

Comments and Responses to the BHA FY 2024 Federal Annual Plan for April 2024 through March 2025.

The following document contains the comments and responses received on the BHA's FY 2024 Federal Annual Plan. BHA staff met with the Resident Advisory Board from September through December discussing the Plan process and documents and sent copies of the Plan to the RAB and Local Tenant Organizations. The Plan was put out for public comment on November 1, 2023 and the comment period closed on December 15, 2023 with a virtual public hearing held on zoom December 12, 2023 at 6 pm.

The BHA took several steps to notify the public of the FY 2024 Federal Annual Plan and the opportunity to comment. The BHA placed an advertisement in the Boston Globe, included a notice with the rent statement of public housing residents, requested mixed finance partners to share the same notice with their BHA ACC-subsidized tenants, sent a mailing to Leased Housing participants in Boston and nearby towns notifying them of the Public Hearing. The BHA also sent letters to many local officials and advocacy groups. The Plan was made available for review at Boston Public Library Copley Square branch, BHA's headquarters at 52 Chauncy St., and on its website www.bostonhousing.org.

Many comments are specific to Plan attachments:

AP: Annual Plan template

PR: Five-Year Plan Progress Report

RAD: RAD attachment

S: Supplement

Administration

Comment: (also Adm/Lsd Hsg) Pine Street Inn, Inc. (PSI) is pleased to comment on the Boston Housing Authority (BHA) FY2024 Annual Housing Plan. For over 30 years, Pine Street Inn has partnered with the Boston Housing Authority to provide affordable, supportive housing for persons experiencing homelessness. Since its inception in 1969, Pine Street Inn has served Greater Boston persons experiencing homelessness through various responsive, community-based programs and services. PSI is the largest nonprofit homeless services agency in New England. PSI provides food, clothing, shelter, day and night-time street-based outreach, access to health care, job training, affordable housing, and other critical resources for over 2,000 individuals each day and night at its 44 locations throughout Metropolitan Boston. Pine Street Inn's mission is to end homelessness by making permanent housing a reality for all.

Pine Street Inn has successfully served individuals experiencing homelessness with myriad disabilities and difficulties for over 50 years. Since 1984, PSI has been developing and operating permanent affordable housing for individuals experiencing

homelessness. Pine Street Inn has designed housing and housing-based services for persons with disabilities, including mental illness, HIV/AIDS, chronic substance use disorder histories, dual diagnosis, and mobility limitations. Units meet the complex needs of the hardest-to-serve homeless individuals. With 960 units of permanent supportive housing in the portfolio, PSI is a prominent provider in Boston's homeless services Continuum of Care (CoC).

PSI enthusiastically supports the Boston Housing Authority FY2024 Annual Plan. While there are many innovative practices and activities to laud, perhaps the most exciting initiative is the expansion of Project-Based Housing Vouchers. With more than 4,000 units under contract by the end of FY23, many of these units provide invaluable subsidies to projects targeted to people experiencing homelessness.

We would also like to commend the BHA for continuing the prioritization of Homelessness as a criterion of admission. The Boston Housing Authority is one of only a few, if not the only, Housing Authority in Massachusetts with this priority admissions preference. This preference is critical in permanently housing our most vulnerable constituents. That said, the BHA's definition of homelessness differs from that of HUD and the Continuum of Care. This disconnect causes issues with access and selection. Pine Street Inn strongly encourages the BHA to adopt the definition of homelessness used by HUD and the CoC Program to streamline unit acquisition and occupancy for individuals experiencing homelessness who are receiving services through the Boston Continuum of Care.

PSI is particularly pleased with the continuation of Small Area Fair Market Rents (SAFMR). This rent adjustment by zip code greatly expands housing options for extremely low-income tenants. The SAFMR allows tenants to utilize higher rates and obtain housing in previously unaffordable areas. As the BHA can keep the payment standard the same for current tenants with a slight decline in the payment standard under the SAFMR, tenants and property owners are held harmless with implementing the SAFMR in new areas.

While the SAFMR excludes the project-based voucher program, we would advocate for its inclusion to encourage property owners to continue service with the BHA. Obtaining market rental rates incentivizes property owners to continue with the program and preserves units of affordable housing that Boston cannot afford to lose.

Pine Street Inn is excited and encouraged by the future siting of Section 8 based voucher projects. The award of 99 Project-Based Vouchers to create affordable housing at 900 Morrissey Boulevard is a prime example. All of these studio units will be targeted to individuals experiencing homelessness, also assisting in significantly reducing the population.

Pine Street Inn is grateful for and appreciative of our ongoing collaboration with the Boston Housing Authority. BHA's 18,870 vouchers and expending 99% of funding eligibility are crucial to the availability of affordable housing in Boston. The

knowledgeable staff, essential services, and the BHA's informed guidance are invaluable. We pledge to work together in partnership with the Boston Housing Authority to preserve, create, and provide access to affordable housing for the people experiencing homelessness we strive daily to assist and empower.

Response: We appreciated the positive comments and the continued partnership with Pine Street Inn. We are happy to discuss the abovementioned policy issues. BHA believes that the broad definition of homelessness captures families that are in transitional housing situations that will result in homelessness should the temporary subsidy expire. Additionally, the BHA considers families fleeing from Domestic Violence as homeless, which comports with HUDs most recent updated definition. Rather than precisely align our definition of homelessness, the BHA has a created system and HUD encourages in its guidance that the BHA prioritize referrals from the Continuum of Care to ensure CoC and City sponsored projects receive referrals from the CoC.

PBVs do utilize SAFMRs. The BHA typically utilizes SAFMRs in those zip codes where The SAFMR exceeds 110% of the FMR. In those zip codes the SAFMR is set between 90% and 110% of the SAFMR and is called an “exception rent”. That “exception rent” also serves as the ceiling for PBV rents. In non-SAFMR zip codes the ceiling rent for PBVs is 110% of the FMR.

Comment: Dear Boston Housing Authority, Introduction

I write on behalf of Emerald Cities Collaborative (ECC) – a national organization founded in 2009 whose mission is to create just, sustainable, and inclusive regional economies. We thank the Boston Housing Authority (BHA) for the opportunity to comment on its Federal and State 2024 Annual Plans.

Under the Wu administration, the BHA has set an ambitious goal to achieve fossil fuel free public housing by 2030. To achieve this goal the BHA has worked with staff, residents, and partners to create a Sustainability Strategy to guide current and future actions related to the BHA’s environmental impact and climate resiliency. The Strategy outlines three key focus areas which include creating sustainable buildings, communities, and operations. The HUD Annual PHA Plans allow interested stakeholders to locate basic information on PHA policies, rules, and requirements. However, there is very limited information required by HUD that describes sustainability initiatives and investments that are planned for that fiscal year. We write today to encourage the Boston Housing Authority (BHA) to revisit the BHA Federal and State 2024 Plans to include additional information that describes the actions that the BHA will take to ensure equitable delivery of sustainability initiatives and investments. To assist in that effort, we outline recommendations for achieving successful implementation that balances both the goals of the BHA and the needs of the residents it serves.

Resident Engagement in Sustainability Planning

We recommend that the BHA engage in an extensive community engagement process as it plans each of its major capital improvement projects that make progress towards its sustainability goals. Not only do green retrofits (e.g., energy efficiency, renewable energy, water conservation) create opportunities for the BHA to achieve its climate and

sustainability goals, but it also allows for the public housing authority to address years of deferred maintenance. Residents likely already have a sense of some of the capital needs within occupied units as well as at project sites more generally, and we encourage the BHA to solicit that feedback throughout the planning process. Engaging community members early will not only help the BHA identify potential projects, but also ensure that those priority projects are defined by the communities impacted. A robust engagement process will also give residents some predictability regarding planned investments (e.g., projects that are completed in phases or built over time) and adequate time for them to raise questions and concerns early in the process.

Furthermore, we recognize that transitioning away from fossil fuels will likely require that residents temporarily relocate. Even in instances where residents can remain in their units, construction work can be severely disruptive to their quality of life. To that extent, we recommend that the BHA develop a strategy for coordinating construction activities such that they limit tenant disruption. These strategies may include:

- Designing a resident engagement process that empowers residents to have key decision-making power in the planning, implementation, and evaluation phases.
- Providing resources to help residents reduce negative impacts related to improvement projects (e.g., relocation assistance, cooking equipment replacements).
- Developing robust, multilingual communications that clearly and effectively outline any and all the project expectations that may impact residents (e.g., changing in heating/cooling sources).
- Creating demonstration projects that allow residents to experience climate and sustainability improvements first-hand and raise any questions or concerns that they might have (e.g., cooking classes using induction stoves, EV test drive events at BHA properties).

Commit to Requiring Project Labor Agreements and Community Workforce Agreements

We also recommend that BHA explore the potential for Project Labor Agreements (PLAs) and/or Community Workforce Agreements (CWAs) which can be powerful tools for ensuring equitable outcomes. The capital improvements projects that the BHA undertakes should be viewed both as a significant infrastructure project as well as an opportunity to ensure equal employment opportunity, uplift underserved workers, and address current and historic inequities that have led to a lack of workforce diversity. BHA has a history of optimizing construction and long-term work opportunities for Section 3 residents, current BHA employees, minority- and women-owned business enterprises, and people of color and women workers. We strongly encourage the BHA to continue pursuing these objectives in its current and future capital improvements projects and incentivize developers to include community-oriented commitments that support at a minimum more equitable workforce development and support for minority- and women-owned business enterprises.

One example of a CWA in action includes the City of Portland's Clean Energy Works Portland (CEWP) Pilot Project. Development of this CWA included a wide-ranging group of stakeholders – including unions representing carpenters and laborers, women trade groups, minority contractor associations, community groups, and more – to craft the CWA. Under this pilot project the City of Portland and the Energy Trust of Oregon's CWA outlined provisions to achieve the following:

- Hire 80% of program employees from the local workforce.
- Create family supporting jobs where participating workers would not earn less than 180% of the state minimum wage.
- Provide health insurance to employees and support small contractors to provide the same benefits.
- Ensure that 20% of contracts were awarded to businesses owned by historically disadvantages and underrepresented populations.
- Provide continuing education resources to create a highly skilled workforce.

As a result of this initiative the CEWP workforce development policies followed a High Road approach by focusing on quality training, and equitable access to good jobs with family-supporting wages and benefits. Under this framework the CEWP was able to perform on all metrics aside from its diverse minority- and women-owned business participation.³ We commend the BHA for being committed to fair and equitable purchasing by establishing and recently updating its Minority and Women’s Participation Provision (MWPP). We encourage the BHA to proactively work with partners and stakeholders to achieve these goals and continue to mitigate institutional barriers that prevent qualified MWBEs from successfully doing business with the BHA and its selected vendors.

Conclusion

Again, thank you for this opportunity to provide public comments for Boston Housing Authority’s Federal and State 2024 Plans and would welcome the opportunity to have further discussions on our comments and recommendations.

Response: Thank you to the Emerald Cities Collaborative for this thoughtful comment; we are grateful that you share our commitment to putting public housing residents at the front of the line in the sustainability revolution, and delivering greener housing that is also healthier, higher quality, and part of a strategy for economic empowerment for the diverse communities we serve.

After Mayor Wu’s announcement in January 2023 of BHA’s intention to get off fossil-fuel-based systems by 2030, the BHA’s first action was to cancel the imminent replacement of a large natural gas boiler feeding a loop of buildings at our Franklin Field public housing site. Since then, we have engaged in extensive planning around a fossil-fuel-free alternative at that location, and as the Mayor announced in January 2024, we are looking forward to partnering with National Grid to bring geothermal heating to the site. Over 2023, we also commissioned a number of analyses related to how we would operationalize this commitment at a portfolio-wide level, in terms of building retrofit typologies, solar capacity, and federal tax credit potential.

Over the coming months, we expect to be able to weave these analyses and information from our existing capital and redevelopment plans together, which will enable us to meet with our BHA residents and other stakeholders to solicit their valuable input. We agree that our green transformation aligns with addressing long-deferred capital needs at our sites, and since we already run an extensive resident engagement

process in relation to BHA's annual capital plan, our residents need to be just as involved in our sustainability planning efforts.

At a project level, however, we have sought to exemplify the process you describe through our resident outreach in regard to a major modernization and green energy retrofit project we have planned to begin at Mildred C. Hailey Apartments this year. This project is supported by City of Boston capital dollars and funds from the state's Department of Energy Resources (DOER). Throughout the planning process, our Capital Construction Department and hired vendors have met with the Mildred C. Hailey Tenant Task Force in multilingual meetings (English and Spanish, plus other languages subject to resident request) to get their iterative input and feedback into every aspect of the project. These meetings have also been attended by Greater Boston Legal Services (GBLS) and City Life / Vida Urbana (CLVU), two organizations which provide advice and advocacy support to our residents.

The BHA has also retained relocation consultants, who will engage in 1:1 individualized meetings and support for every family that will need to be relocated over the course of the project, to ensure that they receive temporary accommodation that meets their needs. We have also designed the project in order to minimize the duration of relocation. We agree that relocation, both in terms of financial costs and disruptions for residents, is one of the most difficult aspects of any holistic BHA capital project. BHA also only has a limited supply of vacant apartments into which to temporarily relocate families. This is why, at Mildred C. Hailey, our hope is to be able to relocate just a few buildings at a time and keep a cascade going whereby we are quickly able to rehouse those families in their renovated units, thereby freeing up more vacant relocation units for the next set of families.

Constraints such as these are one of the reasons that the Boston Housing Authority and its partners have relied on Project Labor Agreements (PLAs) in the past, to ensure a consistent supply of competent labor and prevent any disruption which would negatively affect our public housing families. Disruptions also have cost impacts associated with stopping and starting; at Hailey, for example, we know our project budget will benefit if we are able to keep rolling forward equipment and machinery from one building to the next without interruption. BHA is always spending limited public dollars, so cost savings are paramount from a taxpayer perspective and to enable us to maximize our spending on the plethora of capital projects that will be necessary to our green transformation.

We have also used Project Labor Agreements in the past to help maximize compliance with BHA's Resident Employment Policy (REP) and our Minority and Women's Participation Provision (MWPP), including through the creation of the nationally-known Building Pathways registered pre-apprenticeship program. Building Pathways has funneled a significant number of our residents into jobs at redevelopment projects like Old Colony/Anne Lynch Homes, and into the large (\$67 million) multi-site energy savings project we did a decade ago, in partnership with AMERESCO. We continue to need specialized avenues to get BHA residents into the good-paying construction jobs that our green transformation will create, and we are also very interested in promoting

contracts to businesses owned by Women, Minority, and Section 3 participants, in compliance with BHA policies and federal law. So there may well be a role for a PLA or a Community Workforce Agreement (CWA) in this case as well, per your suggestion. What may make this even more necessary are the apprenticeship minimums attached to receiving an extra degree of rebates from the federal tax credits available through the Inflation Reduction Act; we have just begun to explore these requirements. We expect to further explore these questions, and whether a PLA/CWA model could best address BHA's complex needs as it undertakes this decarbonization work, over the months ahead.

We are hopeful that our most immediate decarbonization project, the one beginning at Mildred C. Hailey this year, will serve as a model and pilot for us on several fronts. It should enable us to test important green retrofit technologies in the brick buildings that predominate across our portfolio, and make it possible for us to show residents an example retrofitted unit, as you suggest. It will also be an early opportunity for us to assess what proportion of these types of holistic retrofit projects can ultimately be supported by federal tax credits. We may also be able to use the Mildred Hailey project to design a model PLA or CWA to ensure that those federal tax credits are maximized, that BHA's Section 3 REP and MWPP are fulfilled to the greatest degree possible, and that BHA is able to command sufficient reliable labor supply to minimize the stop/start costs and resident impacts (such as unnecessarily lengthy relocation) of projects that stall rather than rolling continuously forward.

Thank you again to the Emerald Cities Collaborative for your contribution to our annual planning process, and please take this response as confirmation that we will continue to focus on balancing the many core values and complex factors that you have rightly raised as we plan the BHA's green transformation. We look forward to partnering with ECC on advancing equity and climate action in tandem.

Comment: AP: cover template: p.1, note Standard PHA, and 15,499 Section 8 units and 8,533 Federal Public Housing Units, total 24,032 units. BHA staff have thrown around some different figures on the number of Section 8 units, and it is important to be consistent about this in any presentations (or, where there is a reason for using different numbers, to explain the difference).

Response: Thanks for the comment. BHA staff appreciate the importance of consistency and also being responsive to questions asked in the HUD template.

Comment: AP: p.2, changes to Statement of Housing Need, Deconcentration Statistics, Operations and Management, Grievance Procedures, and Community Service & Self-Sufficiency Programs (balance unchanged). Plan also includes Admin Plan & ACOP changes, revised RAD attachment, and site-based race/ethnicity information for applicants and residents. Limited English Proficiency (LEP) and Financial Resources updates were not provided to RAB until Dec. 2023. In the future, can BHA get all aspects of the revised PHA Plan to the RAB by the time that the public review and comment period begins so there is the same amount of time to review all aspects?

Response: BHA staff strive to work with all departments and to present a complete draft at the beginning of the comment period. Thank you for the comment.

Comment: (also RED) AP: p.2, BHA indicates new activities for HOPE VI or Choice Neighborhoods, Mixed Finance, Demo/Dispo, Designated Housing, Conversion of Public Housing to Tenant-Based Assistance, Occupancy by Over-income Tenants, Project-Based Vouchers, Units with Approved Vacancies for Modernization, and Other Capital Grant Programs. BHA says here no PBRA or PBV conversions to RAD planned, and not sure that's consistent with what's stated later. Can this be checked?

Response: BHA staff will take the comment under advisement. On page 2 this has been updated to yes; BHA does plan RAD conversion in the next year.

Comment: AP: p. 3, BHA notes that the most recent 5-year Capital Action Plan was approved in EPIC on March 6, 2023. This should be shared with RAB (as occurs with any subsequent approval.)

Response: BHA staff welcome an invitation from the RAB to discuss the 5 year capital plan. Capital staff presented on the 5 year capital plan at the October RAB meeting.

Comment: AP: p. 3, no adverse audit findings noted. Glad to hear this—if any such findings come to light during next year, please share with RAB.

Response: Thanks for the comment.

Comment: AP: p. 4, BHA notes that it is not yet required to submit an Assessment of Fair Housing (AFH) but describes what it has been doing. BHA referred to setting up a Fair Housing Working Group in 2022, as well as describing ECHO and social service collaborations to assist residents (such as Leading the Way Home, Boston Public Schools, and Uphams Corner Health Committee & Landmark Assisted Living collaborations), revisions to Minority and Women's Participation Provision (MWPP), and ACOP revisions to streamline processing. At the November 2023 RAB meeting, Virginia Albert from BHA's Office of Civil Rights shared 14 specific action steps being taken by BHA on City of Boston 2022 draft AFFH goals, and these were shared with the RAB afterwards. Some of these relate to mobility and opportunity. Given HUD's recent grant of \$5 million to BHA for Housing Mobility Initiative, it's likely that the information about the limited ECHO program should be revised to reflect what steps BHA will be taking over the next year in this area (also an update on the 5-Year Progress Report). BHA should also convene meetings with the RAB in the new year about the formal AFFH plan that will need to be part of HUD submissions, even though this is not required yet. RAB has incorporated its role with AFFH into its Bylaws and mission. The Boston Tenants Coalition has also expressed interest in being involved with this, given their community engagement role with both BHA and City of Boston in prior AFFH efforts. BHA should also identify who is on the Fair Housing Working Group.

Response: The BHA has not yet entered a planning phase here on the recent HUD grant and will make updates as related to this funding award with the next amendment to the annual plan. BHA staff, Virginia Albert, the BHA convener of the Fair Housing Working Group, presented on the AFFH at the November RAB meeting and offered to come back if the RAB would like to continue the conversation.

Comment: S: B.1.1, Housing Needs of Families in Jurisdiction (pp. 2-10) On p. 2, don't know if any of the material in this chart has changed from last year. It is not clear if this is drawn from 2020 Census—BHA should indicate when 2020 Census data will be used (and if this may be folded into final version). BHA does note, on p. 3, that it is still relying on the City's Consolidated Plan from July 2018 through June 2023, and there is no new Consolidated Plan yet. In response to advocate inquiry, the City has confirmed that it got an extension to be able to use its existing Consolidated Plan until the middle of next year, but presumably BHA will be working with the City on the contents of the new Consolidated Plan, and the RAB should be advised regarding any Con Plan revisions. This will be important both for the AFFH Plan, mentioned above, and for the 5-year plan which will need to be worked on in the fall of 2024.

Response: Thanks for the comment. The current City of Boston Consolidation plan was extended until 6/30/2024. BHA staff will to the best of its ability inform the RAB of the City's Consolidated Plan process which is a public process. BHA staff welcome the RAB and BHA residents to participate. Staff will look to update the data in the table in conjunction with the updated Consolidated Plan.

Comment: S: On pp. 2-3, there is reference to annual turnover of 60 units in the tenant-based waiting list. This figure is not consistent with that cited elsewhere in the materials (p. 33). BHA should revise if necessary and explain why there are these differences.

Response: BHA staff respectfully disagree with the comment that the annual turnover figures are inconsistent. In the Supplement on page 2 the question is asking about wait list turnover while on page 33 is asking about Section 8 Vouchers Program turnover.

Comment: S: On pp. 3-4, as has been noted in the past, there are significant discrepancies between the number of Asians on the Section 8 waiting list (less than 2%) with their composition of the eligible Boston population (9.4%, as shown on p. 2). The public housing waiting list composition for Asians is far more like their overall demographic in the area (roughly 8.5%). As GBLs has recommended in the past, BHA needs to take remedial action regarding this discrepancy and review the Priority 1 categories and set asides to see if there is a way to achieve more equitable results for this community.

Response: BHA staff note the point and expect to continue the discussion as BHA moves forward with work on affirmatively furthering fair housing.

Comment: S: On p. 5, there is a figure given of 33,632 families on the public housing waiting list, and annual turnover of 8,288. This figure seems very high in comparison to

prior years, and inconsistent with that cited elsewhere in materials (p. 33). At one meeting, BHA Administrator Kenzie Bok noted that unusually low turnover was affecting the waitlist. BHA should revise if needed and explain differences.

Response: See above response on similar matter.

Comment: (also RED) S: On p. 7, the second strategy to address the shortage of affordable housing for all eligible populations is to increase the number of affordable housing units. BHA had added language to make clear that the adding of market units at site where appropriate is to “help leverage financing that will ultimately be used to preserve affordable units.” It would appear that this might fit better under the first strategy on pp. 6-7 which is about maximizing preservation, since there is no discussion here about increasing supply. If, however, this will also add to supply, BHA may want to revise the description. There is also text about using Faircloth-to-RAD authority to create new PBV units, as well as a discussion of the BHA’s close work with the City of Boston to identify opportunities at High Opportunity Sites as identified in the City’s 2022 Public Land for Public Good Citywide Land Audit. Greater detail should be provided as part of the PHA Plan on this collaboration and what new affordable housing opportunities will be developed. BHA may also want to include a discussion about the City-funded voucher program to the extent it may be utilized to increase affordable housing supply. The RAB should be given links so it can know more about the Citywide Land Audit, particularly as this may be used to secure affordable housing in neighborhoods that don’t yet have it.

Response: Thank you for this comment. The BHA is actively engaged in a planning process to identify opportunities to create new public housing by leveraging BHA’s Faircloth authority. As part of this planning process, the BHA is exploring priority sites identified in the City’s 2022 Public Land for Public Good Citywide Land Audit, available here: <https://www.boston.gov/housing/citywide-land-audit> . In the past year, the BHA collaborated with the Mayor’s Office of Housing and the Boston Public Library to include Faircloth units in the RFP process for the West End Library, a city owned site, which will include a new state of the art library and housing. BHA staff welcome an invitation from the RAB to discuss Faircloth to RAD initiatives.

Comment: To Whom It May Concern: The Asian American Resource Workshop (AARW) is a 45-year-old organization located in Fields Corner, Dorchester. Our organization leads many programming efforts in the community, one of which is working with Vietnamese tenants in Dorchester facing eviction and rent increases. Our staff work, alongside Greater Boston Legal Services’ Asian Outreach Center, to support community members to stop their evictions and/or negotiate sustainable rent increases. However, this work is harder each year as the rents continue to rise and we continue to see rental units flipped into condos.

Most community members we work with, who are primarily Vietnamese speaking and low-income families or seniors, immediately ask to apply for BHA housing when they come to us. However, for them, staying in their neighborhood, which has the cultural

and linguistic services they need, is critical. There is not enough public housing to meet the demand we see, and certainly not enough in the Fields Corner area.

We have seen Administrator Kenzie Bok speak about increasing the number of public housing units in the city, adding an additional 2,500 units (<https://www.wbur.org/news/2023/04/05/city-councilor-kenzie-bok-boston-housing-authority>). We are very supportive of this effort and would like to see it move forward, as we see every day the need for more public housing, particularly in communities like Fields Corner that serve a linguistically isolated immigrant community who are rapidly getting priced out of the neighborhood. We hope to see this effort moved forward in the BHA's 2024 Annual Plans.

Response: The Boston Housing Authority shares Asian American Resource Workshop's (AARW's) conviction that public housing is a critical resource that our Boston communities need more of, as evidenced by the large number of families on BHA's public housing waitlists. We are aware that BHA is now 2,891 units under our Faircloth Limit; this is 2,891 units of deeply affordable, resilient housing that could be serving local residents and preventing displacement. We do intend to put the agency on a multi-year path to start regrowing our portfolio and ultimately create that number of new units.

We are encouraged by a recent HUD notice from July 27, 2023 (H-2023-08 PIH-2023-12 (HA) that we believe significantly improves our ability to create those new public housing units as Faircloth-to-RAD units, especially given certain new provisions that will make it easier for a non-Moving To Work (MTW) agency like ours to supplement the initial contract rents. Another provision of that notice, however, sets a September 30, 2024 deadline for obtaining Notice of Anticipated RAD Rents (NARRs) in order to be able to supplement rents accordingly; after that date, HUD will pause for policy study.

In light of this limited time window, the BHA intends to spend the next nine months identifying potential viable sites across Boston to locate new Faircloth-to-RAD units, with the goal of submitting NARR applications for as many as possible, ideally the full 2891, prior to September 30, 2024. As we undertake this planning exercise, we look forward to reaching out to AARW and other resident and community groups to discuss desirable locations. We have also put out a Faircloth RFP to make it possible for other entities to indicate their interest in hosting Faircloth units, but we anticipate that reaching the full quantity possible will require public land and public development as well. We appreciate the specific comment here that the people AARW serves are particularly interested in seeing such new public housing located in Field's Corner or nearby, and we will take that under advisement.

We know that people of all backgrounds in Boston are under intense pressure from the extremely expensive housing market, with market rents tending to either price people out of the city or else require such a large share of income as to leave little for life's other needs and pursuits. We are glad that AARW agrees with BHA's mission statement that public housing is a resource that works, bringing stability, opportunity, and peace of mind to thousands of low and moderate-income families across Boston, and is in fact

essential to a diverse, equitable, and inclusive Boston. Please take this response as an affirmation that laying the groundwork to materially grow that resource is an important element of BHA's annual plan this year.

Comment: (also Lsd Hsg) S: On p. 8, under the strategy to target assistance to families at or below 50% of area median income, BHA has eliminated language about the "Moving On for the City of Boston" and "Rapid Rehousing Programs". This seems fine, but it may be helpful for the RAB and the public to explain what these programs were and why the references are being eliminated. In addition, as noted below in comments on Admin Plan, BHA is eliminating the Working Preference for its Section 8 programs, and so the reference to a working preference for Leased Housing Programs here should be eliminated.

Response: BHA Leased Housing staff did come and present on these changes at the October RAB meeting. BHA staff welcome an invitation from the RAB to continue the discussion. The reference on page 8 to admissions preferences aimed at families who are working (in leased housing programs) has been deleted.

Comment: (also Lsd Hsg) S: On p. 9, under the strategy to target assistance for families with disabilities, BHA again has eliminated the language about "Moving On for the City of Boston" and added language about "Mainstream Housing Vouchers and Stability Vouchers." Here again, this seems fine, but BHA should explain why the language was changed and what each of the listed programs do.

Response: See above response.

Comment: S: On pp. 9-10, under the strategy of conducting activities to affirmatively further fair housing, it would be helpful for BHA to supplement this with what was listed on p. 4 of the Template about Analysis of Fair Housing efforts—see notes above.

Response: Thanks for the comment.

Comment: S: B.2.26, BHA Organization Chart (p. 94) There are a lot of changes in this organizational chart, and it is likely, given that there are a number of open positions, and that a New Administrator came on board mid-year, that there may be more. This would be a good discussion at one of the RAB meetings during the PHA Plan public process to go through the chart and answer questions. In addition, as there are changes during the year, it would be good for BHA to share with the RAB and community partners any key updates to its organizational chart, chain of command, who fields what, etc.

Response: BHA Administrator came and presented to the RAB at the December meeting. BHA staff welcome an invitation from the RAB to continue the discussion.

Comment: PR: Explore voter registration at recertification. (p. 16) --The time frame for this has been moved from 2023 to 2024. Who will be coordinating these efforts? Can BHA make sure that this can occur prior to the fall 2024 elections?

Response: Thanks for this comment. The BHA is evaluating policies and procedures needed to enable voter registration during the recertification process. These efforts will be coordinated across our leased housing and public housing programs with different staff in different departments leading but with an overall coordination role played by administration staff. BHA staff welcome an invitation from the RAB to continue the discussion.

Comment: (also Lsd Hsg) PR: Continue to develop information systems, communications tools, and interactive forums to enhance collaboration, efficiency and productivity across departments. (p. 18) --This section is updated to indicate that the "One Call Now" software for automated texting, robocalling, and emailing for effective communications with residents is now in place at all sites. Information includes utility outages, unity days, food deliveries, and resident meetings. The updated text indicates that capacity regarding Living Unit inspections, work orders, and rent due can be added over time. BHA indicates that this will be expanded "as appropriate" for Leased Housing participants and landlords. This is a very positive development and use of technology. Are managers and Leased Housing staff collecting information at recertifications to help fully operationalize this (getting resident email addresses and any preferences on communication)? What time frame & elements are planned for Leased Housing operations in the coming year? What about effective response to resident communications by text, email or the like (it may be that is under Zendesk, discussed elsewhere in the Progress Report)?

Response: With regards to effective responses to resident communications via text and email: BHA has taken great strides in the last year to improve responses to residents with the launch of its customer service team and Zendesk platform. Clients can call BHA's customer service center by dialing 0 on virtually any BHA line; submit a tickets via our customer service center at bostonhousing.org/help or through existing email inboxes which create Zendesk tickets, or use live agent chat to contact us.

Comment: (also Lsd Hsg) PR: Develop a Customer Service Policy to promote client-focused and consistent service delivery. (p. 19) --New text indicates that a Customer Service Representative position has been created within Admissions and Leased Housing. Is this Kelly Cronin's new position on the organization chart, and was this this position that Gloria Meneses had before she retired from the BHA in fall 2023? Is there a slated date for the BHA to have a Customer Services Policy in place? None of the text describes the development of the policy or timeframe, even though that is the articulated goal in the 5-year plan. There should also be a plan to incorporate resident leaders' feedback and the feedback of others who frequently interact with the BHA before the policy is finalized.

Response: Kelly Cronin's position on the org chart is not Gloria Meneses's old position. The Customer Service Representative position is the old Administrative Aide position. However, the functions of the Administrative Aide related to paper, including filing and transporting are now defunct and the position is now more service related. The BHA

formed a Customer Service team with a number Customer Service Representatives to answer front line questions related to inquiries from applicants, participants, and residents. The BHA plans to continue developing this team and related policies in 2024 and will seek resident input at the appropriate time.

Comment: PR: Provide additional opportunities for customer feedback. (p. 22) --This refers to implementation of the new customer service tracking system, Zendesk, and indicates that over 25,000 customer service issues have been resolved since the program launched, with 80% of issues solved on time—a number BHA hopes to continue to improve. Is Zendesk operational for all BHA managed public housing sites, and is it available to Leased Housing participants and landlords? Did this start in 2022, as said here, or in 2023? It may be helpful to provide more of a description for how it works for the RAB, LTOs, and the public, similar to BHA's presentation at the Boston City Council hearing in September 2023.

Response: Zendesk is now operational for all BHA managed public housing sites, as well as leased housing participants and landlords. It is our main method of communication for all residents, landlords and clients. The Leased housing and landlord aspect of Zendesk were rolled out in 2022, and public housing in 2023. We agree a presentation to the RAB, LTOs and public would be helpful. We have been holding off on fully advertising this availability more explicitly to all tenants until we further centralized more functions for public housing in the customer service team and trained that team in all the necessary functions to answer as many public housing resident issues as possible, but plan to roll out this functionality in 2024.

Comment: Chart on Demographics of Waiting Lists & Development Residents (unnumbered) It should be noted that this chart is not exclusive to BHA's federal public housing programs (at least as to resident demographics) but includes state public housing sites. It may be helpful to supplement this chart with some explanation for the lay reader--i.e., what do each of the columns mean? In some instances, something may be listed that is not a "development" (such as the ELAHP program), and it would be helpful to explain how such set asides work. In addition, if BHA staff, on reviewing this data, have come to any conclusions about trends and appropriate steps to address any trends that are problematic, either as part of the Analysis of Fair Housing (AFH)--see above—or otherwise, it would be good to have that.

Response: BHA staff will take the comment under advisement and have tried to ensure the chart captured Federal sites and added a column description for the lay reader. No conclusions have been reached.

Comment: (also Capital) Another item from the Monitoring Committee meeting in the budget included \$2 million coming from Harbor Point. Harbor Point was originally a BHA federal family public housing development called Columbia Point (the largest development in the BHA's portfolio at the time). Unfortunately in the late 1970's there was a plague of disrepair and abandonment at the site, such that only 400-500 of the units remained occupied at the time redevelopment efforts launched during the BHA

receivership. One feature of the redevelopment (which GBLS participated in as counsel for all BHA tenants in the receivership) was the creation of a public benefit fund which could operate as a safety net in case there were issues with subsidy shortfall, but which would also be used to preserve and hopefully bring back public housing units that were lost. BHA has used the Harbor Point item to help shore up efforts to preserve other aging public housing sites like the Mildred C. Hailey Apartments while they are being modernized. It would be good for BHA to regularly report to residents on how the Harbor Point funds are being used.

Response: BHA Staff will take the comment under advisement, and attempt to provide information as to how the Harbor Point Funds are used to support residents.

Comment: (also Public Safety) BHA staff indicated at the Monitoring Committee meeting that the federal public housing operating budget is quite tight and has to be watched. One problem is that public safety staffing/support is not covered. BHA has utilized the maximum 20% of Operating Costs for its Capital Fund allocation to help cover this gap. Discussions are underway with EOHLC about including some of these costs for state public housing in the state public housing operating budget. To the extent that HUD and federal supporters can help do the same, this would be of critical importance to the Authority. Public safety is vital to the lives of residents living at developments across the City, and the BHA public safety resources are well needed to supplement basic City policing services. The Boston City Council and the BHA Administrator had a good discussion regarding these issues in September 2023, but the fiscal support is needed to help with residents' quality of life, just as much as speedy and appropriate response to work orders and repair needs.

Response: The Maximum of Administrative Costs are 10% for the Capital Fund Allocation, Operating Costs are a maximum of 20% of the Capital Fund Allocation. BHA agrees that public safety is vital to the lives of residents of residents living at developments across the City.

Admissions

Comment: S: *B.1.2, Eligibility, Selection and Admissions Policies, Including Deconcentration and Wait List Procedures* (pp. 11-23) In Section A. (pp. 11-17), on Public Housing, the only changed language from the prior PHA Plan submission relates to the number of site-based waiting lists (a decrease from 43 to 40 in public housing waiting lists, and an increase from 5 to 9 in mixed finance waiting lists). See p. 12, A.(2)c.1. Is that so? I'd note that there are ACOP changes (see discussion below), and to the extent that ACOP changes might require any change to what's here, there should be revisions.

Response: Thank you for your comment. The number of site-based waiting list in public housing waiting lists and mixed finance waiting list is correct.

Comment: S: In Section B (pp. 17-23), there are a few minor edits. In B.(1)a. (p.18), there is reference to changing the EIV database for existing subsidies, as well as past eviction and termination history. In B.(2)b (p. 18), there is a reference to the applicant portal as a means by which applicants may apply. In the Section 8 Admissions Point System (p.22), there is a new set of points (20 points) for SRO Referral Preference, and later point categories are renumbered. Finally, in B.(5)a. and b (p. 23), there is reference to the BHA website as a source of information about materials and any special purpose Section 8 programs. This seems fine, but since there are a number of Section 8 Administrative Plan changes (see discussion below), BHA should review this to see if the proposed Admin Plan revisions would require any additional edits to this portion of the Supplement.

Response: Thank you for your comment. On pg. 19 reference to working preference was removed and pg. 20 added SRO referral preference.

Comment: PR: Streamline and simplify the housing application process to maximize transparency for applicants and focus staff efforts on working with applicants who are most likely to be housed in the near future. (pp. 20-21) --Language is added here to provide that while all applications are completed online, that exceptions are made for applicants requiring additional assistance. It would help to know what percentage of applicants need that additional assistance, and whether assistance needs result in any delay of applications or in staffing strains and if there are strategies to address this. Certainly, it can be anticipated that many applicants may lack digital tools or skills, and disabilities and limited English proficiency may also interfere with full participation. BHA must ensure that any on-line systems increase overall access, and do not result in bureaucratic disenfranchisement for those who struggle with technology or its availability.

Response: Thank you for raising this important point. While the majority of our applications completed online, we understand that some applicants may require additional assistance. We strive to accommodate these individuals by providing personalized support. We monitor this closely to ensure we have the necessary resources to meet these needs without causing delays or strains on staffing. Our goal is to provide efficient and effective assistance to all applicants, regardless of their individual requirements. We don't currently have a mechanism to track which applicants are assisted and which are not. It's also important to point out that a significant percentage of applicants receive assistance from homeless service providers or other non-profits and the BHA is often not aware of the assistance.

Comment: (also Legal) PR: Simplify applicant and resident forms, improve program marketing materials and briefings. (pp. 21-22) --BHA has added that it continues to improve the quality of information on its website—could examples of that be provided? Moreover, as noted elsewhere in these comments, it appears that BHA has not been providing VAWA-related notices as required by law in conjunction with adverse actions taken against applicants, public housing tenants, and Leased Housing participants, and contrary to the practice of most HUD-assisted landlords in the Greater Boston area.

Response: Thank you for your comment. Examples of the website improvements included in the progress report including: The BHA will continue working on policy documents in the coming years to be as succinct and precise as possible, and BHA has updated and converted several frequently used applicant and resident forms, including the transfer application, the request forms to add household members, and the request form for approval of residual tenancy, to a new fillable pdf format and online forms with the resident/applicant information pre-filled to increase efficiency. The BHA currently provides a form of VAWA notice with its adverse actions. The BHA is in the process of reviewing the VAWA requirements and the appropriate notices to send going forward.

Admissions including ACOP

Comment: Throughout—BHA has revised pronouns to use “their” in place of “he/she”. This is fine.

Response: Thank you for your comment.

Comment: 1.1 (p. 1) --This is revised to advise people that BHA has additional housing units within its portfolio, and that application information is on the BHA website. Reference is deleted to HOPE VI sites. This is fine.

Response: Thank you for your comment.

Comment: 4.4.1(b) (p. 26) --This is revised to strike “Boston Residents, employed in Boston, or offered Employment in Boston” and to add “Displaced Boston Residents”. This makes sense given how the revised priority and preference scheme works.

Response: Thank you for your comment.

Comment: 4.4.2(b) (p. 27) --This makes a few changes to the Preference points to (a) substitute the Single Elderly Disabled Preference for the Non-Elderly Disabled Household Not Requiring Wheelchair Accessible units and reduce this from 6 to 5 points, (b) eliminate preference points for federal tenants with pro-rated rent, and (c) eliminate residency preference. These are discussed further below.

Response: Thank you for your comment.

Comment: 4.5.4 (pp. 29-30) --As with the Admin Plan, this describes the two points in time that verification for Priority 1 status is sought (at application as determined by BHA, and immediately prior to the eligibility interview). It also provides that a change in Priority 1 qualification to a different Priority 1 category does not affect eligibility, and there is no re-verification of Priority 1 status after eligibility is determined, but BHA will verify non-receipt of a subsidy prior to leasing (i.e., that the applicant hasn’t leased up in the interim with a subsidy, such as through another PHA). Language is also added that

the granting or denial of Priority 1 on any BHA waiting list suffices as an approval or denial for Priority 1 on other lists. All of this is fine—see comments above under similar provisions in the Admin Plan. In addition, BHA may also want to say this for other Priority categories, since under the ACOP (unlike the Admin Plan), there are other Priority categories where verification may be sought.

Response: Thank you for your comment.

Comment: 4.5.5(a)(iii) (p. 30) --This provides that an applicant may not be in receipt of adequate subsidized housing or other low-income housing from the BHA or another government agency but adds that an applicant will continue to be considered displaced if they reside in a subsidized unit that is not permanent or is not accessible. This simplifies the language. BHA may also want to add that applicants who resides in subsidized units who require transfer as a reasonable accommodation of a disability or for safety reasons (such as under the Violence Against Women Act or as victims or witnesses to violent or hate crime) should not be barred because they are in subsidized housing as this would not be “adequate” given their circumstances.

Response: Thank you for your comment. BHA staff will take the comment under advisement.

Comment: 4.5.5(g) (pp. 33-34) --As with the Admin Plan, this eliminates the requirement that notices to quit and summary process summonses and complaints must be provided in all cases seeking no-fault court-ordered eviction priority, and leaves this to the BHA to determine when such additional document may be needed. This is fine.

Response: Thank you for your comment.

Comment: 4.5.5(h) (p. 34) --As with the Admin Plan, this adds rent receipts or bank statements as a means to verify rent paid over time for the cost-burdened displacement category. As noted above, BHA (and HUD) have not required proof that the tenant has actually paid the excessive rent burden. In some circumstances, this is impossible, and in others, tenants may have tendered what they could, but the landlord would not accept less than full payment. If the tenant can verify that the cost burden for rent and tenant-supplied utilities was excessive in comparison to income, this should be sufficient.

Response: The intention behind this language was to provide flexibility for applicants who may not have a lease in their name, and therefore creates challenges in providing documentation that shows the rent amount. We recognize the importance of accommodating applicants who may not be the leaseholder, thereby offering an alternative means of demonstrating their excessive rent burden. Agree, if the tenant can verify that the cost burden for rent and tenant-supplied utilities was excessive in comparison to income, this would be sufficient. The language looks to verify the rent amount, not necessarily the rent paid, in those situations where a lease cannot be presented.

Comment: 4.6.2 (pp. 38-39) --This is a revised description of the single elder/disabled preference over other single applicants (as provided in federal law), and it excludes persons needing wheelchair accessible units, who will be prioritized for such units. Previously BHA had a priority within its family public housing portfolio for non-elderly disabled persons who elected to apply for family units. It is likely that BHA no longer thinks it needs this priority (in the past, it was meant to offset somewhat the effect of the elder preference within BHA's elderly/disabled portfolio under the Designated Housing Program.) It would help if BHA explained the rationale for the elimination of this preference.

Response: With the availability of NED (Non-Elderly Disabled), Mainstream vouchers, and the preference to accept referrals from the Continuum of Care, and the BHA's Priority structure which skews towards disabled applicants already, BHA has reevaluated the Non-Elderly Persons preference and believe that the preference is no longer necessary.

Comment: 4.6.5 (pp. 41-42) --This eliminates the Boston residency preference. This may make sense, but it would be helpful for BHA to explain why the preference is being eliminated.

Response: The BHA retained its Displaced from Boston preference and felt the Boston Residency was duplicative and confusing. The Displaced from Boston preference applies to anyone who has been Displaced from a unit in Boston (they may still be residing in Boston).

Comment: 5.4.9 (pp. 58-59) --BHA eliminated a duplicative section on verification of medical deductions. This is fine. It is likely that this whole area will need to be revised next year in both the ACOP and Admin Plan as part of HOTMA revisions (where the excess medical expense deduction will be changed from those expenses in excess of 3% of adjusted gross income to those in excess of 10% of adjusted gross income, and there will be some phase-in options for existing households), but this can all be discussed at that time.

Response: Thank you for your comment.

Comment: 5.5.3(g) (p. 65) --BHA has added a sentence, consistent with HUD guidance, that it will not automatically deny an applicant based on the presence of criminal history. Rather, BHA will review a number of factors, as outlined further in the ACOP. This is fine and a good addition, consistent with criminal history revisions BHA made in its policies in the FY 2023 PHA Plan.

Response: Thank you for your comment.

Comment: 5.6 (pp. 67-68) --BHA has revised the language in the ACOP about how to handle requests for live-in aides/personal care attendants (PCAs). Currently there may be circumstances where an individual proposed for addition to a household might either

be treated as a “pure” PCA/live-in aide, where the person’s income is not counted in determining rent and the person has no right to continued occupancy as a remaining household member if the tenant of record dies, is permanently institutionalized, or moves out, or of being treated as a “family member” whose income is counted and who may have rights under BHA’s residual tenancy policy. The existing ACOP also provides that the tenant and proposed addition are to be advised of these options and execute a clear document indicating which route is being pursued. This notice of options and execution of paperwork showing which option is elected is retained in the revised draft of subsection (h). It appears that BHA is just clearing up language, but if more is intended, it is worth discussion.

Response: Thank you for your comment.

Comment: 7.1.1 (j) (p. 83) --BHA has revised the Administrative Transfer category to include households who are rent-burdened due to one or more family members with lack of eligible immigration status and would benefit from a transfer to state-assisted housing. BHA has long had this provision and it is important for a humane policy for those households who are awaiting immigration adjustments but have excessive federal rents in the interim.

Response: Thank you for your comment.

Comment: 10.8 (p. 120) --This isn’t included in the summary of changes, but since there is underlining here, it may be new text—it includes different phone numbers for different regions, presumably for resident contact if there are issues about compliance with the BHA’s non-smoking policy in different public housing regions. This is non-controversial.

Response: Thank you for your comment.

Comment: Definitions (p. 130) --BHA has added a definition of “near-elderly family”. While this does match the HUD definition, we wonder why BHA needs this, as BHA had determined in the past, in its Designated Housing Program, to not include any preference for near-elders. Could this be discussed further?

Response: This is solely related to the Live-in Aid requirements which state that a person who is disabled or near elderly may receive approval to have a Live in Aid.

Budget

Comment: (S) Section B.1.3, Financial Resources p. 24: *B.1.3, Financial Resources (p. 24)* As noted on p. 2 of the Supplement above, BHA did not provide the RAB with data on any changed statement of Financial Resources until December 2023, shortly prior to

the PHA Plan public hearing. In future years BHA should make sure that such information is relayed to the RAB sooner, i.e., at the same time that the draft plan's public review and comment period begins.

Response: Budget Department staff are looking at the entire budget process in order to streamline the process and generate the analysis so that will help with this effort.

Comment: S: B.2.18, Conversion of Public Housing to Tenant-Based Assistance (p. 83) The Per Unit Monthly (PUM) costs included here are as of October 2022. It may also be that the average HAP payments are from 2022. BHA did provide updated numbers to the RAB in December 2023. In future years, the update should be available for the full comment period.

Response: Budget Department staff are looking at the entire budget process in order to streamline the process and generate the analysis so that will help with this effort.

Capital

Comment: S: B.2.25, Other Capital Grant Programs (pp. 92-93)
This all appears to be new (BHA did remove the prior text, which referred to the Replacement Housing Factor funds, since it has closed out its Old Colony HOPE VI items). It includes funding for Healthy Housing and Modernization at Ausonia, for \$1.75 million in funding for Mary Ellen McCormack, for \$2.2 million in lead-based paint abatement, for \$1.6 million in housing related hazards, and for \$32 million in ARPA Healthy Housing Funds. There are also some new acronyms here. It would help to have some narrative somewhere in the PHA Plan, Progress Report, or the like so that this section is understandable to the average reader, as well as knowing what the specific sources are (for example, what may be coming from BHA's Capital Fund, and what may be from other sources and what are the requirements for those other sources)?

Response: Thank you for your comment. These are new Grants that have been received from HUD, Congressional Community Project Funds and from the City American Rescue Plan Act (ARPA) Funds. The \$1.75 million funding for Modernization at Ausonia, is comprised of two Community Project Funding Grants (CPF) received December 31, 2022 outside of the Capital Fund Program (CFP). It is managed by HUD HQ with a spending deadline of December 2031 to be spent on sustainability measures and healthy housing strategies. The \$2.2 million Grant for Lead Based Paint (LBP) Abatement at Mary Ellen McCormack and the \$1.6 million for Housing Related Hazards (for Fire Alarm Replacements at Doris Bunte, Hassan, Mildred C. Hailey, Ruth Barkley and Torre Unidad and Fire Pump Replacements at Alice Taylor, Ausonia, Mildred C. Hailey, and Roslyn) were special HUD grants advertised in May of 2022, applied for by

BHA in June of 2022 (and Grants were received in August of 2022). These are included as part of 2022 Special HUD Grants that have an Obligation Deadline of December 2024 and spending Deadlines of December 2026. The \$32 million in ARPA Healthy Housing Funds were received by the City of Boston to improve apartment Ventilation (to prevent mold accumulation) and Window Replacements at 5 sites identified by the BHA with the City as needing these improvements. The sites identified are Ruth Barkley, Alice Taylor, Franklin Field, Roslyn and Rockland. These funds have an Obligation Deadline of December 2024 and Spending Deadline of December 2026. Architect Engineer's (AE's) have been procured and design and reviews are underway. As per all of BHA Capital improvements and BHA Resident Participation Policy, presentations to the LTO's and residents at each site, will occur at various design reviews for resident input.

Comment: PR: Complete a portfolio-wide capital needs assessment for all properties not currently slated for redevelopment. Devise a strategic plan to fund these capital needs over the long term. (p. 7) --The update notes that Capital Needs Assessments (CNAs) are now 100% complete for all BHA public housing properties. This is great news. BHA should share those assessments with its LTOs and the RAB. What's the time frame for carrying out the rest of the goal—the strategic plan to fund these capital needs over the long term?

Response: Thank you for your comment. The Capital Needs Assessments (CNA's) are used to implement Work Activities in the 5-Year Action Plan (5YAP) each year, prioritizing the most critical needs at each site. As has been previously noted, all the Capital Needs (at all the sites) cannot be fully funded with the available CFP Funding received by HUD each year. Best efforts are made to implement work items at each site from the CNA's. The CNA's are required by HUD to be updated every 5 years. CNA's are being posted to the Planning and Real Estate Development website page.

Comment: (also Admin) PR: In furtherance of BHA's commitment to sustainability, continue to reduce carbon emission toward 38% of 2008 level, and continue to explore climate resiliency, moving from identifying vulnerabilities toward implementing solutions. (pp. 9-10) --Additional work items are added for Hassan and Washington Manor (insulation in wall cavities). BHA also added Sustainability Planning and Reduction in Use of Fossil Fuels in Housing, consistent with Mayor Wu's State of the City address in January 2023. There's reference to consultants working on both heating system replacement and other envelope improvements in the 5-year Capital Plan to prioritize reductions in the next 7 years, as well as to review locations to introduce solar energy systems along with energy improvements where there are roof replacements. In addition, the updated Progress Report discusses partnering with utility companies to identify potential sites for geothermal wells for heating and cooling at larger land area sites, and identification of first target sites for electric vehicle charging stations and BHA fleet transition. It would be good to set aside a portion of a future RAB meeting, outside the busy PHA Plan season, for full briefing on all these initiatives and additional detail & timelines (this may also be valuable for the BHA Monitoring Committee).

Response: Thank you for your comment. BHA has implemented planning studies to review the strategies for reducing use of Fossil Fuels in Housing, new locations to introduce solar energy systems, potential sites for geothermal wells for heating and cooling, partnering with utility companies for cost saving from these strategies, identification of first target sites for electric vehicle charging stations and BHA fleet transition. Once these studies are complete with potential schedules for implementation, BHA will plan to meet with the RAB and Monitoring Committee to review in detail.

Designated Housing

Comment: S: B.2.17, Designated Housing for Elderly and Disabled Families (pp. 80-82) The sole substantive change here seems to be in the number of units affected—this previously said 2,326, and it now says 2,711 (available after exclusion of the 129 wheelchair units from the designation pool). The new number does not make sense given that there seems to be no change in the number of units at the individual sites in the table. Is there some explanation why the prior number was so low, or why the total pool increased? It would also be important to track how the various redevelopment and modernization projects at Hailey Apartments will affect the designated units there as they come out of the public housing program. We are not sure if any of that is slated for the period covered by the Plan. It would also be helpful to remind the RAB when the current Designation Plan (approved in March 2022) expires, so that any efforts to revise that plan or to submit a new one are timely and there are no gaps.

Response: Thank you for the comment. It is possible there was a calculation error in last year's table. Staff double-checked the accuracy of the table for this year's plan. The Designated Housing Plan is approved for 5 years from March 2022 and it is then possible to apply for extensions. Staff appreciate the importance of tracking how various redevelopment projects affect designated units and will continue to monitor.

Family Self-Sufficiency

Comment: PR: Increase Family Self-Sufficiency (FSS) Participation from 200 to 800 households. (p. 16) -- BHA has changed the dates by which goals will be completed from 2022 to 2024 (and from 2024 to 2025). However, other information makes it appear that these goals may be completed sooner. Can BHA check this? The FSS program expansion has been a real model in Leased Housing, and it would be very beneficial to bring it to a similar scale in BHA's public housing program.

Response: BHA currently has over 1400 families enrolled in FSS. (Over 1333 in LH, and 73 in PH. In 2024 it expects to graduate approximately 200 from LH FSS's program

and will pivot its enrollment goals to bringing the PH FSS program to scale. It hopes to enroll 100 additional families in the PH FSS program in 2024, and an additional 100 in 2025.

Grievance Procedures

Comment: (S) Section B.1.6 Grievance Procedure Pp. 37-38: BHA is adding language so that if a quorum cannot be assembled for a grievance panel, the hearing will default to a hearing officer. This seems OK, but since this is a formal revision to the grievance procedure, this likely requires individualized notice & opportunity for comment to go out to all affected residents under 24 CFR 966. 52(c). In addition, I know that the revised Tri-Party Grievance Procedure developed at Charlestown (Bunker Hill) has come up with some other small changes which would be improvements for the BHA Mixed Finance Grievance Procedure, and which should also likely be incorporated into revisions to the Standard Grievance Procedure.

Response: Thank you for the comments. BHA made changes to the Tenant Grievance Procedures in 2018 as part of the annual plan. These changes included the language that if a quorum cannot be assembled for a Panel, the hearing will default to a Hearing Officer. The 2018 changes went through the full public review and comment period and was approved by HUD. In the current plan, BHA is adding this as a clarification only.

Human Resources

Comment: (also Ops) PR: Proactively plan for future staffing in light of property repositioning and pending retirements, identify areas where BHA needs to hire for new capacities and functions. (pp. 16-17) --New text is added to refer to BHA collaborations with Bunker Hill Community College and Roxbury Community College for hiring of interns. It is noted that the Building Pathways graduates who've taken BHA maintenance positions continue to be active members of the BHA community. There are slight revisions in the text regarding the onboarding program. One question would be if a particular site does switch from BHA management or maintenance to private operation due to redevelopment, whether staff can transfer to remain in BHA's programs (particularly since BHA will continue to operate its redeveloped elderly/disabled portfolio). BHA should also provide clear and timely information for residents about who to contact on what issue in the event of any retirements or transitions.

Response: Thanks for this comment. The BHA continues to build out its asset management division and is committed to proactive communication with staff and residents at sites undergoing conversion from public housing to Section 8 subsidy. If a BHA property transitions to private management, for example in the context of the redevelopment of a site, current BHA staff would be re-assigned to other BHA properties. At properties where BHA will continue management, for example elderly/disabled sites converting to Section 8 subsidy under the Generations program, the BHA Asset Management Division will replace with new public private property manager positions to reflect updated responsibilities at sites.

Comment: (also Ops) PR: Institute additional mentoring and training for the current and the next generation of BHA staff. (p. 17) --Additional information here is provided on skill building workshops, such as monthly Microsoft Office trainings and Civility in the Workplace, and that in the coming year Operations will roll out a six-month Manager III training program providing a career path for management aides. BHA may also want to discuss the turnover that occurred in 2023 with the Administrator as well as the establishment of new positions and personnel in key leadership positions, and how this relates to both mentoring & transition (preserving and passing on institutional knowledge and skills, while drawing on new energy and skills and effective collaborations with other partners (City, HUD, EOHLC, community agencies, developers, resident leaders, etc.)).

Response: Thanks for this comment. BHA will take this under advisement.

Comment: (also Admin) PR: Continue to promote diverse hiring and employment opportunities for BHA residents. (pp. 17-18) --Text about COVID response has been removed, and language was added about the Resident Training and Internship Program, which resulted in hiring 9 resident student interns for the summer. BHA indicates it would like to expand this and have it throughout the year, as well as partnerships with training and career development opportunities, and that it hopes to launch a resident apprenticeship program for residents interested in program management careers. It would be helpful to get more information on this—how many intern positions are likely to be in place in 2024? When is it anticipated that the resident apprenticeship program will be in place, and who is the point person for both of these? How do these pieces interact with the Youth Advisory Council, discussed elsewhere, as well as Section 3 collaborations with YouthBuild, Design Corps, or SummerFab that have drawn in youth for training and potential employment opportunities, coupled with appropriate professional training or trades certifications?

Response: Thanks for this comment. The BHA plans to continue growing internship opportunities for residents. We have implemented an annual mailing for summer internship opportunities for residents who recently graduated high school and will continue to explore ways to increase engagement with residents about employment and internship opportunities at BHA. Internship programs at BHA are managed in

collaboration with Human Resources and related departments (e.g. Operations, Leased Housing, etc.) BHA staff welcome continuing the conversation with the RAB at their convenience to respond to any additional questions on this cross-departmental effort.

Leased Housing

Comment: S: B.1.7, Homeownership Programs (pp. 39-43) There are no revisions shown from the prior Supplement. BHA made significant changes in last year's PHA Plan to its Homeownership Program. As the BHA Administrator discussed at the December 2023 RAB meeting, has had dramatic success in increasing participation in the Section 8 homeownership program (24 closings in the past 6 months, in comparison to 24 closings in the prior 12 years), through collaboration with the City of Boston and use of ARPA funds to augment downpayment assistance for first-time homebuyers. We'd also note that while the last paragraph on p. 40 mentions that public housing residents may qualify for the program once they meet eligibility requirements, there is no information in the previous section on homeownership for public housing residents. BHA may wish to revise this so that it is clear throughout that the program is open to both public housing and Leased Housing participants.

Response: Thank you for your comment. BHA staff will take the comment under advisement.

Comment: (also RED) S: B.2.23, Project-Based Vouchers (pp. 87-89)
This has been updated to reflect the expansion of the Section 8 portfolio, and therefore the increased number of units that may be PBV, as well as additional authority to project-base where assisting the homeless, where the property includes supportive services for elders or persons with disabilities, or where the property is located in an area with a poverty rate of 20% or below. BHA indicates, based on this, that it anticipates having more than 4,000 PBV units under contract (up from 3100 in last year's plan). These are very positive developments given the many good features of the PBV program (good cause & rent limitations, choice mobility) supplemented by the BHA policies to carry over many public housing protections where public housing is converted to PBV (resident participation rights, grievance protections, and management protocols). As noted elsewhere, BHA should formalize Mixed Finance Management protocols that it expects will be used at all redeveloped sites, rather than have to spend significant time reinventing the wheel each time management plans are developed. BHA may want to update the paragraph on the top of p. 88, which refers to exceptions to the PBV cap at certain sites but is focused on 2022 and 2023.

Response: Thank you for your comment. BHA staff will take this comment under advisement. With respect to "Mixed Finance Management Protocols": BHA works closely with Mixed-Finance owners and managers to ensure appropriate and effective

management practices, and we have found that management plans must necessarily be tailored to individual sites. That said, we do recognize that standardizing practices is useful, and we will continually strive to do so.

Comment: (also RED) S: On p. 89, BHA has added language about its pursuit of sites for project-based vouchers to fully utilize its Faircloth to RAD authority. See discussion elsewhere in Plan and these comments.

Response: Thank you for your comment. BHA is excited at the prospect of creating new RAD units by utilizing BHA's Faircloth authority.

Comment: PR: Maintaining 100% Utilization of Section 8 Resources (p. 4) --As in the past, BHA has done an excellent job as a High Performer for its Section 8 program, and the anticipated 99% expenditure of funding eligibility and 98% of unit months is impressive, so that BHA is very close to the HUD baseline. For the statistics included here, it may be helpful to include what portion of the HCVP units are PBV (this is also found in the Supplement, but it wouldn't hurt to include it here).

Response: Thank you for your comment. BHA staff will take the comment under advisement.

Comment: PR: Apply for additional vouchers as opportunities arise. (pp. 10-11)--This was revised to (a) reflect that 410 families had been housed with Emergency Housing Vouchers (EHVs), (b) to increase the number of Foster Youth to Independence vouchers that had been obtained and where there was lease up, (c) reflect that BHA did receive an additional 55 HCVP vouchers in October 2022, and (d) that as of October 1, 2023, BHA received 57 stability vouchers to utilize in partnership with the Continuum of Care (CoC). This is all good news. BHA may want to describe more what "stability vouchers" are and how its collaboration with the CoC works.

Response: Thank you for your comment. BHA staff welcome an invitation from the RAB to discuss.

Comment: PR: Maintain high occupancy rates in the Project-Based Voucher (PBV) portfolio while decreasing turnover times. (pp. 11-12) --BHA has added language saying that in addition to technologies, BHA is seeking other ways to optimize and streamline the screening process. Could BHA provide further specifics and timelines for implementation?

Response: Thank you for your comment. The BHA is always working on ways to streamline our processes and therefore it is sometimes difficult to give a timeline.

Comment: (also Admin/RED) PR: Optimize the use of PBVs to preserve and create affordable housing in Boston. (p. 12) --As also discussed in the Supplement, above, BHA has updated this to reflect exploration of use of Faircloth-to-RAD capacity under HUD's revised 2023 RAD notice, and that ultimately there could be 2900 units that

could be authorized using this authority. It would be good for the RAB to get more information about these initiatives and the BHA/City collaborations to increase the supply of deeply affordable housing.

Response: Thanks for this comment. BHA staff welcome an invitation from the RAB to discuss Faircloth to RAD initiatives to create new deeply affordable housing.

Comment: PR: Implement ECHO—Expanding Choice in Housing Opportunities pilot program—and Small Area Fair Market Rents to promote access for voucher holders to a wider array of neighborhoods. (pp. 12-13) --The description here appears to be unchanged. While the Plan was pending, HUD announced that it had approved BHA for \$5 million to support BHA's Mobility Initiative, and so this should be updated to encompass what BHA intends to do to expand its efforts given this welcome news.

Response: The BHA has not yet entered a planning phase here and will make updates as related to this funding award with the next amendment to the annual plan.

Comment: (also Ops) PR: Optimize technology to transfer interaction with the agency—e.g., landlord and tenant portals, vendor tools, on-line rental payments and direct deposit. (pp. 19-20) -- New text is added about instituting hand-held tablets with a mobile work order platform. There is also an update that in September 2023 BHA implemented a dashboard capable of providing real-time information on work-orders, vacancies, and other performance metrics. This combination of initiatives is very promising as it will avoid the necessity to reload information from written notes and to expedite vacancy and work-order turnover (see other comments in Supplement). On resident portals, it's a bit unclear what the plan is for what will be implemented, and when, and BHA should provide more detail.

Response: Thanks for the comment. The BHA continues to look towards technology as a way to improve operations and customer service. BHA is seeking to trial handheld work order scheduling devices that remove paper from the field operators hands, will allow tenants to electronically sign when work is complete, and give BHA much cleaner data on what work needs to be scheduled completed. The trials will be completed in early 2024 and we hope to implement across the portfolio by mid-year. In addition, BHA is looking to design a resident / participant portal. That process is in the beginning stages, but we are outlining the requirements and determining the best path for development which we hope will start by the end of 2024.

Comment: PR: Improve landlord recruitment and retention strategies. (p. 22) --There is no new text here. Is the Request for Tenancy Approval process managed entirely online now (as has been projected last year)? BHA may want to advise as to what progress occurred with landlord recruitment and retention strategies since the last Progress Report.

Response: The BHA now holds monthly landlord workshops which can be helpful to receive feedback and resolve issues. The RFTA is now online although we receive

paper copies from time to time. We have also instituted electronic signatures on our HAP contracts which has been helpful. In addition, the three ECHO coordinators are constantly reaching out to new landlords, checking with new construction and renovation site, and liaising with existing landlords to find new and available units for BHA families. This work is ongoing and continuous.

Comment: PR: Maintaining 100% Utilization of Section 8 Resources (p. 4) --As in the past, BHA has done an excellent job as a High Performer for its Section 8 program, and the anticipated 99% expenditure of funding eligibility and 98% of unit months is impressive, so that BHA is very close to the HUD baseline. For the statistics included here, it may be helpful to include what portion of the HCVP units are PBV (this is also found in the Supplement, but it wouldn't hurt to include it here).

Response: Thank you for your comment. BHA staff will take the comment under advisement.

Comment: (also Res Capacity) BHA provided the budget for its Section 8 program at the Monitoring Committee meeting, which included \$20,000 used for tenant participation. The RAB has understood that part of its annual budget is covered by these funds and part comes from the federal and state public housing operating budget. In the past, BHA has helped support Section 8 participant outreach and organizing through Section 8 Tenants, Inc. (S8TI)., and presumably S8TI's expenses were under this item. However, recently S8TI has been inactive. It would obviously be helpful to revive Section 8 participant outreach and organizing. Could BHA provide more information on this item and planned uses for the coming year?

Response: BHA will take this comment under advisement. BHA hopes to be able to conduct additional Section 8 participant outreach in 2024 when the Resident Capacity program is up to full staff. BHA does send the Resident Engagement newsletter to any Section 8 residents who have signed up for the newsletter and continues to reach out to Section 8 residents related to programs that apply to Section 8 residents. Unfortunately, with S8TI currently inactive, it is difficult to drive some of the Section 8 resident outreach work and priorities. There is currently no active budget for S8TI.

Leased Housing Administrative Plan

Comment: 3.3.5(b)(2) (p. 22) --This revises the definition of Super Priority for participants in the Mod Rehab or PBV program to strike language about the owner and BHA's inability to approve the Applicant's request for reasonable accommodation, and to substitute that they cannot accommodate the Applicant or a member of the Applicant's household. Some revision to the language is needed, since too much was stricken and there was no reference to this being related to a disability or reasonable accommodation request. Moreover, the approval of a Super Priority IS accommodation,

and this makes it appear that no accommodation is being provided. The issue instead is that there is no way to make sufficient adjustments within the PBV or Mod Rehab program to meet the person's needs. For example, it may be that a person will require medical treatment that is not available where she is but transfer to the tenant-based voucher program would allow her to continue to benefit from the Section 8 program while she is getting necessary medical treatment in another location.

Response: See updated language in Admin Plan which will be posted on-line in conjunction with plan submission.

Comment: 3.3.5(e) (a-c) (pp. 24-25) --May want to consider redesignation—having an (a-c) immediately after (e) may cause confusion. In addition, there is new content here about how BHA verifies Priority 1 status at two moments in time—at the time of application with verification as determined by BHA, and immediately prior to the eligibility interview. (b) makes clear that a change in ineligibility from one Priority 1 category to a different one will not result in disqualification. For example, if an applicant had Priority 1 status due to homelessness, but was then housed, but the housing was inaccessible for a person with a disability, the loss of homeless priority wouldn't affect the ability to claim inaccessibility priority. In addition, it clarifies that BHA does not re-verify Priority 1 status after eligibility is determined, although BHA will verify that there is no receipt of subsidy (as discussed elsewhere in the Admin Plan). In addition, (c) eliminates language that is now in (b) but clarifies that approval or denial of Priority 1 status on any BHA waiting list suffices for approval or denial of that status on all BHA waiting lists. This all seems fine, with the exception of the confusing lettering scheme.

Response: Thank you for your comment. BHA staff will take the comment under advisement.

Comment: 3.3.5.(e)A.(6) (pp. 28-29) --As noted above, the lettering here is not as clear as it could be (particularly given the subparts of (e) prior to the listing of Displacement Categories). However, the change suggested here—removing the notice to quit and summons and complaint as necessary elements to verify court-ordered no fault eviction but allowing them to be requested where other paperwork is not sufficient to determine that—makes sense.

Response: Thank you for your comment. BHA staff will take the comment under advisement.

Comment: 3.3.5(e)A.(7) (pp. 29-30) --This adds, as a verification requirement for those who are rent-burdened, that the tenants provide rent receipts or bank statement providing the rent amount paid over time (if the tenants don't have leases providing the rent amount). There may be an issue here if the tenant was unable to pay the demanded rent given the tenant income. If the tenant has something other than a lease or receipts that may prove that there was a tenancy and what rent was demanded (such as emails or notices from the landlord or sublessor), that should be sufficient.

Response: The intention behind this language was to provide flexibility for applicants who may not have a lease in their name, and therefore creates a challenges in providing documentation that shows the rent amount. We recognize the importance of accommodating applicants who may not be the leaseholder, thereby offering an alternative means of demonstrating their excessive rent burden. The language looks to verify the rent amount, not necessarily the rent paid, in those situations where a lease cannot be presented.

Comment: 3.3.5.(e)A.(8) (p. 30) --Not sure if this is new language. It is underlined, but it is not in the summary of Admin Plan changes at the beginning of the document. To the extent that this revises the Inaccessibility Priority, since the prior language isn't referenced here, it's not clear why the change is being made, and it would be helpful to know that. In addition, given the reference to "administering agency", it may be helpful to know in what circumstances this might come into play with an administering agency. For example, let's assume the person had a Section 8 voucher with Metro Housing Boston. Are there cases where a MHB referral would be appropriate, and cases where it would be appropriate to advise the person to have further discussions with MHB?

Response: This language isn't new, it was underlined in the last approved Admin Plan.

Comment: 3.3.7(c) (p.34) --This eliminates the Working Families Preference. It would be helpful to know why BHA decided to make this change. Was a similar change made to the ACOP? In addition, BHA may want to eliminate the reference in the PHA Plan (Supplement, p. 8) about employing admissions preferences aimed at families who are working in Leased Housing Program. BHA will also need to renumber since they are removing (c), and the Displace Boston Tenant preference would become (c), rather than (d).

Response: BHA's decision to eliminate the Working Preference was driven by its absence in the ACOP and the organization's aim to align its policies. Changes were applied to Supplement p. 8, and Admin plan was renumbered.

Comment: 3.3.7(l) (p. 37) --This creates a new SRO Referral Preference, where an otherwise qualified Priority 1 applicant is referred by the owner of an SRO site to their waiting list. It would be helpful to explain how this works mechanically and why it is added. As noted elsewhere in the Supplement and Admin Plan, a relatively large number of points are assigned to such referrals.

Response: In accordance with HUD regulations, BHA made the decision to adopt a SRO preference to allow landlords the opportunity to refer clients directly to the BHA, thereby expediting the placement of tenants into vacancies. Without the SRO preference, applicants who have applied for both SRO and one bedroom units were typically coming up for both types of units at the same time and rarely choosing the SRO, resulting in higher vacancy rates. This change hopes to resolve that issue.

Comment: 3.3.9(b) (p. 38) --This adds SRO Owner Referral (with 20 points) to the point system—see comments above under the Supplement and the Admin Plan. This also lists 1 point for Working Family Preference which should be removed since BHA is removing that preference.

Response: Changes were applied to remove the Working Family Preference. Plan will be updated to remove the points.

Comment: 9.5.3 (pp. 109-110) --This adds new language about how the owner may verify repairs for reinspection with receipts, photos, or other verification. From the cover summary of changes, it appears that this is to be designated subpart (d), but the lettering is missing. This makes sense in appropriate cases and could also include proof that an owner obtained a necessary permit. However, as was discussed at the RAB meeting in November 2023, there may be concerns about owner abuses or being unduly friendly with certain inspectors causing lapse in judgment—so residents should be informed if BHA is accepting an owner certification that a repair has been done, and if the resident questions it, or if BHA has other evidence that this is not so (complaints from other residents in the building affected by a common system, or notice of a current ISD citation), BHA should independently investigate this.

Response: Thank you for your comment. BHA staff will take the comment under advisement.

Comment: 11.1.1(a) (p. 122) --This adds language about supplying any necessary verification about departure of a family member. This is fine. What may be possible can vary from case to case. In most instances, it is likely that a new lease, utility bills, or the like can demonstrate a new domicile for the departed member. There may be cases, however, where the participant really does not know where the person has gone but is willing to both document reasonable efforts to verify their whereabouts and to certify that they are providing accurate information that the person is no longer in occupancy, and this is the best that can be obtained.

Response: Thank you for your comment.

Comment: 11.1.1(b) (p. 122) --This adds language about a family's responsibility to inform and supply any necessary verification to BHA within 30 days when a family without income receives earned or unearned income, and BHA will then process an interim certification. It does not make clear what happens if the family doesn't do that—BHA should clarify what the consequences are for untimely reporting or untimely response to verification requests. It also doesn't make clear what happens if the tenant does inform the BHA and provide follow-up information, but BHA doesn't advise the tenant right away of what additional information it may need. In this situation, if the tenant is being responsive to each notice, BHA should not impose any retroactive penalty, but if there were an increase in the tenant rent share, BHA should do this with advanced written notice, rather than retroactively.

Response: See updated language in Admin Plan.

Comment: 11.1.1(d) (p. 123) --This says that if BHA doesn't receive necessary information to perform actions in the time frame, it will either inform the participant that it is not taking any action on the request or is proceeding to termination, whichever is appropriate. This is relevant to removal of household members, interim reporting of receipt of income after being at zero income or reporting a decline in income. Termination of assistance should only rarely come into play. Moreover, if the tenant is trying to be responsive, it should be BHA's obligation to advise the tenant in writing of what else it may need and set a reasonable time frame for that information to be provided. In some instances (such as failure to timely report going from zero income), it may be that a retroactive increase in the tenant share could be imposed, instead of taking no action or terminating the participant. In other instances, as noted above, if the tenant is being responsive but there is some delay because BHA does not timely inform the person of what else it may need, the tenant should not be penalized, but should either get rent relief (downward adjustment) back to the first month after an income decline was reported, or increases should be prospective. There may be times if the tenant is at fault in the delayed verification that it would not make sense to deny the relief outright, but to adjust the effective date (such as in the case of reporting on decreased income).

Response: Thank you for your comment.

Comment: 14.8.9(d) (p. 184) --There is language added here about use of Emergency Housing Voucher (EHV) service fees to pay not only a security deposit or real estate broker's fee, but "other owner related fees such as owner retention payment". This seems fine based on the EHV program guidelines, but it would help for BHA to describe what is meant by the term "owner retention payments".

Response: BHA has been paying a bonus to owners after one year with the EHV voucher holder in the amount of one month's contract rent.

Comment: 17.8.2 (p. 249) --This adds language about when participants are eligible for Choice Mobility vouchers, to make it be the later of one year after conversion (effective date of the HAP contract) or one year after the person moves into the property, whichever one is later. This is fine.

Response: Thank you for the comment.

Comment: 17.8.3 (p. 249) --This provides that BHA will manage the Choice Mobility process in accordance with its policy and in concert with the project-based owner. This is fine. Close coordination is often needed to avoid problems. For example, the tenant may be issued a voucher, but not be able to secure a new unit, and should not be adversely impacted as to their ongoing PBV relationship with the owner. If, on the other hand, the tenant can secure a new unit, BHA can work with the tenant and the PBV owner to avoid hardship to both parties and any duplicate subsidy during the transition.

Response: Thank you for the comment.

Operations

Comment: To Whom It May Concern: They renting room under tables. It's illegal. I'm writing it for you because doing some wrong. Example: Residents female she or her and bringing boyfriends or husbands. Ok boyfriends of husbands are working outside earn a lot money. But they lovers cover it and the report each earn to BHA. Example 2, Boyfriends, sons, husbands – those people never report it to BHA. It's true. Can you come with (Fed-Policeman or FBI) and you going to take some Residents out forever. It's the truth. You're too creative (Real Residents ID) to finishing illegal business over BHA. Example 3, First Floor and Fourth floor and some more. It's terrible. It's terrible. Some residents are not on the lease! All securities are blind. All employees – local offices are blind too. OK thanks.

Response: Thanks you for the comment. Appropriate Operations staff were alerted to the allegations and will follow up with any necessary lease enforcement.

Comment: S: *B.1.4, Rent Determination (pp. 25-30)* BHA has no revisions here. It was anticipated originally that BHA would be rolling out a number of HOTMA changes in its FY 2024 PHA Plan which would affect rent and income eligibility determinations for both federal public housing and Section 8, but HUD has issued revised guidance giving BHA and other PHAs more time to implement changes in their PHA Plans, ACOPs, and Admin Plans, as well as any related lease provisions. BHA should supply information on the likely time frame for engaging with the RAB, LTOs, and affected residents regarding these changes and should take sufficient time for resident education and involvement over what may be some fairly complicated changes. This should be a more robust process than simple notice-and-comment since there are significant changes and there is likely to be significant resident concern. Identifying areas where the BHA does not have a choice and where it retains discretion and resident input will be valued will be important.

Response: BHA is in the process of conducting a policy review of mandatory and discretionary HOTMA changes in the Public Housing and Leased Housing programs, and will actively engage with residents over the course of 2024.

Comment: S: Section B.1.5 Operation and Management: On pp. 31-32, BHA eliminated Mission Main from the list of developments, since it has now been converted to RAD/Section 8 blend (previously was public housing ACC) and has changed the address for the Anne M. Lynch Homes at Old Colony from 25 James O'Neill Street to 20 Rev. Burke Street. Should Heritage (RAD & PBV), Lower Mills (RAD and PBV), and

Patricia White (which is now 100% PBV) remain on this list? For Hailey, should there be slightly different descriptions of what portions of what was formerly Bromley Park and Heath Street remain in BHA's portfolio as the new Centre Street Partners properties go up? Similar question for Charlestown/Bunker Hill (depends on whether there may be lease up of those new Mixed Finance buildings within the term of this PHA Plan)?

Response: Thank you for the comment. Properties that no longer include public housing ACC units will be removed from the chart. Properties under active redevelopment will appear in the chart while there are public housing ACC units at the property. BHA will consider adding additional context in the form of a footnote to indicate properties actively undergoing transition between public and private management.

Comment: S: On p. 33, the chart is revised to reflect revisions in the number of public housing units and Section 8 voucher units (including PBV) within PHA management, as well as expected turnover. As noted above, there is some discrepancy here between the turnover listed here and that listed earlier in the PHA Plan. Moreover, we expected to see the number of PBV units to rise, since a number of BHA public housing units have converted to PBV, but it seems that the HCVP total increased, but the PBV total has not changed.

Response: BHA staff respectfully disagree that there is a discrepancy in the figures as in one place BHA is reporting on waitlist turnover and in another place on program turnover. Please note the amended text in section 23 of the supplement on project-based vouchers.

Comment: S: On p. 34, there is an increase in the number of persons expected to be served by the elderly/disabled resident services program, but a decrease in turnover. Similarly, there are changes for Resident Employment (decrease) and Public Housing Self-Sufficiency. Can BHA explain why these changes were made?

Response: There may have been a calculation error in last year's plan regarding number of elderly disabled served. BHA staff are making an estimate of the units or families served in a program at year beginning of April 1, 2024.

Comment: S: In the note on p. 34 with five asterisks, which lists those served by the ROSS program, BHA deleted the explanation that said this would increase from 300 to 400 with Mary Ellen McCormack being added as a 5th site. As drafted, there is still an increase from 300 to 400, but no explanation for the deletion which explained why it changed. It would help to either keep the explanation or have some other explanation.

Response: ROSS was funded and the Mary Ellen McCormack site was added.

Comment: S: B.1.8, Community Service and Self-Sufficiency (pp. 44-48)
The chart on pp. 45-46 includes revisions in numbers for participants in the Elderly/Disabled Resident Services Program, VASH, Section 8 and Public Housing Family Self Sufficiency (FSS), Boston Public School Homeless families, Foster Youth to

Independence, JRI, and Resident Employment Program. It may help to explain why these numbers have changed. In addition, in the notes, Public Housing FSS size is based on Oct. 2023 figures, but the ROSS figures are based on October 2022—assume the latter should be October 2023. The chart on p. 47 has updated participant levels for Section 8 and Public Housing FSS.

Response: The ROSS date has been updated.

Comment: (also Admin/RED) S: B.1.10, Pets (pp. 62-63) This is just a summary of the two separate policies—one for family public housing and one for elderly/disabled public housing—and no changes are proposed. It may make sense at some point to review these policies generally to see if any tweaks are needed. For example, at Bunker Hill some questions have arisen about the \$25 registration fee and whether this still makes sense or is uniformly enforced. In addition, when sites are converted from public housing to other forms of subsidy, it should be assumed that pet ownership rights would carry over, and this should not just be grandparenting existing pets but preserving the right to get a replacement pet if an animal passes on. This is one of a number of the topics which could be addressed in standardized Mixed Finance Management Protocols, building on existing protocols for Grievance and Tenant Participation.

Response: BHA staff will take the comment under advisement.

Comment: S: B.2.20, Occupancy by Over-Income Families (p. 84) BHA revised this section regarding which section of the ACOP refers to over-income occupancy. This was the subject of an amendment to the FY 2023 PHA Plan which the RAB participated in earlier in 2023.

Response: Thank you for the comment.

Comment: S: B.2.21, Occupancy by Police Officers (p. 84) This is unchanged, and BHA does not have any units officially occupied by law enforcement officers.

Response: Thank you for the comment.

Comment: (also Admin/RED) S: B.2.22, Non-Smoking Policies (pp. 85-86) There are no changes here. It should be noted that if BHA public housing is redeveloped through a public-private partnership and the smoking policy details are changed (such as occurred at Old Colony), the changes should be described and there should be the normal opportunity for resident review and comment on any changes, with due weight given to resident concerns.

Response: BHA staff will take the comment under advisement.

Comment: (also Capital) S: B.2.24, Units with Approved Vacancies for Modernization (pp. 90-91) BHA is revising its prior statement, which said that there were no units officially offline as funded for modernization. It appears here that 12 units (with some

change in apartment designation) are offline at Mary Ellen McCormack, and there are 5 McCormack units removed from the list. Is this indicating a net increase from 5 to 12, or a decrease from 17 to 12? 15 units are listed for Eva White, and 2 are stricken out. Finally, 4 is added for General Warren, and 8 is removed for Mission Main (presumably because all Mission Main units have now been converted to Section 8 PBV or RAD). It should be noted that all these units are either managed by Winn Companies (Mission Main, Eva White, and General Warren) or have significant Winn involvement (McCormack). It would help to have a narrative explanation for this section so that the RAB and members of the public can understand this section and long-term strategies regarding these units.

Response: Thank you for the comment and suggestion. The Mary Ellen McCormack list reflects a net decrease to 12 units. BHA acknowledges that additional context may be helpful, and may add comments. For General Warren the 4 vacant units were added due to a structural and major plumbing/underground sewer repair project at 375 and 381 Main Street (Building K). 2 units were vacant for several years while this capital improvement project was pending. BHA was unable to secure an AE capable of performing this design until recently. The work has been bid and construction began in August/September of 2023. 4 units (1/2 of the building) are being completed at a time. There are 8 total units in the building.

Comment: (also Capital): My favorite quote from John Lewis, A great civil rights leader and activist said the followings:

“Do not get lost in a sea of despair. Be hopeful, be optimistic. Our struggle is not the struggle of a day, a week, a month, or a year, it is the struggle of a lifetime. Never, ever be afraid to make some noise and get in good trouble, necessary trouble.”

This is my listings of “good trouble, necessary trouble” Work Items for the BHA Annual Plan CFP 2023:

1. Re-Open all the Family Unit Trash Chutes at Commonwealth Development.
2. Clean buildings, and Hallway clean up
3. Heating for all residents, new Honeywell thermostats that can be regulated by the resident.
4. New Plumbing and Pipes
5. New apartment doors(current doors are too high-up off the floor and cold air and pest can get inside of unit)
6. New Windows with better ventilation, that do not sweat in the hot and freezings temperatures, ?mold)
7. New Elevators for all high rises(current elevators break down all the time, and the elevator ceiling fan does not work which causes poor and no air circulation)
8. More Street lighting throughout the property for the residents safety
9. More Cameras on the property for residents safety.
10. Repair Roofing for all high-rises
11. Repair property trip hazards(residents are afraid of falling down, and the residents with walking sticks-canes, and wheelchairs)

Response: Thank you for the comment and list of priorities, some of which can be found in the BHA's Capital Plan. BHA welcomes and incorporates resident input as part of the annual capital planning process. BHA staff will take all comments under advisement. Specifically Items 1, 2, 3, 4 & 8 may be reviewed with Operations staff if this has not been addressed; Item 5, had a Unit doors replaced in CFP 18 and 19 (recently completed), if new weatherstripping is required it can be reviewed with Operations staff; Item 6 is being reviewed with current Envelope/Masonry Repairs noted in CFP 21, 22 & 23; Item 7 have the elevators at Commonwealth Elderly out to Bid funded currently in CFP 22 and CFP 21 have planning review of the Commonwealth Family Elevators in Design with budgeting of added City Funds; Item 9 had significant cameras added through CFP 18, project was completed in Nov. of 2021; Item 10 Roofing at Commonwealth was last completed in 2002 with replacement scheduled for 2027 (will be added in CFP Budgets for 2027 & 2028). Item 11 currently in construction contract 1629-05 & 06 which should resolve tripping concerns.

Comment: PR: Maintaining 97% or Higher Occupancy Levels (pp. 3-4) --This has been a key BHA goal since the end of receivership in 1990. It is commendable that BHA has achieved a 96.8% rate by the end of September 2023 and aims to achieve 97% within FFY 2023. As GBLS has said in the past, BHA should provide not only aggregate information on this, but development-by-development information so that site-specific strategies can be developed. While BHA has allowed vacant units at Bunker Hill and Mildred C. Hailey Apartments to be used for relocation, there may be times where there is a surplus above reasonable relocation needs. Such a surplus may provide an opportunity for on-site residents to right-size or meet long-standing accommodation needs. It may also provide relocation resources for other sites as needed during their redevelopment. LTOs should be actively involved both in the development of their relocation plans and in prioritizing how any such surplus may best be utilized. BHA may also want to discuss the new use of inspectors available from the Leased Housing program to help support public housing operations, both with carrying out Living Unit inspections and in quickly identifying any necessary work upon turnover.

Response: Thank you for the comment. BHA maintains a constant focus on maintaining and increasing occupancy rates, with monitoring at the program, property and unit level. Relocation units are held in accordance with approved project schedules. BHA acknowledges and agrees that the status of those units should be reevaluated as project schedules change. BHA is currently utilizing Housing Inspectors to conduct LUIs and assist with common area inspections.

Public Hearing

Comment: So basically, I'm a Charlestown resident. I'm not prepared to speak, but I do have concerns. I need to be truthful. I do not want to be taken advantage of and to be misinformed. I was sure I have to be truthful and to say that I was absolutely sure that

there would be some... Because I'm also half deaf, I need to say that I have hearing problems. So when I attended the previous BHA meetings and I didn't know about the being deaf, so sometimes I didn't understand why it just [inaudible 00:20:26] me. Now I know the reason. I was sure that this construction which was going on, that it would be somehow conducted very quickly in an organized fashion and that all the buildings, more or less, quickly would be demolished. And we all would be happily ever after moved into the new buildings, which of course looked very beautiful, and you requested our input and all that.

But quite a few weeks ago I found out, and actually it was an outsider, it was a complete outsider that informed me, who pointed out that first of all, it was a Section 8 based project that I do not have a Section 8. That person pointed out that you do not have a Section 8. This building that is being constructed, it's not about you. And I started collecting information at that point and I realized that that was the situation. Exactly. That building which is being constructed in the redevelopment space, it's for those people who were in other buildings very near mine, but it's not my building. The timeframe for my building is not known.

So being a very inquisitive person, I visited Ellen McCormick development, you know what it is. Mary Ellen McCormick, Old Colony. And I had taken a look at what it is there and I see what I see. There is a relatively new building... that was constructed some years ago, probably in 2015. And there is still that very old complex, the same buildings, they're still standing there. So I'm afraid that I will find myself in the same situation. But not even that situation, that my situation will be even worse. That someday, some morning... Because I have encountered some very ironic native Boston residents who told me that they will not know until they wake up one morning and see their building demolished. Of course, that person was exaggerating, but there was a grain of truth in that.

I'm afraid that one morning I will wake up and see construction going on in front of my building in what I call my backyard. It's a sort of backyard. But again, will not have any relation to me. It will be because someone else again. When I say that, I'm talking about 9 O'Reilly Way, 9 McNutty Court, 17 McNutty Court and 82 McNutty Court. And I'm in building, which is 1 O'Reilly Way, 18 Staff, 26 Staff and 74 Walford Way. So I would like to get information about when it is planned to demolish my building, which is 1 O'Reilly Way, 18 Staffs and 74 Walford Way. And are you going to construct anything before in place of mine? Are you going to construct anything? Demolish 9 O'Reilly Way, 9 McNutty Court. 17 McNutty Court, 82... Before demolishing my building.

Response: Hello. I'm happy to talk to you at length after this meeting. But for the benefit of everyone, I do want to explain that the Boston Housing Authority is carrying out a redevelopment of our Charlestown public housing community in the Charlestown neighborhood of Boston. It's a very large public housing site. There are 1,100 public housing apartment units across 42 or 43 buildings. It's true that we are not moving as quickly as we would like. But that said, we have started, we have vacated and demolished 126 original apartments at this point. And we are in construction on the first building, which will be 102 new apartment units.

I just want to be very clear that when as new buildings are built, folks who live in the public housing development will be invited to move in to brand new apartments. So rest

assured that the new apartments are indeed for current Charlestown Public Housing residents. And into the future, future families will come off of the Charlestown Public Housing waiting list. They will stay permanently affordable.

So I think that the simple answer is we're not moving as fast as we had hoped, but we will absolutely continue to keep you and your neighbors informed about our progress. There will be no surprises. No one will wake up one morning to find buildings being demolished unexpectedly. Again, I'm happy to speak with you anytime today or anytime you'd like.

Comment: [inaudible 00:27:55] before was a resident of Boston Housing Authority or a clientele because I know him very well. This is my mom and she lives in Charlestown. Yeah, she's a clientele also. So I just have a question, I'm sorry. Knowing the background of some of the workers. Just a question, I'm sorry, because I have proof of evidence what I'm saying to be true. Just not trying to throw the ball in there, like softball. My question is, is there a reason why it's being delayed or is it due to the fact of its actual staff member that's kind of lagging off, not letting this go forward on a faster pace for the residents?

Response: I can answer the question. So the question was about the Charlestown redevelopment and whether there's a reason for the delay or if it is being caused by BHA staff or other individuals. And I would say no, it's not being caused by any BHA staff. BHA is very focused on advancing the redevelopment. We're not terribly delayed. We're not as far along as I had hoped we would be. And the reasons have to do with two things. One is construction costs which continue to rise and then most recently with interest rates on debt.

Comment: Yes, hi. In my sleep, I was stabbed 33 times in 2017 and I have trouble with paperwork and I'm also disabled. I keep getting conflicting paperwork from different people from the office saying I have to mail paperwork in ASAP or I'm going to lose my housing and stuff like that. And I try calling a phone call [inaudible 00:30:35] on speed dial, Boston Housing, and I'm trying to find out just to get an answer to make sure I'm not going to get a knock at the door and get thrown out of my place.

Response: Commenter provided their contact information to staff and this was given to leased housing staff for follow-up.

Comment: I just have a question burning to my situation. Don't hate because I'm beautiful. I participated in the HUD-VASH program. It's Housing Urban Development Veterans, it's subsidized housing, same thing, Section 8. However, I have a unique... I wrote it down, because I also have issues speaking in public. All right. So greetings. Thank you for allowing me this opportunity. Although my question is specific to me, it's not unique. Your program hypothetically is designed to assist folks with re-assimilating into society. You answered this, correct? Correct, right? I'll read it again. Okay. All right. So I have this question that pertains to that and I'm having an issue. I just have to say it and maybe you guys resolve it, whatever. Let's see. Some requirement procedures are cumbersome to point that they border on being

shortsighted. I'm going to say it like that. I have the opportunity to use this system exactly how I believe it should be used, eventually being independent. So my question is this, why is it not possible for me to apply my HUD-VASH procedures like my voucher in this fashion? It just so happens that unfortunately my parents have passed away, they had a house and all this. And the house has been empty for 18 months. I could conceivably rent it. However, being that I'm involved in this program, my finances do not allow me the ability to do that.

However, with HUD-VASH's assistance, I could rent it. However, between HUD-VASH, Boston Housing and every other place that is involved, and I tried to do this where I moved into where I live now in February. For the record, my name is Vincent Getty. I live at 1433 Hancock Street, Quincy, Massachusetts, Apartment 211. So the house, why I was denied is because... And I could live there. It would help me gather myself and go out into society and eventually get off of this program and be self-sufficient. Why I was denied to apply my voucher to it was because my last name and... It's actually my grandmother's name who I actually never met. The house is in her name. So theoretically, in someone's mind it's my house. It's not. Because I wouldn't be a participant in this and all this, I wouldn't be here and got the letter and all that, because I made all the criteria. So that's my question.

I'm going to follow up in writing. See, my voucher runs out in April. This house has been empty for 18 months. I'm going to attempt to move there again. So this isn't going away, just so you're aware, I intend to follow up. Thank you for your time. I appreciate you. [inaudible 00:34:23] today. Thank you.

Response: Appreciate your comment. And also, there are some rules around... As you are probably have already run into, there's some rules around renting houses from a relative. I think also with respect to your situation, I'd like to understand it a little bit better so I can be as responsive as possible. Commenter provided their contact information to staff and this was given to leased housing staff for followup.

Comment: Greetings, consider this clarification confirmation of my participation question posed on December 11, 2023 at the annual federal and state plans public hearing. First and foremost, thank you! I appreciate your bedside manner. You are a credit to your profession. This is what I asked: I have the opportunity to apply my HUD/VASH/BHA voucher to rent a house (single-family) for the rate (whatever it is) that is applied to a single person, (me) and ((Natick)). The circumstances are: both of my parents and my older sister have passed on. God rest their souls. The only immediate family remaining is my older brother. Who lives in Hyannis, MA. My family home is in Natick, MA. The house has been vacant for approximately 18 months. I attempted to reside at the Natick residence before moving to my current residence in Quincy, MA. The HUD/VASH folk plus BHA explained that this was not possible because the house and I have the same last name. They also mentioned that it makes no sense. The house in Natick is paid for. Only taxes and maintenance costs are applicable. When I try to move there last year, my mother was still alive, but living with my brother due to her age, 86, at the time and a medical condition referred to as early onset. My brother retained power of attorney over my mother's affairs. If the house was disposed of, I am entitled to nothing. However, my brother is hesitant to do that. For a variety of reasons that are his business and his

business alone. He was gracious enough to extend an invitation to me to inhabit the dwelling and forgo rent by instead of paying the taxes and maintenance. I might actually be able to do it without any assistance. However, it would extinguish my 60% compensation awarded one the first of every month. Basically I would have no money to live on. I'm sure. In Natick in familiar surroundings. I am sure in a short time (less than two years) I would be self-sufficient and not require the HUD/VASH assistance I earned. Also, that I would, indeed still be in Natick, flourishing and helping others. That's it short (kinda), simple (maybe). I appreciate your time and attention in this matter. Your efforts, although sometimes misunderstood are appreciated. Question or contact can be achieved with the included contact information. Happy holidays to you and yours! So you know the roof at the Natick residence was replaced last summer, the heating current configuration is up-to-date and efficient. I apologize for the presentation, resources are limited. Although BHA may not be the actual agent for Natick, MA, Middlesex county. The federal system is actually the actual 'vehicle' from where my benefits are drawn. The question is still pertinent, and BHA is involved because I am under their authority now and when the time comes (April) to renew my lease they would have to approve. So it is a valid question and the answer should be applicable to any and all agencies involved. Thank you again.

Response: Commenter provided their contact information to staff and this was given to leased housing staff for followup.

Comment: Alrighty. Now, from what I gather, I really need to talk to you because I live in a beautiful area of just [inaudible 00:35:34] Village. But our people, staff that running the place, they need a good kick in the butt. They're blaming gaming Boston Housing for not taking care of the issues that they have when us tenants move in, they're claiming that they're inspecting it. And I know damn well that you guys are not inspecting it because I'm finding too many issues. First issue was simple things, but the other thing is something that they've taken care of today. I've had mold from the other tenants and I've been living there since September 1st on my [inaudible 00:36:33]. They're now taking care of that now. They should have taken care of that before I moved in. When I moved in to 46th Jerry Road, there was issues there. They're not taking care of us, but they're blame gaming the Boston Housing because they're not so-called getting their money that they want.

So with that in mind, all they're saying is that, "Oh, we had inspector." But they don't. And then putting it onto the next tenant to have it fixed. So they need to be told that they need to be taking care of us and they need to take care of their town homes just as good as the other places that they took on. I'm tired of this. I love the place itself. It's beautiful, it's gorgeous, but it's the case of now, it's the wood floors and they're not taking care that. They need to, they need to step up to the plate. Oh, you ain't kidding, not only that. I fell already. I have cancer, I have leukemia and I take chemo daily. I have cancer that has no cure. And of course I have leukemia to boot. I'm a Athena Barbara patient. I'm about ready to move out of there completely because I'm tired of having to complain to the front desk. The other thing is they're not taking care of their grounds. I've had to complain to them about the trees and the branches and everything else. Somebody needs to kick them in the butt.

Response: Very sorry to hear by your circumstance. Thank you for coming today. Thank you for your comments. Commenter provided their contact information to staff and this was given to leased housing staff for followup.

Comment: Yes. I'm a little emotional. Good afternoon. I'm from [inaudible 00:39:24]. A couple of years ago, 2012 when I have low income and I appreciate everything you did for me. But last five years I have long issues for my neighbors and I did complain to the office, but is never do nothing. I called the police, and the police are coming. Explain to police what's going on. And then the cops tell me, "You have to take your mom to third floor or to five floor." I tell the cops, "My mom it's 92 years old, why [inaudible 00:40:15] over there?" And the younger people has kids sleep at night. My mom will have anxiety, my mom will have stress and I have too, because after I finish work and I need to go home to the relax, but I can't. And they go to the office, the office don't do nothing. And they look at me I'm the bad person.

Couple of months ago, the people go to my house and 12, 1 o'clock, and I'm not supposed to open my door but I think it's my neighbors. Because I think the neighbor is a sisters and brothers for me and to take care of each other, to love each other, to respect each other.

And yes I open the door and I put my foot this way because I don't know, because when I look I don't see nobody. I said, "I don't know because the [inaudible 00:41:14] is still in my room." My mom said, "Somebody in the door, somebody in the door." As I'm pushing the door and a little girl come in and [inaudible 00:41:25] me here and I said, "Hi." And the mom in the corner, there's a family member. He started... It's a bad word. I can't use it because my mom don't teach us to do this thing. And I tried to close my door, she's pushing my door and she's curse me all the name. I said, "You want to come over?" She said, "Yes." I said, "You want to come over? I don't think so. You want to go out because this is [inaudible 00:41:52] to you." She said, "Don't talk to my family, don't talk to my family." I said, "Okay."

I go to the office, the office don't do nothing. And these couple of weeks ago, I called here and they send me the voucher. And I do everything I can because I don't speak English very well and they pay somebody to help me and they do. And they send everything. I signed the paper and I find a house. I say it can be 10th floor but I want leave it, because I don't don't want to do... I'm scared. I don't want to die and my mom. After that... And they signed all the paperwork and everything I do and later I take my stuff out because they say I signed the lease to moving not. The lady [inaudible 00:42:45], she's calling, she said, "Maria, you can't move because it deny you. You have to go to the office to tell the people can give you another place to leave." Thank you so much. I want you guys help me because they tell me, "You need to go back home. You need to go back to your country." They say tell me. The office now, everything. It's all the things I need to explain. I'm emotion. I am here today. This is my first time. I appreciate the [inaudible 00:43:18].

Response: Thank you for your comment, we'll get back to you shortly to resolve your situation. Commenter provided their contact information to staff and this was given to leased housing staff for follow-up.

Comment: Hi. I'm from [inaudible 00:44:51]. I have an issue with Boston Housing. I worked for Boston Public School for over 10 years. I didn't do my course because I failed that school 2014. And I ended up with a hip replacement and a fractured pelvis. I was denied housing from Boston Housing. So it took me a train of years to walk. I couldn't walk, I couldn't do anything. Eventually, in the train of years, they me send to Amazing Court, which I didn't know Amazing Court and I lived here 40 years. So when I moved to Amazing Court, it was a strange community and eventually there was some people live above me on the third floor. So after I fell I couldn't walk and have a lot of problem with the person that is above me. So I complained to the property manager and then she told me that there's no one live up there.

So I said, "No one live up there? Somebody live up there. And I have problems with this person coming in back and forth in the apartment and they're vandalizing my property."

So eventually somebody took my citizenship, my birth certificate and my social security card. It happened that four people is using my social security right now. And my citizenship, I still will receive it. I went all the way to Revere to do another appointment to get the new citizenship, which I'm a citizen here. Eventually they told me I have to wait. So I'm still waiting. I moved from there to Quincy because I'm still having problem with these people, this boy. I took him to court. I have a restraining order against him and his girlfriend. He come in and out of my apartment, he vandalize my property. He stalked me and he hacked into my phone and knew all about my business.

So what he did, he took my citizenship and I heard that he sold it to some people in Dominican Republic. And after he did that, it was like my name is everywhere.

Everybody who is Glendora Brooks. Now his girlfriend is using my marriage name, call herself Alexis Brooks, which four people right now is using my social security. He went into my account because he know everything about my account. They have voice lines because they're from Dominican Republic, they're from Guatemala, El Salvador, Puerto Rico, Central America, and they stalk people. And they [inaudible 00:47:53]. And after they stalk you, they get into your business and all their crew watching you. They know where you go. They put hack on your phone. They know if I'm here. They know I'm in Jamaica. They know everything. So I say my mom passed, I was in the hospital, I couldn't go to my mother's funeral. What I need right now, I took him to court, I need an attorney in case I move to come inside and he's there. The girlfriend is there. She knows where I'm at. I don't sleep at night. She will hack in my phone. I [inaudible 00:48:42] phone. [inaudible 00:48:42], she hacking it. I have all the phone that they have and I have all the paperwork that I have, they give the court. To be honest with you, I got Section 8 from them and I'm in process of moving somewhere out of Boston and I told the property manager today that I'm coming here because it's like I'm not safe here. Because they came in and out of the apartment, they put poison in the food. I got sick, I was hospitalized so many times, they locked me out of the apartment. They drop me [inaudible 00:49:15]. I have a scar right here from [inaudible 00:49:19]. He took my clothes and [inaudible 00:49:22]. So it's not good for me. It's not safe for me.

Response: I'm going to follow up with you right there. Thank you. Commenter provided their contact information to staff and this was given to leased housing staff for follow-up.

Comment: Sure. Just a general question if you don't mind me asking. I just have a question for you. I just hope you don't mind asking, are you the administrator for the Boston Housing? I hear a lot of people coming up here saying they have citizenship and my father fought in Vietnam for two years and had an Honorable DD214, that's right, in Vietnam as a soldier and fought for this country. But does it really matter where you come from? I mean, people have more rights if they come from Haiti or Jamaica or Puerto Rico, Dominican Republic and you become a clientele for BHA. Or is it the same for everybody, that it's fair if you have families or children? Like this question? I mean, is it sphere across the board for everybody or is it... Because when I hear people come up here and they're clientele, they're talking about that someone stole my citizenship this and this, this and that. Because I thought it would be fair across the board for everybody.

Response: Thank you for your question. So I can speak very briefly to the question, which is basically what does BHA prioritize? The BHA has priorities on its waiting list for homeless families and other priorities. But also there are specific rules around citizenship on the federal housing assistance. In order to receive assistance on the federal program, one or more family members need to have eligible citizenship status or essentially a pathway to citizenship. Those rules do not exist with respect to the state subsidized housing program.

Comment: I have a question actually related to that. Because I was once a semi documented alien and I didn't have access to all this information either. Does it mean that in the United States, or at least in this state, it was possible to get some sort of subsidized housing to someone who is not a citizen? I only had a work authorization with a valid immigration case.

Response: Here's the answer. Just to reiterate first and foremost, the reason why we're having this hearing today is to comment on the annual plans that are out for revision and comment. With respect to your question, the state subsidized program, the state MRVP program, the state public housing program does not require people to have eligible citizenship status in order to apply and receive housing benefits.

Comment: Do they need to be Green Card holders?

Response: Not for the State program.

Comment: Hello. I just have a question about... I had gotten into the... Well, he already knows about a little bit of the summary about what I'm going to talk about. I had gotten into some trouble, I want to say, the ending of last month. They had sent me a letter questioning about the termination of my Section 8. I filled out the paperwork, I sent it back and haven't heard from you since. All I know is that they're still paying my rent until they come up with a decision. I've been calling, I've emailed them the paperwork, I've sent it through the mail. I just want to know how long it'll take for them to reach out to the client. I don't know about you all, but my housing is very serious to me. I've been homeless for 13 years, since I was 18 to the age of 29. And I'm not trying to be

homeless again. My housing is very important to me and that's the most important thing, the most valuable thing I hold onto my life. And I haven't heard from anybody yet. I don't want to be homeless again.

Response: I understand. So first, I know that the hearings take up quite some time to schedule. So if you submitted a request for a hearing, it just might take some time for them to get to you. And then the second thing is I'll have somebody call you and reach out directly to ensure you where we are. It may not have been scheduled yet. It may just be in a holding pattern. So there may not be any information to give you, but I will have somebody call you directly to confirm that. Maybe we've just received it. It has not yet been scheduled. I know there's a significant backlog with scheduling hearings right now. So thank you for your comment. I understand the stress there, so we'll get back to you shortly.

Comment: I would like to speak, I changed my mind. I just want people to hear what I have to say. Good afternoon ladies and gentlemen. I come to Boston when I was 13 years old. But what I'm going to tell you now, the house that I'm living in, I bought it back in 97 for my mother and father. They were separated living from different places. And I bought this house so we could live together so I could have the medicine ready for them at night. But later on doing that, I couldn't keep up with the mortgage. But my mother and father has gone on now. But what I'm trying to tell you now, I went to court, I wanted the right to get my house back, but I couldn't afford to fix it up and create the back mortgage and stuff.

See, I'm a member of City Life, Fido, [inaudible 00:57:21]. And I let this none organization have it for \$1. It's a great big two family house. Second floor had seven bedrooms. Everybody thinks it's a three family, but it's a two family. But what I'm trying to say, I let them have it for \$1. And I would be able to live there and pay rent. I'm handicapped. And when my mother and father was living, I wasn't able to get a handicap ramp to the front and back. So they fixed the house up that I'm in. Listen to what I'm going to say. They put a handicap ramp to the front. So I've been asking them for six years or more about the one to the back. And guess what they tell me, you got one in the front. But what if a fire start and what I'm trying to tell you, the back step is about three or four. See, I'm not a bad looking dude, but I had all teeth across here and I fell out of step twice and knocked them out.

So what I say, that being is I let them have it for \$1 and I'm leaving here. I'm not going sue them or nothing. All I want them to do is help me get my teeth back in. And I didn't want no false teeth. I want the other kind of teeth that you put in that can't get out. They keep messing me around. "I'll call you back later." When I call there wasn't nobody to answer the phone. So that hasn't been taken care of at all. But what I'm here today is to let you all know, I'm getting a wheelchair ramp tomorrow. Not a wheelchair ramp, an electric wheelchair. And I have no way to get out the back door if a fire start. But just see what they tell me, "You have one in the front." But how I'm going to get out the back?

And that's what I'm down here for. Try to get a wheelchair ramp to the back of the house where I used to own, but I don't own it no more. And I let them have for \$1. And they treat me like a dog now. Just like a dog wants something to eat and they won't feed me.

That's what they're doing to me now. All I want is a handicap ramp. Now I'm getting a electric wheelchair tomorrow, it's being delivered tomorrow. "Go in the front." I've got nowhere to get out the back. You see what I'm trying to say? And I'm independent. I'm trying to take care of myself and everything. See, I do everything for myself. I try, but I have a hard time, but I try to do everything. See, because as you get older, people don't want to help you around and handicapped. I should be a macho man. But as you get older, your health go bad. See what I mean? And when you get older, nobody want to watch over you. They're going by you acting like they don't hear you or see you because you're walking so slow. That's all I want to do, is get me a handicap ramp. That's all. And I live at 63 Harford Street, Dochester, MA, Apartment 1. I just want a wheelchair ramp. So I can go in and out if a fire start. I will get burned up. I'll try to get out the best way I could, but now I don't. I don't have any. See, I wasn't going to speak, but it has bothered me. I said, "Well, I'm done. I better open my big mouth and say something." Thank you all for listening to me.

Response: Commenter provided their contact information to staff and this was given to leased housing staff for follow-up.

Comment: So I just want, as a public housing tenant to have my remarks go to HUD and to let the Department of Housing and Urban Development know that I'm very, very grateful to Boston Housing for supplying my housing. Because as a public housing tenant, I could not afford, cannot afford to rent an apartment in Boston right now. Now, I have not said that Boston Housing is the ultimate tenant, but I have to say that as one of the largest landlords, is the largest landlord in Boston, that I am so grateful. I live in Jamaica Plain. When I put my key in my door and I open my apartment and I have heat, I have electricity, I have a reasonable apartment size. I just love it. The average cost of an apartment on the real estate housing market right now, we all know if I have to rent a two bedroom apartment on the open market, it would probably cost me about \$2,000, and I'm on the low end. And for me to be living in an apartment where I pay, if I work a third of my income for my rent is just... I just have to say thank you Boston Housing. Thank you Housing and Urban Development. And I hope that you know that we the tenants of Boston Housing, we are grateful to Boston Housing and we are grateful to HUD for continuing to fund us and to provide us with funding. So I just want to say thank you.

Response: Thank you.

Comment: Hi. I think I got a letter the other day. I just have a question. I just want to know, do Boston Housing do inspections on the weekend? Because I got a letter that they was going to come to my house Saturday from 9:00 to 12:00 to do inspection. And if I'm not there, they can't enter my apartment, that I'll lose my Section 8. Or they won't pay my rent.

Response: So if you can't be there for that inspection, you just call and reschedule it. We don't typically do inspections on Saturday, so that seems odd. You should call the number on the letter to reschedule that and that's all.

Comment: Thank you. So I wrote something here, which seems to me that some people are getting a lot more than others, and I really think that we should get back to the basics such as more places to live with the utilities included. So I don't know how much supported services, money, how that works, where the money's coming from in terms of how much housing or if any of that money is going to supported services. I'm just saying no, get back to basics with more housing and utilities included. Inclusion, I don't know where that is as a Section eight mobile voucher participant. Usually we pay all or most of the utilities while other types of rent, reduced housing, tenants pay, no utilities. Inclusion in terms of landlords. The minute they hear section eight, they say bad tenants. And if you believe in rent supported housing, then I believe that you have an obligation to make more of an effort to solve the problems, not just relabel the buildings. (19:36):

This is on page 24, all the different things that people, problems that people have had, and I think it's obvious that housing authorities have, where is it that they have tenants that really shouldn't be there? Maybe they should have been evaluated for either mental health or anger management to be living in a mental health facility. I just know that it's a huge problem and I don't think very much of some of the new tenants. She has done a number of different things, which a neighbor and I both found annoying a while ago, and every time she sees me, she decides to act up because she's trailer trash. So that's one thing. (20:39):

And my, I'm also tired of being called the illegal because my home and my community are two different places. I live in the no man's border zone. Meanwhile, Brookline prefers people that have no permission to be in this country. No attend amnesty hearings, just disappear. Don't ask, don't tell. So I really hope there needs to be some power taken away from Brookline. And in terms of equity inclusion, I don't know why the landlords get all the money instead of why we as a Section eight tenant with excellent credit, but no, not enough equity. Why some of that money couldn't be put towards my mortgage and my taxes and my utilities because I would really love a place of my own and I would move to a condo because I know I would be accepted. But the problem is I love this building, but when the owner decides to sell in a year or two, where would I be? There's no other places in my area. So in summary, I think Fair Housing also isn't fair and it isn't for Section eight mobile, I don't think that the fair housing should be included because fair Housing is never fair. So that's all I have to say. Thank you. I mean, it's just in, in terms of equity, I don't think I can afford it long-term because I've never had a prestigious job and I'm in the near elderly category. So as much as I'd love to, I still need to be supported as a tenant, even if I owned my place financially. So that's the problem.

Response: Thank you. I would only say that we do have home ownership programs and some of them are focused on people with vouchers and ways that you can get assistance for down payments and money from your voucher can become part of this program and we can give you the name of people at the BHA to talk to who operate that program, and we have had a number of people successfully purchase homes. So it might be something you want to look into, so we'll get you that information. [After the hearing, staff sent commenter link to BHA First Home Program and staff email.]

Comment: Okay. My question is on this page here, and there's a section here for Commonwealth Family, it talks about envelope repair, repoint masonry facade. Now, that may have been explained in some email that I gotten, but maybe Joe or someone can explain to me what does that mean for Commonwealth? What kind of repair is that talking about? What exactly is that?

Response: That work is associated with repairing the masonry envelope, the windows and or masonry facades. Sometimes they have moisture penetration that's deteriorating the brick. We usually, when we plan a project like that, we do a survey with an architect engineering firm that will look at the facades and make some assessments, and then we'll move into a project to repair the conditions at the facades. Several years ago, there was some work done where we put these precast panels up near the top of the building. You see them, they're light concrete, and I think that was done almost 15 years ago, and some of the mortar joints and things around those need to be evaluated and repaired, and then we would move that into a project to repair the facade to bring it for another 10 to 20 years of useful life.

Comment: Does that mean our windows will be replaced if they're sweaty? Is that all?

Response: Well, the evaluation will be done on the windows. We have some additional funding for window repair in the five-year plan. Yes. Again, it depends on how much it costs and how many buildings we can do in preparation of doing that work.

Comment: What is the policy for notification recertification for the next lease term? Since my lease expires 12/31 and I filed all the paperwork by October 15th as required, I've had no correspondence from BHA and being 72 with cancer and having quite a bit of anxiety concern. It's always the wonderful property manager here. This is a section eight voucher. I'll be going onto my fourth year at the property. Mr. Guzman is my leasing officer but he only speaks to me once a year and he's, he's very efficient, but as I've sort of mentioned, I'm in a high anxiety state, real high anxiety.

Response: We can touch base with the leased housing department and get that information and actually have somebody reach out to you to tell you exactly what's going in.

Comment: Is there a policy or a rule that you're aware of as if I wasn't re-certified? What I'd be told, I can't conceive that it would be possible. Would I be told 60 days before the lease ends or what is the general policy?

Response: They would ask you again about the recert paperwork, but I'm sure that if they hadn't a problem with the, I'm not sure, but it's likely that if they have a problem with the information that you submitted, if there's something missing or whatever, they probably would've reached out to you by now. But we'll verify all that and get that information to you so you can not worry about it over the holidays.

Comment: Hi, yes. I just wanted to know about the repairs that BHA will do on older units. I know there is a lot of lead paint asbestos, especially if they're sanding down the plaster. Is it safe for tenants to be present or will they have to move during I guess the restoration of a unit?

Response: What usually happens when we're doing a major renovation project in units related to any property and or any work related to an asbestos containing material (ACM) abatement and or lead-based paint, we temporarily relocate families in a way that is conducive to the project. And when I say that we plan with relocation contractor who we have usually on a two to three year contracting basis to support us with the renovations. The process may be that for lead-based paint and or an ACM, the resident might be temporarily housed in a hotel or in another apartment that's made available to the resident while that work is going on. And that work sometimes is two to five days depending on the timeframe to do that work. But no, a resident really for abatement purposes of lead-based paint and or asbestos containing materials, a ACM needs to be out of the apartment while that work is going on for their own safety. (33:18): But they would be moving back to their own apartment after the work is completed. Again, two to five days depending on the type of work for a major renovation project, we would be working with the residents and have meetings with the residents on the plan for upgrading units so that they understand the timeframe. Sometimes it could be two weeks, sometimes it could be four weeks. And again, it would be a temporary relocation out of your apartment while the major renovation work is going on, and then you would be relocated back to your apartment. Most of the time when we do a major renovation, we do it in what we call stacks because most of the apartments have plumbing stacks that are back to back of each other, maybe two or three or seven apartments depending on the number of floors are done at the same time and the work is replaced and then you're moved back as quickly as we possibly can arrange that. Again, it's all planned. We meet with you, we tell you the strategy of how the work is going to be done through an architect or engineer, and hopefully we can get you back into your apartment as soon as possible.

Comment: Awesome, thank you. My question is also this is Commonwealth Elderly. My question is about the elevators. I seen that you guys were dedicating some funds to that, so I appreciate that. As someone who has seen the elevator down quite a few times, I guess I'm just kind of wondering about the logistics. Will they kind of be out of service and when did you guys anticipate it being fixed?

Response: So we have a major capital project right now at Commonwealth Elderly. We are actually building two new elevators at the entrance end of the building, one on each wing building one and two, I guess they're called. One's at 2-4 Fidelis Way and the other is at 6-8 Fidelis Way. And those new elevators will be built first and then made operational, and then the existing elevators that are in need of repair will be completely upgraded as well. So when the project is finished, you will have four new working elevators. So if one would happen to go down, you would still have access to another one right near the existing elevators. Then the work is actually planned, I believe in bid and the bids are due very soon if they're not already been received. And we have about

a two month process to evaluate the bids and make recommendations to get the projects underway. Again, we would be meeting probably with the residents when the project is about to begin to explain some of the activities that will be happening. I know there's one or two apartments through, I think there's seven floors there at Commonwealth Elderly. And when the new elevator's going in, there'll be some relocation of the residents that are right adjacent to this new elevator work going on. (37:23): I hope that answers your question.

Comment: (Admin) Thank you. I'm from Greater Boston Legal Services. I work as a technical advisor with the RAB, and a lot of these comments are influenced by my work with the RAB, but they aren't from the RAB per se. They're from the GBLs. One thing I wanted to acknowledge was this has been a big year of transitions at the BHA former administrator, Kate Bennett departed new administrator Kenzie Bok came on where a lot of new exciting tools and initiatives, the BHA FAIRCLOTH to RAD, your Zendesk customer service pieces, the new initiative about using staff from leased housing on inspections to help managers of public housing developments get inspections done, handheld tools so that when you're doing work orders and inspections, it gets in a reliable way. All that stuff is very good and exciting and look forward to hearing about more on AFFH. (39:09).

Response: Thank you for your comment.

Comment: (Lsd Hsg) I realize that this is not the year that BHA needs to submit an affirmatively furthering fair housing plan to HUD, but this is something that probably over the next year, BHA and the city need to finish up and regather on work that they had done before. And I know this is something that the RAB is also has as part of its mission. Just also wanted to mention that HUD did a big deal about giving \$5 million to the Authority for a mobility initiative, which will allow you to significantly expand your ECHO initiative. And it'd probably be good to revise a bit of the discussion in the PHA plan to talk about that because something that you could count on at the time you put out the plan for comment, but it's quite good.

Response: BHA staff presented on AFFH to RAB at the November meeting. The BHA has not yet entered a planning phase here on the recent HUD grant and will make updates as related to this funding award with the next amendment to the annual plan.

Comment: (Lsd Hsg) On HOTMA. Again, this is another piece where we weren't sure when the year started if we were going to have to have a lot of HOTMA discussions this year. (40:09). Fortunately we've dodged that bullet, but we are going to have to have a lot of those discussions next year. And I think it's going to require a several step tenant education process. And probably just like the process that was done last year on the resident participation policy might be a multiple stage thing where you gather one time and then you come back again just to get all the feedback from people so people really understand what parts of it BHA doesn't have a lot of discretion about and what parts of it you do have discretion about. And then wanting to hear from residents what they think about all of that.

Response: Thank you for the comment.

Comment: (Grievances) I noticed that you did a small revision to the grievance procedure. Just also noticed that the mixed finance group also did some revisions to the grievance procedure. So you may want to meld those together and just technically you may need to put it out for notice and comment to affected individuals. (41:06): Cause it's a slight change. And I'm not sure if it actually went out to all the households, but leave that to the authority on that. I do know that the mixed finance stuff already was incorporating some of the really small minor changes. And it may be that you want to do the same thing on grievances.

Response: BHA made changes to the Tenant Grievance Procedures in 2018 as part of the annual plan. These changes included the language that if a quorum cannot be assembled for a Panel, the hearing will default to a Hearing Officer. The 2018 changes went through the full public review and comment period and was approved by HUD. In the current plan, BHA is adding this as a clarification only.

Comment: (Res Capacity/RED) Generally being a broken record, I will once again pitch for having mixed finance management protocols that you adopt across the authority for the unfinished business. I know we started the business about tenant participation. We started the business about grievances. All that is very good, although there are problems sometimes with management companies not following through on what they should be doing on notifying tenants about grievance rights and evictions still a problem, but there are a bunch of other areas where it might be good to standardize all of this stuff rather than having to reinvent it each time on management plans and just so setting that as a goal to try to get it done in the next year would be really good. (42:18):

Response: The BHA Administrator and relevant staff plan to meet with mixed finance resident leaders as well as owners in 2024 to clarify expectations, policies, and procedures and discuss issues of concern from staff and residents. With respect to "Mixed Finance Management Protocols": BHA works closely with Mixed-Finance owners and managers to ensure appropriate and effective management practices, and we have found that management plans must necessarily be tailored to individual sites. That said, we do recognize that standardizing practices is useful, and we will continually strive to do so.

Comment: (Legal) Finally, last thing, the Violence Against Women Act. Some of my colleagues that do more of this work in this area took a look at BHAs policy and it looked like it didn't get revised when HUD did some revisions on the regs a few years back. (43:21): And also there's a question of standardizing, making sure that VAWA notices go out in all the packages for applicant denials or for Section 8 terminations or other forms of adverse action. I had taken a look at the eviction filings and for most of the eviction filings, BHA also hadn't done the VAWA notices, although recently they have. So somebody must have taken a look at this and that's good, but it's just maybe worth looking at. I'm probably not the only person who may be commenting on this and

there may be something written that comes in. I of course have a lot more that I put in writing. Hopefully I got it to the Authority early enough on that you could start working on it. And I will try to finalize and finish that out with my colleagues at GBLIS before the 15th deadline. Thank you.

Response: The BHA recognizes that it must comply with VAWA requirements and is fully committed to the policy behind VAWA. The BHA's constable serves BHA public housing tenants with HUD's Notice of Occupancy Rights Under the Violence Against Women Act (VAWA), with its attached Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation ("the VAWA Notice"), when serving Notices to Quit (NTQ) for non-payment of rent and for cause. On each return of service, the constable lists the documents served on the tenant, including the VAWA Notice. The BHA e-files the NTQ and return of service with the housing court when entering the summary process eviction action against the tenant. During 2023, the Eastern Housing Court requested that the BHA not e-file all attachments to the NTQ (other than the constable's return of service) when entering a case, which may explain why the VAWA Notice itself does not appear as a document image with the NTQ and constable's return of service on some MA Court summary process action dockets. The BHA, however, properly serves the tenants with the VAWA Notice.

Comment: Okay, this is my second question. We had our taskforce meeting last night, so present this to them. They asked me a lot of questions that I could not answer, so I said I would ask tonight. So my next question, the first one was from me, but this is the one that came from one of our residents. She wanted to explain what they meant about the common finishes?

Response: Generally finishes are floors. If you have been to the elderly building at Commonwealth at 2-4 and 6-8 Fidelis Way, we did refinishing all of the floor finishes in the common hallways on all those floors. And we are hoping to move to doing the same work and the Commonwealth family corridors. Sometimes it also includes paint. If the railings need to be repaired or need to be replaced, we would do that. But it's like making things look better and more sustainable over time. Give the areas a new lease on life. And we've been doing this quite a bit all over the Authority, but common areas are things like your corridors that serve all the units on each floor, outside of the units.

Comment: Hi again. Thank you. I just wanted to know if this was available to the public, the recording of the hearing?

Response: So I can respond for this one. Two things: first, yes, this zoom is being recorded and I should be able to post this recording onto our BHA website. So stay tuned. That usually just takes a day or two for me to receive it from Zoom and then be able to post it and get it up onto our website. So yes, it would be available in the future. And then the other thing, and this was part of opening comments, but just to reiterate, there's also a transcription of the comments that we receive and the BHA responds in writing to the comments that we receive. And those then form an attachment, which will

also be posted onto our website and is also submitted and is part of the annual plan that that gets submitted to HUD and that the HUD staff review.

Comment: I just have a comment. You said that it's your job to listen, but you didn't say it was HUD's job to listen. And I feel that they should have us make up more of the agenda and give us more discretion because we're the ones that live here. That's the first thing. And I also feel that if you believe in rent reduced housing, you need to try maybe a little harder to address the problems and just not relabel the different buildings, just do the things necessary. I mean, I also don't believe that everyone that's in housing should be here. That's just my opinion. So thank you.

Response: Thank you. I think we would all appreciate if HUD would listen to us more, both housing authority and housing authority residents.

Comment: Thank you so much. Just quickly, I thought Camden was a part of BHA and I heard that it's no longer a part of BHA. It's totally off topic.

Response: It's still part of BHA, but in a different way. Others could probably speak more to it, but it went through a mixed finance renovation process. It's got a private owner, but BHA definitely has a lot of say over it because BHA administers all the subsidies there and controls the land.

Comment: So my question was, also back to this sheet. It talks about electrical load center. Is that underground outside? Is that electrical Load center survey upgrades? Is that something that's outdoors or is that inside? It's about Commonwealth family.

Response: That is related to family apartments. We would be upgrading and looking at your electric service in your individual apartments and the service at the basement. Usually it's in the basement of the building to make sure that we don't have any more federal Pacific panels at all. A lot of those were put in the sixties and seventies and we want to make sure that none are active any longer.

Public Safety

Comment: S: B.1.9, Safety and Crime Prevention (Including VAWA) (pp. 49-61)
There are no revisions in this section. BHA staff may want to review that, given recent discussions with Boston City Council about public safety. In addition, there should be a review of both the VAWA policy and the VAWA-related resources to make sure that they are up to date (including contact information and organizations). In addition, BHA may want to have email addresses, websites, etc., as opposed to solely relying on phone numbers for contact.

Response: To the BHA's knowledge, the VAWA policy and VAWA-related resources are up to date. The BHA downloaded the VAWA Notice forms from HUD's website. HUD would need to create fields for additional information on the forms.

Real Estate Development

Comment: S: B.1.11, Asset Management P. 64) There are no proposed changes in this section, and BHA has included more of the description of its redevelopment and Mixed Finance activities in other portions of the Plan and RAD Supplement, discussed below.

Response: Thank you for the comment.

Comment: (also Capital) S: B.1.12 & 13, Substantial Deviation Significant Amendment/Modification (p. 65) This section doesn't indicate any redlined changes (except for one underlining of "BHA"). However, there are a few questions-- Are the RAD-related exclusions itemized as a-d at the bottom of the page new? I don't recall seeing them earlier but may not have noticed. While we understand the need for expedited action to support redevelopment, it is critical that affected residents are fully informed of progress and changes as plans progress, and there have been problems elsewhere in the country where PHAs have proceeded without full resident engagement. It may be that the use of the full PHA Plan amendment process is not the best means to do this, but there should be sufficient reassurances that BHA is taking a different approach with its residents.

A few years back, the BHA had agreed, at the RAB's request, to include, as a significant amendment, additions of non-emergency work-items not included in the current Annual Statement or 5-Year Action Plan which exceeded either \$3 million or 10% of the total CFP. It may make sense to revisit this to be sure this is followed, and that the threshold is the right amount.

Response: With respect to the RAD exclusions, those items are not new. As you suggest, BHA does not believe that the PHA Plan amendment process would be the best way to handle such updates. Instead BHA is committed to keeping residents updated through a variety of other approaches, including resident meetings and written correspondence, targeting the individuals and households most affected by any changes. Capital Construction attempts to follow the requirement that for changes to the Capital 5-year Action Plan (5YAP) does not exceed \$3 million or 10% of the total CFP (which currently at 10% is about \$3.6 million). In 2018, we received an added \$10 million in CFP Funding which we submitted a significant amendment to the 5-year Action Plan for CFP 18 – 22 in the 2019 Annual Statement. Since that one significant amendment, we have not encountered any major changes to the 5YAP.

Comment: S: B.2.14, HOPE VI or Choice Neighborhoods (p 66) This has been revised to reflect that all HOPE VI projects have been closed out, with a final audit going to HUD

in 2021, and that there is one active Choice Neighborhoods Implementation Grant at Whittier Street. This is fine, but it would help to know when BHA anticipates closing the Whittier Street grant, and if BHA intends to pursue Choice Neighborhoods for any other initiatives in the coming year if that is possible.

Response: BHA will not be in a position to close out its existing Choice Neighborhoods Initiative implementation grant until at least 2025, when the onsite redevelopment of the original Whittier property is scheduled for completion. The actual closeout may come later than that, as the Whittier Transformation Plan technically includes offsite activities which may take longer to complete. BHA does not have current plans to pursue another Choice Neighborhoods Initiative grant before the Whittier grant is closed out.

Comment: S: B.2.15, Mixed Finance Modernization or Development (pp. 67-68)

This was revised to say that--

At Old Colony, construction is underway on Phase V and Phase VI is anticipated to begin construction in 2024.

34 East Springfield construction has an expected completion date in late 2023 (BHA provided more information to the RAB at its meeting in December 2023, indicating this building would be used for VASH Section 8 subsidies).

At Amory Street, Holtzer Park is completed, 127 Amory will break ground in 2024, and there will be one additional phase thereafter.

Response: Yes, that's right. As an update: 34 East Springfield reached construction completing in the last weeks of December 2023, and we expect occupancy by VASH-eligible households to happen in the early weeks of 2024.

Comment: On St. Botolph, there is no new information. BHA indicated at the RAB meeting in December 2023 that the work would again be going out for bid. Residents want to know what's going on with this long-delayed work and projected timeframe for conversion, etc. GBLS is happy to attend a community meeting to assist with this. Mission Main information was revised to reflect that Section 8 PBV/RAD conversion took place in December 2022.

Response: Yes, the modernization work at St. Botolph will be put out to bid again in early 2024. BHA staff have promised to visit the task force early in 2024 to plan a broader St. Botolph resident meeting. We would welcome GBLS's attendance.

Comment: On Lenox Street, BHA updated to say that renovations were completed by 2023. One loose end earlier on this was whether any tenancies that were temporarily HCVP (due to need to "turn on the HAP" in February 2021) had all been switched to PBV by now—can BHA verify that?

Response: All 285 units at Lenox are now under the Section 8 PBV HAP contracts.

Comment: On J. J. Carroll, this indicates that construction completion is anticipated in late 2023. BHA said at the RAB meeting in December 2023 that it anticipated completion of work and making of return relocation offers during the holidays.

Response: Current update: Completion did not in fact happen before the end of 2023. It is now anticipated by 01/15/2024.

Comment: (also Admin) S: BHA updated the Faircloth and Faircloth-to-RAD description to include a reference to HUD's revised July 2023 RAD notice and the joint BHA/City of Boston RFP for the West End Library site to incorporate Faircloth and Faircloth-to-RAD units in the site's redevelopment. On p. 68, there is discussion of the planned joint RFP that could lead to development of approximately 100 new Faircloth-to-RAD units. There is also discussion about BHA/City identifying other such opportunities at what the City identifies as High Opportunity Sites in the Public Land for Public Good Citywide Land Audit. Can that Citywide Land Audit be shared with RAB?

Response: Thanks for this comment. The Citywide Land Audit is publicly available on the City of Boston website, link here: <https://www.boston.gov/housing/citywide-land-audit> .

Comment: S: B.2.16, Demolition or Disposition (pp. 69-79)
This summarizes what's in this section (both what is unchanged, and what is revised)-- Old Colony, all demolition to complete as of 2023, and final phase of construction (Phase Six) to complete in 2025.
Whittier, new construction to be completed by 2025.

Response: Yes, that's right.

Comment: Charlestown, demolition of Phase One began 2023. BHA may want to add that new construction of one of Phase I buildings also began 2023 and it is anticipated to be completed in 2024-2025 (things are a little up in the air on start and completion of 2nd Phase I building).

Response: Yes, that is correct. We specifically reported in this section on the demolition activity, but as is pointed out, new construction on the first building also began in 2023.

Comment: Amory, revised timing for disposition (one parcel disposed 2023, and another to be disposed of in 2025).
West Newton/Rutland/East Springfield, as noted above, construction completion for final portion (East Springfield) expected by end of 2023.

Response: Update: Construction at East Springfield was indeed completed in late December 2023.

Comment: Hailey (Centre Street Partners redevelopment portion), suggest breaking this and the next item into the suggested titles, to keep things clear, and information should

be added on the completion of demolition for Phase IA and anticipated construction completion for Phase 1A. There also need to be discussions among developers, BHA, and resident leaders to make sure consistent management protocols are applied across the site regardless of which entity owns/manages each building.

Hailey (BHA modernization portion), see above on designation. BHA should advise the RAB on HUD action on the demolition/disposition (demo/dispo) application. BHA staff will need to work on relocation plan, Letter of Assurance, and protocols to be applied here, working with Mildred C. Hailey Tenants Organization.

Response: BHA did not provide specific details about anticipated construction, as this section of the Annual Plan addresses more particularly the demolition activities. In regard to any other aspects of the comment outside of the formal Annual Plan, BHA provides frequent and ongoing updates to the RAB, the Mildred C. Hailey Tenant Organization, and residents of the Hailey community broadly.

Comment: Mary Ellen McCormack, this indicates that the demo/dispo application has not yet been submitted. The developers did get Boston Civic Design Commission and BPDA approvals to move forward with Phase I redevelopment in December 2023. Can BHA advise the RAB on the status of this? There was a RAB process on this, and comments submitted, and understand there is pending city permitting. It would be good to know why the application is being delayed. BPDA is holding a hearing on McCormack redevelopment on December 14.

Response: Update: BPDA approved phase one of the McCormack redevelopment at its meeting on December 14. BHA submitted its demo/dispo application (for the entire site, broken down by subphases) on 12/28/2023.

Comment: Eva White, it appears that while a RAD/Section 18 blend application was to be submitted this year, it has not yet happened. This refers to conversion and disposition in early 2024, but wouldn't there need to be a HUD application and approval first? Can BHA advise RAB on the timetable for RAB's consideration of this?

Response: The formal RAD application was submitted in 2019, and HUD issued a commitment (a "CHAP") in May 2019. Since that time BHA has made supplemental submission. A formal Financing Plan is due to HUD in May 2024. We expect to close shortly thereafter. BHA staff values the opportunity to update the RAB on all redevelopment efforts, and we would welcome the chance to do so in 2024 and on an ongoing basis.

Comment: Lenox Street—as noted above, renovation work was completed in 2023. J.J. Carroll—nothing new here, as noted above, it is anticipated that work will be complete by end of 2023. BHA should advise the RAB when existing residents have been relocated back, as well as any housing opportunities for new applicants for the additional deeply affordable units being created on the new site.

Response: Construction will not in fact be completed until mid-January 2024. BHA has already been processing applications both from original (returning) residents and new applicants off of the waiting list.

Comment: Patricia White, while there's nothing new here (application occurred in 2020 and conversion to Section 18 happened prior to end of year), it is clear that a number of renovations need to happen at this site, and it is unclear what relocation protocols would apply. Moreover, for this and other sites that have undergone redevelopment, there likely need to be new bylaws to reflect the new Mixed Finance status (existing bylaws refer to "public housing tenants"), and there likely need to be revised Memoranda of Agreement under the Mixed Finance guidelines, even if the ownership is with a BHA affiliate.

Response: BHA continues to work with its procured design team to assess the scope of work for construction. A Relocation Plan and other key policy documents will follow. BHA staff understand that GBLS staff have offered assistance with bylaws review and staff welcome this offer.

Comment: St. Botolph, as noted above, there needs to be engagement by BHA staff with residents at this site who are disturbed at how long it has taken for work to commence, particularly given that the demo/dispo application was approved in 2020. GBLS would be happy to assist the newly elected LTO board.

Response: Thank you again for this comment.

Comment: Doris Bunte Apartments, this is just revised to reflect start date in 2024 and completion date in 2026.

Ausonia, this is just revised to reflect start date in 2024 and completion in 2026. Torre Unidad, this is another planned application which hasn't yet come to the RAB, but a 2023 date is listed for the application and 2024 for the start of activity. Here, as with other demo/dispo applications that haven't yet come to the RAB on this list, can BHA give projected date(s) for when these will be discussed, particularly given that the RAB calendar for the end of 2023 is crowded with various PHA Plan activities?

Response: BHA staff will strive to update the RAB in a timely fashion on all real estate development and subsidy conversion activities, just as we have in the past. We would welcome an invitation from the RAB in early 2024, so that we may provide specific details regarding Eva White and Orchard Gardens, which are moving toward RAD/Section 18 blends, as well as provide updates on projects that have already received Section 18 approval.

Regarding the three sites specifically mentioned in the comments, we note that BHA discussed the Section 18 disposition plans for Doris Bunte with the RAB at its meeting dated 02/13/2020; and the Section 18 disposition plans for Ausonia at the RAB meeting dated 08/12/2021. BHA does not have current specific plans to pursue a Section 18 disposition application for Torre Unidad, but staff continue to explore options to finance

needed renovations at Torre Unidad (which is why it continues to be listed in the Annual Plan); BHA will keep the RAB (and site residents) informed as plans take shape.

Comment: Mission Main, as noted above, is revised to show that the conversion to RAD/PBV happened in December 2022.

Parcel 2D at Adams/Orchard, this discusses an application in 2023 and projected end date in 2023 or 2024. This was approved by the RAB a while ago (disposition of a vacant parcel at Orchard that cannot be used for housing purposes), but the check boxes here are confusing, since it sounds like a “planned application”, but elsewhere it says “submitted, pending approval”. Can BHA update on this?

Orchard Gardens, the only addition here is that planning and public process are underway. Can BHA advise the RAB on what steps have occurred so far and when it may expect to review an application?

Response: Regarding Parcel 2D, that application has indeed been submitted and (in fact) HUD approved the disposition in December 2023. BHA will correct that information. With respect to the two Orchard Gardens public housing developments, those are mixed-finance projects that are not directly owed by BHA. (The original disposition dates back to the late 1990s, when the site was redeveloped under a HOPE VI grant.) BHA and the mixed-finance owners have been exploring a RAD conversion with a Section 18 blend, and we have held meetings with affected residents. The specific timeframe is currently unclear due to constraints on private activity bond volume cap at the state level.

Comment: General Warren, nothing new here, but it was stated that the application date would be in 2023, with a projected start date in 2024 and completion date in 2025. Should those dates be revised? When should the RAB expect to get the demo/dispo application on its calendar?

Response: Yes, BHA will revise these dates pending further discussions with General Warren residents.

Comment: S: B.2.19, Conversion of Public Housing to Project-Based Assistance Under RAD (p. 84) BHA has included details here in the RAD attachment—see separate comments below. BHA may want to update the reference to the RAD notice, since it was revised in 2023 (as BHA has noted in a number of other places in the Plan). Since many of the BHA’s conversions are not done through RAD, but may occur through the Section 18 demolition/disposition process without a RAD component, it is important for transparency that details be provided for both RAD and non-RAD conversions of what was formerly public housing. Moreover, we assume that BHA is making similar guarantees for such residents as it would if there was a RAD conversion.

Response: Yes, thank you, HUD did indeed updated its RAD Notice in July 2023. It is still “Revision 4” to the RAD Notice, but, on July 31, 2023, HUD published “Version 4 as amended by Supplement Notice 4B.” BHA has updated its 2024 RAD Attachment by appending the most current (July 2023) sections of the HUD RAD Notice. BHA certainly

wants to provide clear and transparent information, and we look forward to working with the RAB on the best tools for communication. Yes, in the case where BHA repositions a site through Section 18 without a partial RAD conversion (in other words, a straight Section 18 disposition instead of a RAD/Section 18 Blend) BHA would certainly aim to extend the same guarantees and protections to residents that the RAD program provides wherever possible. We are mindful that RAD protections do not automatically extend to Section 18 (in the absence of a RAD blend), so BHA takes care to articulate those protections in our policies and transaction documents. We are also mindful that there could be narrow instances where BHA faces specific regulatory constraints, but in all instances BHA will work closely with a resident household to provide the greatest support and benefit to that household. Generally speaking—as BHA staff have discussed with the RAB on many occasions—a Section 18 conversion (without RAD) provides greater financial resources than RAD does to support renovations and redevelopment at public housing sites, and it is in the interest of the resident community as a whole that we pursue Section 18.

Comment: (also Admin) PR: General Goals & Strategies--On pp. 1-2, in the cover statement of overall goals and objectives, there is the discussion both of use of public-private partnerships to leverage resources to preserve BHA deeply affordable housing applying certain principles and maintaining a core of many units under continued BHA control. In addition, it may be useful to mention two other goals— (1) retaining community, and (2) adding to the supply of deeply affordable units. The former issue arises during redevelopment either where multiple owners with possibly different management companies & approaches may end up at a site, or where the site may be partially redeveloped by private parties and partially modernized under BHA auspices (both aspects are in play at Mildred C. Hailey Apartments). It is important that residents have a shared common experience and expectations regardless of who may own their portion of the site, and that where transfers may be required, that they can be as seamless as possible to serve the collective needs of residents and the site. Faircloth-to-RAD (discussed later in the Progress Report, as well as in the Supplement) and similar approaches by BHA and the City can address the needs of Boston's future and the pressing housing hardship needs throughout our area.

Response: BHA staff will take the comment under advisement for next time it updates the 5 year plan.

Comment: (also HR) PR: Formalize asset management staffing and systems within BHA's organizational structure. (p. 6) --There is no change in the text here, but it may be that BHA has further revised its organizational structure such that this should be revised. For example, Leased Housing inspectors are now being used to help support public housing operations, and certain BHA management staff have been dedicated to supporting Mixed Finance transformations. There may also be templates such as the Mixed Finance Management protocols, or the development of a Mass. Housing model Section 8 PBV Occupancy Agreement, that will help streamline work across sites.

Response: Thanks for this comment.

Comment: PR: In all redevelopment transactions, provide for BHA's financial stability in order to preserve public housing character and associated tenant protections into the future. (p. 7) --Nothing new has been added here (one typo was corrected, and there was a deletion of the sentence about ISHI extension (since that grant was completed in 2022). This is probably worth further discussion in terms of BHA financial stability in redevelopment (which is the focus of the goal). For example, it had been anticipated at Bunker Hill initially that the mixed-income building would be the first building built in Phase 1, and that both the mixed-income and all-affordable buildings would be completed at roughly the same time to maximize return of relocated residents to new units. However, the order was switched, and financing has still not been secured for the mixed-income building, with interest rates posing a significant challenge. Redevelopment plans at Hailey have shifted, so it would be more realistic to get timely revamping of the site through a combination of private partner redevelopment of 1/3 of the site and BHA modernization & subsidy conversion of the balance of the site with City resources that were fortunately available. While public-private partnerships have provided for some flexibility in terms, and Tri-Party arrangements among BHA, the private developer, and the resident organization have proven to be fruitful, it would be useful for BHA to huddle and share with its residents and community partners any further reflections on what is necessary for preservation and tweaking of strategies.

Response: Your comments are correct. BHA is committed to sharing with residents and community partners the details of what are continually evolving strategies.

Comment: PR: Add new deeply affordable units where possible during redevelopment. (pp. 7-9) --This is updated to include reference to the first two new buildings in the Hailey Apartments redevelopment with Centre Street Partners including 8 net-new Section 8 PBV units, in addition to the 91 Section 8 PBV replacement units and 124 other affordable units. The update also refers to 38 net-new Section 8 PBV units in the next new building at Amory Street (127 Amory St.), which will include 6 or more units subsidized through a Faircloth-to-RAD mechanism. All of this is exciting, and BHA should continue regular updates for the RAB and larger community about additional units being created.

Response: Thank you, we always welcome opportunities to update the RAB about BHA's development activities.

Comment: (also Capital) The BHA's Monitoring Committee met on December 14, 2023, and GBLs staff listened in. There are a few additional comments/questions arising from Monitoring Committee presentations by BHA staff that may have bearing on the federal PHA Plan--

The Capital Plan provides an opportunity for affected tenants to review anticipated spending in the coming year and next five years for their sites where they are traditional federal public housing. Is there (or can there be) a similar process for Mixed Finance sites, even though this is not something that is required by HUD, and involves choices being made by non-BHA entities out of Section 8/RAD funding streams? It would be

helpful to ensure there is similar process for Mixed Finance owners to think about what capital work they plan for the coming year and obtain resident feedback before a spending plan is finalized.

Response: Thank you for this comment and excellent suggestion. BHA staff will take this under advisement.

Real Estate Development RAD Attachment

Comment: (also Admin) Pp. 1-2—BHA has revised this to refer to HUD’s additional guidance from 2023 (PIH-2023-19), regarding use of Faircloth capacity in conjunction with RAD to create new project-based voucher units through a Faircloth-to-RAD mechanism. BHA indicates that it intends to diligently pursue this, and one goal is to leverage public land as sites for such developments, and that BHA will work closely with the City of Boston to identify opportunities at what the City considers “High Opportunity Sites” as identified in its 2022 Public Land for Public Good—Citywide Land Audit. This is commendable. As noted above, BHA should share the Citywide Land Audit with the RAB (and its Monitoring Committee), and should provide more information, as it identifies feasible sites, as to where and what it intends to develop.

Response: See earlier response. The BHA looks forward to discussions with the RAB and Monitoring Committee about Faircloth planning efforts. The City’s Land Audit is available at: [https://www.boston.gov/sites/default/files/file/2022/06/2022-CityLandAuditReport_Final%20\(3\).pdf](https://www.boston.gov/sites/default/files/file/2022/06/2022-CityLandAuditReport_Final%20(3).pdf) .

Comment: West Newton-Rutland-East Springfield Street (p. 3)--146 family public housing units were converted to a RAD/Section 18 blend with 110 units RAD and 36 converting to Section 18 PBV. Apparently a CFP allocation is required here since some units have still not been completed (in addition to explaining the revision in the CFP allocation for this and other sites generally, BHA may want to review if this number is right, or should factor out units that are already on line).

Response: : While units that convert to RAD are no longer eligible for CFP funding, BHA does continue to receive CFP awards specifically for those units that were disposed of via Section 18. Those awards are made in the form of “Demolition Disposition Transitional Funding” for five years—which is why BHA received CFP funding in FY2023.

Comment: Ausonia (p. 4)--As with the Supplement (p. 77—see comments above), it appears that this section needs to be revised, since it still discusses pursuing this on two tracks—pure Section 18 conversion of 100% of units to Section 8 PBV, or a Section 18/RAD blend with 80% of units as Section 8 and 20% as RAD, and BHA finally fixed on

one approach and obtained a HUD approval. The CFP allocation was revised, and changes should be explained. The RAB and HUD approved the demo/dispo plan, but details should be provided about any relocation (which hopefully will be minimal and all on site) and completion of all work by 2025.

Response: Yes, you are right: BHA has indeed received Section 18 disposition approval; however, the actual disposition has not yet advanced. The change to the CFP figure is simply a function of the fact that every year each public housing site receives a newly calculated allocation; the previous figure was for FY2022, and this current one is the allocation from FY2023.

Comment: Anne M. Lynch Homes at Old Colony (p. 5) --Much of the redevelopment at Old Colony was not done through RAD, but there were a limited number of units in Phase 3A (38), completed in 2022, that were converted to PBV. There is no CFP allocation, since these were previously converted. As was discussed at the December 2023 RAB meeting, in Phase V and VI redevelopment, there will be a net gain of units, including larger bedroom sizes (4 and 5 BRs), but there will also be an “elderly” building—it is not clear, from the remarks at the RAB, if this will be “elderly/disabled” or if there will be strict age limitations, and it would be helpful to know that.

Response: The new senior housing planned as part of Old Colony Phase Six will be Section 8 Project Based Voucher units designated for seniors (i.e., age restricted).

Comment: Orchard Offsite Phase II—Long Glen Apts. (p. 6) --No new information, 34 public housing units converted to PBRA RAD in 2021. This is BHA’s sole PBRA RAD, as all others are PBV.

Response: Yes, that’s right.

Comment: Heritage (p. 7) --This converted in 2022, so there is no CFP allocation any longer. Of the 31 remaining public housing units, 28 were converted to PBV RAD, one studio unit was an agency unit, and two 2-BR units were employee units (and presumably those units are in the same status, but without any underlying operating subsidy).

Response: Yes, those agency/employee units do not receive operating subsidy under RAD.

Comment: Lower Mills (p. 8) --This converted in 2022, so there is no CFP allocation any longer. Of the 19 remaining public housing units, 17 converted to PBV RAD, one 1-BR unit was an agency unit, and 1 2-BR unit was an employee unit (presumably those units are in the same status, but without any underlying operating subsidy).

Response: Yes, those agency/employee units do not receive operating subsidy under RAD.

Comment: Mission Main (Phases I, II, and III) (p. 9)--This has a CFP allocation, but it's not clear why, since the conversion took place in Dec. 2022 (BHA indicates that this is Demolition and Disposition Transitional Funding (DDTF), but that is not mentioned elsewhere in the Supplement (p. 92—see comments above) where DDTF would normally be mentioned). All of the 445 public housing units which were under the HOPE VI program converted to PBV RAD/Section 18 blend. As in the Supplement (pp. 77-78, see comments above), it may make sense to refer to the specific PBV (40%) and RAD (60%) blend, as found to be necessary under HUD's 2021 RAD notice.

Response: It is correct that the three public housing sites that made up Mission Main all converted to RAD with a Section 18 blend: 60% of the public housing units converted to RAD and 40% converted to conventional Section 8 pursuant to a Section 18 disposition. Those units that were subject to the Section 18 disposition specifically continue to be awarded CFP funds in the form of DDTF for five years. (RAD units do not qualify for CFP awards.) The DDTF award is part of the BHA's annual CFP grant, unlike in the past when HUD used to award Replacement Housing Factor funds for units that have been disposed of or demolished. For that reason (unlike with RHF funding from the past) BHA has not listed DDTF funding under the "Other Capital Grant Programs" section of the Plan Supplement.

Comment: Eva White Apartments (p. 10)--As also provided in the Supplement (see pp. 73-74 and comments above), this provides for a RAD/Section 18 conversion of this 102-unit elderly/disabled development, with Section 8 PBV (80% of units) and RAD (20% of units), and that if capital needs are higher, there would be no RAD pursued, and all units would be Section 8 PBV. Here again, the CFP allocation is changed (and the revision should be explained). Is it true that BHA is still up in the air about whether this is a RAD blend or pure Section 18 submission, or is the text out of date? As noted in the Supplement, there has not yet been a demo/dispo proposal submitted to HUD. As with other planned demo/dispo applications, BHA should provide a timeline for when this is likely to come to the RAB

Response: This is planned as a RAD/Section 18 blend (not a pure Section 18 action), which means there will not be a stand-alone Section 18 disposition application. The change in the CFP figures is merely to update the documents to reflect 2023 funding. (CFP funding varies from year to year.)

BHA staff will strive to update the RAB in a timely fashion on all real estate development and subsidy conversion activities, just as we have in the past. We would welcome an invitation from the RAB in early 2024, so that we may provide specific details regarding Eva White and Orchard Gardens, which are moving toward RAD/Section 18 blends, as well as provide updates on projects that have already received Section 18 approval.

Regarding the three sites specifically mentioned in the comments, we note that BHA discussed the Section 18 disposition plans for Doris Bunte with the RAB at its meeting dated 02/13/2020; and the Section 18 disposition plans for Ausonia at the RAB meeting dated 08/12/2021. BHA does not have current specific plans to pursue a Section 18

disposition application for Torre Unidad, but staff continue to explore options to finance needed renovations at Torre Unidad (which is why it continues to be listed in the Annual Plan); BHA will keep the RAB (and site residents) informed as plans take shape.

Comment: Orchard Gardens (Phases 1, 2, and 3) (p. 11) --The proposal here would be for conversion of all 282 public housing units to a Section 8 PBV/RAD blend. This was a HOPE VI site, and the plan is like that which BHA did for Mission Main. As noted in other comments on the Supplement, BHA should indicate when it is likely that a draft demo/dispo proposal will be brought to the RAB for review and comment. In addition, it is not clear if there are any Orchard Commons units that would be done at the same time. CFP allocations have also been changed, and the change should be explained.

Response: There is no stand-alone Section 18 disposition application when a housing authority pursues a RAD/Section 18 blend. Orchard Commons is not included in these current plans. The change to the CFP allocation is merely to reflect the FY2023 amount, as calculated by HUD. (HUD CFP funding varies for year to year.)

Comment: Mildred C. Hailey Apartments (p. 12) --This piece is solely for the RAD/Section 18 blend BHA “modernization” of 2/3 of the site, as opposed to the Section 18 redevelopment by Centre Street Partners (CSP) of 1/3 of the site. Does BHA know if this will be a RAD/Section 18 blend or just Section 18? Discussion in the Supplement (pp. 71-72, and comments above) leaves this up in the air. This should likely be revised to reflect any submission to HUD of the demo/dispo proposal and, if it comes through before PHA Plan submission in January 2023, any HUD approval. Here again, as elsewhere, BHA should explain the revision in the CFP allocation in comparison to what was previously listed. In addition, as it did with the balance of the Hailey site, and for equity of approach to all residents, BHA should execute a Letter of Assurance related to relocation and carryover tenant protections (including no change in utility payment arrangements) for the balance of the site.

Response: BHA has been pursuing two paths, a Section 18 approval and, as a back-up, a RAD Conversion (with a Section 18 Blend). HUD approved the Section 18 disposition on 10/26/2023 but (due to the large file size) the approval letter did not reach BHA until 01/08/2024. Until the actual Section 18 disposition process is completed, BHA will continue to keep a RAD/Section 18 blend as a back-up plan in the Annual Plan in case we need to revert to that path for some or all of the site. Regarding the Letter of Assurance, BHA, the Mildred C Hailey Tenant Organization, and GBLS have had an ongoing dialog about what would be the most useful and appropriate update (or supplement) to the existing Letter of Assurance.

Comment: General Warren (p. 13) --This has a revised CFP allocation (going from \$348,017 to \$342,110). Can BHA explain why this has changed? BHA also indicates that it plans to issue a Request for Proposals to procure a development partner for these 96 elderly/disabled public housing units in 2023, but the CHAP date is to be determined, and the closing date is expected in 2025. Similar to what’s in the Supplement (p. 79—see comments above), BHA has left open whether this may be a

RAD/Section 18 blend or a pure Section 18 submission, depending on capital costs. BHA should indicate when it intends to have the RFP, when it's expected that a development partner will be selected, and when it anticipates coming to residents and the RAB with a proposed demolition/disposition plan.

Response: BHA intends to discuss further with General Warren residents the best course of action. The revised CFP figure is merely to reflect FY2023 funding. (The calculation is done by HUD with each annual CFP grant.)

Comment: West End Library (p. 14) --This is new, and involves a PBV RAD. As summarized, BHA and the City of Boston issued a request for proposals for the redevelopment of the City-owned property that is the current site of the West End branch library, and the RFP called for development proposals including Faircloth public housing units, and those would subsequently be converted to RAD upon completion and prior to occupancy. The item otherwise does not contain details on the number of units and timing, although this is also referred to in other portions of the Supplement and Progress Report. BHA should advise the RAB and public as things progress with this proposal.

Response: Following numerous public meetings and developer presentations, the development team of Preservation of Affordable Housing (POAH) and Caste Capital received tentative designation for the West End Library project. BHA participated in the selection process alongside representatives from the City of Boston including the Mayor's Office of Housing and the Boston Public Library. This proposed project will include 119 income-restricted units, around 20 of which are planned as BHA Faircloth units. The City of Boston has created a project page to share information about this redevelopment, available here: <https://www.boston.gov/buildinghousing/west-end-library-housing-public-assets> . BHA staff welcome an invitation to discuss this project and other Faircloth initiatives with the RAB.

Comment: p.15--This cross-references certain HUD requirements in 2016 and 2019 RAD notices regarding resident rights, participation, waiting list, and grievance procedures, and says that copies of the documents reference in the 2nd paragraph of the RAD addendum are attached here, but there is no attachment. BHA should clarify what this means and provide any attachments for review. In some instances, there may be detailed language in Tenant Participation MOAs, Mixed Finance Grievance Procedures, or management plans that may be relevant and responsive. In addition, HUD has changed certain language in the 2021 RAD use agreement which discusses utilization of a cure mechanism if a RAD developer is not in compliance, and it would be important for adversely affected residents to know who should be contacted at BHA if they are raising compliance issues. (This would also be important for non-RAD transactions such as through Section 18 repositioning and subsidy conversions, where BHA has adopted similar protections as a matter of policy.)

Response: Yes, thank you, HUD did indeed update its RAD Notice in July 2023. It is still "Revision 4" to the RAD Notice, but, on July 31, 2023, HUD published "Version 4 as

amended by Supplement Notice 4B.” BHA has updated its 2024 RAD Attachment by appending the most current (July 2023) sections of the HUD RAD Notice. With respect to the question about what to do if a developer is not complying: Residents and others should please report suspected noncompliance to BHA’s Asset Management department. Raul Lean is BHA’s Director for Asset Management.

Comment: Other—As noted in the Supplement (p. 77—see comments above), there is a plan for possible disposition for the Torre Unidad development, but without any specificity about whether this may be a RAD/Section 18 blend or a pure Section 18 proposal. This would likely depend on the level of capital needs. Torre Unidad should be included in the RAD supplement as has been done for other sites where it is still possible that RAD will be pursued.

Response: BHA does not have current specific plans to pursue either a RAD conversion or a Section 18 disposition application for Torre Unidad, but staff continue to explore options to finance needed renovations at Torre Unidad (which is why it continues to be listed in the Annual Plan). BHA will keep the RAB (and site residents) informed as plans take shape.

Resident Capacity

Comment: PR: Rebuild resident capacity program to support resident empowerment and leadership, etc. (pp. 13-16) --While there are positive developments to report here, there remain significant challenges. As noted, 7 local tenant organization (LTO) elections were completed in 2023—it would be good to list the sites. The Tenant Participation Policy was updated and renamed as the Resident Participation Policy (RPP), and BHA both had a public process and several subsequent meetings with resident leaders and advocates to get further feedback before the final policy was released. The policy now clearly applies to Mixed Finance developments and provides guidance about LTO’s ability to use stipends with a BHA-approved plan. In addition, not mentioned here, BHA revised its Memoranda of Agreement (MOA) with LTOs and the RAB including further safeguards about funding and community participation. It is not clear that all recognized LTOs have executed new MOAs, and there may need to be site-by-site reviews to be sure documents are consistent with Mixed Finance arrangements, particularly since they have a 3-year term, and some sites may evolve over 3 years to have different units in alternate subsidy or ownership structures. The initiation of a Youth Council, as mentioned here, is a great step, but there should also be a plan for LTO involvement and how other local collaborations with youth (including YouthBuild and its Section 3 role) will be incorporated. The Progress Report also references BHA’s new Digital Equity coordinator, wiring of 17 developments, and assessment of other wiring needs. It would be good for BHA to report on what sites have been rewired and what is planned in what time frame for specific development expansions. Note that while the earlier plan discussed distribution of an additional 3,000 laptops, this is removed here—is there a reason for this reduction? Finally, as the

deletion of the specific staffing commitments in the draft indicates, there have been issues with hiring and retention of staff needed to support resident capacity. The Resident Capacity Team leader moved to the Digital Equity position, and one of two people hired to coordinate resident capacity efforts with the RAB and LTOs has left. BHA should indicate what the plans are to fill these positions and in what time frame. A number of other LTO sites badly need elections and need BHA feedback about how to proceed with the Election Committee process. The RAB has not had elections since 2016, and while there are plans for RAB elections in 2024, the BHA needs to prioritize to make sure that all necessary RAB and LTO elections occur to be compliant with its own guidelines and HUD/EOHLC requirements.

Response: 1) The signing of the MOAs is still underway. They have been sent to all of the LTO Boards but the boards have not returned them so staff will be following up on this with LTO boards in January and February 2) On RCP staffing, a new Director of Resident Leadership and Community Affairs starts on 1/8/2024. Additional staff will be hired in the next few months as well. 3) The LTO Boards that held elections in 2023 include South Street, Bellflower, Ausonia, Mary Ellen McCormack, Commonwealth, Eva White, St. Botolph, Orchard Gardens, Franklin Hill and Washington Beech. 4) The developments that have been wired are Bunker Hill Development, Alice Taylor Apartments, Mary Ellen McCormack, Franklin Field, Pond Street, Annapolis, Foley, Groveland, Davison, West Ninth Street, JJ Meade, Doris Bunte, General Warren, Hassan, Spring Street, Bellflower Gardens, and Malone Apartments. 5) BHA is actively working to identify additional election vendors to assist with upcoming elections. The RCP team also works closely with residents of developments to identify and train election committee members to assist with the election process at their development. 6) The BHA Youth Council, which is newly formed and still creating bylaws, has been engaged in survey activities during Unity Days, a green space initiative at Archdale, an art project at Hailey and in the course of that and other work has met some of the BHA's resident leaders. We anticipate that this will continue and are working on a more formal introduction to the RAB as well. The youth anticipate doing some type of presentation for resident leaders at the end of their winter term. Youth Council members are also presented with information related to youth serving organizations and job opportunities, such as YouthBuild, but also work directly with a youth serving organization, SpokeArt, Inc. 7) The 3,000 laptops were removed as they have been fully distributed and were part of a partnership with the Boston Public Library. However, BHA distributed additional devices prior to that partnership and also has a smaller number of additional devices that it continues to distribute on an as needed basis as part of its digital equity work with residents.

Comment: (also RED) PR: Institutionalize resident protections and participation in all redevelopment projects advance internal BHA systems to ensure long-term compliance by new owners. (p. 16) -- While this section refers to the successful completion of the ISHI collaboration on this topic with GBLS and CLVU in the fall of 2022 (involving Orient Heights, Lenox/Camden, Amory Street, and extended to Hailey Apartments), it does not describe what's happening since. While there have continued to be good discussions at specific sites on management plans and protocols, a key issue continues to be the need

to build on prior templates like the Mixed Finance Tenant Participation MOA and the Mixed Finance Grievance Procedure to have a similar Mixed Finance Management Protocols for other areas (lease terms, tenant selection, transfer, etc.) that mean that each deal does not need to be reinvented (but there is flexibility on terms as may be required). Mass. Union of Public Housing Tenants and the Healey-Driscoll Administration have included a number of these key principles in pending housing bond bill legislation, modeled in large part on what BHA and some other PHAs have done at some sites. BHA needs to take this up and identify which staff will be working on this with resident leaders and redevelopment partners. Moreover, while BHA did have some Mixed Finance Residents meetings in 2023, once it has gotten staffing capacity, it should set up a regular schedule for Mixed Finance Residents & Partners meetings so that residents, BHA staff and development partners can benefit from their shared experiences and identify where improvements are needed.

Response: Thank you for this comment. The BHA Administrator and relevant staff plan to meet with mixed finance resident leaders as well as owners in 2024 to clarify expectations, policies, and procedures and discuss issues of concern from staff and residents. With respect to “protocols” specifically, BHA agrees that the existing Mixed Finance Tenant Participation MOA and Mixed Finance Grievance Procedure have been very valuable, and BHA is always interested in standardizing other policies where possible. BHA works closely with Mixed-Finance owners and managers to ensure appropriate and effective management practices, and we have found that management plans must necessarily be tailored to individual sites. That said, we do recognize that standardizing practices is useful, and we will continually strive to do so.