

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
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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.

A PHA Information						
A.1	<p>PHA Name: Rutland Housing Authority PHA Code: VT003</p> <p>PHA Plan for Fiscal Year Beginning: 04/2020 PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p style="margin-left: 40px;">Please see attached narrative.</p>					
<input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)						
Participating PHAs		PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
					PH	HCV
Lead PHA:						

B	5-Year Plan - Required for all PHAs completing this form.
B.1	<p>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.</p> <p>Please see attached narrative.</p>
B.2	<p>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.</p> <p>Please see attached narrative.</p>
B.3	<p>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.</p> <p>Please see attached narrative.</p>
B.4	<p>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.</p> <p>Please see attached narrative.</p>
B.5	<p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p>Please see attached narrative.</p>
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/> Please see attached narrative.</p> <p>(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.</p>
B.7	<p>Certification by State or Local Officials.</p> <p><i>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.</i></p>

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

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

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.

**Fiscal Year (FY) 2020-2024 Five-Year Public Housing Agency (PHA) Plan Submission
Rutland Housing Authority**

Narrative and Additional Information

A. 1 The public may view this PHA Plan, supporting documentation, and obtain information regarding any of the activities outlined in this plan at the Rutland Housing Authority's main administrative offices at Templewood Court, 5 Tremont Street, Rutland, VT, 05701. Phone: 802-775-2926

Additional documents and supporting documents for this PHA Plan, that are also available for viewing at the above location, are listed below:

- Form HUD-50077-CRT-SM: PHA Certifications of Compliance with the PHA Plans and Related Regulations
- Resident Advisory Board (RAB) comments on PHA Plan
- Form HUD-50077-CR, Civil Rights Certifications
- Form HUD-50077-SL, Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

The PHA Plan and its supporting documents are also available for review on RHA's web site at www.rhvt.org.

Staff met with Resident Advisory Boards (RAB) on November 12 and 14, 2019 to discuss this PHA Plan and received comments from the RAB.

A public hearing regarding this PHA Plan was held on December 9, 2019 at 8 a.m. in the Board Room at RHA's main administrative offices (Templewood Court, 5 Tremont Street, Rutland, VT, 05701).

B.1 Mission

The Rutland Housing Authority is dedicated to building healthy, safe and vibrant neighborhoods by creating and offering service-enriched housing options.

Vision Statement:

As a local Housing Authority committed to the needs of our community, our vision is to:

BE A LEADER in the development of consumer driven, service enriched housing opportunities for the Rutland Region;

BE RECOGNIZED for our commitment to the principals of sound property management, process improvement, excellence, stewardship of public resources, use of appropriate state of the art technologies, and outstanding customer service;

PROMOTE community and resident participation and responsibility in developing healthy, safe and crime free communities;

BE A CATALYST for resident involvement, education, family self-sufficiency, diversified regional home ownership, healthy aging and independence.

Values Statement:

The Rutland Housing Authority dedicates its efforts to providing an environment that nurtures families. We believe families thrive in communities that recognize the contributions of individuals and promote safety, stability, and independence.

Communication. We are committed to providing timely, accurate and appropriate communication to all of our stakeholders.

Integrity. We will strive for enhanced accountability and responsiveness to the ever changing needs of our diverse customers. Our relationships will be built on a foundation of fairness, loyalty, respect and credibility.

Quality. We shall provide the highest quality services through ongoing evaluation and improvements.

Knowledge. We shall encourage the pursuit of knowledge so as to ensure organizational excellence, resident empowerment, and self-sufficiency.

Cooperation. We value teamwork and the resulting synergies created through effective partnerships.

B.2 Goals and Objectives

In support of its mission, RHA will engage in the following goals and objectives for its Public Housing and Housing Choice Voucher programs over the next five years. This includes fiscal years 2020 through 2024.

To the extent possible and appropriate the RHA will act in support of the City of Rutland Housing Needs Assessment, including:

- Placing housing strategy within the broader context of ongoing regional marketing strategies for economic development.
- Continuing to support focused, sustained investment in the Rutland City downtown and surrounding neighborhoods.
- Managing down the housing supply to adjust to a declining population, while supporting improvements to the quality of the existing supply.
- Promoting accessible and affordable financing to fix up existing housing in Rutland.
- Providing better housing, complemented with services, for the lowest end of the income spectrum.
- Working with developers and investors to support targeted downtown housing and mixed-use development, as part of a holistic approach to bring more life downtown. Seeking partnerships with organizations that can bring sophisticated financing capacity to invest in mixed-use and small multifamily and commercial development.
- Reviewing and advocating around tax policy and regulatory issues that may be impacting the ability of developers to bring a quality housing product to market. Acting regionally and collaboratively across sectors.

Additionally, the following goals and objectives will be pursued during the 5-year plan period:

1. Expand the supply of assisted housing:
 - Apply for Federal, and if available, State rental subsidies for tenant-based rental assistance programs, subject to availability of funds, including Section 8 Housing Choice Vouchers, Mainstream Program Vouchers, Foster Youth Initiative Tenant Protection Vouchers, and new sources as they become available.
 - Continue to reduce vacancies in all RHA-owned and/or managed properties.
 - Through the expansion of the Project-Based Voucher program, up to the maximum allowed by HUD, leverage private and public funds to create additional affordable housing, either directly or by supporting nonprofit housing developers.
 - Develop and/or support through Section 8 Project Based subsidies the establishment of one or more permanently supportive housing projects that house:

- Individuals and families that meet the definition of homeless under Section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C 11302), and/or
- Families that are comprised of or include a veteran, and/or
- Persons with disabilities or elderly persons as defined in 24 CFR 5.403, and/or
- Individuals and families located in a census tract with a poverty rate of 20% or less, as determined by the most recent American Community Survey Five-Year Estimates.

Supportive services may include case management providing direct service or referral for: rehabilitation, vocational and employment assistance; connections to general health and dental services; assistance with income support and benefits; substance abuse treatment; development of life skills; social isolation; housing retention; dispute resolution; ongoing assessments and crisis intervention.

- Manage limited resources to maintain or build the number of families served under the Section 8 Program.
- Acquire or construct affordable rental units either directly or in partnership with Housing Initiatives, Inc., or other nonprofit housing developers.
- Pursue disposition of .43 acres remaining on the old Forest Park site for purposes of constructing affordable homeownership or rental units.

2. Improve the quality of assisted housing:

- Complete the conversion of Sheldon Towers and Templewood Court to the Rental Assistance Demonstration Program (RAD) – Project Based Section 8 Program.
- Pursue RAD conversion of 20 Public Housing Units in phase one and two of the Hickory Street neighborhood.
- Maintain High Performer status in both the Public Housing Assessment System (PHAS) and the Section Eight Management Assessment Program (SEMAP).
- Concentrate on efforts to improve specific management functions including finance, maintenance, property management, occupancy and continued occupancy, modernization and lease enforcement with an emphasis on RAD conversion requirements.
- Complete unit upgrades (modernization) of 14 units at Sheldon Towers during 2020.
- Develop revised capital improvement action plans for each RHA owned and/or managed property utilizing the results of recent capital needs assessments.
- Evaluate the need for as appropriate expand the availability of tenant storage space at Templewood Court.

3. Increase assisted housing choices:

- Expand voucher mobility counseling for new and existing Section 8 Program participants.
- Expand outreach efforts to potential Section 8 landlords and develop an education and recognition event.
- Continue to promote the Section 8 Homeownership Program to current and future voucher holders.
- Generate new admissions and continued occupancy policies for RAD properties with an emphasis on relevant wait list preferences.

4. Provide an improved living environment:

- Expand security measures designed to protect residents and property.
- Secure relevant grants that support independence, self-sufficiency and asset development of assisted households.
- Partner with local agencies to improve the employability and advancement of assisted families.

- Continue and as necessary expand activities under the Support and Services at Home Program (SASH) for elderly and disabled residents.
 - In partnership with local law enforcement, develop a neighborhood watch program for RHA properties.
5. Ensure equal opportunity and affirmatively further fair housing:
- Expand affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status or disability.
 - Expand affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status or disability.
 - Expand affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.
 - All staff has participated in updated fair housing training.
6. Complete a revised five year strategic plan.

B.3 Progress Report

1. Expand the supply of assisted housing:
- The RHA expanded its Section 8 Voucher Program from 194 to 233 with the addition of 25 Tenant Protection/Relocation Vouchers and 14 Mainstream Program Vouchers.
 - With the exception of units taken offline for modernization, Public Housing vacancies have remained low with lease-up rates over 97%.
 - The RHA completed the Forest Park Neighborhood Renewal Initiative with the opening of Phase 3 of the Hickory Street development in Rutland's Southwest Neighborhood.
2. Improve the quality of assisted housing:
- The RHA is a "High Performer" under the HUD Public Housing Assessment System
 - Section Eight Management Assessment (SEMAP) scores have resulted in "High Performer" status for the past ten years.
 - The RHA restructured the organization to improve specific management functions, including activities directed at preparing the agency for a Rental Assistance Demonstration (RAD) conversion. The agency has implemented a Human Resource Department to address recruitment, retention and staff development. Measurable improvements have been made in tenant account receivables, Section 8 Program management, finance and property management.
 - The Capital Fund Program has been used to modernize our Templewood Court and Sheldon Towers properties. Initiatives have included energy efficiency measures, expanded emergency generator coverage, new sidewalks, roof replacement, structural repairs and bathroom upgrades at Templewood Court. Sheldon Towers has been converted from electric to propane heat; fire safety upgrades were completed, unit renovations/upgrades to outdated units were undertaken with 14 more units remaining, replacement of obsolete electrical panels and 504 unit upgrades made for expanded accessibility.
 - The Forest Park Neighborhood Renewal Initiative was completed in 2018. Seventy-five obsolete and blighted units were replaced with seventy-eight new mixed-

finance, mixed-income affordable units inclusive of a community center, community gardens and a fully integrated site plan.

- Over the past two Five Year Plan periods the RHA secured 74 Tenant Protection/Relocation Vouchers to assist with the relocation of tenants displaced by the Forest Park project. All replacement units were subject to strict Housing Quality Standards.

3. Increase assisted housing choices:

- Since 2010, the RHA has greatly expanded its mobility counseling and landlord outreach as a result of the influx of relocation, tenant protection and mainstream vouchers (163 total). Although the agency was not successful in converting any Housing Choice Vouchers to Homeownership we continue to work with our community partners to promote this option.
- A total of 8 Housing Choice Vouchers were converted to Project-Based Vouchers and placed in the third phase of the Hickory Street development. Six of these vouchers were designated to assist families that were either homeless or at risk of homelessness. The Rutland-based Homeless Prevention Center (HPC) provides extensive case management services to support these families. Additionally, the HPC Landlord Liaison has greatly supported housing retention in both our owned/managed properties and our Section 8 Program.

4. Provide an improved living environment:

- The new Hickory Street development is a mixed-income community that includes public housing, Project Based Section 8, tax credit and market-rate units. The goal of deconcentrating poverty in this neighborhood has been achieved.
- The RHA continues to enjoy a strong working relationship with the Rutland City Police Department (RCPD). Security cameras have been installed at all three sites. The RCPD has access to recordings as necessary.
- A SASH (Support and Services at Home) Coordinator and Wellness Nurse support aging in place through services directed at resident wellness, chronic care management and successful transitions back from institutional settings to the home environment.

5. Promote self-sufficiency and asset development of assisted households:

- The RHA actively supports its community partners in promoting supportive services that improve the employability of families and the independence of elderly and disabled residents. Critical to the efforts are the services of the Southwestern Vermont Council on Aging, Bennington-Rutland Opportunities Council, VNA & Hospice of the Southwest Region, Rutland Mental Health Services, and the Homeless Prevention Center.
- Annual state-funded Housing and Supportive Services (HASS) grants have been secured over the five-year plan period. These vital funds have been used, in part, to provide greatly needed homemaker and home care aid services to at-risk elders. On-site service coordination is funded through the Resident Opportunity and Self-Sufficiency (ROSS) grants which were awarded by HUD in 2015 and again in 2018. SASH services have been funded throughout the five-year plan period utilizing resources to deploy these programs and supports.

6. Ensure equal opportunity and affirmatively further fair housing:

- Despite Rutland’s limited racial and ethnic minority population the RHA has had some success in reaching these communities to ensure equal opportunity and fair housing. The local media, flyers to local community partners (employers, churches, health and human services providers, etc.) and advertising has resulted in limited expanded diversity.
- As previously noted, Capital Fund Program grants have been used to enhance accessibility features in several units, including four at Sheldon Towers.
- All new staff received Fair Housing training, and two full staff program updates were provided during the plan period.

7. Complete a revised five-year strategic plan:

- The Authority did not complete a comprehensive strategic planning exercise during the plan period. This goal has been carried over to the next Five-Year Plan.

B.4 Violence Against Women Act (VAWA) Goals

To help meet the goals of the Violence Against Women Act (VAWA), RHA provides support and referrals to counseling for victims of domestic violence, dating violence, sexual assault, or stalking. RHA’s partner, the New Story Center, features an emergency shelter, 24-hour crisis hotline (802-775-3232), referrals to area resources, advocacy, supportive counseling and support groups. RHA has an Agency-wide VAWA Policy which clearly defines and describes RHA’s efforts to ensure that VAWA victims retain their housing assistance. RHA also assists victims with referrals to obtain restraining orders.

On November 16, 2016, the U.S. Department of Housing and Urban Development (HUD) published a new Final Rule implementing the housing protections authorized in the Violence Against Women Reauthorization Act of 2013 (“VAWA 2013” or “2013 Act”). Despite the VAWA 2013 Final Rule’s identification that a formal PHA policy is not required in order to implement the provisions of VAWA 2013, RHA chose to develop a single, stand-alone VAWA policy which describes RHA’s commitment to VAWA adherence and enforcement.

RHA’s new VAWA Policy has the following principal goals and objectives:

- Maintaining compliance with all applicable legal requirements imposed by VAWA;
- Ensuring the physical safety of victims of actual or threatened domestic violence, dating violence, sexual assault, or stalking who are assisted by RHA;
- Providing and maintaining housing opportunities for victims of domestic violence, dating violence, sexual assault, or stalking;
- Creating and maintaining collaborative arrangements between RHA, law enforcement authorities, victim service providers, and others to promote the safety and well-being of victims of actual and threatened domestic violence, dating violence, sexual assault, or stalking, who are assisted by RHA; and
- Taking appropriate action in response to an incident or incidents of domestic violence, dating violence, sexual assault, or stalking, affecting individuals who RHA assists.

Additionally, RHA’s new VAWA Policy states the Agency’s commitment to cooperate with organizations and entities, both private and governmental, which provide shelter and/or services to victims of domestic violence. If RHA staff becomes aware that an RHA assisted individual is a victim of domestic violence, dating violence, sexual assault, or stalking, RHA will

refer the victim to such providers of shelter or services as appropriate. While RHA's VAWA Policy does not create any legal obligation requiring RHA either to maintain a relationship with any particular provider of shelter or services to victims or domestic violence, dating violence, sexual assault, or stalking or to make a referral in any particular case, the RHA maintains a number of partnerships to provide services to victims of domestic violence, dating violence, sexual assault, or stalking with which RHA has referral or other cooperative relationships.

Lastly, RHA's new VAWA Policy incorporates and explains the Agency's use of the following four HUD documents required as per the VAWA 2013 Final Rule:

1. Notice of Occupancy Rights under the Violence Against Women Act
2. Model Emergency Transfer Plan for Victims of Domestic Violence
3. Certification of Domestic Violence
4. Emergency Transfer Request for Victims of Domestic Violence

B.5 Significant Amendment or Modification

In accordance with 24 CFR §903.7(r)(2) which requires public housing authorities to identify the basic criteria the agency will use to determine a substantial deviation from its 5-Year Plan and significant amendments or modification to the 5-Year Plan and Annual Plan, the following definitions are used:

Substantial Deviation: A substantial change in the goals identified in the Five-Year Plan. For example, making a formal decision not to pursue a listed goal; or substituting an entirely different set of activities to achieve the goal.

Significant Amendment/Modification: Adding or eliminating major strategies to address housing needs and to major policies (e.g., policies governing eligibility, selection or admissions and rent determination) or programs (e.g., demolition or disposition, designation, homeownership programs or conversion activities); or modifying a strategy such that a substantial transfer of resources away from others is necessary in order to carry it out. Under this PHA Five-Year Plan, the RHA is clarifying that any change required to comply with state or federal rule, law, or regulation, where the RHA is not able to adopt discretionary policy, would not be considered a significant amendment. However, the RHA would continue to work with the Resident Advisory Board and staff for comments.

Substantial deviations from the 5-Year Plan and significant amendments or modifications to the Annual Plan will result in the Rutland Housing Authority subjecting these changes to the policies or activities to full public hearing and HUD review before implementation.

The Rutland Housing Authority shall define substantial deviation from the 5-Year Plan or significant amendment or modification to the Annual Plan as any of the following actions:

- Changes to rent or admissions policies or to the organization of the waiting list;
- Additions of non-emergency work items (items not included in the current Annual Statement or 5-Year Annual Plan) or change in use of replacement reserve funds under the Capital Fund;

- Any change with regard to demolition or disposition, designation or conversion activities.

An exception to this definition will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements; such changes will not be considered significant amendments by the Rutland Housing Authority.

As part of the Rental Assistance Demonstration (RAD), the Rutland Housing Authority previously redefined the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items provided that the adjustments to the RAD plans are authorized by the RHA's Board of Directors in the normal course of business:

- A. The decision to convert to either Project Based Rental Assistance or 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 Comments

A total of three Resident Advisory Board meetings were held during the month of November, 2019 (one each at Templewood Court, Hickory Street and Sheldon Towers) and a Public Hearing in December.

- a. Did the public or Resident Advisory Board provide comments?
Yes
- b. If yes, comments must be submitted by the PHA as an attachment to the 5-Year Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decision made on these recommendations.

The bulk of the comments received by the PHA dealt with operational issues that will be addressed on an ongoing basis including procedural changes and revisions to house rules. Resident's asked that projects be considered as part of the 5 Year Capital Fund Plan. They included more storage at Templewood Court, enhanced lighting at Hickory Street and an expanded smoking shelter at Sheldon Towers. The Authority will research the cost and feasibility of these projects and implement as appropriate depending on available resources and the overall needs of the properties.

There were no tenants or members of the public at the Five Year Plan Public Hearing held on December 9, 2019