanfill, Quinlan Steiner, John Coghill, Matt Claman, Sean Case, Steve Williams, Dean Williams, Trevor Stephens

Commissioners Absent: Stephanie Rhoades, Joel Bolger, Walt Monegan, Valerie Davidson (Gennifer Moreau-Johnson sat in for Commissioner Davidson)

Participants: Alysa Wooden, Gennifer Moreau-Johnson, Tony Piper, Janet McCabe, Rob Henderson, Nancy Meade, Diane Casto, Edie Grunwald, Barbara Pierce, Juliana Melin, Teri Tibbet, Carrie Belden, Alison Hanzawa, Troy Payne, Gwen Kennedy, Dave Walker, Rita Bishop, Laura Russel, Araceli Valle, Cathleen McLaughlin

Staff: Susanne DiPietro, Brian Brossmer, Susie Dosik, Teri Carns, Staci Corey, Barbara Dunham

### **Agenda and Previous Meeting's Summary**

The agenda and summary of the previous meeting were approved with no opposition.

### **New Commission Chair**

Outgoing Chair Greg Razo said that it had been an honor to serve as chair of the Commission, and he considered it a source of pride and accomplishment. He noted that Commissioner Matt Claman had offered to be chair, nominated him for the position. He asked if there were any other nominations. There were none. Commissioner Razo noted that when the Commission has made recommendations to the legislature in the past, he has typically presented the recommendations. He was happy to keep doing that so Commissioner Claman could avoid conflicts and was sure other Commissioners would volunteer as well. There was no opposition to Commissioner Claman assuming the chairmanship of the Commission.

Chair Claman thanked the Commission and said he appreciated the support. He noted that with previous chairs being Justice Bryner and Commissioner Razo, he had big shoes to fill. He would strive to continue their tradition of trying to find common ground and consensus decisions.

[Later in the meeting Chair Claman clarified that Commissioner Stanfill had agreed to continue on as vice-chair; there was no opposition to this either.]

### **Reinvestment Recommendations**

Gwen Kennedy, guest facilitator, explained that she had learned last time that the principles for reinvestment identified in the Commission's 2017 annual report were still consistent with the

Commission's values for reinvestment this year, and she walked the Commission through those principles to refresh the Commissioners' memories. Those principles are (as summarized in the slide show presented):

- 1) Reinvestment should be strategic, data-driven and collaboratively implemented.
  - Funds should be appropriated according to a strategic plan
  - Focus should be on treatment
  - Coordinated approach can target high utilizers
- 2) Most reinvestment should be directed towards programs in the evidence base.
  - Maintain 90% ratio of evidence-based programming for state investment in criminal justice programs
  - Focus on treatment
  - Allow some non-evidence-based programming to address Alaska-specific needs; must include evaluation component
- 3) Reinvestment should be directed towards evidence-based programs that have been shown to reduce repeat offending, thereby decreasing future crime.
  - Focus on treatment
  - Evaluate batterer intervention programs
- 4) Whenever possible, reinvestment should be directed towards programs that generate tangible monetary benefits and positive return on investment.
  - Expensive but effective programs should evaluate costs
- 5) Prioritize funding for programs that target high risk (and medium risk) offender groups.
  - Use risk-needs-responsivity principles
- 6) Reinvestment should be targeted at all areas of the state, including rural Alaska.
  - Allow returning citizens to complete programming in their home communities to the extent possible
- 7) Maintain and expand funding for victim's services and violence and other prevention programming.
  - Support CDVSA prevention programming
  - Support programming that targets children affected by ACES
  - Support victims' services including bridging funds for restitution

Commissioners Razo and Lindemuth asked whether principles 2 and 3 couldn't be combined. Susanne DiPietro, executive director of the Judicial Council and staff to the Commission, explained that the third principle was more intended to highlight the recidivism reduction aspect but she agreed there was not much difference. Commissioner Steve Williams pointed out that principle 3 is subtly different, and in the extended text explaining the principle in the 2017 annual report, included language that also called for a need for some experimental programs, given the unique nature and needs of Alaska's communities. Commissioner Razo thought the two principles could be combined without losing the substance in the text accompanying each principle.

Dr. Kennedy said she wanted to use these principles to analyze the draft recommendations generated at the previous meeting. She had placed the draft recommendations in a grid with the principles, to visually represent whether the recommendations align with the principles. She walked the group through the first few recommendations together, then broke the meeting up into small groups so

they could discuss each category of recommendations and how the recommendations aligned with the principles.

Commissioner Razo said that the workgroup preparing for today's meeting had proposed analyzing the information in this way in order to create a tool for legislators to make funding decisions with—a tool that is broad enough to apply the principles with specific ideas to fulfill them. It would be a kind of measuring stick. Dr. Kennedy asked the legislators present if they thought this idea would work. Chair Claman thought it could be useful and Commissioner Coghill said that the principles address questions that the legislators will undoubtedly have.

The Commissioners and participants then broke out in to small groups to analyze whether the recommendations identified at the last meeting aligned with the principles identified the previous year.

### **Public testimony**

Barbara Dunham, project attorney for the Commission, read an emailed public comment to the Commission from member of the public Nanette Greer. The comment was:

*“Since hearing the outcome of Justin Schneider’s charges, plea deal and sentencing, I have been outraged. Please review the current sexual assault laws that could allow this case not to be considered a sexual crime, and explain.*

*As for it not being attempted murder, he strangled her to unconsciousness. He had no reason to believe that he had not killed her before he stopped. Please explain how he avoided an attempted murder charge.”*

There was no other public comment.

### **Reinvestment Recommendations, continued**

The group then reviewed the results of the small group work. The recommendations were categorized as treatment, competency, precharge/pretrial diversion, alternatives to incarceration, probation/parole, reentry, and victims. The Commissioners agreed that the recommendation for crisis stabilization was more related to treatment, and it was agreed that it would move to the treatment category rather than competency.

Commissioner Dean Williams noted the precharge/pretrial diversion group had not labeled street diversion as being cost-effective. Commissioner case said one could assume that's the case, but outcomes for diversion programs are not easy to quantify, track, or assess. Commissioner Dean Williams said he agreed, although it was clear that dropping people off at DOC who are in need of other services is the most expensive route.

Commissioner Razo said that it appeared particularly for this category that more data was needed to assess whether the recommendations fit within the principles. Commissioner Steiner said that there was a need for data across the board. He suggested recommending that all programs funded by the state have a certain percentage set aside for evaluation. Even established programs in the evidence base can drift from fidelity. The recommendation could pertain to every department and agency that works in criminal justice.

The alternatives to incarceration group discussed the recommendation for electronic monitoring (EM) expansion to “more areas,” noting the language was vague, and made the assumption that the

recommendation pertained to areas outside urban hubs. They thought it might be better to have more detail on this recommendation, including what kinds of charges, what status, and what target population—e.g. low-risk offenders who should not necessarily be exposed to jail—the recommendation pertained to. There was also a need for more data here.

Commissioner Dean Williams said he agreed and was not sure EM reduces recidivism per se—it depends on targeting a specific population. He thought it did reduce recidivism for some population. Commissioner Steiner said that it also brought up the issue of net widening. Expanding use of EM could lead to oversupervising low-risk defendants; this reinforced the need for regular evaluation of outcomes. Commissioner Dean Williams said that a new area DOC is exploring is using EM for people serving sentences of less than 90 days, which will allow them to remain in their local community and remain accountable to that community. He thought there was enough research to support this use of EM as an alternative sentence.

Dr. Kennedy suggested wordsmithing the recommendation to reflect this discussion.

Commissioner Stanfill asked the alternatives group how therapeutic courts relate to principle 7 (victims). Judicial Council attorney Susie Dosik said the discussion involved child and family courts.

Regarding the recommendation to add medium-risk misdemeanants to those eligible for reentry case management, Commissioner Stanfill wondered if that was in the evidence base. Commissioner Steiner said he couldn't remember but thought that both medium- and low-risk reentrants should not be oversupervised. He was not sure anyone would want voluntary supervision. Commissioner Stanfill said her understanding of the recommendation was that it was more about getting access to more services. Commissioner Steiner agreed people would sign up for that. He added that the individual services provided with case management were evidence-based—e.g. housing which benefits rehabilitation.

Regarding the victims category, Commissioner Stanfill said more data was needed on how best to assist restitution collection.

*[Break for lunch]*

Dr. Kennedy explained that she had sorted the recommendations into “hows” and “whats.” She said the next step was to ascertain the Commission's priorities within each category. Commissioner Steve Williams questioned what the end product might be, noting that just choosing the top three in each category might still produce a laundry list. Commissioner Lindemuth said that was a good point, and added that not every category has the same level of need. Commissioner Razo agreed and suggested prioritizing the #1 results but also mentioning the #2s and #3s. Chair Claman noted that some recommendations were similar and might be combined.

For the “hows,” (i.e., principles for applying the recommendations across the continuum of categories/intercepts with the criminal justice system), the Commission prioritized:

1. Continue to evaluate programs and assess their costs/benefits to inform funding recommendations. (I.e. redo Results First), recommend successful programs for further funding, recommend against funding unsuccessful programs, and review programs not currently used in Alaska for possible use.

2. Use a problem-solving approach rather than a punitive-only approach, throughout the continuum of justice involvement/at each intercept.

The Commission then broke out in to small groups to determine the priorities for the “whats” (i.e. action items) in each recommendation category; the small groups then reported their results to the full group.

### Treatment

The Commissioners discussed whether to combine recommendations to build infrastructure for substance use disorder (SUD) treatment or to provide flexible funding for mental health treatment and social services. Commissioners noted they were different items and both reflected urgent needs. Commissioner Lindemuth thought SUD treatment was the priority. Gennifer Moreau-Johnson, sitting in for Commissioner Valerie Davidson, noted that funding for social services was more difficult to obtain because it was not covered by Medicaid. Commissioner Steiner suggested recommending the legislature take balanced approach to funding both. The group agreed.

Commissioner Stanfill said she didn’t think that domestic violence (DV) programming was comparable to behavioral health treatment, and didn’t think it was fair to lump DV programming in the treatment category. DV offenders have the highest recidivism rate, and this problem should be a priority as well. Ms. DiPietro asked whether the DV recommendation should be moved to the “victims” category. Commissioner Stanfill said it would depend on the focus of the program to be implemented. If it focuses on recidivism then it is not really about victims. The Commission agreed that DV programming was a priority and that including that recommendation would not “count” against victims’ services.

Treatment priorities identified were:

1. Provide flexible funding for DBH to be used for community-based providers for mental health treatment and social services.
2. Increase substance use disorder funding, including investing in physical infrastructure.
3. Increase the agility and sustainability of drug/alcohol and mental health treatment statewide, across timeframes of a justice-involved individual (school, pre-charge, pretrial, prison, reentry).
4. Provide timely and available assessments and treatment.

### Competency

The Commission agreed that the two top identified priorities (which were tied for the most votes) could be combined. They were:

1. Build infrastructure to care for incompetent incarcerated population/remove from incarceration institutions and expand API.
1. Add forensic psychologists and psychiatrists.

### Pre-charge/Pretrial Diversion

The Commission agreed to combine two of the recommendations regarding pretrial diversion, combining expanding access to diversion with tribal court agreements. The priorities were:

1. Fund a data-driven, evidence-based pre-charge/pretrial diversion program with behavioral health supports to sustain it.

2. Provide expanded access to pre-charge and pretrial diversion including tribal court agreements for youth and providing more services through tribes.

### Alternatives to Incarceration

Commissioners also agreed that two recommendations (develop a strategic plan for therapeutic courts, expand beyond Anchorage) in this category could be combined; the priority recommendation was:

1. Develop a strategic plan for statewide development of therapeutic courts, including exploring the use of therapeutic court models in other areas beyond Anchorage.

The remaining recommendation in this category involved expanding the use of EM. Chair Claman noted that the use of EM is itself a reinvestment (money saving) mechanism so wouldn't necessarily need to be a recommendation for reinvestment.

### Incarceration

The priority recommendations in this category were:

1. Train and retrain DOC staff to focus on rehabilitation by employing principles of normalcy, effective conditions of confinement, dynamic security, education, vocational training, and transitional incarceration.
2. More resources for "behind the walls" treatment.

Commissioner Lindemuth said both recommendations should make the Commission's final list.

### Probation/Parole

The priority recommendation in this category was:

1. Provide more outpatient services for those on parole, probation and upon release.

Commissioner Stanfill noted that this recommendation could also be included in the recommendation for community based treatment in the treatment category. Ms. DiPietro wondered if it should be made explicit that the recommended services include those available for justice-involved individuals. Commissioner Steiner noted that justice-involved individuals are not really a targeted group in the current DHSS structure. Commissioner Stanfill thought that it would be implicitly understood the treatment should be for justice-involved individuals because the recommendation was coming from the criminal justice commission. Commissioner Coghill agreed.

The Commissioners noted that while state funding and Medicaid reimbursement did not target justice-involved individuals, generally funding treatment could potentially work as a mechanism for crime prevention. Commissioner Steve Williams thought it was important to note that our system is largely Medicaid funded, but not everyone is Medicaid eligible or has access to needed services funded by Medicaid. It is a prescriptive structure that can't do things like case management. Being able to have flexible funding is therefore crucial.

The Commission agreed that providing services for those on probation/parole would remain a priority in its own category.

## Reentry

The priority recommendations for this category were:

1. Provide more outpatient services.
2. Provide expanded access to reentry services and make available flexible funds for immediate individualized transitional supports (e.g. housing, clothing medications, transportation, etc.).

## Victims Services

The small group looking at the victims' services recommendations prioritized the recommendation to revisit the action items identified from the victim/survivor/advocate roundtables conducted in 2015. The identified four priorities from the roundtables. Those were:

1. Increased services for child victims and witnesses in Alaska should be provided to address their myriad trauma and safety needs.
2. Law enforcement officers who respond to domestic violence calls should receive additional training and oversight on how to determine which person is the primary aggressor, to avoid situations in which victims are misidentified as offenders.
3. During the parole and reentry phase of the criminal justice system, crime victims should also be considered clients; educated about their role and rights; and included in case planning.
4. Institutionalized training for criminal justice professionals should be regularly offered to teach about victims' rights; victim sensitivity; victim trauma (including the neurobiology of trauma, PTSD, and invisible disabilities); how to talk to victims; trauma-informed responses to victims; cultural diversity and competence; and crime prevention and bystander intervention.

## DV Intervention

Commissioner Stanfill noted that the DV intervention programming issue was still outstanding. One reason this kind of programming was not easily categorized was that it was not well understood. She thought the Commission should prioritize this population. Ms. DiPietro noted that this issue was also being discussed in the Commission's sentencing workgroup.

Commissioner Steiner said he and Commissioner Stanfill had been discussing this. The problem was that there is research showing that the widely-used Duluth model doesn't work, but it seems that Alaska isn't exactly using that model. They have discussed the need for evaluating Alaska's programs. He wanted to forward a recommendation to that effect.

Diane Casto, director of the Council on Domestic Violence and Sexual Assault (CDVSA) explained that they had just completed a program survey/inventory of all programs, both state-funded and unfunded. CDVSA will put together a report. A cursory initial review shows that the Duluth model was not being used exclusively – if a program was using it, it was being supplemented with other things. The grantees are eager to get more state support for monitoring and evaluation. They are looking at the full continuum of care for those convicted, not just victim services. Everyone agrees that a one size fits all approach does not work, that there are varying patterns of DV.

Commissioner Stanfill asked what would be beneficial to put in the report for the next legislative session. Ms. Casto said CDVSA wanted the support to revamp the intervention program and really get a good program for the state. Providers currently don't feel like they are a priority to the legislature.

The Commission agreed that the final recommendation would be:

1. Evaluate existing DV programs in Alaska, and if they are not shown to be effective, find or create and adequately fund an evidence-based model of intervention programming for DV offenders. This model should include an adequate risk-needs assessment process for those convicted of a DV offense.

### *Reporting*

The Commission agreed that the "what" recommendations identified above would be reported out as a list. The "how" recommendations would be incorporated into the principles identified last year, which will also be in the report. Commissioner Steve Williams will work with staff to distinguish principles 2 and 3.

### **GBMI Clarification**

Ms. Dunham explained that the Commission had voted to amend the Guilty But Mentally Ill (GBMI) statute in April. As written the recommendation that had been forwarded to the Commission called for a hearing on the current dangerousness of someone found to be GBMI at sentencing 60 days from the prisoner's release eligibility date. After that draft was sent to Commissioners it was pointed out that parole hearings occur 90 days before release. The Commission had discussed amending the recommendation to put the dangerousness hearing at 180 days before release eligibility, but the record of the meeting was not clear that the Commission had actually amended the recommendation.

Commissioner Stanfill moved to amend the recommendation to reflect that the hearing should take place 180 days before release eligibility. Commissioner Lindemuth seconded the motion, and it passed without opposition.

### **Reinvestment language**

Commissioner Dean Williams had to leave the meeting early and wanted to address some aspects of the draft reinvestment language for the report. He had noted that the report said that it would cost \$3.8 million to reopen a closed facility, but looking at it now it would be at least \$10-15 million. He wanted to be careful about reflecting this idea accurately. He will work with staff to get a more accurate picture. He also wanted to be really clear that prison population numbers look like they are rising, particularly pretrial. He shared some preliminary data with the Commission to that effect.

Commissioner Lindemuth said that the report should also include language noting the increase in crime, including violent crime, that began before SB 91 was passed. The implication is that the original projections for Alaska's growing prison population and the savings that were projected from avoiding that growth by passing SB 91 may not have accounted for these increases in crime. Crime rates must be put in context; the prison population has been going up for reasons unrelated to changes in legislation, including the opioid crisis and an increase in arrests and case filings. It is important to put all this together. Recently the criminal justice working group learned that there were 1000 more felony filings in FY18 than FY17.

Commissioner Steiner said that the increase in the pretrial population also might suggest that the bail reforms are not being implemented as intended. Ms. DiPietro said that staff were working on a bail study that would tell us more about what's happening in pretrial decision making. She also noted that the increasing arrest rate could likely be tied to the increase in APD hiring. Commissioner Dean Williams added that the increasing pretrial numbers also added a logistical headache in that many in the pretrial population must be held at Goose Creek, and often need to be transported for hearings.

Ms. Dunham noted that there were two data sections in the annual report, one devoted to the implementation of criminal justice reform and prison population data, and one related to other trends such as crime rates and law enforcement staffing levels. She said she would welcome any comments on the layout and suggested data reporting and would include whatever the Commissioners thought relevant.

### **BJA Funding Application**

Ms. DiPietro reminded the Commission that the Commission could still apply for Bureau of Justice Assistance (BJA) grant funding for implementation of criminal justice reforms. She summarized the Commission's previous expenditures from this fund. On the table now were two new proposed projects. The first was an extension or follow up of the work Mary Geddes did as the diversion planner at DOC. This person would develop a street-level diversion program which would divert those who come into contact with police pre-charge. Ms. Geddes had identified APD as the agency in best position to move forward with a diversion pilot program.

The second proposal addressed ways for people in rural communities to serve time in their community, rather than being flown from those communities to a hub to serve short sentences. DOC has started this project in a couple of sites, but staff needs support to carry the program forward. DOC thinks it can identify a few more new sites for this program, but needs technical assistance and logistical help. A program like this needs the support of the community where it is to be implemented, and getting that buy-in takes significant effort.

Commissioner Razo asked if there was enough money left in the fund for both proposals. Ms. DiPietro said there was, and that the Commission would need to work with grant manager CJI to strengthen the application so that BJA will approve it.

Commissioners asked if the vision was for one consultant for both projects or one for each project. Ms. DiPietro said it could be for either. Chair Claman asked if it was the will of the Commission to distinguish the two proposals by having funding allocated separately for each, even if ultimately the same person is hired to be the consultant on both projects. The Commission agreed that it was.

Commissioner Steve Williams asked who would be receiving the money. Ms. DiPietro was not sure. State agencies such as DOC might have a problem getting the necessary federal receipt authority. Commissioner Lindemuth said that DPS should have ample receipt authority, and that it might not be much of an issue to fund the diversion proposal directly through APD. She asked Commissioner Case what he thought might be needed to stand up the diversion program. Commissioner Case said that the consultant would determine what resources would be needed; the consultant would come up with how the project would be implemented but would not be responsible for implementing it. Also once

implemented APD would not be a service provider, but would refer diverted individuals to needed services funded through other sources.

Commissioner Steve Williams said it was important to delineate which resources would go to which project. Commissioner Lindemuth said her sense was that the division looked 2/3 of the remaining funds would go to the diversion proposal and 1/3 would go to the DOC proposal. Chair Claman noted that travel expenses for the DOC program might cost more than a consultant fee, and the two might not be directly comparable.

Commissioner Razo wondered whether coordinator could decide what they need and how many trips they will take and then ask for what is needed later. Barbara Pierce of CJI said that it would be best to ask for all the remaining money available using the best estimate and then if needed the Commission could seek an adjustment for how the funds would be used. This can be done relatively easily if the adjustment is under certain a percentage of the total. She also noted that BJA has been taking a while to approve applications, and it would be best not to leave money on the table.

Commissioner Stanfill moved to forward the application with funding proposed at \$78,320 for the diversion proposal and \$45,400 for the DOC proposal. Commissioner Razo seconded the motion. The Commission agreed that this was generally reflective of the Commission's priorities and that funding could be flexible as to whether it was designated for travel or for consultant fees within those numbers. The motion passed without opposition.

### **Behavioral Health Standing Committee Recommendations**

Commissioner Steve Williams explained that the Behavioral Health Standing Committee had approved forwarding several recommendations at the last meeting. These recommendations aligned with those identified in the earlier discussion, and they also share significant overlap with other strategic plans and initiatives. The recommendations were to:

1. Expand data sharing capacity, infrastructure, and formalized agreements among agencies.
2. Expand Crisis Intervention Training efforts and include a co-response mental health practitioner element.
3. Develop crisis stabilization centers.

Commissioner Razo moved to adopt the recommendations and Commissioner Lindemuth seconded the motion. The group discussed where the appropriate place was to put these recommendations in the report. Commissioners reflected that these were both funding and policy-based recommendations. Commissioner Coghill said it made sense to discuss funding and policy separately, and that the legislature will often make those calls separately. Commissioner Lindemuth suggested letting staff integrate the recommendations appropriately.

The Commission approved the motion without any opposition.

### **Sex assault crimes**

Commissioner Stanfill explained that she had asked for this item to go on the agenda for today. She, like many present, had been getting a lot of calls regarding the plea deal approved by Judge Corey the previous week. For one thing, it has raised questions of what the definition of a sex crime should be. The Sex Offenses Workgroup has been talking about some of these issues but she thought it would help

to get some direction from the Commission. She thought there was a need to go through sexual assault statutes and look for loopholes such as defining contact with semen as a sex crime and the fact that it is a defense to the sexual assault of an incapacitated person if the defendant is the victim's spouse. There is also a need to get input from victims on how best to listen to them. She asked the Commission to direct the Workgroup to discuss these issues and potentially develop recommendations.

Commissioner Lindemuth said she supported this idea. She thought that anyone would say that contact with semen should be a sex offense. The Governor's office will be proposing a law to that effect next session. The administration was already looking at a larger package addressing other loopholes in the sex offense statutes. She thought it would be helpful to also have analysis from the Workgroup. The Governor's office will present the package of sex offense reforms on Monday.

Chair Claman asked what Commissioner Stanfill was thinking in terms of timing. Commissioner Stanfill said she thought that the workgroup could meet and prepare something in advance of the November meeting. Commissioner Claman thought that the opportunity for a public listening session was important and that any final recommendation could wait until the January meeting if necessary.

Commissioner Stanfill moved to have the Sex Offenses Workgroup review the sex offense statutes in title 11, to address any loopholes found, and to garner victim input in how best to address victim needs in sex offense cases. The motion passed unanimously.

Judge Stephens offered to address the earlier public comment on this case. The conduct alleged was not a sex crime because of the way the law is written; the law defines that conduct as harassment and harassment is not a sex crime in the statutes. Deputy Attorney General Rob Henderson noted that offensive contact with semen was not included in the definition of sexual contact as set forth in AS 11.81.900 (a)(59). Judge Stephens said it wouldn't be possible for those not parties to the case to know why attempted murder wasn't charged. Commissioner Lindemuth suggested referring to the comments made by Criminal Division Director John Skidmore over the weekend explaining the charging decisions in that case.

### **Annual report**

Ms. Dunham explained that she had circulated a draft of the annual report to give the Commission an idea of the report's scope and substance. She welcomed any and all comments on the draft.

The Commission agreed to have a telephonic meeting to approve the final draft. Commissioners agreed to get back to staff with their initial comments by October 4. Staff will then send another draft out on October 10. Commissioners will get any additional comments to staff by October 19, and staff would have a final draft ready in advance of a telephonic meeting to approve the final draft on October 25 at 4pm.

The meeting adjourned at 3:47 p.m.