

## Comments and Responses to the BHA FY 2022 Federal Annual Plan.

The following document contains the comments and responses received on the BHA's FY 2022 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, 2021 and the comment period closed on December 15, 2021 with a virtual public hearing held on zoom December 6, 2021 at 11 am and another at 6 pm.

The BHA took several steps to notify the public of the FY 2022 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, 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](http://www.bostonhousing.org).

Many comments are specific to Plan attachments:

**AP:** Annual Plan template

**5Y:** Five-Year Plan Progress Report

**RAD:** RAD attachment

**S:** Supplement

## **Administration**

Comment: We are the Mildred C. Hailey Tenant Organization ("MCHTO"), the official resident organization that represents the 1,700 diverse federal public housing residents who live at the Mildred C. Hailey Apartments in the Jamaica Plain neighborhood of Boston.

It has come to our attention that the United Front Against Displacement ("UFAD"), going by the name of "Mildred Hailey Committee Against Displacement", has been circulating mischaracterizations about the proposed redevelopment of our Mildred C. Hailey Apartments by our local nonprofit partners and the Boston Housing Authority ("BHA"). UFAD's tactics to "stop the privatization of public housing" has been opportunistic, misleading, and a disservice to the well-being of our vulnerable families.

UFAD does not speak for the MCHTO and does not represent our priorities.<sup>1</sup> No one is more aware than us of the severely distressed nature of the federal public housing in which we live today, many of which were built in 1941 and are obsolete. Our families'

need for new, safe, and sanitary housing that is deeply affordable and sustainable is urgent and our utmost priority. We recognize and appreciate the public support and resources necessary to make possible the redevelopment of Mildred C. Hailey and to preserve the deep affordability of our homes.

With no federal solution, we will continue to support the transparent public process for the 1-for-1 replacement of all of our Mildred C. Hailey public housing units within a new mixed-income community that will be 100% income-restricted and 100% nonprofit/socially-owned; where all units will be indistinguishable in their quality fixtures and amenities and share open spaces and a new community center with programs that are welcoming for all; and where all BHA-assisted residents will continue to enjoy the same public housing protections, rights, and procedures we have today.<sup>2</sup> We, the MCH TO, will also continue to work with our residents, the BHA, and our nonprofit development partners to minimize the disruption on our directly impacted families from any temporary relocation for the redevelopment and to assess and address the repair and maintenance needs at our existing buildings.

We thank you for your support of the preservation and creation of more affordable housing in Boston, which is necessary to ensure the welcoming diversity and inclusivity of our city and to ensure that everyone, regardless of income, is afforded equal access and opportunity to the resources of the city to improve our quality of life.

Response: Thank you for your comment. We are grateful for the ongoing involvement and active leadership of tenants at Mildred C. Hailey. The BHA is proud to partner with you in ensuring the best outcome for public housing tenants as this project moves forward.

Comment: Statement by current board members of Mildred Hailey Tenant Organization and City Life Vida Urbana

History: Public Housing has a bum rap. Public housing has provided decades of truly affordable housing to millions of people all across the country. The main problem with public housing is that it was woefully underfunded. This is especially true given the fact that public housing gave homes to the poorest Americans. We have lost many units of public housing in recent decades.

The attack on public housing: Former BHA director Bill McGonagle once explained that he was between a rock and a hard place. HUD's estimate of what was needed to keep up public housing was very low, and then the government provided only 85% of that amount. That meant that public housing deteriorated. We see examples at Mildred Hailey. One program aimed at bad conditions in public housing was Hope VI. But that resulted in the loss of thousands of public housing units. The model for Hope VI was Harbor Pt., where 2/3 of the public housing units for working class people were lost.

A new solution: As the housing market in Boston got hotter and hotter, the BHA realized that they had a hidden asset, the land underneath public housing. By redeveloping

public housing sites, they could add new units, some higher income units and use that profit to subsidize and improve public housing units. They began to implement this plan first in Bunker Hill in Charlestown.

Under this new plan, all public housing units would be preserved and no one would be displaced. This was a huge improvement over Hope VI. Some residents would have to be temporarily relocated, but that was worth it to get a brand new public housing unit guaranteed. This policy will now be implemented at Mildred Hailey, section by section over coming years.

In the first phase, 253 units will be demolished and replaced by approximately 673 units. All public housing units will be replaced and maintained at 30% of the income of residents. In addition hundreds more units of affordable housing are planned.

How is this being done? Who is buying?: Many public housing developments are getting a new sources of funding – project based Sec. 8's. This funding allows the maintenance and rehab of public housing units over time. Project based Sec. 8 developments feel like public housing, but the funding source provides greater subsidies for repair. In some cases, the BHA will be the developer. In all cases, the BHA will still own the land. The BHA then gives a ground lease to new owners to guarantee affordability “in perpetuity” (forever). We believe it's best if the BHA maintains control of this process. We trust the BHA much more than private for-profit companies.

If the BHA is not the new owner of the buildings, we support priority for non-profits like JPNDC. In all the developments sold to private companies, only the ones sold to a non-profit actually added affordable housing. We are glad the JPNDC, along with other non-profit, are the developers at Mildred Hailey rather than any other for-profit corporation acting alone. We urge the JPNDC to be careful in selecting a management that will avoid notorious eviction law firms and have a good grievance procedure.

Get the facts: We urge our friends and neighbors to get the facts. Trust the people who have fought with you for years. We welcome discussion on these matters.

Response: Thank you for your comment. We are grateful for the ongoing involvement and active leadership of tenants at Mildred C. Hailey as well as neighborhood organizations like City Life / Vida Urbana. The BHA has been proud to work with CLVU on efforts to develop model procedures on tenant protection and involvement during public housing redevelopment projects, and will continue to listen to all stakeholders views on how to achieve optimal outcomes given the history of federal disinvestment outlined in this comment.

Comment: (S) (Organization Chart), p. 90: Note that there are a number of changes from last year, with Joel Wool's new position as Chief of Staff, Lydia Agro's new title & responsibilities, David Gleich and Leased Housing/Admissions no longer being under Operations, Gloria Meneses being head of Compliance as a subdivision of operations,

and a new subdivision of Operations for Public/Private Partnerships headed up by Raul Leon. It may be helpful for BHA to describe these changes further to the RAB.

Response: Thank you for your comment. The BHA will be pleased to update the RAB with changes to its staffing and its organizational chart.

Comment: (5Y) (also Ops) p. 13, Voting registration at recertification: This has been moved forward to 2022 (and may make sense because of still being under COVID protocols for recertification). It would be important for BHA staff to set a timeline for steps for this in 2022, and to incorporate this into the RAB calendar for 2022.

Response: BHA continues to review how best to incorporate voter registration and other resident engagement efforts into its standard business processes. BHA will work to set action steps and timeline in 2022 to help to achieve this goal.

## **Admissions**

Comment: 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.

Response: Thanks for your comment.

Comment: (S) Section B.1.1 (Public Housing Waiting List), pp. 5-6: No real changes here, except that the waiting list number (41,269) and annual turnover (2,480) have been updated.

Response: Thanks or the comment.

Comment: (S) Section B.1.2.A. (Eligibility, Public Housing), pp. 12-14: At (2)c. (p. 12), it is noted that the number of site-based waiting lists is shrinking by 3 from 46 to 43 developments. Can BHA identify which developments are coming off the list? At (4)(b) (pp 13-14), changes are made to the transfer section to reflect the simplification and consolidation of transfer categories that are in the proposed Amendment 1 to the FY 2021 PHA Plan and related Admissions and Continued Occupancy Plan (ACOP) revisions. See GBLS' separate comments/questions on that.

Response: The developments that are coming off are Pat White, Whittier, and JJ Carrol.

Comment: Section B.1.2.B (Eligibility, Section 8), pp. 19-23: At (2)b. (p. 19), this adds the supported housing programs, and see comment above about getting the MOAs. At (4)2 (p. 20), there is elimination of the singles preference. I don't recall this being discussed and there have been good reasons to retain it, but there may also be good reasons to scrap it—there should be some discussion of this. Finally, at (4)(3), there is a whole reordering of preference/priority points, and it's not clear that these are consistent with what's discussed later on pp 22-23, and not sure that this matches exactly with what BHA had proposed in FY 2020 and FY 2021 PHA Plan Amendments. Here again, more discussion may be in order, and should include advocacy groups that are working on placement of the homeless and other at-risk populations.

Response: The MOAs will be posted. A draft web page was created to house existing MOAs and shall be publicized within the month.

It is unclear why the singles preference was eliminated in the draft document, so it will be restored for the meantime.

The priority chart has been updated to be in-sync with the information in the Administrative Plan and on pages 22-23.

Comment: Asians continue to be disproportionately housed, in relation to blacks and Hispanics. This may be because homeless and displaced Asians tend to move in together leading to overcrowded situations. "Doubling up" is exacerbated by the lack of affordable housing across America. Can LHA's like BHA explore making overcrowding a priority?

Response: Effective with the most recent iteration of the Administrative Plan and ACOP, a priority for being cost burdened is being added as priority 1. BHA is hopeful that this new priority changes the applicant mix which currently heavily pulls from residents of family and individual shelters.

Comment: (5Y) Pp. 16-17, Simplify housing application process: This has been long delayed, and was originally promised as part of the Amendment to the FY 2020 PHA Plan. It had been hoped that this would all be in place by the end of 2021, but this now indicates that it will begin in early 2022. BHA should report to the RAB and to homeless providers and others that it collaborates with as soon as it implements this system so they know how to effectively navigate the revised system.

Response: Thanks for your comment. Long overdue, BHA has finally implemented an updated system and BHA expects to reach out to advocates and other stakeholders shortly once internal processes are updated and staff are appropriately trained.

## **Budget**

Comment: (S) Section B.1.3 (Financial Resources), p. 25: John Kane of the BHA furnished the RAB on 11/18/21 with a revised statement with significantly revised figures—should that replace what people revised in the version of the draft plan which was mailed out (and is posted on line)? It may make sense for BHA to also revise what's on line so that the public is responding to the correct version.

Response: The financial resources information was updated by the Finance Dept in anticipation of the RAB meeting scheduled for Nov 4, however that meeting was then rescheduled for Nov 18. The Plan Supplement posted online has the most current version including the updated Financial Resources section.

## **Capital**

Comment: (also Ops) Hello, 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 2022:

1. Re-Open all the Family Unit Trash Chutes at Commonwealth Development.
2. New Kitchen Cabinets for all residents
3. New bathroom vanity cabinets and sinks for all residents
4. Clean buildings, and Hallway clean up
5. Heating for all residents, new Honeywell thermostats that can be regulated by the resident.
6. New Plumbing and Pipes
7. New apartment doors(current doors are too high-up off the floor and cold air and pest can get inside of unit)
8. New Windows with better ventilation, that do not sweat in the hot and freezings temperatures, ?mold)
9. 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)
10. More Street lighting throughout the property for the residents safety
11. More Cameras on the property for residents safety.
12. Repair Roofing for all high-rises
13. Repair property trip hazards(residents are afraid of falling down, and the residents with walking sticks-canes, and wheelchairs)

Response: For item #1 Operations staff will take the comment under advisement as a decision was made previously to discontinue their use. Item #4 cleaning building hallways is standard operating procedure and if a hallway is not clean, BHA staff ask the commenter to please contact the manager. For Items 2, 3, 5, 6, 10 and 12, these are not currently in the Capital Plan; however, a Physical Needs Assessment (PNA) is scheduled to be performed in late spring/summer of 2022 to inform the BHA of all physical needs at Commonwealth (including these above items). Residents will be included to participate regarding findings and needs. Item 7. Unit Entry Doors at Commonwealth Family (including high rises and townhouses) were repaired/replaced in 2020. This was BHA Job number 1632-02. Item 8. Replacement of Windows for Commonwealth Elderly (buildings 1 & 2) are included in the 5-year plan (CFP 20 through 24 along with Windows to be replaced at 91-95 Washington Street also). Replacement of Windows for the Commonwealth Family were reviewed and surveyed with site and operations personnel and these were found to be in Good working order. The planned PNA for Commonwealth will inform BHA if the windows at Commonwealth Family need to be replace. For Item 9, CFP 21 through 23 has funding currently for the elevators at Commonwealth Elderly (Buildings 1 & 2) are planned to Add a new elevator in each building (to accommodate larger wheel chairs) and replace all existing components & equipment on the existing elevators. There is a funding in CFP 20 to perform repairs to the Elevators in Commonwealth Family (albeit added Special Funds from HUD may allow for major overhaul of all the elevators in buildings 3, 4, 5 and 7. For Item 11, The BHA has just completed a \$3.6 million upgrade to the Federal Properties in which 16 Cameras were added to Commonwealth Family and Elderly Sites. For Item 13, There is currently 2 Tripping Hazards Contracts for Authority Wide Repairs, Job # 1629-05 and 1629-06. The Contractor performing this work is scheduled to begin this work at Commonwealth Elderly and Family sites around April of 2022.

Comment: (5Y) p.6, Capital Needs Assessments: It's good to hear that about 1/3 of these have been completed, and the balance are anticipated to be completed by the end of 2022. There would be likely benefit to convening a meeting to discuss overall results after everything is in.

Response: It is planned that the selected consultant for these Capital Needs Assessments (CNA) or Physical Needs Assessments (PNA) will be including Resident Participation through meetings and review of Draft PNA to inform BHA staff and residents of overall findings at each site.

Comment: Lighting for grounds should be assessed and should be included in capital program for state and federal.

Response: Lighting issues and conditions at sites will be included in CNA/PNA Assessments.

Comment: BHA discussed at the RAB meetings about the physical needs assessments that will be done at different sites, and added in the loop where there will be resident feedback (invite LTO comment) before finalized. It would be good to have a schedule

for which PNAs have already been completed, when the remainder will be done, and roughly how long before completion there will be the resident feedback loop—and if any PNAs were done without the resident feedback loop (because they were done earlier), how that will be incorporated).

Response: The PNAs that have been completed to date are for the following sites: 206 Ruth Barkley, 219 Mildred C Hailey (Bromley Heath), 230 Foley, 236 West Ninth Street, 247 General Warren, 250 Rockland Towers, 251 Codman Apartments, 252 Heritage Apartments, 254 Pasciucco, 257 Lower Mills, 262 Hassan, 270 Spring Street, 271 Patricia White, 272 Roslyn (Cliffmont), 298 Hampton House, 2-126 (aka 244) Frederick Douglass and 2-127 (aka 299) Washington Manor. The remainder of the Federal Sites will be performed in the late spring through the early fall of 2022. Resident participation is required through the PNA Consultant. For sites where PNAs are already completed, resident/tenant meetings will be established for each site through the CFP 23 planning process in late winter/spring of 2022.

Comment: Sure. I think I'm unmuted. I wanted to thank you for the opportunity to speak tonight. And one of the things I wanted to recognize was one of the things that Randi Holland had brought to the RAB. I believe it was at last month's meeting, which was a significant savings that BHA had done through refinancing the capital financing fund and identifying that was going to result in some significant savings to the BHA, which could be plowed back into doing some repair work. And so I applaud BHA for doing that. I think it's going to make a big difference over the next 10 to 15 years, but in addition, the topic that came up earlier about ARPA funding, and I know it's only recently that we've gotten the word that the state legislature has made some decisions on ARPA. I know that there may still be some action by city hall regarding that.

And I know this is really the only opportunity we have right now to talk about PHA plans, because it's our time. We need to do this in December, and then the plan needs to get out by January. But to the extent that BHA in fact gets word out about any ARPA funds that might make some significant additional opportunities for developments, for all kinds of work that may be needed. It would be really good to convene, perhaps another rep meeting about that and to get some information out about that. Otherwise, I've shared with the BHA and the rep, a number of comments we have on both the federal plan, the state plan. I just got to you right at the start of this hearing comments on the FSS action plan and look forward to perhaps getting you some more before the comment deadline of December the 15th. Thank you.

Other speaker: But the people over here, we don't even know what you're talking about. What kind of money is and all that, you just saying stuff, but we don't know what you're talking about. The people on this call don't know what you're talking about. What kind of money were you talking about? Can you explain it to us? Yeah, but you're on the phone now at this meeting. We're interested since you brought it up. Can you let us know. We are tenants at too of BHA. We'd like to know which stuff. The people that were running for mayor, they put it on the website that it was going to be for Boston housing. It's just like I said, the American recovery money, and everybody know that money was there because that money was being given out to everybody with small businesses. So they had lot of money left the over. And they said that, the mayors that were running said



that money was going to be used for... So, that money's there. It should be there. They said it was. And everybody knows that money from the American Cup Recovery Plan was there. It was there. They were supposed to give it to the small businesses and they didn't give it to them. So they said it going to be giving it to Boston Housing.

And now you are all acting like the money is nowhere to be found, or we don't know where it's going. They're the ones that made the comment on the website that it was going to... Or is that just like you saying, somebody said, they don't want to over speak. So, that's what I'm saying. People are speaking and saying that. So is that only the plan? The money's not nowhere to be found, like you're saying, or we don't know, or Boston Housing is not controlling that money, or are you just saying that?

First speaker: Certainly. So a number of years ago, actually prior to the big recession in 2008, BHA decided to borrow money to do a major capital work, because it figured if it could borrow the money and do a major investment at that point, the cost would be less than they would be if they had to do it in dribs and drabs over time. And so that was called the Capital Fund Financing Program. Under that BHA has to then repay that loan over a course of 20 years. And so a good chunk of the BHAs capital budget that it gets from each year has to be set aside to repay that loan. BHA last year realized that the interest rates on the loan were very different if they refinanced it now than they were at the time that it was done. And so it took advantage of the fact that there were some developments that maybe no longer needed to be under the CFFP as well as refinancing.

And so that's what Ms. Holland was speaking about at the RAB board meeting last month, was that BHA had refinanced that bond, and that the long term costs of then repaying that bond were significantly reduced. And that then meant that there was going to be additional millions of dollars that BHA would have available to it, to meet some capital needs. The capital needs of the authority are huge. This has been an issue for the authorities since it went in receivership in the 1980s, but every bit that you can get helps. And so that's what I was referring to with the CFFP.

For the other item, I believe that's what Gail was referring to earlier around the issues, the discussions with city hall and some advocates asking for money to be spent of the nature of \$50 million. And there is money from Congress and the Biden administration, but nobody knows what the final figures are on those. And as was said, that is not controlled by the housing authority. And so the question is once there is something that may in fact be within the housing authorities control, we'd all love to know that. And then that would all be a good discussion for people to have about how should that be prioritized among all the different developments and all the different needs.

Response: So I think that what Mac said, and what I tried to say earlier was that there have been some commitments that people would support that, but it has to go through the city budget process. So we have not yet received any money from the city for Hailey or any other development there and when we do, we'll let people know. And we will, as I said before, we will talk about what it is that we have.

Comment: Well, now this is some second money that the guy just spoke. He spoke about some money that Boston Housing now has got and making money. I mean,

getting money or they didn't lose no money. So that small money, another lump of money that's being talked about other than the \$50 million. But we all want to know, and that this money is not being used to privatize the projects with, they're not going to put the money into that. But not to privatize the projects. Right. Or will it be?

Response: Its capital money. So the money that is being saved, because we refinanced the capital fund financing bonds (CFFP), is in the capital budget, and that can only be spent for capital improvements to federal public housing. And that's how it will be spent. It can only be spent to make capital improvements. No, it will not be spent for any redevelopment. It will be spent to repair and do maintenance and make capital improvements. And we call them capital improvements because they're bigger than what, when somebody comes in and fixes a stove or a toilet or a leaky pipe. These are projects where we come in and we like redo electrical service to an entire building or replace all the windows in a building. Those are the capital projects.

Comment: Because you got to start from... It's a lot of work to get mold out of apartments. All right. Then they need some type of ventilation systems because like a lot of people got them and I'm sure you all got all those pictures that they, I seen them online. A lot of pictures of mold and apartments.

Response: It is. And so you have to eliminate the condition that causes that, which is, as we spoke before about its moisture. Sometimes it's moisture in the units and poor ventilation. Capital Construction has several planned ventilation projects in the current 5-year plan and more will be considered in future planning years.

Comment: All right. Can you hear me? I am looking at the work item by development, the CFP 22-26 year plan. It lists each development and the work that the BHA is going to be doing over this five year. And when I look at Commonwealth, it... I see stuff like "...envelope, repair/repoint masonry facade. Now, I have no idea what that means. Can someone tell me what that means?

Response: That's one of the things that's in that capital plan. So, building envelope, envelope means the outside of the building. So it means that the masonry is... So it's the brick buildings, right? And the masonry is the white stuff that's in between the bricks. And over time, lots of times, it wears away. You can see sometimes that there's a lot of distance between the edge of the brick and where the masonry is. So, what we have to do to keep the buildings weather tight, is to go back in and repair the masonry and make sure and do any other repairs on the facade to make sure that it's watertight, airtight.

Second response: So it's called a masonry facade, which is a French word for "the wall."

Comment: The wall, thank you. Does that have anything to do with the roof? Because in all the years I've lived here, I've never had a leak in the roof. In our back hallway... Does this take care of the roof leaking in because there's now a leak... The office does know about it, but is that going to be addressed in this five year plan?

Response: The facade and the roof are two different things, but sometimes the connection between the masonry and the juncture of the roof, there might be some flashing issues up at the top of the wall, which is causing some moisture to come in, but it's not necessarily related to the roof. The roofs are in fairly good condition. They're still under warranty from work that was done in the early 2000s, I believe. So we usually purchase a 20 to 30 year warranty on our flat roofs and their membrane roof, but I will actually have... which building number are you in or what address?

Comment: I'm in [inaudible 02:10:28] nine. And I did talk to Christine. She's aware. They did a lot of repair on that roof and they're just waiting for it to dry up before they can come in and paint it, I guess. But there are times it seems like it's still leaking. I'm not sure what's going on. I haven't gotten back to her yet because, as you know, they're understaffed over there, but that was my concern. I had no idea what that facad... facade...

Response: As previously, noted, Physical Needs Assessments (PNA) are planned for Commonwealth Development and the roof conditions will be reviewed and included in the Assessment.

Comment: Now, replace common area finishes, replace common area finishes. Can you explain a little bit what that means?

Response: So a few years ago, I think it's been two or three years now, we redid all the flooring in buildings one and two for the elderly buildings. They got new floor finishes. And so some of the common area floor finishes are what we are looking at for the rest of the Commonwealth families walk up and elevator buildings. It wouldn't be necessarily all the townhouses, but it would be the corridors leading in the hallways.

Comment: That's what I'm talking about, the high rises. Only the high rises, because that's where the leaks are. That's where the leak is, in the high rise. Yeah. There is a leak in my building, and they're supposedly aware of that. So I was looking at this five year. It's not going to take five years to fix that, is it?

Response: Okay, we can check on that. No, it won't take five years. The five year plan has a certain amount of work planned over the five years. It might be a one or two years over that five year period that we would be doing that work. I believe I'd have to look specifically if the work is probably geared for CFP 22, which is the year we're in now, but we have what we identify over five years work that might happen. And in the plan, we can pull any of that work that might be planned in like CFP 24, we can pull it up to 2022 if we think it's more of an emergency and needs to be done sooner rather than later. We rely on the building managers. Sometimes things come up, not that this has happened, but sometimes animals get into the basements and they eat some of the piping or they eat some of the electrical wiring and we have to redo some electrical wiring throughout the building. We might move up a project that was planned in CFP 25 or even 26 and bring it down into 22, which we're allowed to do with a five year plan.

And that's why we identify all these work items so that if something comes up that needs to be fixed sooner rather than in the current year, we had the money budgeted for, we can pull that project down sooner and push something maybe back a year because it's not as big an emergency as we investigate the project.

Comment: Lastly, speaking for residents here who use those walkers that they push? Now trip hazards, are those considered capital things that come under the capital funding plan?

Response: Yes. We currently have a major authority-wide capital project going on now called Tripping Hazards. And it touches every single federal site, we had about \$2.8 million dollars or closer to \$3 million dollars in all the elderly sites and almost \$7 million dollars at all the major family sites, which are our bigger sites like Mary Ellen McCormack, Bromley, I believe Commonwealth has work planned. I just have to look at the documents to see what work is planned there. And they probably haven't started out there at the Brighton sites. They've been at south Boston, Mary Ellen McCormack, at Charlestown, and they're basically taking care of eminent hazards that, if you trip and fall, you get hurt and we don't want that kind of activity to happen. So we've been repairing many items, some of the repairs are wholesale pavement over parking areas or our private roads. Most of the roads in our development belong to us. A Family, Elderly and 91-95 Washington Street is anticipated to start in mid to late April under the current projects under contract now.

Comment: Thinking about inside the development, not on Commonwealth Avenue side, but literally inside where the bricks are just coming apart. And in order to, for those...them to push their Walker across it, is almost impossible sometimes, because I walk. For me to walk over it, I have to literally be careful not to fall and hurt and hurt myself. Even when I go upstairs to... I'm going by Miss Archibald's apartment, her stairs are horrible. I have to hold onto the railing for fear that I'm going to fall. But it's not a part of Commonwealth apparently for the next five years. I don't see that.

Response: No. We already have a contract now with a contractor, and it's been a two year project to do all the work. So the Commonwealth family and elderly are included in the scope of work. I'm just saying that the contractor himself has not moved to the site to do these repairs yet. We are under contract to do the work now, it was funded in CFP 18, 19 and 20, and we're planning 22 through 26. So that work is already under construction and design and installation. Work at Commonwealth Family and Elderly (plus 91-95 Washington Street) is anticipated to start in mid to late April under the current projects under contract now.

Comment: , I wanted to know the difference between Section Eight and Section Nine. And how is Section Eight any better than Section Nine.

Response: I think Section Nine is actually the capital portion of the plan. So it's 1437-G of the US Housing Code as opposed to 1437-F, which is Section Eight. and so BHA gets capital funding, that's what Ms. Holland was speaking about earlier. That's what a

few people have talked about, about the money that BHA gets from HUD, that they use for longer term capital work. So it's very different from Section Eight. It is capital money that's used for the public housing program.

Comment: So is Section Nine worse than Section Eight, or is it the same?

Response: They're very different things. So Section Eight is a special housing program that Congress created starting in 1974, which uses the private market and provides housing subsidies for rental in the private market or to support affordable housing like BHA housing that may have been converted. There was the Patricia White example that was given earlier. And section eight can provide more money than public housing operating subsidies. So in that sense, it's not necessarily a bad idea, but Section Nine is a completely different thing. It's the money that Congress appropriates for capital work in the federal public housing program. And it's Section Nine of the US Housing Act of 1937. That's why it's called Section Nine.

Comment: So if you're saying that Section Eight and Section Nine are very different then how come in your documents you're also saying that these privatizations are pretty much going to be the same thing, that people are going to have the same housing as before. And you even say that you're preserving public housing by converting it into Section Eight. So how do these different things line up? Just the different things that you're all saying.

Second speaker: Can I make a comment on that? This is Lauren. One of the aspects that are different is the funding stream with regard to the needs of maintaining housing. But the tenant rights section is a separate issue. And the way BHA does that is by carrying over the public housing rights into the project based voucher tenancies.

First speaker: Also with section eight, if your children are over 18 don't they have leave the unit?

Second speaker: No.

Response: BHA staff agree with the response of the second speaker.

Comment: One last comment, security. Is there any funding for security for Commonwealth in the near future? I know it's not in the CF capital plan thing because I don't see it. Is that something that can be looked at, the reason I said, we have a lot of people coming in and out, sleeping in our hallways. We call the police, we do all of that, but it's really, it also does, it's wearing and tearing on our building because they leave behind things that are not sanitary. Is there any security measures that can be made for our development, for our high rises at any point, that's what I'm really referring to, not for the townhouses but for the high rises, to keep people from coming in and sleeping and things of that nature.

Response: I'm the Director of Capital Construction, we have just actually literally last week completed a major two year security camera upgrade where we added an awful lot of security cameras at all of our federal developments. But as far as like a card access reader type system, I know we have plans to do some intercom, so door release

type things at, I think Commonwealth is included in that. We're doing a major kind of pilot plan right now at three separate sites with new intercom systems. And those are kind of tests basically for us operationally to make sure we're picking the best system, but I'm not sure at Commonwealth that we've included in the security component that we had for the cameras, any kind of card reader, card access system. I don't know if you have a card reader now that you use to enter your buildings?

Comment: We do have a doorbell, and years past there was a system where people could see who was entering, who was ringing their doorbell from their TV camera. There was a camera connected to the...somehow within, but it's not there anymore.

Response: We're looking at better automated systems and cameras short of additional people, but it's certainly something that we're always looking to do better and we are putting some of that stuff in our capital plan. So if we can do better door access, et cetera, we will be doing that.

Comment: There was a follow-up to that to see if that work that you mentioned also included Patricia White?

Response: Yes. I believe so. It is a little quicker at Patricia White now with the fact that it's been Section Eight vouchered, so I'm not necessarily able to spend capital money on that, but it doesn't mean that we can't spend some operating money related to that. Intercoms were on Patricia White's capital plan prior to it being converted to Section Eight.

Second response: Yes, there we'll be developing a separate capital plan and probably have a separate capital plan for Patricia White, and that there will be some significant work done there in the fairly near future.

## **Communications**

Comment: (5Y) (also Ops) p. 14, Improved communication tools: Can BHA supplement this information to say when testing is likely to be completed and when, if things go smoothly, it anticipates implementing these tools which will help with resident communication?

Response: BHA is in process of testing the new communication tool (which allows for texting, emailing and phone calls to BHA residents) internally. We anticipate beginning testing with residents and using the tool within the next few months.

Comment: (5Y) (also Ops Lsd Hsg) p. 18, Additional opportunities for customer feedback: It is good to know that BHA will be implementing these technological improvements in early 2022. Will this be available to all BHA Section 8 and public housing families? To applicants? If a Section 8 landlord is having an issue, will there

be a way to track what's happening with that? If an advocate (with an appropriate release) contacts the BHA on behalf of a client, will this be treated in a similar way, and would that advocate similarly be able to track how the request is being handled? This likely should be worked into the Customer Service Policy.

Response: The communication tool will be available to BHA public housing and Section 8 households, as well as to landlords. The BHA is also anticipating implementing a 'ticketing system' in 2022 to better track constituent requests that will be initially implemented in the admissions/leased housing/communications departments and possibly expanded to additional departments. Section 8 landlords also have access to a landlord portal through which they can communicate and receive assistance from the BHA. Advocates who contact the BHA on behalf of a client will be assisted similarly.

Comment: The other thing is, all these residents in Boston Housing have started to get surveys in the last week or so saying, "We want to know how you feel about us, what problems you have." And we'd like to know, are you going to be releasing the results of these surveys? I'm sure that you can anonymize them and aggregate the results. And we would very much like to see the results project by project.

Other speaker: Yeah. And that sounded pretty good. The survey that they put out, they said that they're going to do the surveys and they have the questions about the situation in your apartments. Are they good, bad, or not good. And they said that they're going to do these every year. And the people with the most problems, like the things that people are having more problems with, they're going to fix. So they're going to be doing this every year. That definitely would help them get certain things together, but are they going to do that? They said they're going to do it. They're going to do a yearly survey. They're going to have it every year. That sounds great, if they're going to do that. I think that would be a good fix, but I don't know, but that's what they said, so yeah.

Response: Yes, BHA plans on doing the surveys annually and sharing the results.

## **Designated Housing**

Comment: (S) Section B.2, Part 17 (Designated Housing Plan), pp. 78-80: The only change here is the number of units, and this reflects the removal of certain units from the elderly/disabled public housing portfolio. See separate comments on the Designated Housing Plan attachment, below.

Response: Thank you for your comment and observation. The BHA is proposing a new Designated Housing Plan which only includes developments which will not be converted in the near future. BHA is committed in its efforts with ensuring that proportioned housing opportunities may continue to be available to our increasing Elderly population, (Baby Boomers, especially here in Massachusetts) as well for our Non-Elderly Disabled and most vulnerable families.

Comment: In 1999, prior to the creation of the first RAB, BHA sought HUD authorization for a Designated Housing Plan (DHP), as is authorized by federal law for federal public housing which is designated for use by elderly or disabled families. See 42 USC 1437e. HUD approved designation, but not in the manner sought by BHA. It agreed that 70% of the units in BHA's federal elderly/disabled public housing portfolio could be set aside for families who were 62 years of age or older, and that 30% could be set aside for non-elderly disabled households. No existing households in such developments would be required to relocate, but they would be given the option. BHA would give preference points to applicants in each group to help get the mix to the desired percentage. BHA also sought and HUD agreed to set aside additional Section 8 vouchers for non-elderly disabled families who might be burdened with longer waiting periods.

BHA had originally sought a 80/20 split, rather than the 70/30 split assigned by HUD, and in 2015 HUD finally approved a revised plan with this split. BHA set aside an additional supply of mitigation vouchers for non-elderly disabled households who might have longer waiting periods as a result of the decrease in public housing units. BHA also agreed that wheelchair accessible units would be exempt from the designation, and would be assigned to elderly/disabled applicants regardless of age who needed such features. BHA was approved to extend this 5-year DHP plan in 2020 by an additional two years, to mid-2022.

As noted in BHA's DHP, it has converted a number of sites that were formerly BHA elderly/disabled public housing to Section 8 assistance. HUD responded to a BHA inquiry earlier this year that BHA could not continue its DHP plan for those sites, although BHA could decide on set-asides for PBV sites consistent with PBV criteria. The submission of a new DHP now, for a 5-year term, will avoid having to spend time on this issue in the spring. Since BHA is not proposing any changes other than the removal of sites as they convert, there is likely no issue. BHA should periodically share reports on how many non-elderly disabled applicants who normally would have been reached for public housing units (and now have longer waiting periods due to changed designation levels) have been issued Section 8 vouchers, and have successfully leased up, since it was an important element of the 2015 DHP plan regarding mitigation vouchers. Moreover, this may be another population in need of ECHO housing search assistance, since it is often difficult for such applicants to find appropriate units in the private market, even with some reasonable accommodation flexibility on payment standards; BHA may also want to discuss collaborations on this with groups such as BCIL.

Response: Thank you for your comment and observation. BHA is pleased to update stakeholders on housing outcomes for non-elderly disabled applicants. BHA agrees that the ECHO housing search may be a resource alongside our various valuable City partners who continue working closely with the BHA so together we ensure we are meeting to the best of our ability the continued increasing needs of our most vulnerable and very diverse population by utilizing all available BHA housing programs within the public housing and Section 8 Housing Choice Voucher programs.



Comment: Thank you. Someone just hit on it, when they said do 18 year olds have to leave? I'm wondering are there any elderly housing buildings still standing that are truly elderly housing anymore? Patricia White of course is elderly and disabled, and disabled over the years has had a big change in its umbrella of what it covers. So now Patricia White, I've seen 18, younger, there's children, there's pregnant women, there's just everything in this building. And there never was any communication of these changes that happened. It just happened.

Response: So, our elderly buildings are for elderly/disabled, also known as non-elderly disabled. The BHA has had HUD approve a designated housing plan for us, which ensures that we can keep at least 80% of the occupancy in our elderly public housing for elders and 20% for non-elderly disabled. And, so that's where it is. There is true elderly housing, called Section 202 housing which I don't think they're making any more of, but it was truly just for the elderly, and there may be others. But the BHA public housing is for elderly and disabled. That's the definition of who is eligible for it. And that's where that is. Which is why we do have in place a designated housing plan to try and manage the percentage of elders versus the percentage of non-elderly disabled and ensuring the preservation of housing opportunities for the increased elderly population who are rapidly transitioning from Non-Elderly Disabled to Disabled Elderly.

Comment: And that's overseen by HUD in terms of those percentages being handled?

Response: HUD has to approve the plan that we put in place to do that but then it is overseen by BHA Admissions Department.

Comment: Because our building just doesn't seem to me like it's 80% elderly. And I do know disabled encompasses a group much younger than the elders. . I just bring it up because the building just doesn't seem to have 80% elderly, but I could be wrong because we are a quad and I tend to stay in my own lane. So I may not see everyone, but the people I see are younger. But even children, infants are allowed now.

Response: Having the designated housing plan in place allows us to make sure that when we assign people to a vacant unit apartment in the building, that we can maintain that proportionality. The mix may be slightly different depending on how many wheelchair accessible units there are in the building because those aren't counted in that 80-20 mix. Those wheelchair accessible units just go to people who need that particular feature of wheelchair access. But otherwise the 80% for elderly and 20% for non-elderly disabled.

Comment: Someone just had a baby.

Response: And we will no doubt seek to transfer them to a family development. Because they would need a two bedroom. But it can be difficult and time consuming.

Comment: I had a family over me, the tenant's son had actually took residence with his girlfriend and four children. Over my head for over six months, and I had made

complaints other people had made complaints, but nothing was done until his portable AC overflowed into my unit. And then they had to go in and they had to do something.

Response: Thank you for your feedback and expressing your concerns.

## **Family Self-Sufficiency Action Plan**

Comment: **Introduction (Section I, p. 3)** May want to discuss the BHA's entire FSS history pre-Compass.

Response: Text has been added to the FSS Action Plan. Prior to its partnership with Compass, BHA managed its own FSS program, from the program inception in the mid-1990's. Just prior to its partnership with Compass, BHA had 50 Public Housing FSS participants and approximately 124 Leased Housing FSS clients. BHA's partnership with Compass Working Capital has allowed the program to grow rapidly and serve many more families. BHA has invested administrative dollars and Compass has brought philanthropic dollars to allow BHA to bring the program to scale. However given the pilot nature of the public housing rollout, BHA is reconsidering the goal of 500 by the end of 2022 and replacing that with a goal of 100 enrolled. This realistic reduction is based on the fact that the initial pilot at family sites will include about 1000 units and we typically see about a 10% enrollment rate where enrollment efforts are completed remotely. The ultimate goal remains 500. BHA will reassess the goal at the end of 2022 with the hopes that more on site recruitment will be able to be completed. BHA staff will carefully monitor the success of the expansion and update the RAB upon request.

Comment: Shouldn't there be some discussion about the BHA's public housing FSS program.

Response: BHA's public housing program has been graduating the last families it enrolled prior to the Compass Partnership. It has 33 families remaining on the program from prior years, and just enrolled its first family via the Compass partnership. BHA staff will review the Action Plan in coming months to encompass the public housing program.

Comment: If this Action Plan isn't what's referenced, then those who are already in the public housing program, or may be in the pilots discussed at the RAB meeting on 12/2 (expected to get to 500 families by end of 2022, originally at Barkley Apartments and with expansion of pilots to 2 more site) should be told what document to reference. In addition, there should be some bridge for people to go from public housing FSS to Section 8, or in the other direction, if the development changes subsidy platform, or if a tenant is shifted from one program to another.

Response: See above response. BHA currently graduates families who transition from PH to LH, and has not had any families go from LH to PH. It would seek to graduate and reenroll any families who shifted from one program to the other as the escrow accounts are held separately for each program.

Comment: May want to discuss the separate LEAP program (for MRVP and state public housing), and where information can be found on that.

Response: BHA has had a Mass LEAP grant in the past that has now ended and will look for opportunities to reapply in the future.

Comment: Below (in the Demographics, Section II), it says this is for HCVP—and that leaves open the question whether Section 8 Project Based Voucher (PBV), Enhanced Voucher (EVs), Emergency Housing Vouchers (EHVs), city-funded vouchers, or Mod Rehab, or RAD conversions (which may be PBV or PBRA), can participate.

Response: HCVP includes all of HCV's, which includes PBV's (RAD or regular) and EV's. Mod Rehab, State and city programs are not eligible for FSS which is a federal program.

Comment: In the subsection describing Compass, it would be helpful to discuss their other collaborations with PHAs or assisted housing providers—could this be furnished as an attachment?

Response: For those interested in further information about Compass Working Capital and their work please visit their website or use this link:  
<https://www.compassworkingcapital.org/impact>

Comment: **Scope (Section III, p 3)** Rather than saying 1,000-2,000, it would be more helpful to discuss what benchmarks program has gotten to at various points already, and what is anticipated by the end of 2022 and going forward.

Response: Leased Housing has enrolled over 1100 families into FSS via the Compass partnership to-date. We hope to enroll a total of 1500 in LH and 100 in PH by the end of 2022.

Comment: **FSS Family Selection Procedures (Section IV, pp. 3-4)** In subsection A (Voluntary Participation), what happens if an individual enrolls but changes their mind? Just as is stated in Section VIII.A below, regarding program termination (p. 8), it should be clear that such individuals don't face adverse consequences for continued participation in HCVP or other programs.

Response: A family may withdraw from the program at any time. No part of FSS participation/non-participation would impact a family's standing in the HCVP program.

Comment: In subsection C., it may be good to say what “good standing” means. There may, for example, be Section 8 households that owe money to the BHA (because they were moved owing rent to the BHA, or because they failed to accurately report income at some point, but as long as they are either disputing the debt or are honoring any repayment agreement (or behavioral conditions on continued participation, such as exclusion of a wrongdoing family member), they should be considered in good standing.

Response: This only means if BHA is seeking to terminate their subsidy, otherwise the household would be enrolled.

Comment: **FSS Activities and Supportive Services (Section V, pp. 4-7)** In subsection C (Community Partners), there should be inclusion of the various vocational and trades programs that are important for Section 3 resident employment opportunities, such as in the building trades (Youthbuild, Building Pathways, Benjamin Franklin Institute of Technology, etc., as well as any collaborations with trades and construction contracts that BHA and various developers that it is in partnership with are doing. This is very important at sites like Bunker Hill, McCormack, and Hailey.

Response: BHA staff will take the comment under advisement.

Comment: BHA should also encourage existing programs which are intended to reward public housing tenants who are willing to invest in their future (like the Northeastern University tuition-free program for BHA public housing residents) to be open to all BHA residents whether their particular housing is public housing or Section 8.

Response: BHA staff have asked Northeastern to consider expanding the program to section 8 participants and welcome resident advocacy on this issue.

Comment: **Incentives to Encourage Participation (Section VI, pp. 7-8)**

In addition to the escrow accounts identified here, BHA should consider whether there may be other exclusions or delays in tenant rent increases that can be offered to those participating in employment and training programs. Thus, for example, the Earned Income Disregard (EID) for persons with disabilities still exists at present, or there may be persons with disabilities who are in the PASS program (Program to Achieve Self-Sufficiency); certain HUD or other governmentally funded programs may qualify for exclusion of stipends during a training or probationary period. BHA should work at maximizing this for both Section 8 and public housing residents, in addition to establishing escrow accounts in which savings can be used to accomplish articulated goals.

Response: BHA staff will take the comment under advisement. Last year BHA applied for Moving to Work and if granted MTW status would consider some of these suggestions.

Comment: **Method of Identification for Family Support Needs (Section VII, p. 8)**

While it is good to go back to a family's baseline to see how it has progressed, there should be some recognition here that goals may change. Career opportunities may shift with the evolution of new trends. Health issues may arise which mean that someone may need to go to part-time status (either to address their own health or the health of a family member). A family may relocate either to an area with different transportation challenges (for work, school, and health needs) or to an area where porting of the subsidy would be needed. BHA should make clear to participants that they should not hesitate to bring such information timely to the BHA and that BHA and Compass will work with the family to modify an initial plan to make it meet current circumstances.

Response: BHA agrees with this statement and will better clarify this point in the text.

Comment: **Program Termination and Grievance Procedure (Section VIII, pp. 8-9)** Under Subsection A, it should be clear that certain things don't lead to termination. For example, while 3. provides for termination if the person moves from BHA public or subsidized housing, where it is possible for the FSS household to port to another PHA and continue with FSS through that PHA, it should do so, and households should not be inhibited in their exercise of portability and mobility.

Response: Families are permitted to port and continue with FSS if the receiving PHA has such a program.

Comment: Under 4, while noncompliance with FSS programs certainly could lead to termination, as is discussed in the Grievance Procedure subsection B, there should be an opportunity to discuss cure, revision of goals and objectives, and the like. While under 5, termination from the Section 8 HCVP program might also be appropriate to lead to loss of FSS escrow, there may be times where that is NOT appropriate—such as where the individual goes over-income for more than 6 months, or is unable to secure new housing with a voucher within a search period, or where the HAP contract was terminated for reasons that were not the tenant's fault.

Response: BHA does seek to graduate families early where they have met their goals and can be graduated.

Comment: Under Subsection B, Grievance Procedure (pp. 8-9), the time period to request a grievance hearing should be 20 days, rather than 10 days, to be consistent with the guidelines used for other Section 8 informal hearings. If an issue of reasonable accommodation arises, BHA should hold off on final action pending evaluation of the reasonable accommodation request.

Response: Thank you for the comment. BHA has made the change to the FSS Action Plan.

Comment: **Other Additional Information (Section X, p. 10)** This all seems fine.  
**Demographic Information (p. 11)**

It would be good to include this in the body of the PHA Plan. Moreover, some of the numbers that one would expect to add up don't appear to do so, and so an explanation for that would be helpful. To the extent that there is also to be reporting on Public Housing FSS, similar data should be included for Public Housing.

Response: BHA staff would be happy to discuss the data with the commenter.

Comment: I am a public housing tenant of the Boston Housing Authority (BHA). I live at South Street, a state-owned family development in Boston, MA. I'd like to see the Family Self-Sufficiency Program expand to include a state version for public housing tenants in state developments. Can BHA explore whether this is something that Boston's new mayor might consider?

Response: The state version of FSS is the Mass LEAP program. BHA has had a Mass LEAP grant in the past that has now ended and will look for opportunities to reapply in the future.

Comment: (5Y) p. 13, Increase Family Self-Sufficiency (FSS) participation: It is very impressive that BHA has achieved the 500 household goal, but even more impressive that it intends to get to 800 families by the end of 2021. Can BHA report to the RAB, at the time of its HUD submission in January, 2022, if it got to this goal, and if not, what was obtained? It is BOLD for BHA to commit to 1500 households by the end of 2022—such a large FSS program may represent a culture change, and there likely will be other changes necessary to help support the success of this program and participants. This is likely something that would be a good topic for a RAB discussion with BHA staff some time in early 2022.

Response: Leased Housing has enrolled over 1100 families into FSS via the Compass partnership to-date and enrollment in public housing has begun under the pilot. BHA staff welcome the opportunity to meet with the RAB upon request.

Comment: FSS plan should also discuss similar initiatives for state public housing and MRVP, and outcome of the REACH initiative and whether BHA is continuing this. While it may be that DHCD does not require this, it's good for us to have a full picture of all Family Self-Sufficiency Programs available for all programs.

Response: The FSS Action plan is focused on federal housing. BHA staff will take the comment under advisement about having a central place to gather information on self-sufficiency programs.

Comment: I'm from Greater Boston Legal Services and I work as a technical advisor with the RAB, and I thank both Karen and Steven for being on the call and representing the RAB for this morning session. One short thing I wanted to check on, and I have not yet sent formal comments to the BHA on this portion of its proposal, has to do with the FSS action plan. So I know that Kelly Cronin did a presentation to the RAB on that on this past Thursday, and she mentioned in her presentation, as did John, that there was

going to be a piece around public housing, FSS, but that that was going to be a pilot that would be rolled out originally at the Ruth Barkley apartments and then at two others and they wanted to double check the sites before giving information out. I didn't know if they had information about the other sites. But the other thing is the FSS plan itself doesn't refer to any of those public housing aspects. It only refers to the Section 8 proposal. So it may be that BHA would want to clarify things a little bit so it's clear that the FSS is open for those other components as well. Or if people should be looking somewhere else, that are public housing tenants, that are thinking about enrolling in their insights that are part of the pilot, they'd know where to find that information.

The other thing that I'd suggest, and again, I have not written up the written comments yet on this, is one thing that's not clear is, could an adult who's not the head of household apply to become an FSS participant? So let's say that the issue is not the head of household but it's some adult child who's part of the household, who's now getting significant earnings coming in. Could they be the FSS participant? Because there may be similar goals there where they're increasing their earnings, could achieve certain goals over time like education, home ownership, other types of self-sufficiency.

The other issue is, and we've been talking about this a lot with some public housing redevelopment, is integrating this with some things around trades and construction and things like Youth Build, the Benjamin Franklin Institute, Building Pathways, et cetera. None of that is discussed in terms of the community partnerships there and it certainly would be an important thing, particularly as some public housing developments are switched to the Section 8 platform and FSS may be a major way in which people can achieve some significant goals over time. But these are going to be major projects that go on for 10 or 12 years at a number of sites. So just the thought about maybe tweaking some parts of the FSS plan to integrate with some of the larger goals that BHA has portfolio wide. Thank you.

Response: Thank you. The very beginning part of your question just around the public housing sites, So on the public housing, we will be starting the pilot at the Ruth Barkley Apartments, and it really is a pilot. It will take some time for BHA to develop these processes, to develop the staffing, develop the reporting. There will be additional public housing sites that will get added, and one that I know about is the Alice Taylor Apartments. So that would be a second site. But it really is going to take a period of months. I didn't want anybody to think this was going to roll out in the next week. It's going to take some time, and we'll be glad to keep the RAB updated around the sites and the locations. And then we'll take your other comments about integrating the FSS action plan under advisement. HUD has indicated that there will be a change to the FSS regulations which permit enrollment by someone other than the HOH, however it has not been finalized. BHA will change its action plan to permit enrollments by any member once HUD finalizes this change. Thank you very much.

## **Grievance Procedures**

Comment: (S) Section B.1.6.A (Grievances), p. 38: This adds language about in-person hearings being subject to public health requirements, such as social distancing. We believe BHA has been doing some of its hearings, at least with hearing officers on public housing and Section 8 matters, remotely, and as with the courts and BHA tenant participation provisions, it may be that this is an option that should be retained for “good cause” (such as where a person may be homebound or hospitalized).

Response: The BHA will take this suggestion into consideration. Note that the BHA has always allowed for telephone hearings as a reasonable accommodation when in-person attendance is difficult/impossible due to a disability.

## **Human Resources**

Comment: (5Y) p.14, Improve Mentoring and Training for the Next Generation of BHA Staff: It would be good to review the content of what’s conveyed in the training. There is also likely a lot of cross-fertilization between those going into this work at the BHA and those who are doing similar work at community-based organizations such as CDCs, and groups like the Mel King Institute and Citizens Housing and Planning Association may help establish good networks and opportunities for staff to learn and grow. There may be opportunities with community partners to also do this (like the collaborative presentation that BHA, GBLS, and City Life/Vida Urbana did at the National Legal Aid & Defenders Association in the fall of 2020 on public housing redevelopment).

Response: Human Resources staff would be interested in connecting with these organizations for shared training/support if the commenter can provide the appropriate contact person for each place.

Comment: (5Y) (also Civil Rts & CAE) p. 14, Promote diverse hiring opportunities for BHA residents: In addition to what’s highlighted here, BHA is likely to be engaged in collaborations with development partners, adult educators, and various higher education programs to systematically look at how to increase opportunities for recruitment and hiring in pre-apprenticeship, building trades, and collateral positions available in conjunction with public housing development. To take just one example, the Charlestown Adult Education program has collaborated with the Charlestown tenant organization, with BHA’s assistance, to set up a training program for adults to complete prerequisites needed to get into these positions. The developer partners also set up a Design Corps summer program for high school students to get exposed to career opportunities.

Response: Charlestown Adult Education did receive a grant targeted to help 30 residents access training and employment for in-demand careers and will leverage strong relationships with a number of training and employment partners to meet goals.



Comment: (5Y) (also Ops) Pp. 14-15, Customer Service Policy: While this indicates that a position was established, it does not include if it was filled and when, and there is no statement whether BHA intends to establish a Customer Service Policy (and what arrangements there will be for resident input in the creation of that policy or for feedback as the policy is implemented).

Response: The position has been filled. BHA staff will work on the customer service policy and engage with the RAB in its development.

## **Leased Housing**

Comment: For over 30 years, **Pine Street Inn, Inc. (PSI)** has partnered with the Boston Housing Authority (BHA) to provide affordable, supportive housing for persons experiencing homelessness. Since its inception in 1969, Pine Street Inn has served Greater Boston's homeless 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 nearly 2,000 individuals** each day and night at its 44 locations throughout Metropolitan Boston. Pine Street Inn is pleased to submit these comments on the FY 2022 Annual Housing Plan.

Pine Street Inn has successfully served people experiencing homelessness with a myriad of disabilities and difficulties for **over five decades**. Since 1984, PSI has been developing and operating permanent affordable housing specifically for individuals experiencing homelessness. Pine Street Inn has developed housing and housing-based services specifically for persons living with disabilities (mental illness, HIV/AIDS, chronic substance abuse histories, dual diagnosis, and mobility limitations). These units meet the complex needs of the hardest to serve homeless individuals. With 850 units of permanent supportive housing in the portfolio, **PSI serves as a prominent provider in Boston's homeless services Continuum of Care (CoC).**

PSI **enthusiastically supports** the Boston Housing Authority FY2022 Annual Plan. Perhaps the most exciting initiative is the allocation of **480 Emergency Housing Vouchers**. Working with the CoC, these vouchers are making an immediate and continued impact on persons experiencing homelessness.

Pine Street Inn is excited and encouraged by the award of **210 Project-Based Vouchers** to preserve and create affordable housing at 140 Clarendon Street. **111** of these units will be targeted to individuals experiencing homelessness, also assisting in significantly reducing the population.

PSI is particularly pleased with the continuation of **Small Area Fair Market Rents (SAMFR)**. This adjustment of rent by zip code greatly expands housing options for extremely low-income tenants. The BHA's recent rent study confirmed dramatic increases in Boston area rents. The SAFMR allows tenants to utilize these rates and obtain housing in previously unaffordable areas. As the BHA can keep the payment standard the same for current tenants where there is a slight decline in the payment standard under the SAFMR, tenants and property owners are held harmless with the implementation of the SAFMR in new areas.

While the SAMFR currently 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**.

Response: Thanks for your comment. The BHA enthusiastically supports the work of the Pine Street Inn and is proud to be partnered on the above-described activities. This year the BHA repeated the rent study when it learned that HUD had calculated that FMRs for 2022 would result in a 6 percent decrease. The rent study date confirmed a 7 percent increase over HUD's estimate, a 1 percent increase over the 2021 HUD FMRs. We expect these numbers to be published shortly. This will ensure that families can continue to find and afford housing in most zip codes in Boston and greater Boston.

Comment: Another key initiative is optimizing technology to transform interaction with the agency, including landlord and tenant portals. Hiring a Director of Housing Search and Landlord Recruitment was a wise and timely move. These additions will lead to improved customer service and minimize frustration and miscommunication.

Pine Street Inn is grateful for and appreciative of our ongoing collaboration with the Boston Housing Authority. The knowledgeable staff, essential services, and informed guidance provided by the BHA 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: Thanks for your comment. BHA echoes the sentiments in the comment above.

Comment: (S) 2/ Section B.1.1 (Section 8 Waiting List), pp. 3-5: This shows that BHA has not opened its Section 8 waiting list for 13 years, and it is still pulling from applicants that were in a 2008 lottery. The waiting list has diminished (from 1483 last year to 873 this year), but the turnover (313) means it would still likely be almost 3 years before this old list is exhausted. As noted, BHA also picks a number of Section 8 applicants from various special purpose and set-aside categories, and a new one (where there are memoranda of agreement (MOA) in place with referring service agencies to supply stabilization and housing search services) has been added. It would be helpful to know which agencies currently exist and to get copies of those MOAs.

Response: The BHA will begin posting all active MOAs to the website shortly with executive summary language.

Comment: (S) Section B.1.1 (Section 8 Waiting List), pp. 3-5: As has been identified for a number of years running, the number of Section 8 applicants who are served who are Asian is FAR below the proportion of the eligible population (less than 2%, as opposed to 8-9%). BHA had agreed in the past that it would study its priority system to determine if revisions were warranted to better serve and address the housing needs of this population, but there has been no action to date. This is a serious concern.

Response: Thanks for your comment. One of the actions that we think will be helpful for this issue is the updated priorities, which will now include rent-burdened families in Boston. Under the outgoing priority system, being in a shelter was often a requirement to achieve priority 1 status.

Comment: (S) Section B.1.1 (Strategies), pp. 8-9: Under Strategies for Housing for Disabled Families, BHA has added Mainstream vouchers.

Response: Thanks for your comment.

Comment: (S) Section B.1.1 (Strategies), pp. 9-10: Under Affirmatively Furthering Fair Housing, BHA has revised reference to the ECHO program to move it from the planning to the implementation stage, but information about the numbers to be served was deleted. Is there still information somewhere about intended scope of the program—perhaps in the Progress Report?

Response: The ECHO program is staffed by the Director of Housing Search and Landlord Recruitment and two ECHO coordinators who provide counseling and landlord assistance, and consists of the following elements:

- A group briefing session for interested participants, including highlighting all the below elements of the program, as well as the BHA's recent adoption of Small Area Fair Market Rents (SAFMRs) that set housing voucher subsidies by ZIP Code and therefore make nearly every community in Greater Boston affordable for BHA voucher holders.
- Pre-search counseling, helping voucher holders set goals that make sense for their family, including learning preferences for neighborhoods, the importance of school quality and public safety, and other individual needs such as access to hospitals and childcare.
- Credit score assistance, helping enroll families in Family Self Sufficiency (FSS) through our partnership with Compass Working Capital.
- Search counseling, helping families find new housing, including in Expanded Choice Communities, through one-on-one counseling.

- Landlord engagement and recruitment, working to recruit landlords in Expanded Choice Communities and help families throughout the process, including facilitating connections with landlords, negotiating rent and leases, and providing one on one search counseling.

- Access to the ECHO housing search tool, echosearch.org which provides customized neighborhood recommendations based on preferences for school quality, public safety, and individual public transportation needs based on important addresses for each family.

echosearch.org, that provides information on neighborhoods and public transit to facilitate the housing search process. That tool was funded with support from the Boston Foundation, Boston Indicators, the Sasaki Foundation, and MIT's DesignX.

- Streamlined processing of unit inspections and flexibility with move-in dates. The growing ECHO team has been working with clients as of October 2019. Despite the COVID-19 pandemic that discouraged many families from moving, nearly 30 families in the ECHO program have moved to Expanded Choice Communities as of December 2021.

Comment: (S) Section B.1.4 (Rent), pp. 26-31: While BHA is correct that this portion of the PHA Plan has not been revised, given the specific questions that HUD posed in the Supplement form, it should be noted that there has been a significant proposed change in Section 8 (as captured in the FY 2021 PHA Plan Amendment) to eliminate most interim recertifications for mid-year increases in income.

Response: Thanks for your comment.

Comment: (S) (also Admin) Section B.1.8.B(1).b (Economic Self-Sufficiency), pp. 44-48: There are revised numbers here, similar to what's discussed above under Operations, for certain programs. Note the large number who are to be served under the BPS Homeless Families initiative (1136) and the relatively small Foster Youth to Independence pilot (4). BHA also notes that pursuant to HUD pandemic waivers which extend until the spring of 2021, it is not currently enforcing/tracking Community Service compliance for public housing families.

Response: The Foster Youth to Independence program now has 6 vouchers. 4 additional have been requested. Vouchers for this program are funded on a by request basis.

Comment: (S) Section B.2, Part 23 (Project Based Vouchers), pp. 85-87: This updates the 20% PBV cap to 3,100 units (reflecting the increased number of Section 8 units), and indicates that BHA expects to be at the cap by the end of FY 2022. Moreover, BHA notes that certain additional units are not subject to the cap, either because they are public housing conversions under HOTMA, are Mainstream vouchers, or would be in areas of low concentration of poverty. It would be helpful to get the information about

any PBV siting in low concentrations of poverty (since this likely would also create affordable housing with an opportunity area). BHA may also wish to note that it has sought Moving to Work status under the Landlord Incentive Cohort, and if this is obtained, it would also have greater flexibility to project-base assistance.

Response: Thanks for your comment. The BHA will update the plan in light of this comment.

Comment: (5Y) p. 2: 2nd paragraph, would replace 14,500 with 15,500 (as BHA did on p. 1). In this same paragraph, you may want to discuss how BHA has also pursued appeals of FMR determinations when they appear inadequate (both a few years back and now in 2021).

Response: Thanks for your comment and suggestion. The BHA will make some updates here. See above response on FMR.

Comment: (5Y) p.4, Full Section 8 Utilization: This says that BHA is fully utilizing authority this year, and projects utilizing 98% of authority for next year, but no explanation is given for why BHA would not fully utilize all authority. Moreover, there is no discussion here about whether the BHA is currently in shortfall, how that is impacting operations, and when BHA anticipates being out of shortfall and what steps may be required. (In a conversation related to Lenox Street on Nov. 16, BHA staff indicated that they were in shortfall. Shortfall usually means that BHA cannot issue any new vouchers, and at times must recapture vouchers it has already issued, and this can also impact other aspects such as whether participants in the PBV program can exercise choice mobility after a year's occupancy and whether there may then be vacancies in PBV units that other Priority 1 applicants may move into. In addition, at Lenox, the developer had agreed to accept HCVPs at subsidy standards that households qualified for, rather than full PBV levels based on unit sizes, where households were currently not right-sized. The anticipation here was that as families relocated in conjunction with rehabilitation, the HCVP units would be replaced with PBV units based on actual unit sizes. It was known that BHA's overall fiscal situation might pose challenges for how long this might take, but it is not clear when that might change. This is important to know because what occurred at Lenox Street could potentially occur with other subsidy repositioning where right-sizing may take some time and any financial partners' willingness to stretch in the meantime would not be indefinite.

Response: The intention is always to fully utilize all HUD awarded funding. In some instances, funding does need to be reserved for planned PBV developments. BHA will look carefully at the issue of right-sizing going forward and intends to resolve some of the issues with the updated transfer policy, that will allow for most right-sizing to occur prior to the conversion.

Comment: (5Y) Pp. 9-10, Additional Vouchers: This is all positive news on additional vouchers for Mainstream, Emergency Housing Voucher (EHV), and VASH program. BHA's full utilization of its Family Unification Program (FUP) should help if there are

future funding rounds, and while the Foster Youth to Independence program is small, it is important for those who need it, and like FUP provides a good opportunity for collaboration with the Department of Children and Families.

Response: Thanks. A note on the FYI program: the BHA receives funding through a non-competitive grant and is entitled to up to 25 vouchers on an annual basis. As mentioned above, a voucher is received on a referral basis. Once a foster youth is identified by DCF, BHA requests funding for that individual. It is not the traditional HUD funded program where BHA receives X amount of vouchers and then utilizes them based on eligible waiting list applicants

Comment: (5Y) p. 10, Maintain High Occupancy Rates in PBV: This refers to an Owner Portal which will help to track referrals from Leased Housing to owners for suitability screening. Has the portal begun operations, and how is it working?

Response: Implementation is in progress and a goal for 2022.

Comment: (5Y) p. 10, Utilizing PBV to Preserve/Create Affordable Housing: The news here on Mercantile Wharf is good (this site came up at last year's PHA Plan hearing), but it's not clear if there is still a strategy for use of PBVs for the tenants who were in Section 13A units that have expiring protections at Newcastle Saranac, the Forbes Building, or any other sites. Which particular Jamaica Plain sites are involved? It's also good to hear about the 140 Clarendon St. Preservation through Mainstream and traditional vouchers (what will the mix be)?

Response: The Newcastle Saranac site has an MRVP contract covering 30 units that was extended for 15 years. Newcastle Saranac also applied for and was awarded eight (8) two-bedroom vouchers. The HAP execution is imminent as of January 2022. The Forbes Building has not pursued PBV's through BHA.

BHA awarded 210 vouchers to the 140 Clarendon Street. Effective 11/2/2021 eighteen (18) Mainstream vouchers came into service for existing residents. In total, the BHA has awarded 120 Traditional Vouchers and 90 Mainstream Vouchers which will be brought on in stages throughout 2022 and 2023.

Comment: (5Y) Pp. 10-11, Expanding Housing Choice: The paragraph here on the number of families being served by the pilot was deleted, and so it is not clear how many families are currently being served by ECHO and how many families BHA ultimately intends to serve. It will be very beneficial for existing public housing tenants who have to relocate due to domestic violence and for Section 8 participants whose Section 8 subsidies are at risk because of owner failure to repair to get the benefit of ECHO's housing search services. As noted above, BHA may also want to mention its appeal of the recent FMR determination as part of its effort to ensure broad housing opportunities for voucher holders.

Response: See above response regarding ECHO.

Comment: (5Y) Pp. 17-18, Landlord recruitment and retention strategies: This appropriately references the BHA's Moving to Work proposal for landlord incentives. However, language that was in the prior draft about moving to biannual inspections (as permitted by law) and self-certification (as to completion of non-life-threatening repairs) was deleted. It would be helpful to know why this change was made. How is the Owner Portal working out? Any issues?

Response: The language will be re-added. The practice of biennial inspections and self-certification are here to stay and remain tools that have been well received by owners. With respect to the owner portal, about 1/3 of our landlord population is enrolled. Inspection results and payment registers are the features that they are accessing with the most frequency.

Comment: People wanted to know what was happening with accessing the Section 8 homeownership program, and if this can be accessible to other programs as well. Some people remember being put on waiting list for this but never hearing anything and still have an interest—could there be a report about how many in program now, how many succeeded, realistic turnover and how many new families could be served per year, as well as whether waiting list updated?

Response: Thanks for your comment the BHA will be making efforts to increase capacity with respect to homeownership programs.

Comment: There is no discussion about how the City-funded voucher program relates to other programs, and there should be. For example, assume that someone is in the City-funded program because their federal rent might be pro-rated and too high (they've got work authorization, but are waiting for permanent legal resident status); can they be eligible and prioritized for vacancies in the federal program when they become eligible, so that subsidy can turn over for someone else? How many new families will be served, and in what groupings (i.e., where did this expand the targeting for a new affordable housing development, and where was it just a voucher to help a family get into a better situation)? If families are in the MRVP or city-funded voucher program and they need to relocate out of MA for safety or economic reasons (and they are otherwise eligible for federal programs), are there ways that can be done? How far has BHA gotten with the program this year, and what does it intend to accomplish in 2022?

Response: A narrative on this subject shall be added.

Comment: All right, there we are. Yes, I'm on the Resident Advisory Board, I've been on and off for a while, but this is the most... I just wanted to say that I really like how [inaudible 00:44:51] to involve tenants in what's going on. And I realized that HUD wanted to change their bad reputation as a company and then they had consultants and more meetings and tenants and asked how they could improve, but I don't really feel that they took a lot of our suggestions. I'm a Section 8 mobile voucher holder and so this is very important to me in terms of the quality of tenants that the landlord receives

because it affects me greatly, because the landlord doesn't have to accept Section 8 tenants mobile tenants.

I just wanted to say that it's unfortunate that the severe mental illness tenants and juvenile delinquents continue to destroy the quality of life for other tenants. And I've read about ratings and I've also had the misfortune to meet this sort of tenants, and I just wanted to say I really think it's a ruined opportunity in terms of other places that I would've considered. And I just don't agree with the label of having a disability or being disabled or a low-income tenant just is for so reasons. And I feel that the mentally ill are using disability as a cover for their real problems instead of getting help. This is often a problem with others and it brings everyone else's down and it ruins everyone else's home.

And as I said, reputation is very important in private housing with the landlord because he doesn't have to accept certain tenants. And when certain tenants are deemed bad, being, "Oh, well you're a Section 8 mobile, you're a bad tenant." And I like living in private housing because it is quiet and I'm very quiet, but most of the landlords, they still don't even give me an interview even though I have excellent credit.

I love the building in which I live. I don't love the area because... Well, I'll get into that in a minute. But anyway, so I'm still looking for a place like mine across the street, back home, that's 55 plus in Brookline because it's quiet, and the only 55 plus places I've found are in suburbia. I don't drive, I don't want a car and I'm just... With the drug epidemic and all the mental illness that follows, I just don't understand why we don't have more of these facilities, residential facilities, built outside of the metro area so that there'd be fewer people and fewer access to drugs and alcohol. Okay. So in conclusion, the inclusion of exclusion with the mental illness so a landlord could get paid more money, which I obviously don't have access to the broadband benefit which I was supposed to get, which my company offered to pay them \$50 during COVID and they still denied me because they just want to cancel our contract because I'm now paying \$30. And I don't agree with having to go with a phone monopoly either. And I can't just show my phone cards to get the phone benefit for the broadband either, which is really not very nice.

I really don't agree with having a housing trust fund in terms of housing because this is discriminatory against lower incomes because that means that the plan doesn't have to be on site with the rest of the building. I feel it's a way for the landlord to get the restrictions off his property while still having all the perks and privileges.

And then the inspection thing, that was changed so that the tenant no longer gets a copy on the spot, which is unfortunate because my landlord used it as a term... My new managing agents use that as a way of intimidation. You would ask them something and they would write you up for attitude when the Housing Authority and the landlord didn't talk to each other. So that's my fault. But they yell at me and write me up for yelling at them, which is on the tenant's inspection notice, which really was not fair. They realized that I'm against their over-development without a permit under my window, which is reason why they continually give me a hard time. So I was just wondering if we could put this as part of the agenda as well. In the U.S., did you know we're the only ones to post nearly everything online, home titles, whatever? I find it disconcerting that some of us are part of the vulnerable populations and to have our ages posted, when men get distinguished and women get old, online when we did



nothing to facilitate this, such as having media accounts, whatever and... I just think it's wrong that these agencies post these things. I find it atrocious that the Greater Boston Legal Services was hacked recently and all our personally identifiable information was exposed and it was, again, without permission. I've never given any permission. I have the name of some of these companies.

I'm also wondering about the 2021 tenants, something, are now allowed to keep temporary non-recurring sporadic income and gifts or some sort of money I've heard. I was just wondering, I've had this taken away from me in one way or another so I can't buy a one-bedroom, and I was also wondering in this case, what about the exemption of earned income for those that are 55 plus years old? I mean, it just seems like I don't get moving fees, everyone else does, I don't get any income exemptions and I'm just three points short of the work quotient. I'd love to do something in public speaking but I don't know how to do that in terms of career choice or FSS. So yeah, if you have any suggestions, thank you. I'm a section eight mobile voucher holder. And it's come to my attention that especially in elderly disabled developments, that their trash shoot is being closed unnecessarily. Their buildings don't have a history of abuse, like on Washington Square. Mine, they do have an abuse, so they had to close it. But the management also needs a real talking to because I have excellent credit and the management, the new property owners, the owner, and the Housing Authority, they did not talk to each other during COVID. So I got mad when they gave me a notice to quit and I have excellent credit. So more communication it needs to happen because it's not happening and they're writing anything they want on the inspection notices, even when it's not true. We need the carbon copy.

HUD says the purpose of the RAB is to assist and make recommendations well I do not feel that we assisted tenants get to do this enough. For the most part the meetings are about Public Housing or RAD as well as housekeeping. Comments should be asked for at every meeting what issues people are dealing with and let the person talk about it. What do people agree with and what do they not agree with in regard to the policies and procedures? This should not fall under new business in the agenda because most of the time we do not get to it.

Fair Housing is mentioned a lot and there are so many things that have been unfair for me.

Own your own home no at the time this was not even an option for Section 8 tenants. Oh your working sorry you earned \$10 too much so you receive no help with heating your apartment. New rules now you get to keep sporadic income and gifts without being penalized after my life is more than half over this is OK now unfair. Oh your not working now that your older with health issues so you have to keep paying your rent so the landlord does not through you out no 2 years of free rent like those that worked one day a week. Internet infrastructure bill will pay for low income tenants to have free internet or phone \$50 a month for free but not for you, your denied getting this because others want to be lazy in giving it. Brookline low-income tenants automatically get free internet deduction.

My Grandpa was the first generation in this county and he and his family learned English and he lost his fingers on one hand because of his job. He could have become a golf professional but no one helped him with anything. Priority for anything other than

being in line and waiting your turn is unjust. I really wonder how many tenants especially in Brookline speak English as a first language are they citizens of the USA? It seems to me that more than half are non-citizens receiving a discounted rent.

Always being told to or suggested I am a bad tenant because I am Section 8 other tenants get into private housing and cause problems. Unfortunately I know of such people it is a shame HUD spent so much money on consultants to have a better image and this took no suggestions of existing good tenants.

There is a lot of discrimination against low-income people and those that are over 50 years old but you never see signs saying low-income lives matter. In fact everything suggests that they do not.

In the way of someone else's progress I still have not found acceptance in a building I would like back home across the street in Brookline.

In terms of representation of tenant groups there are actually 4 or 5 Groups that have different issues that come up with where they are living. These groups are Public Housing, Project based Section 8 tenant based RAD, Section 8 mobile, the Elderly and the disabled. Even with 4 groups some argue that it would be too difficult to manage. Why would anyone want to be called disabled in anything I do not know as I find it embarrassing. Furthermore many very mentally ill use disability for a cover about what is really wrong. This matters because reputation matters even Section 8 mobile has a bad reputation because well-intentioned agents wanted to tell me why I was having such a difficult time moving back home Brookline. Having to choose noise inside my building or outside my building.

Why does everyone else have to suffer because the addicted and very mentally ill live in our homes and not yours HUD. Where are the residential treatment centers in the suburbs so they will have less access to their addictions and have a free place to stay? I feel like my Metro Area has been taken away by over development and beggars and thieves but I do not drive.

Conflict of interest members on the RAB board should have only 1 vote and one chance to go on any trip. SETI Edna Willrich (her own agenda) should not be allowed to go on every trip just because a different tenant group pays for her or anyone else. No one should be able to attend more than once else regardless of who pays. RAB members should not have a voting voice to more than one tenant group because Section 8 Mobile tenants do not even have 1 voice except when recognized by RAB. No tenant groups should be invited all the time but on occasion invited by RAB as a whole sometimes. A technical adviser and Facilitator by Housing Authority is important at every meeting.

I wish the Whole Metro Area would have a tenant group instead we are splintered into different cities but being geographically closest to each other, (Brookline across street, Boston and Allston tax address are the borders of my building and Cambridge being a little further tenants of the SFMR (value rents) would understand if they thought about it. Ideas are taken by other people from other states and they receive a bigger welcome than people from our own state because we/Housing Authorities do not even talk to each other that live in the Metro Area. The bigger welcome is also given to other states people not within our own state. This is absurd the Metro Area of this state is different than others states. Boston is the only area that

everything is called Boston even when it is not Boston Proper which causes a lot of confusion both in distance (meetings & Cab rides) and in Covid Hot spots. If there were a City-Wide Residents Organization No tenants should be running it or at least not the same tenants every year running it. No career SETI tenant person and no Public Housing tenant person every single year the same person or persons. To have ALL the Metro Area Housing Authorities talk to each other and tenants quarterly with tenants in a City-Wide Residents meetings about new ideas or whatever is needed or should be planned. Section 8 is not really mobile for Metro Area people.

Thank you.

Response: Thanks for your comment. Comment has been referred to the leasing officer for follow-up.

## **Operations**

Comment: (also Lsd Hsg) Does BHA offer or plan to offer Section 32 Homeownership opportunities? According to HUD, “the Quality Housing and Work Responsibility Act (QHWRA) allows Public Housing Authorities (PHAs), through Section 32 of the U.S. Housing Act of 1937, to have the option of making their public housing dwelling units available for purchase by low income families as their principal residence”. (BHA’s limited homeownership options and self-sufficiency programs seem to serve only tenants in federal housing developments and Section 8 voucher holders.)

What is HUD doing to (a) help LHA’s like BHA offer more homeownership opportunities to their tenants, and (b) reach out in partnership with banks to offer and/or expand access to more affordable mortgages? These home-ownership options can help tenants move out of subsidized housing. Most tenants are discouraged by the high costs associated with buying a home on the open market, especially in pricey housing markets, like Boston. Tenants may be willing to buy, but they may need support accessing home-buying classes, lower-interest mortgages and available stocks of affordable properties.

Response: BHA’s Leased Housing Division offers access for participation in the Section 8 Family Self-Sufficiency Program (FSS), which allows residents to utilize escrow accounts to save for goals like homeownership. BHA’s Public Housing Program is offering the FSS program as well. It is initially available at one property (Ruth Barkley Apartments) and will be expanded more broadly, in alignment with resident interest and the availability of slots for participation.

Comment: (and Lsd Hsg) Template 1/ BHA notes that it has 9,279 federal public housing units at present and 15,442 Section 8 units, for a combination of 24, 721

federal units. 2/ BHA has revised its Statement of Needs, Eligibility, Operations, Grievance Procedure, Community Services portions of its Plan (discussed in greater depth in the Supplement). Also attached are the Limited English Proficiency, Site-Based Resident and Applicant Demographic data, the Rental Assistance Demonstration (RAD) attachment, the Family Self-Sufficiency (FSS) Plan, and an updated Designated Housing Plan (DHP).

3/ BHA has proposed new activities in the areas of Mixed finance, Demolition/Disposition, Designated Housing, Conversion to Tenant-Based Assistance, and the Project-Based Voucher Program.

4/ The HUD template has a new Section on Affirmatively Furthering Fair Housing (AFFH). BHA says it is not yet required to submit on this. It would be helpful to know when the BHA will be required to do so and what the BHA's plan is for RAB and resident involvement with that; the RAB was involved in prior AFFH discussions and added this work as an explicit part of its mission.

Response: Thank you for your comment. Regarding Affirmatively Furthering Fair Housing and when the BHA will be required to submit this new section, the template states: Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart.

Comment: (S) Supplement 1/ Section B.1.1 (Overall Eligible Population), pp. 1-3: This is updated to show use of 2018-2013 Consolidated Plan Data. However, at what point will BHA be able to use 2020 Census Data?

Response: The census data has been delayed due to the pandemic. The census.gov website states that the Demographic Profile including selected demographic and housing characteristics about local communities date of availability is tentatively 2022.

Comment: (S) Section B.1.5.A (Operations), pp. 32-33: This reflects the removal of Lenox Street and J.J. Carroll from the public housing inventory, and that BHA is now directly managing Commonwealth, 91-95 Washington Street, and Patricia White. Since Patricia White is now under a Section 8 contract, should it remain on this list?

Response: As there are no more public housing units at Patricia White, this former public housing development will be removed from the list and accurately reflected as a Project Based Voucher property.

Comment: (S) (also Lsd Hsg) Section B.1.5.B (Operations), p. 34: This reflects the reduction in federal public housing units (from 9,806 to 9,279) and the increase in Section 8 units (from 14, 979 to 15,686). Should make sure that these figures are consistent with those used elsewhere (such as in the Template) and if there are discrepancies, those are explained. Similarly, the figures here about turnover (400 in public housing and 480 in Section 8) don't match what's elsewhere in the Supplement, and so there should be explanation of that as well. BHA should explain what the 200 DHP set-aside vouchers were eliminated (if the thought is that the point system will produce similar results without an explicit set-aside, BHA should so indicate).

Response: Thank you for your feedback. BHA will review and make corrections where needed based on the Section 8 and public housing data. Supplement data on turnover on the waiting list is different than turnover of residents from the public housing program or participants in the leased housing program.

Comment: (S) Section B.1.5.B (Operations), p. 35: There are also figures here about changes in numbers for different programs serving BHA residents. One program, the Supportive Housing Program, is eliminated completely, and there should be some explanation. On the reduced numbers for Resident Service Programs in elderly/disabled housing (down from 3,179 to 2,852), it's not clear if this is due to loss of certain units from the public housing portfolio (like J.J. Carroll or Patricia White) or other reasons. While the increased numbers for the Family Self-Sufficiency (FSS) program for Section 8 (going from 270 to 514 and increasing turnover to 91) are great, less great are the reduced numbers for public housing (going from 50 down to 38 and reducing turnover from 11 to 5), and some explanation of that, if it doesn't exist elsewhere in the Progress Report, would be helpful.

Response: The reduction in the elderly/disabled number reflects the loss/conversion of those units to redevelopment or in their transition to PBV. The Supportive Housing Program totals were omitted in error. They will be revised to reflect current totals (60) and turnover expectations (13) for the year.

The Public Housing program is in the process of reintroducing the FSS Program, beginning with Ruth Barkley Apartments, where residents are now able to enroll. BHA plans to expand the opportunities to other properties. As the remaining participants in the previous incarnation of FSS graduate from the program, the numbers will diminish until more new participants are enrolled at Barkley and future sites.

Comment: (S) Section B.1.5.C (Operations), p. 36: It would be helpful to get a copy of the BHA's Vaccination and Testing Policy, so residents and the public are aware of this. In addition, I believe BHA has renamed its "Sexual Harassment Policy" a "Workplace Anti-Harassment Policy", and it is broader than just sexual harassment—probably should revise the title here.

Response: Thank you for your feedback and recommendations. BHA will follow-up internally with the appropriate Department(s). The BHA's Vaccination and Testing Policy may be obtained by request from the Human Resources Department.

Comment: Fire safety: Can BHA implement some form of Fire Safety Training and Awareness for tenants, that models the No-Smoking Policy? Would HUD be willing to fund and/or support a program like that? Knowledgeable tenants reduce the risk of death, injury, and property damage, from fires.

Response: Thank you for your comment and recommendation. BHA works in partnership with the Boston Fire Department on Fire Safety issues and will evaluate the

recommendation to determine the most effective means of raising fire safety awareness and will continue reminding residents of the BHA's non-smoking policy through posted notices, flyers, and other methods.

Comment: Work Order/Blast PORTAL: a great idea. Can it be expanded, giving tenants the ability to log in to the BHA site, create an account (tenants use their unit ID as a user name), create a unique password, and log in to generate/track work orders (like when repairmen will come and choose a better time if that time-slot is not convenient), pay rent/track posted payments, upload documents (recertification); get messages from BHA and managers, instead of mailing - as well as send complaints/feedback to BHA, etc. *Can HUD and/or BHA explore this?* Covid highlighted a need for low-income residents to be technologically connected. This will help LHA's and tenants function better in future pandemics/emergencies.

Response: BHA is currently exploring portal implementation and will endeavor to provide residents with the ability to report maintenance problems, submit recertification information and documents, make rent payments, and monitor those payments and balances. BHA's goal is to begin implementation of the resident portal in 2022 and utilize it to the extent possible and practical, but we will continue to be mindful of those who may not be able or as comfortable utilizing web-based business processes as some others.

Comment: South Street does not recycle. BHA may want to move towards ensuring that all their housing developments have recycling receptacles. BHA should check if the city requires separate bins for items like glass and paper.

Response: Textile recycling has been implemented at South Street and other BHA properties. The management office at South Street can provide residents with information on the location of containers.

Comment: (5Y) p. 1: In the 3rd paragraph under Background, 7th sentence, typo, "principals" should be "principles".

Response: Thank you for the comment. The document has been updated.

Comment: (5Y) (also Admissions) p.3, Occupancy Rate in Public Housing: This is troubling, since it not only says that BHA has fallen to 95%, but it sets no goals for getting to 97%, and eliminates the prior ultimate goal of 98% occupancy. This has an impact on homeless and at risk families who are in need of scarce affordable housing resources. There's also a reference to both increasing offers and to capturing data centrally, but there is not a detailed description of the BHA's strategy. Since this is such an important PHAS factor, BHA should describe what it will be doing, and particularly when it will be implementing the various Admissions reforms sketched out in its FY 2021 PHA Plan Amendment which have yet to be rolled out.

Response: BHA continues to aspire to achieve the maximum occupancy percentage, and has prioritized the improvement of the occupancy rate. It has leveled off at 95% after dropping significantly while managing the dual challenges of the pandemic and the relocation of hundreds of residents, due to a number of redevelopment projects. BHA remains focused on increasing the number of offers and improving the condition of units upon turnover to minimize refusals and better compete with other providers in the affordable rental housing market who may offer new and improved amenities. Our mission is and will continue to be serving in the best capacity the most vulnerable population in need of affordable housing. We continue working closely with many of our community partners to ensure the uninterrupted services regardless of the on-going unprecedented health crisis we are all facing.

Comment: (5Y) Pp. 4-5, Moving toward high performer status: It is impressive that current rent collection is at 97% given pandemic challenges, and we look forward to continuing to collaborate with BHA and non-profit partners (such as HomeStart) to help insure stabilization and avoid displacement for those affected by the pandemic who lost jobs or may not have been able to navigate tech or other challenges to report changed circumstances and seek appropriate rent adjustments. The information here about the new work order system and staff training on PHAS protocols is encouraging. Does BHA have any information about when REAC inspections are to resume? As noted above, getting back to full occupancy and addressing barriers to that will be critical to having a good PHAS score.

Response: Thank you for your feedback. Yes, the BHA remains focused with striving to meet all HUD requirements and of those we serve. We need all the support available from our always valued partners. Together, we continue to deliver our services which we know are much needed, even more during this health crisis. HUD has now begun notifying public housing properties of coming REAC inspections, with the initial inspections scheduled for the end of January, 2022.

Comment: (5Y) (also Capital and RED) Pp. 8-9, Sustainability, Reduction of Carbon Emissions, and Climate Resiliency: It's helpful to see the additional items here designed to reduce carbon emissions. It should be noted that some of what's included here is state assisted housing (Msgr. Powers), and not sure if HUD would want that in its report—this certainly would be appropriate to include in the State Plan report. On the new item c. on the City's Climate Ready team and the Heat Resiliency study, it would be helpful to get updates. In addition, issues have arisen about trees and the urban canopy and particularly how to insure replication of trees where redevelopment may require some removal. Issues about heat islands and coastal flooding/water levels are relevant to a number of BHA sites, and this has become a factor in BPDA approvals; BHA may wish to work this into this portion of the Progress Report as well.

Response: Yes, that's correct, some of what's included here relates to state assisted housing. BHA's aim is for the 5-Year Progress Report to track portfolio-wide activities (state and federally assisted sites). We certainly welcome opportunities to share further

updates with the RAB and BHA residents more broadly in the coming months and years.

BHA is working through our Energy Manager with the City's Climate Ready Team to facilitate Climate Resiliency into our Capital Projects that are planned. We have already been working toward energy management/consumption reduction improvements in our heating systems (providing heat pumps systems in garden style apartments), roofing increased insulation systems and window replacement projects (improving thermal qualities).

And, yes, we fully agree that trees—the preservation and replacement of trees, specifically—are critically important in redevelopment planning.

Comment: (5Y) Pp. 15-16, Optimizing technology to transform agency interactions: This indicates that the majority of BHA public housing files have been scanned. It may be helpful to establish a goal for the completion of the rest of the conversions. It is not clear from this how far back information may go, and whether it may still be necessary to rely on non-scanned information. (For example, a common issue we encounter in our work is whether public housing rent was properly determined, and this may require going back a number of years, or determining if the Earned Income Disregard was utilized as of an earlier date, etc.) This also indicates progress in setting up Resident Portals (which could be used for maintenance tracking, recertification, etc.), but doesn't set target dates for implementation. As with other technological enhancements, this may not work for all residents (such as those who don't have reliable internet access, good devices, or the ability to use the same), and BHA will need to make sure that there continue to be traditional ways for those who can't utilize the technology to communicate with the BHA and to obtain necessary information over the phone, by mail, through authorized third-party contact, or where necessary and consistent with public safety protocols, in person.

Response: To date, over 90% of of the public housing files have been scanned. This has been extremely helpful, especially during this health crisis. BHA expects the remaining files at the privately managed developments to be scanned during early 2022. BHA has the physical files in storage, where they are available for recall, as necessary.

The public housing resident portals are in the planning stages, with BHA anticipating the initial implementation beginning in 2022. BHA will certainly be mindful of those who may have difficulty utilizing the portals, and will continue to utilize processes that will meet the needs of our diverse population.

Comment: Should be some kind of recycling program that public housing residents (state and federal) can participate in.



Response: BHA is currently implementing the textile recycling program at various properties and will review the current recycling program. Operations staff would be happy to meet with the RAB to discuss recycling upon request.

Comment: There is a perennial issue about hallway clean up. While at one point residents would sign up for hallway cleaning duty, it's clear under the Sanitary Code that this is the owner's responsibility—but particularly during the pandemic, this has slid. How can responsibility for this be institutionalized?

Response: BHA has placed renewed emphasis on the cleaning of hallways and common areas, and has increased the inspections of these areas. BHA has also increased the use of 3rd party cleaning vendors and contractors in an effort to identify the most effective and efficient ways to keep them clean.

Comment: I grew up in Chelsea there and I moved to Boston by myself because I have two sons and I was trying to look for a better education for them. I looked it up, I did my researches and then I figure out that over here they have a better opportunity for to go to college and they have more help. So we came over here. Everything is going great, because thank God my kid started college this year and it's really hard now with the epidemic because there was a point that he got really depressed and he told me, "Mom, I'm not going to go to college. For what am I going to go to college? We all die." And it's hard because some of our loved ones died and we never had so many death in the family. We've seen it around the world and everything but you have to push your kids to keep on. I told them we had a purpose to come to Boston because all my family is over there... Well, my mom and my brother is over there and I'm here alone. But the purpose is that we're going to achieve a goal and we're just going to be better and help others and do the things that we love to do and we're not going to stop. This is not going to let us stop because if God didn't take our life we're going to keep on moving.

We support each other. We're a team. But we live here in the projects. My son, my oldest son, he just started going to college so I started working to help pay the college and he started working to commute in all his gears and stuff that he needs. They want to increase my rent now, so I try to tell the Lenox department here if they're going to increase my rent, why can't I get a three-bedroom? Because my son doesn't have a bedroom and he's going to be paying rent. That's one thing.

Another thing, I'm really grateful. I'm really grateful with the program that I have a place to stay. You do your place however you want to do it. You create your environment, your home. You live how you want to live. Because if you come in my apartment, you would never think it's the projects. I have it nice and cozy and it's really nice, it's homey, but there's things... I see a lot of people get affected of the heater. This heater never turns on. Only when they want to turn it on. It could be two days freezing and they don't turn on the heater. No, but my point is nothing negative. My point is that if we have those little things taken care of, that neighborhood will be better because there's people here that... People say, "Oh, the projects is bad." It's not bad. It's people that are fed up with waking up with little things that they could get fixed.

Like I said, I'm really grateful with the program and everything but those are things that, if they get fixed, the people will be better. And that's the whole point of living in Boston

public housing and having a hope and a push to the future, right? Not to get stuck and to be miserable for things that are not necessary. So that was my comment, that we could fix little things that... Sometimes Boston Housing comes once a year to do the inspection but they inspect only the fire alarms. My fire alarms go off unnecessary because of the heater, and those are things that they could come and fix, So maybe Boston Housing, for this year's plan, involves a little bit more in the public areas to see how they're managing it. See? So that's my comment.

Response: Staff referred the comment to the Beacon Lenox manager for follow-up.

Comment: I am a Resident Advisory Board member also and I have been a member [inaudible 00:51:16] RAB for six years.

For those who don't know what the RAB is, is HUD's brainchild to keep or open discussion between BHAs and their residents. In Boston, the RAB consists of three separate boards, family, elderly disabled and Section 8 voucher holders. The RAB meet once a month, usually the second Thursday of the month. Each section of the RAB is elected by residents in their own section, family elects family, elderly disabled elects elderly, disabled, and Section 8 elects Section 8. Each section elects 10 members and alternates. The full RAB has 30 voting members. Each section has their own chairperson, and the chairpersons rotate chairing the monthly meetings.

As of now, the RAB has been meeting remotely on Zoom because of the pandemic. Hopefully by spring they'll be able to meet in the flesh. If so, in July, there will be an election of the entire RAB to start a three-year term.

Now, this year's annual plan is of significant because it takes into the five-year cycle that coincides with the 250th anniversary of the Declaration of Independence. Eight years ago, a young candidate from here got elected for recognizing the housing crisis in Boston. Now two years later, he is a cabinet secretary in the housing crisis [inaudible 00:53:03]. BHA plan moves forward to address Boston's housing needs, however, whether it gets to Build Back Better remains a quandary. It's time to move forward and to keep the faith and finally solve the housing and homeless situation in Boston. Thank you.

Response: BHA staff look forward to continuing the partnership with the Resident Advisory Board and working together to address affordable housing needs in Boston.

Comment: I have Section 8. I live in private housing. My question was about where do I get this document that we're talking about? And I got the link from Jane... I mean from John. Sorry. But now my quick question is, can you give a quick summary of what exactly we're supposed to make comments on? What is it that is big that we are trying to accomplish? I don't know if it's possible. If it's not, that's okay I'll try to read it and I'll come back later at six o'clock.

Response: Why don't we take a minute and try to give a little description? But there's nothing that'll quite replace your... You might come up with your own question because of how you read the plan, someone else has another one, but we can give a quick summary. We are placing a link to the annual plan documents in the chat and you can

also see a hard copy at the Boston Public Library Copley Square branch. And as Mac noted in the comments, you do not have to do a hurry up and comment by this evening. You actually have until December 15th to provide written comments to the BHA. So you do have a bit of time before you actually make a formal comment to the BHA.

So the BHA, some of the documents that are amendments to the annual plan like the ACOP, the Admissions and Continued Occupancy Policy, as well as the administrative plan, there were some changes that we received public comment on earlier in the month... So quite a few changes were made with respect to the priorities and preferences for the Admissions and Continued Occupancy Policy, a lot of them to really align them with the Section 8 priorities and preferences. But in addition, there were some new priorities added to... One of them being that we have a category called Priority 1, so one of the major changes is that an applicant will be eligible for Priority 1 if they are rent burdened, meaning they are paying more than 50% of their income towards rent and utility. So that would qualify somebody for Priority 1.

Another major issue that we dealt with in the Admissions and Continued Occupancy Policy is the way we deal with transfers in public housing, as well as the offer processes in public housing. Those are some of the major issues in the document, but again, like John said, you should take a look at the documents and see what issue's specific that you might want to comment on. And since you are a Section 8 participant, you may be more interested in some of the things that are in the Section 8 Housing Choice Voucher program administrative plan, as opposed to the Admissions and Continued Occupancy Policy. But those priorities that I spoke about are mirrored in the administrative plan as well.

So that's just off the top of my head, some of the major changes that are occurring.

Comment: Well, I do have an individual comment, and I guess I could give an introduction too, if no one did that. And you sent us this really nice email about trash chutes and all of that. And I just wanted to comment on that and say how it has affected my lifestyle, my living, and not just me, but all the other tenants because we don't have it anymore. And why did the elderly, why did part of Commonwealth get to keep their trash chutes and some didn't? Was it a budget thing or...

Well, actually, I think you told us it was because no family members have it in the development. But my question is, since we've had trash chutes from day one since the building was put up, is there any way we could have kept them open? Because we've always had them. It's really been an inconvenience for us. And I did read your letter. It was very good, I understood it, but it's been such a inconvenience to all the tenants, really has.

And since we've had them... Because we've had them from day one, I haven't been in this building 40 something years, but the trash chutes have always been there. And now that they're gone, is there anything... is it about the funding, or is it just because other family units don't have it? Or because we were so bad and not taking care of them. I don't know. It's just that, it just seems like to me, I don't want to mention anybody else, but we never knew we had a problem until the BHA came in, and took over. I never knew that was an issue. Because we're in a high-rise building, it's really difficult. If you ask, I think the rats have gotten worse. It's gotten worse, since we don't

have the chutes open, because the dumpsters are always falling over, I don't know. I don't think we had as many rats as before. I just don't think... I just know most of the residents here who live in these high-rise, I mean, we don't live in the townhouses who have easy access to these dumpsters. But yeah, it was just something that I wanted to bring up.

And hopefully, maybe somewhere down the road, something can happen. Since the elderly people still have theirs, the elderly, disabled buildings here at Commonwealth, was there some legal reason why they got to keep theirs and we didn't?

Response: So, I really don't have anything to add to the letter that was written. You know, we can talk about this at a task force meeting as well. I mean, I know it continues to be a concern for you and others in your building.

Comment: Well, basically, if it's okay, I'll just use my little brochure which I use with all my tenants, with all the tenants around here. I basically tell them, and I'll just state it here, that the resident advisory board consists of public housing and Section 8 residents who assist the Boston Housing Authority, the BHA and make recommendations, we make recommendations regarding developments of the BHA agency plan.

And our brochure go on to say that the RAB members are elected by their peers, tenants from the BHA family, public housing development, elderly disabled public, housing development, and Section 8 voucher holders, elect fellow tenants who are interested in serving on RAB, and elections are held every three years. We don't have a location right now because of COVID. So, I can't really speak on that.

We're doing everything by Zoom. And basically, we also advocate for each of the tenants. We represent the tenants, and whenever they have issues that they don't feel comfortable with, we direct them to resources. Regarding their rental housing issues that might come up. We basically just assist tenants if they need it.

And we're just here as a service. Even though we're residents, we try to serve our residents too in such a way that we want to be served and helped. I guess that's about all I can say. If anyone else wants to throw something in there...

As a RAB member, basically, we represent all of BHA. I might have to talk to someone from JJ Carroll even though they're in redevelopment right now. We don't just focus on Commonwealth. We try to help all of BHA residents. There's a lot of people that know we're RAB members and we try to help them all. And if we can't help them, we direct them to someone who can, basically.

Response: BHA staff thank the RAB for all their efforts.

Comment: Hi there. I'm an organizer with the United Front Against Displacement resident group, and I just want to register my strong opposition to the overall strategy that BHA has around the entire city of privatizing the public housing projects and turning them into Section 8.

And then, adding in all these luxury apartments, which is in direct opposition to the stated goals in your own plans. In your five-year plan, you say that your goals are to strengthen and preserve the BHA portfolio of public housing, and prevent displacement

and harmful gentrification. But that's exactly what you're doing, by taking all the units of public housing you have, it's, obviously, your goal to do that with pretty much all of the units, and hand them over to private landlords, and hand the management over to private landlords, hand the ownership over to mostly giant banks like Bank of America, is really a disgrace.

And it's clear that you're trying to hide that from residents. You also write that your goal is to have meaningful participatory planning in what you're doing, and yet, most of the residents we talked to didn't even get the flyer to join this very public hearing. There was no link to view the plans in the flyer to join this hearing.

And even the plans themselves are confusing. They're full of red scribbled-out stuff. It's impossible to even understand what you're doing, unless you look at it really closely with a lot of different people. So, it's very clear that you know what you're doing, and you're trying to hide it from residents. And residents understand that, and they should have no reason to trust you. You say that you're going to create new tenant protections, but tenants are mistreated by your very employees every single day.

And then, now, at Mildred Hailey, you've moved all the managers to another project, but that's all you're going to do. They're not going to receive any punishment for the way that they've systematically refuse to do anything for residents, when people ask for repairs, nothing happens for months on end. Maybe they don't even get their work orders submitted. And this is from the top down, it's clearly a culture. And now, you say, oh, you should trust us to oversee these random private companies to operate things in your benefit. But there's no reason people should trust that. And there's no participation that's happened in this process. It's pretty much illegitimate, I think.

For example, at Mildred Hailey, the current tenant organization was created by one of the developers, JPNDC. It lists on their website, we began intensive community organizing in 2014, or I don't know if it was 2013, to create a new tenant board. So basically, once BHA took over and kicked out tenant management which was the only real form of management that ever actually represented tenants' interests at Mildred Hailey, the developer who wanted to come in and take over created their own tenant board.

And now, you say that the process is legitimate because it has the approval of that tenant board. So, it's really a joke, and I think it's disgrace.

Response: The BHA is not in any way abandoning our public housing communities, but rather we are engaging in creative partnerships that provide additional resources to the portfolio in order to preserve ALL BHA affordable units for the future. We are committed to open communication with our residents and all community stakeholders, and indeed the comments submitted by the Mildred Hailey Task Force board and City Life/Vida Urbana (and documented above) are a testimony to BHA's success in engaging the community. In the case of the partial redevelopment of Mildred C. Hailey, BHA is engaging in a partnership that involves multiple respected not-for-profit community organizations with ample experience developing and maintaining affordable housing in the community. With respect to the 2022 annual plan specifically, the BHA sent notices of the annual plan and the public hearing to public housing and section 8 participants in the mail. In addition, copies of the plan were sent to Local Tenant Organizations. BHA also sent letters to many housing advocates and elected officials about the annual plan

and public hearing. BHA also posted a notice of the annual plan and public hearing in the Boston Globe. BHA in response to comments has used versions of the plan showing edits in redline or underlined as a way to highlight the changes made. The point is well taken that this can be confusing and is hard to understand unless you look closely with a lot of different people which is exactly what the BHA staff does with the elected Resident Advisory Board. BHA staff met with the Resident Advisory Board at the Oct, Nov and Dec meetings and made presentations on the annual plan and responded to questions.

Due to federal underfunding over decades, all older public housing facilities have a backlog of capital repairs. Understanding the critical needs at the Mildred C. Hailey buildings and without receiving additional funding for repairs, BHA increased staffing and accelerated repairs at Hailey in 2021, made updates to how it conducts repairs, provided coordination from senior-level staff, and also increased cleaning activities at Hailey.

Comment: (also Capital) Hello. Yes. Yeah, I'd like to make some comments about the annual plan in relation to the living conditions, and also, in relation to the stuff that others brought up.

You know, one of the major things that people are facing is these atrocious conditions, in many cases. You know, molds that turns whole walls black, leaks that don't get fixed, holes that don't get fixed for months. And looking at the capital fund five-year plan that lists out the amount of money that's going to go to different developments to supposedly fix stuff, there is basically no mention of some of these major issues like mold. There's one mention of mold at one site, and nothing else.

The BHA has sent notices to people saying, "Oh, believe us. We're really committed to addressing the issues you're facing now." But really, I mean, since some of the major issues like mold which is a major issue across BHA properties isn't even listed in this capital fund action plan, I think, it's called.

It seems that you're not so serious about that. And in the meantime, you're toeing the line that comes from Congress and from HUD, yeah, to get rid of public housing as public housing, and do these developments, redevelopments that hand over ownership, that take 15 years, and in the meantime, people are expected to just wait with this mold that isn't even listed as a thing of concern in the capital fund five-year action plan, that's supposed to address these... That says what things are going to be worked on in terms of plumbing and these other things. So, yeah.

So, are you all going to just keep saying thank you very much, but you're not giving us no kind of feedback. We're not going to get no feedback? Are we just having these meetings just to say we had them? So, just to put this on your checklist, check, gave them meetings, check. We did this, check. We did that. But nothing's going to happen. Is that what these meetings for? You said you would have people call us back, to follow up or something about them. You said that too at the beginning. If you couldn't answer... Remember you said that?

Response: I said that we will respond to all of these in writing, but that during the hearing itself, we were here to listen. And that from time to time, if there was a specific question that could get a short answer, then, we would do that.

BHA has a process in our Standard Operating Procedure for the determination of mold/mildew and its remediation process. When warranted the BHA will transfer affected households in order to properly remediate the mold/mildew conditions. With our Capital Construction Department, we are determining based on allocated funds the prioritization of work to be completed at each property within the next 5 Year Plan. Multiple building envelopment improvements having been completed or are in the design process. Please refer to the Capital Construction response above.

Comment: (also Capital) I'm an organizer. I'm an activist, and I organize with a lot of developments around Boston. I was just wondering, in addition to what others said about the conditions for your BHA residents, how are you guys going to... When are you guys going to show the plans as far as the funds being spent to improve these conditions? Yeah, we would like a date. I don't know if anyone covered that already, like the rats, or there are issues with people having trouble getting around that are handicapped, the mold. Like some conditions you are keeping your residents in, instead of waiting for that 10 to 15 year-plan and building Section 8 housing, how will you guys help them right now? And where can we see answers to the funds being spent on these conditions and repairs as soon as possible? Like exterminations. A lot of residents are having extreme problems with rats and mold. Those are important issues. Those are also emergency issues that need to be handled right away.

Well, I know you said you guys don't have the funds yet, but when we will see a plan as far as the funds, what funds, how much the funds, how much funds you'll spend on these conditions, and when will they be handled. Something like extermination, I feel like that can be handled as soon as possible. But it's clear that they've been continuously mistreated, even threatened. I think management even called police on them at one time, just for bringing up these issues. That's obviously the first plan of action that a resident is going to take, but there has been no real follow up. There has been no real plan on exterminating. There needs to be a more serious plan. Put some type of effort in. So, besides giving advice as to call management, what are you guys going to do when management isn't doing their job?

Other Speaker: You need to get new management.

Response: So, I will just respond, just to put things in some context. First, we have a capital plan with capital dollars and there are some larger projects for Hailey in that plan. Secondly, we have an operating budget which day to day routine maintenance is done. And so, included in that is an ongoing contract for pest management. I know that we work... Our contractor work individually with residents. So, to the extent that residents are having a problem that's unaddressed, we really would encourage them to contact the management office and the work order center. In addition, I will say that with respect to large amounts of money that may be forthcoming from ARPA, or other funds from the city for Mildred Hailey, as I said before, when that happens, we will let people know. And we will talk about how those will be spent. I will tell you that, to the extent

that we are counting our chickens before they're hatched, because we don't have this large amount of money yet. But if we do receive the funds, we do consider that ventilation, which... as poor ventilation as well as leaks are what lead to a lot of issues with mold, and that those are at the top of our list for addressing, but I mean, that's what we are thinking now. But we will be talking with the residents about that.

In order to address the various concerns, the BHA has increased labor force at Mildred C. Hailey; has been, transferring households with severe maintenance conditions that may not be addressed while the unit is occupied, allocated a new management team, and hired a 3rd party vendor to perform inspections at BHA properties.

Comment: Mold ends long lasting condition. Mold also has roots, and you breathe in the spores with mold. So, you're breathing in... there are a lot of different types of fungus and some of them are deadly, and they can cause serious respiratory issues. But as far as the rats, you guys have the resources to get rid of the rats. So, I'm just asking what are the plans to get rid of the mold, and what are the plans to get rid of the rats besides your yearly or monthly routine that isn't working?

There are other efforts that you guys can put in, besides what's your suggestion which the residents have already put to use. So, besides just regular extermination, which isn't working, there needs to be a plan on exterminating. Do you guys plan on sending out some type of plan, and it being effective as far as the rats and the mold?

Other speaker: Well, it's not working. It's not working. We live in it. We're living it, ma'am. It is not working. The exterminator come in here and stay in apartments 10 minutes, from the time they walk into the door, it's like a revolving door. How are you going to get something done if you come in somebody's house and stay 10 minutes, and then, say you're exterminating? That's not even exterminating. They're wasting you all's money. That's what they're doing. They're getting paid for doing absolutely nothing.

Response: We are continuing to do routine maintenance to the extent that we can. And we are also providing pest management services to contractors that are certified by the state.

Comment: I just wanted to continue on with what others are saying, some of these questions about mold. So, so far, what I've seen at Lenox Street projects, at Bromley-Heath and at Mary Ellen McCormack is that for the most part, mold has just been scrubbed and painted over. And my question is why aren't they really fixing these issues with mold? Because from what I understand, if there's mold growing out of the walls, there's no potential in actually getting rid of the mold by just scrubbing over the mold. You have to destroy the wall entirely. But this has been going on for decades. So, my question is why aren't they actually fixing the issues?

Other speaker: I've been to a lot of people's departments. I've never, ever seen mold treated in a way that did not... Was not just scrubbing and painting it over.

Response: Well, we have a protocol that is not just cleaning the mold.



Comment: It would be helpful if you could describe the protocol, actually. Do you know it?

Response: Well, we can send it to you. Not off the top of my head, ma'am. You wouldn't want me to misspeak. To see the BHA Standard Operating Procedure for Maintenance beginning on page 51; and the particular section on mold and mildew (section 16.12) beginning on page 145 see this link:

[https://dhcdcims.intelligrants.com/ Upload/MADHCD PHRA/23014 5.pdf](https://dhcdcims.intelligrants.com/Upload/MADHCD_PHRA/23014_5.pdf)

Comment: No, I wouldn't, but I'd want you to know. So, other question is that there have been several residents who have had their conditions responded to only decades after filling out a work order, which you responded to as being a method in getting their conditions fixed. So, how do you explain that? I can send you many documents of people who have.

Response: I certainly have no explanation for that, and we don't have new work orders that are that old. Plus, we do annual inspections of units. Okay. I would be happy to receive them. Thank you.

Comment: Happy holiday season everybody, and thank you for this meeting. I wanted to make a couple of comments. The main comment I want to make is that heating is not a luxury, it's a human right. I wanted to say that at Commonwealth development, when they put in the new heating system, the... Not manual, but the automatic heating, this development has had heating problems ever since. And I just got new thermostats put in my apartment that are Honeywell's, and they're self-regulated, and I have heat for the first time. I'm so thrilled.

Now, I'm on the board at Commonwealth, and I spoke to the manager, Joey, and I said, "Joey, I really want to have heat in everybody's apartment." Now, it's not that we don't have heat at all. The heat comes off in the register sometimes, but it comes on maybe once every 20 minutes, even if it's 20 degrees out. And I told him, and he really wants to help me, but he feels the problem would be to get an electrician out here, because we only have one electrician. But I very emphatically and strongly say that the heating system needs to be revamped here and you need to put in these Honeywell thermostats in every single person's apartment in townhouse. And the last thing I wanted to say is whenever they come out... Okay, if you put in a heating call to the office, they will send out a maintenance man with a handheld thermostat. It could be zero degrees out, it will register that it's 75 in here, it'll register that it's 78 degrees. And I don't know how I'm going to get BHA, to replace all these thermostats. They're going to say, we don't have the money. We don't have an electrician, but you need, not you personally, but BHA needs to definitely, without a doubt, get every single person here, Commonwealths thermostat redone and give them what I have, give them the Honeywell.

And if you have to stagger it and do 20 people one week and 20, the next. And people are so apathetic now, these tenants are so apathetic that they don't even report the low heating to the office because they know what's going to happen. That the guy's

going to come out here with his handheld thermostat that doesn't work. So I really want this to be put as a priority that Commonwealth, every single apartment gets heated. Thank you for listening.

Response: I will see what the plans are for making that more widespread and see what we can do.

Comment: (also Capital) I wanted to say that as far as the trash chutes are concerned, I know I've got a letter from BHA a while ago, and I think that there's got to be absolutely a reason that they're doing the elderly buildings, trash chutes, and they're refusing to do us. I think it's a legality. I think I'm not being told exactly what's going on. And I think it's disgusting. I got to just come out and say it that people have high rises and have had their chutes shut down. And I think BHA needs to come in here and do whatever it takes because it's very illogical that everybody in the elderly disabled here has it and we don't.

And the last thing I wanted to say is that the construction projects here, BHA, without coming to the tenants board allowed about 10 parking spaces on Fidelis Way to be, it's been months now, permanently taken up by the construction company and we're out 10 parking spaces. And BHA come to my board and say, "we'd like to discuss this with you." It got done and I'm upset about it and I don't even have a car. Thank you for listening.

Response: Thank you for feedback. The BHA has been working with the surrounding community to create betterments for the properties such as widening of streets, adding trees, improvements to the community center, and other improvements including the addition of additional parking spaces.

Comment: Okay. First I want to speak about the rat situation. Right outside my window there's eight holes in the wreck some about the size of a ruler. In my apartment, I've had to plug up 10 holes myself. I have sticky traps all over the kitchen, trying to catch these things. I'm putting out my own money. In the yard we were cementing the yard ourselves trying to prevent the rodents from coming into the units. This is tenant money being spent. And also a situation that I have that it is right now is the carbon monoxide problem.

They've come into this unit and they've replaced the carbon monoxide detector 10 times and it's still going off. We sleep now with all the windows up in the apartment. This is December and I've spoke to management about it. I've talked to meetings about it. The fire department has come up, their meter has 96%, but part of them say, you guys should be dead. [inaudible 01:11:38] They care about the tenants. You're putting our lives in danger.

Response: I know that because I've talked to your superintendent about the rats near your apartment. The maintenance superintendent, because I know, and I think he talked with you about them so I can follow up with him because I know that they've been trying to address that. So I'll see precisely what they've done. I don't know precisely what they've done, but I know that he said that he had spoken with you and followed up. And I am very concerned about the carbon monoxide issue. I hadn't heard that was a

problem and I will follow up in the morning with the program maintenance supervisor for your region to see if we can determine what's making that go off.

Comment: I basically just piggyback up on what others was talking about when she mentioned the heating. I recently had to get one of those little small heaters from my management office. I'm very appreciative of it, but I would like one of those thermostats that work because mines clearly doesn't work. There was a time that I could hear the heat come on. I don't hear it come on anymore. So I've had to go to the management office and they gave me a little heater. I'm very careful with it. I only use it while I'm awake, but I shouldn't have to use that heater. And the other thing I wanted to talk about was, someone mentioned mold and I'm starting to see some of that in my building. And I just feel like also I did talk to Joey about this. I'm sorry, Christine. And I believe she's getting ready to leave or something. I'm not sure what's going on or someone like Valerie left someone there.

But anyway, I know that they're short staffed over there in the management office, but my ceiling, I've been talking about that. I think Christine told me they was going to come and fix that if it was still leaking. That's another sign of mold. If it's still leaking, it's mold. I'm very concerned about mold. I think we might have a mold situation here in Commonwealth. Not sure yet, but one other thing I wanted to mention was the... Oh, I did talk about the rats. Sorry. I saw an increase in rats since we didn't have the chutes. I talked about that already. Basically that was it.

Response: I was just going to say that I know that over by, across the street at 91-95 Washington, there had been a problem with rats and we've been doing that and one of your fellow taskforce members reported that things were a bit better there. So let's turn our attention then to the Commonwealth side of the street and we'll see what's going on. And I'll touch base with... So when they gave you a heater, that's great, but did they send anybody over to look at your heat? But I'll follow up with the management office on that. We'll follow up.

Comment: Okay. I just wanted to add to the heating thing. I just wanted to say I would like it if every tenant could get both their thermostats done, not just one room. And then the other thing I wanted to say about the heating situation, I think it shows negligence on BHA's part that they have to give heaters to tenants to begin with. That's kind of an admission that they know the situation is occurring. The other thing I wanted to say is that since BHA took over, I know it's different than the private management company. But the thing I was going to say is that with the old management company, the manager, he could do a lot and I know BHA has a different setup, but it's like, my manager has to go to two or three people above him to do almost everything, not everything, but a lot of things.

And I'm wondering if it could ever be that BHA could give my manager more power so he could do more things right away. I'd really appreciate that because his hands are tied. A lot of times when I call him up, he'll say, well, I have to call this one, I have to call that one. And I'm just wishing that the power structure could be different and BHA to be redundant, to give my manager and all managers more power. Thank you for listening. I appreciate it.

Response: Thank you for your feedback. The BHA is always looking at ways to continue improving the delivery of our services and the involvement and empowerment of our staff to ensure we may serve our residents and prospective residents in the best possible way while compliance with various regulations.

Comment: All right. I'm the next person. Well, mine is about the heat too, since they've been talking about the heat. So everybody's talking about thermostats and everything. And the couple of weeks ago in a row, two weeks in a row, we had blackout. They did not inform us that our lights were going to be going out at a certain time. We had blackouts and star was in the streets and everything, and they've been there quite regularly. So when we all applied for Boston housing, they said that heat was included. So my question is, since everybody's talking about heat, talking about these thermostats, are we eventually going to all have to pay for our heating systems in our apartments? Are we all going to have to pay for heat? Well, why is it now they got thermostats here and there and they're regulating our heat and paying attention to how much heat we are getting in our apartments. They're ration us for heat, monitoring apartments. So if they're not doing that, why is all that going on? Why is our heat being monitored and maintained and everything? And everybody talking about thermostats, we never had thermostats in the apartments.

Response: No BHA public housing tenants won't have to pay for their heat. The thermostats are so you can control the heat, in your apartment individually. There were some heating plant upgrades done at Hailey, and there are different systems in different buildings. And so there may well be apartments that don't have the same way to control heat. I am not an expert on which buildings have which systems, but there's no intention to have people start paying for heat.

Comment: I just wanted to kind of follow up about another person was saying that, basically from what she said, it sounded like there were power outages all night on a Friday night, two weeks in a row for about eight hours in the middle of the night without sufficient notice. And I don't even understand how that could make any sense. What would you even be doing that you would need to put out the power entirely in a building for overnight, especially two weeks in a row. And that seems incredibly dangerous. So do you even think that people deserve to have heat, electricity, because so many people here constantly for managers, that all the things that I think you would probably say are human rights, like having heat, running water, refrigerators that work, a stove and an oven.

We've heard from people who've had ovens that were broken. They had a gas leak and they were told, it's fine because you have a stove. So it's not an emergency. And people like Tia and John were there having gas leaks in their apartment that could have killed them already. They could have killed them already. And they're just coming in, replacing the carbon monoxide detector 10 times to try to find one that doesn't work. So how can you even sleep at night knowing that your employees are treating people this way.

Other speaker: But they don't give us No notice. They didn't give us no notice. Usually we get 24-hour notice. And then when the lights did go out, our whole block went out the whole block, the whole block, the whole Heath street. From the top of Heath street to the bottom of Horan Way, they went out, the lights went out, just went black. And we just had to walk around in the pitch black. I had to call 311, keep calling, keep calling, keep calling the management off the time. All they got to do is put the timers on because they knew we had a black out. They had to, because when they go back in their office, their stuff is off too. So they know it's a blackout.

So I had to keep calling them, tell them, just tell the guys, come over and set the timers. And they really wasn't doing it. I call and then you can check it. City hall has my number 311. I called there, at least four or five times and keep calling the management office. Finally, they got it, but I don't get it. If they know it's a black out, then they know the buildings, all the whole blockers and as dangerous, we can't walk around at night or anything. I know I can't, it's dangerous for us to be walking these blocks with pitch black. It's too much going on around here.

So that happened the two weeks in the row that it happened. I had to keep calling, keep calling them. And they finally got it though. I called office, told them, thank you, or whatever, but I don't get it. If it was a black out, they already know and it's nothing. All you got to do is set the timers, put the lights on. But this is the stuff they do over here too. But yeah, it is what it is.

Response: We're going to look into the issue with his carbon monoxide detector. Secondly, I believe that at least one, if not both of those outages were problems that came from NStar; it wasn't BHA problems. It was NStar problems that go to some of those buildings and they had to repair some of the transmission lines.

Comment: Okay. So another thing that I've basically found problematic, I've basically gotten the letters where they were talking the conflicting letters, where it was talked about how that a lot of work orders have been done since April 1st and now where it's basically like, there's not enough money to basically make maintenance and everything. One of the longstanding problems that I have is that there's [inaudible 01:36:21]. And this ties into one of the problems that we have even in my apartment is that I heard a lot of talk about ventilation and everything, but in like, say my apartment, the windows don't work. If you try to open one, it's going to basically immediately come down on your head or it'll just fall in and just crack and us knock you unconscious.

And then in my grandparents building, it's like for them, the main door into their apartment building, the locks have basically been forever broken. And basically they've been telling management and everything about it, but they just said, well, people are going to just break into the locks so there's no point in even fixing it. So how do we know that something like that isn't going to be with all of these changes and everything that's being made. But that's not going to be something that just carries on and continues both with the redevelopment and basically with how these buildings are going to be treated from here on end.

Response: So all we can say is that we are providing service that to the best of our ability and that we need to know from you what needs to be done. We will be also

inspecting again, all of the units at Hailey over the next month or so. And that will give us not by BHA staff, BHA staff, accompanying professional contract inspectors, and we'll get a really good overview of exactly what is needed.

Comment: The windows and the doors have been reported. As I said, I can't open them because as we said, gas problem levels up to almost nine. It's up to 90% and stuff like that. We can't open the windows.

Response: I would certainly never argue with you about the state of your windows. And I can ask somebody to go over and take a look at them shortly. Not tonight, but I mean, I can if we want, if you would like to have somebody come over. I thought we'd been in your unit, but if we have not, we'll go take a look at the windows.

Comment: And just want to hit on again, that the locks in these doors should be fixed immediately across all these projects. It's not very expensive. This is not fixing leaks across buildings. It's really hard to understand how these are just left to stay the same. And when people complain, the managers tell them, "Why should we fix these locks? Someone's just going to break them again." That doesn't really seem like a proper response when you're talking about people's homes and people's safety.

Response: Our response to broken locks is to fix broken locks and we fix them continually and we'll continue to do that.

Comment: Right. Well, I don't mean to interrupt. I'm going to hang up, my phone is dying, but thank you, Gail. And I appreciate it. I don't know if, but yeah, the conversation was good, anyway. I'm going to hang up. Thank you all for your time. I just didn't want to hang up without saying anything. Okay. Bye bye.

Response: Appreciate it, thank you.

Comment: Great. Great. I wanted to thank you for the meeting tonight. I appreciate that we have this opportunity to say how we feel. And I wanted to also piggyback on what Betty said about our manager. At first., I didn't like him as much because I didn't realize that he couldn't do a lot of things because he had to ask his boss. But now that I know that, I just wanted to say that he's very personable. He walks the extra mile and he's a kind person, and he advocates for us. So I do really hope that Gail, you can tell him that I said that. Yeah, he does. And there's been plenty of managers here who have not done what he does.

Response: Well, I will definitely do so. And thanks for that. I know he does. I know he does try hard.

Comment: The other thing I wanted to say is, I don't know, Gabrielle, I just wanted to thank you for talking. And I wanted to tell you how happy I am there is a community organization such as yours. And if you could put your information in the chat for all of us

the name of the organization and how you can be contacted, and maybe even an email link a website, because I would appreciate that. Can you do that?

Other speaker: Yes, absolutely. Thank you so much for your comment. Here is contact: [wewontgoboston@riseup.net](mailto:wewontgoboston@riseup.net)

First speaker: You're welcome. The other thing I wanted to say is Gail, until these trash chutes get reinstalled, I'm going to keep fighting for them. So I just want you to know this isn't the end of the issue.

Response: I have no doubt that you will.

Comment: I'm sure you don't. The other thing that Gabriel said, is that about retaliation, and I'm like, wow. And if that's the case, people are getting retaliated against by BHA, that has to be told to the head of BHA, to Kate. That has to be like really rectified. I don't know what Gabriel is talking about, like who, but that's serious stuff, that's very serious stuff. And so I really have no idea what that's about, but that's how I feel and...

Oh yeah, definitely. That has to be dealt with. And I wanted to say to the woman from Patricia White, that she was talking about how she felt like that there could be actions taken against her. If she like talks different tenants, talks to management. And I just wanted to say to everyone here, including her, that by all means don't feel fearful because that is what tenant boards are for. And every tenant should be able to go to the manager and be able to talk about how they feel. And I know that tenants here have told me they're afraid that they can get in trouble. So I just wanted it to be known that my experience with BHA is that I've always gone to them. So I just wanted to say that. And I just wanted to say, let me see. I wrote everything down and I can't read my own writing.

I'm just seeing. On my board, I just wanted to say this I've talked to Sahar and Gail many times about the bullying on my board, the mistreatment of three members, including myself on the board. And how they have violated so many rules, I could spend an hour talking about it and something has to be done about our board. There has to be, someone has to come from the outside, whether it's Sahar, and read the riot act and just say, these things have to be done on this board, the finances, they have to start showing the bank statements every month. And I'm really, every time I go on a board meeting, I'm nervous. And I just want that to finally be taken care of. I really do. And they they don't want us to have Zoom meetings. I've heard that she wants us to come in person for the meeting we had with Kate Bennett. And I had to fight to get that Zoom meeting, to take place in our community room. And so there's that. And I'm just seeing if there's any last thing I want to say, looking at this. I said that I can't read my writing. Thank you, I appreciate it. Gail, can I just say one thing what can be done about our board? I've been trying for about 10 years.

Response: Well, I agree with you, Jeanie, it's certainly not something that we sanction and I would want to know of any instances of retaliation that take place. So, thank you for commenting and giving this additional information, but we are working with your board. We, meaning Sahar, Lueteshia and Lydia. And we are aware of those issues, and we're going to continue to work to resolve them. So I appreciate you continuing your conversations with us. And when you, if you have issues about the Zoom

meetings, please feel free to reach out to me, because I will make sure there's a link that you are able to join for all meetings.

Comment: Okay, Lueteshia, just one last comment. Somebody such as yourself or Sahar needs to come to a meeting, a Zoom meeting and just say, you've got to post notices every month for the zoom meeting. You've got to start showing bank statements. There can't be, you know this bullying on the board. Someone needs to come in and talk to these folks, and can that happen?

Response: Lueteshia Raymond can come to the next meeting.

Comment: Okay. I just wanted to ask what the policy is during the pandemic if you have a neighbor that's making your life miserable because they're noisy and you've asked them to turn down the noise and it continues. I just talked to them personally yesterday. I'm hoping it doesn't continue, but I think it's going to. That's all I wanted to ask, thank you.

Response: So eviction moratoriums are kind of up in the air now. I know there's litigation pending. So, we have we have not been doing evictions, but that's no reason that the, if the manager knows about this, that we cannot do a private conference to address complaints with the resident who's causing a problem. So if you let us know who that is, the manager can have a private conference with that individual.

## **Real Estate Development**

Comment: (S) Section B.1.1 (Strategies), p. 7: Under the Creation of new affordable units, BHA deleted the reference to use of Replacement Housing Factor Funds to create new units. This is likely because BHA is running out of these funds, and newer conversions do not involve this. However, BHA may wish to discuss other strategies to create additional affordable units, such as use of Faircloth authority in conjunction with the RAD program, which has been an active topic with the Boston City Council.

Response: Yes, that's right: BHA deleted the reference to Replacement Housing Factor (RHF) funds because all RHF funding previously awarded to BHA by HUD has been successfully expended in creating new units of housing, and HUD no longer awards RHF funding. And, yes, BHA is very much interested in pursuing the creation of new affordable units using its existing Faircloth authority in conjunction with the RAD program. We will add that to narrative at Section B.1.1.

Comment: (S) (also Ops) Section B.1.10 (Pets), pp. 62-63: As part of QHWRA, Congress and HUD guaranteed federal public housing tenants the right to have common household pets under reasonable rules on size, number, and care. BHA has



not proposed changes here, and this policy has been in effect for roughly 20 years. However, it should be noted that as public housing developments are redeveloped, this is one area that is not addressed by HUD RAD guidance. Many residents may want to be sure that they can retain existing pets if their site is redeveloped; others may be concerned about the right to get replacement pets if an existing pet passes along. It would be good to establish standard protocols on this so that as BHA engages in discussions with other partners and residents about redevelopment, it's clear what the expectations should be.

Response: Yes, BHA agrees. Policies around pets are one of many public housing policies that need to be considered in the context of public housing redevelopment and repositioning, and BHA is indeed working to develop standard protocols for management and operational standards at redevelopment sites. Pet policies will be included.

Comment: (S) Section B.2, Part 15 (Mixed Finance), p. 67: This is slightly revised to show that at Mission Main, given new RAD/Section 8 blend options, the Mixed Finance work will be both RAD and Section 8. This probably means that in the paragraph below the list, Mission Main should be included along with the other sites. Clippership was removed from the list as conversion is completed there.

Response: Yes, that's right: At Mission Main, pursuant to HUD guidance issued in 2021, BHA is now pursuing a "RAD Blend" approach that includes Section 8 in addition to RAD subsidy. The predevelopment work at Mission Main is quite advanced, and we expect to close the RAD Blend transaction in early 2022. Indeed we had aimed to reach closing before the end of 2021 (though we now know it has slipped into the new year). But that was the reason we did not include Mission Main in the following paragraph, which seemed more focused on sites in a less advanced stage of planning. (On reviewing this section again, however, BHA does acknowledge that several of the sites could be equally well included in the enumerated list or in the paragraph following the list.)

Comment: (S) Section B.2, Part 16 (Demolition/Disposition), pp. 68-77: On p. 69, the disposition of vacant land at O'Connor Way (near the Mary Ellen McCormack site) is removed from the list, as this is now completed and new, non-BHA affordable housing (with BHA Section 8 PBV options for applicants) has been built.

Response: Yes, the O'Connor Way development was completed in 2021.

Comment: On p. 70, the demolition date for Charlestown should be moved from 2021 to early 2022.

Response: Yes, phase one demolition at Charlestown has slipped into the new year. BHA will make that update.

Comment: As above, on p. 71, Clippership has been removed.

Response: Yes, the Clippership redevelopment was completed in 2021.

Comment: On p. 73, BHA has revised the proposal for Eva White to reflect that it is likely to be a Section 18/RAD blended proposal which, according to HUD's guidance from Jan. 2021, would be 80% PBV and 20% RAD. There is a question whether the Eva White timeline should be changed, since this says planned submission in 2021, and no demo/dispo proposal has, to the best of our knowledge, gone beyond the RAB-BHA may want to revise this to be flexible and include possible completion and submission in early 2022.

Response: Yes, that's right. BHA will update the "Application Date" to 2022. Also BHA will keep the RAB updated about the HUD process. Based on past experience the RAD/Section 18 Blend at West Newton-Rutland, we do not expect there will be the typical Section 18 disposition application that the RAB is accustomed to seeing. For West Newton-Rutland HUD handled the Section 18 disposition application as an adjunct to the RAD conversion process without the formal application. This seemed in keeping with HUD's RAD Notice which says that "HUD will offer the PHA [public housing authority] a streamlined process for getting HUD approval for the units eligible for Section 18 [disposition]." But we also realize that HUD's approach may have evolved. In more recent guidance (HUD's Public and Indian Housing Notice 2021-07 published in early 2021) HUD affirms that: "Notwithstanding processing by the Office of Recapitalization [the RAD office at HUD], in addition to RAD requirements, the PHA must also comply with Section 18 submission requirements." At this point we do not know exactly what form the Section 18 process will take, but BHA commits to updating the RAB regarding the HUD process as we progress toward each RAD/Section 18 Blend closing, and if there is a formal Section 18 application then HUD will share that with the RAB.

Comment: For J.J. Carroll (p. 74), BHA changed the start date from 2020 to 2021 (associated with pandemic delays) and the likely completion date from 2022 to 2023.

Response: Yes, disposition and the start of demolition at JJ Carroll happened in 2021, not in 2020 as previously anticipated.

Comment: On St. Botolph (p. 75), BHA has also changed the start date to 2021 and completion date to 2023, but it doesn't appear like it is yet ready to get underway, and it would make sense: (a) for BHA to give a complete report on the status of St. Botolph; and (b) to likely revise the start date.

Response: That's correct, work at St. Botolph did not get underway in 2021 as expected; the project has been delayed due to construction bids coming in above budget. BHA is planning appropriate adjustments and is now aiming to begin in 2022. We will revise the start date to 2022. In the meantime, BHA has kept St. Botolph residents updated on the status of the schedule and will be sure to keep the RAB updated as well.

Comment: For Bunte Apartments (pp. 75-76), BHA is revising the start and completion dates to 2022 and 2023.

Response: Yes, that's right.

Comment: For Ausonia (p. 76), BHA has revised this somewhat to reflect both Section 8/RAD blend (at 80/20 ratio, as per the January 2021 HUD guidance) and possibly a full Section 8 conversion—in this one, unlike Eva White, it appears that both possibilities are still on the table. Here at Ausonia, too, it may make sense for BHA to revise the start date (which still stays 2021).

Response: Yes, that's right. BHA will revise the start date to 2022.

Comment: On Mission Main (p. 77), it is true that there was an original RAD submission to HUD that was approved, but there is now a revised plan for a PBV/RAD blend at a 60-40 ratio, consistent with HUD's January 2021 guidance. This says that this revision was submitted and is awaiting approval. When was it submitted? Was there any RAB review on that revision (if so, we don't recall seeing the documents), or would this have been exempt because of the prior approval? We do not want to slow down the process or create any roadblocks, but just want to make sure that this is covered.

Response: As explained above with respect to Eva White, BHA's experience with PBV/RAD blends is that HUD does not require a formal Section 18 disposition application; rather the Section 18 component is handled as an adjunct to the RAD conversion process. In other words, we do not anticipate there will be any new documents for RAB review.

Comment: (S) (also Lsd Hsg) Section B.2, Part 18 (Conversion of Public Housing To Tenant-Based Assistance), p. 81: This is another situation where John Kane submitted information to the RAB on 11/18/21 with updated figures on current per unit averages for Operating Fund and Capital Fund costs versus Section 8 per unit averages. Here, as with the revisions to Financial Resources, BHA should also say that there is revised data on its website so that those who rely on the website will have the updated information. In addition, BHA may want to consider revising some of the language here about obsolescence, since in fact BHA has been or will be proposing, as part of demolition/disposition and PBV applications, that certain public housing developments listed here have affordable units be replaced with Section 8 project-based assistance in part because of an obsolescence analysis.

Response: The information was updated in anticipation of the RAB meeting scheduled for Nov 4, however that meeting was then rescheduled for Nov 18. The Plan Supplement posted online has the most current version including the updated information. Regarding the reference to obsolescence, BHA agrees that it would be best to remove that wording from this paragraph for exactly the reasons stated. We will therefore delete the words "of obsolescence" so that the paragraph will now read: "None

of the general occupancy developments in the BHA's portfolio has reached the stage where it would be cost effective to convert to tenant-based assistance rather than to maintain it as public housing."

Comment: (S) Section B.2, Part 25 (Other Capital Funds), p. 89: As noted above, this removes specific Replacement Housing Finance Funding from the future report, noting that BHA completed expenditure of these funds for Old Colony Phase 3 and the newly created units are to be occupied by the end of 2021.

Response: Yes, that's right. The new units were completed and occupied by the end of 2021.

Comment: (5Y) (also Ops) p. 5, Asset Management planning and staffing: It would be good to devote some future RAB time to this, and particularly to any revised measures for monitoring performance in properties that have been switched to mixed finance and are outside of BHA's day-to-day managerial operations, to make sure that this is not an "out of sight, out of mind" situation. This section discusses differentiation between the paths of retaining a property as public housing, switching it to project-based Section 8, and a third undefined path of other subsidy utilization, and it would be helpful to know what causes BHA to place particular developments into certain "buckets" and what that 3rd path is so that all BHA residents can have similar expectations. In addition (and this may be covered elsewhere), BHA should continue to work on Mixed Finance protocols to supplement those that it already has in place, and particularly about how its programs may relate to each other as there may be needs for transfer and relocation (and helping to minimize disqualification due to program rules that are not related to tenant suitability, such as differing LIHTC, over-income, and other rules that may need to accommodate changes that occur with families over time.

Response: Yes, BHA agrees, and staff would welcome the opportunity to discuss these matters with the RAB. As stated above (in response to a prior comment), BHA is advancing a set of management and operation standards for all redevelopment properties. We have received input from Greater Boston Legal Services in the form of a draft set of Mixed-Finance Protocols. We look forward to finalizing those standards with further input from the RAB, GBLS, other advocates, and BHA residents.

Comment: (5Y) p.6, Standardize Tenant Protections in Redevelopment: While the ISHI grant has been wrapped up, the partners should set a timeline to finalize the toolkit, and it may be beneficial to convene a general workshop (similar to what was done in spring 2019, under appropriate public health guidelines) to spread this information to all. There are likely to be further refinements that come out of continued BHA/resident/developer partnerships, such as the discussions at Charlestown, McCormack, and Hailey.

Response: Yes, agreed. In recent weeks, in fact, BHA and other ISHI partners have affirmed our intention to continue our productive collaboration through a formal extension of the ISHI grant. A general workshop (or other forum) is specifically planned.

Comment: (5Y) Pp. 6-8, Creation of More Deeply Affordable Units: This summary is very helpful, but it could possibly be clearer in saying which units just met a baseline (for replacement of existing public housing units with deeply affordable Section 8 units), and which result in a net increase in affordable units—both pieces of information are important, but the way the information is reported here, it's a bit unclear, and it may be that BHA would want to provide a chart that broke out each. In addition, as discussed under the Supplement above, the Boston City Council has had discussions about how Faircloth authority could be used to generate additional affordable housing, and this has also been the subject of some recent reports from the HUD RAD program. It would be helpful to have the benefit of BHA's thinking on this, with the understanding that concrete proposals may take identification of particular sites and opportunities.

Response: BHA has revised this item in the 5-Year Progress Report to specifically address “net-new affordable units”—which is the subject of this particular goal—and to remove the references to replaced (or preserved) units, in order to clearly focus on the information about net-new units. That said, we like the suggestion about creating a chart to track and distinguish both replacement units and net-new units, and BHA will aim to do exactly that for use in our regular recurring updates to the RAB BHA development activity. Regarding Faircloth, BHA is certainly interested in pursuing opportunities to create new affordable units. HUD's recent guidance around using Faircloth in combination with RAD is especially promising, but we are also exploring other possibilities such as using Faircloth to create affordable housing units from existing (non-affordable) apartment units in the City. BHA issued a Request for Proposals in 2021 to gauge opportunities for doing just that, but BHA received no proposals. We expect this is due to the current lack of guidance from HUD around such an approach, but BHA is very much interested in working with HUD and others to create new opportunities. BHA would very much welcome advocacy from housing groups like CLHPA, NCIHC, and NHLP on the use of Faircloth authority to create new deeply affordable housing units.

Comment: (also Lsd Hsg) I have a question. You have been talking about monies from the federal government, I believe, for certain sites. What do you know of Patricia White apartment building? Is this still a BHA property?

Response: It is the BHA. The BHA converted those to project-based vouchers that the BHA administers and the BHA continues to own the property through a nonprofit entity. It's called the Patricia White Housing Corporation, which is an instrumentality of the BHA—which basically means it is the same as the BHA, yes.

Comment: Okay. And are they also responsible for the conditions of the apartments that they were in when they took over this... When they created this corporation from within the BHA, are they still responsible for all the maintenance in the building, in the apartments?

Response: Yes.

Comment: I was just told by a leasing officer that a maintenance problem in a unit is not a maintenance issue until the Boston Housing Inspectional Services tells Leased Housing that it's an issue. But I have had issues in my apartment for over three years.

Response: Right, right. So, it's kind of the right hand and the left hand; they're both BHA, but they have different responsibilities. The leasing officer is responsible to make sure that everybody in the building is eligible for the Leased Housing Program, for the private project-based voucher, and does the recertifications. But there's also a manager in the office, here at the building, and they are responsible for managing the building, which is doing the maintenance on the building. So if you talk to your leasing officer about a maintenance problem, he or she is going to say, "Well, you got to talk to BHA. You got to talk to the manager," And I believe we're still using the same work order number, but that's how it works.

Comment: Okay. Let me just say this... I am in complete communication with the manager in the building, and there is the maintenance manager as well. But I was talking with the Leased Housing regarding recert and I brought up to her the fact that we have issues in my unit anyway, and I know lots of other units, but I was speaking about mine, and she brought up the issue that a maintenance issue is not considered a maintenance issue in this corporation, unless it is given to them by Boston Housing's internal inspection unit.

Response: The Leased Housing department has an inspections department and they inspect the units to make sure that they meet the housing quality standards and can therefore be subsidized through the project-based voucher program. And they come and they do inspections on a regular basis to make sure of that.

Comment: I live here. I have signed those forms. And I am telling you at every inspection for the last three years, these issues still are there. And no one from Boston Housing Inspections has come to my unit, only the manager. And before the BHA took it over, it was Corcoran Management that was doing them with BHA. And now BHA was doing them, only it's the BHA Corporation with the maintenance, only it's the manager, as you just described, who inspects the apartment. But my maintenance orders and issues were given to them in writing when they took over this property from Corcoran and all these issues still remain.

Other speaker: This is scary because I'm a senior citizen, and they tried to put me in Patricia White and it was before three years. And now to know that they got two different managements with the people that's doing work orders and that... I denied it. But that's sad. See, I don't want to be getting put in a position like that, where that's happening, where I'm... I could stay right where I'm living at now, Mildred Hailey Development. It's pretty good. I really don't have no complaints.

But would you, you are a senior citizen, you would want to move out of your house to a pretty good situation to a worse situation? Now you're going to go from bad to worse? That's just bad. That's terrible to think about that. That's just like this lady in this development that had that Karen... had the same situation. You went from a bad situation to a worse situation.

Response: If you would like to speak with me tomorrow about the specific situation I'll also talk with the manager over there. So my office number is (617) 988-4393.

Comment: I just want to say this because my level of trust in calling people at BHA is very low. I'm on an emergency trip right now and mid-October, I tried calling four different numbers in Leased Housing and no one ever returned my call. I called the maintenance manager. She still has not returned my call. And each call, I'm letting people know about the emergency and my whereabouts. And it wasn't until last week that I finally talked to someone. So nobody returns my calls is my issue. And I'm asking you, if I don't reach you and I leave you a voicemail, are you going to call me back?

Response: I will call you back.

Comment: Okay, thank you. We had the same thing prior to this corporation being set up, that a developer was going to come in and take over the property. And they tried. We used to have meetings before COVID, and after COVID we've never had another meeting and thus the communication system broke down between tenants and BHA. And these little letters we get are really kind of... you just don't understand. It's just words on a piece of paper that you can't get anything answered from.

And then we are put into this subsidized position, what's it called... Section 8. Well, we're told we're supposed to be eligible to apply for Section 8 at the end of this year. And I don't know what that means for us for next year, but I'd like to ask you, are you aware of, someone else mentioned this, are you aware of any senior citizen properties whose tenants are going to be assessed charges to have... Let me say this right so I read it right... because it came from BHA and it is costs for keys, mailbox, entry door, lock charges, lockouts and lockouts. And then there's charges for apartments and storm screen doors, electric smoke detectors, toilets, window screen... the list goes on, and I know you can't see because of this light. It goes on and on. And I couldn't believe it when I saw it posted. These charges are supposedly being considered to be assessed on senior citizens. We don't own that toilet. Can I get your email? I'll send it to you today.

Response: Sure. So my email is [gail.livingston@bostonhousing.org](mailto:gail.livingston@bostonhousing.org) and I will also place it in the chat. The BHA has always had a list of potential charges. If people lose their keys, we sometimes charge them for replacement. When there's tenant caused damage to an apartment, there is a charge. If you need a new refrigerator, we don't charge you for a new refrigerator. We don't charge for maintenance repairs. Everybody who's a BHA tenant on this call knows that that's the case. So I'll take a look at what you send to us. I want see where it came from.

Comment: I wasn't going to talk or show myself because I really feel non-trusting with BHA right now. And so I kind of was feeling that this is like, "Don't talk, because you'll be labeled as a troublemaker. Is this kind... are we really getting information? Is it a witch hunt?" And some of it... and I, what's the word I'm looking for... I confer with some of

these fellow tenants on what they say and how they feel the communication comes back to them, how they're not heard or how they're not being told 100% what's going on.

So I appreciate that you will do this, but I really wasn't going to show myself or speak because I'm worried about backlash from BHA. And I wanted to be on the board with BHA, but... And I've gone to many, many meetings with Kate Bennett and the works. But right now I feel like this. I don't know where I am as a tenant.

Response: Well, I'm listening to everybody. We obviously have to continually prove ourselves and we have to continue to do that and do better to earn and maintain tenants' trust.

Comment: . I live in the Mildred Hailey development. So out of the introduction that Gail Livingston gave a little while ago, my understanding what I'm getting from what she's saying. I don't know if I'm right or what, but so the Federal Government is trying to, in a nutshell, they're trying to do away with all public housing developments. That's what I'm getting out of it. Eventually, that's what they're going to do. They're going to do away with all public housing developments and it's not going to affect everybody. It's only going to affect us people that have low incomes. That's what I'm getting out of this. So that's really what's going on. They're just trying to do away with all housing developments and it's only going to affect poor people. So is that what's going on? Can I get a answer to that? Because that's what I'm getting from it. Is that the plan?

Response: BHA is committed to preserving all of our housing developments as vibrant communities, truly affordable and accessible to low-income families and individuals. The federal government has not always provided the level of financial support needed in the public housing program, but the federal government is working with housing authorities like BHA to help us preserve our public housing communities for current residents and future low-income applicants who are currently on our waiting list and who will apply in the future. BHA is working with our residents and the entire community to take advantage of all available tools to further that mission.

Comment: Okay. And I have part two to that. So in October, in October, before the election, there was something on the website that said that they were giving 50 million dollars to the Mildred Hailey development to help fix up the development. So, is there any way we can find out what is being done with the 50 million dollars that... They did it before the election. The people that were running for mayor saying on one of the websites that they were giving 50 million dollars to the Mildred Hailey development. So, can we get any kind of feedback on where the moneys went or what the money is being used for? 50 million is a lot of money and a lot can be done with that money.

It was supposed to be the recovery money that people... Was supposed to get the private... Like when people had their businesses closed down, the private money, the private act money from the government, that money was already there. It was the American Recovery Plan.



I thought it was on the website and it came from the government and they said they were giving it to the Mildred Hailey development.

Response: It is a lot of money. So, the 50 million that you're referring to, to the best of my knowledge is there were some advocacy organizations around the city during the election who were asking everyone who was running for office to commit to supporting 50 million dollars, that was the number that they gave, to Mildred Hailey development for fixing existing buildings, not to be contributed to any redevelopment activity. I believe that most of the folks who were running did commit to supporting that. But that's as far as it's gone as far as we are concerned. Now we have not had any official communication about that money or when it might be received or if it will be received.

But I am just saying that those are not funds that came directly to the BHA and if they're provided to the BHA by the city or other entities, then we will let folks know. And there will be conversations around how they're proposed to be used. I think it's, as I said, which is that people who were running for election committed to supporting such money coming to the BHA for use specifically at the Mildred Hailey development. As I said, we have not yet received that money. When we do, you will know, as well as other folks.

Comment: So I'm from Mildred Hailey, and our neighborhood seems to be currently undergoing through the entire privatization thing where they are basically giving these three buildings to private developers to work with. Now, one of the things that I actually have a comment on is that, and in previous meetings, I did not basically get a straightforward answer on that. So, if Boston Housing is going to basically... They're basically going to be the ones that basically own the land that these buildings are going to be on, even though they're going to give it to these private developers. But they have not basically said whether or not there's going to be any kind of accountability if any of those entities, basically, mismanage or mistreat any of the tenants that basically live in those areas.

Because even right now, in our neighborhood, a lot of them, the residents have basically been treated very dismissively. They've been condescended to, and basically, they've received... what... They've basically been threatened to basically not deal with anyone who's basically talking against what BHA is currently doing and everything. So, I'm basically wondering exactly what's going to be done about that. What is basically going to be included that's going to basically protect the tenants' rights?

... Kind of just going back to what you were saying, I did receive the letter of assurances, but the problem is, and basically, I'm not sure if I'm... basically back me up on this, is that a lot of the things that are promised are not really kept within Mildred Hailey. If anything, it's basically empty words, and the management does something completely the opposite or ignores it.

So, what guarantees do we have that basically any of those assurances are basically going to basically be, what is it, enforce or upheld? All of us going to get a legal document individually?

Response: Within the last week, I believe, or 10 days, all of the residents at Mildred Hailey should have received, and if you haven't Ms. Wheeler, you should let me know,

and I'll make sure one gets delivered directly to you. Have received a letter of assurance, which was issued jointly by the BHA, Centre Street Partners and the Mildred Hailey Tenant Task Force. And it sets out the protections that will be provided to current residents of the Mildred Hailey development throughout this process.

I will also say that there are going to be a number of legal documents that control the redevelopment process that are negotiated among the three parties, the BHA, the tenant task force and the Centre Street Partners, the developers, and those will also contain those assurances. They will be in documents like the ground lease developer agreement, and then, there will also be a, what we call, a tri-party agreement, that sets out the role that the tenants will play in decision-making around the redevelopment project. You'll have your lease and you have the letter of assurance. I would also suggest you stay involved in the process.

Comment: A few things. I think it's very telling the attitude towards this city official... this mayoral promise of 50 million of saying, "Oh, well, we just have to wait until the city hall and the mayor figures it out. I mean, if BHA's stance is, "Oh, we don't have money to do these basic things," and there's these promises made, if they were really about fighting for the people's interests and the tenants' interests, you'd think they'd more proactively fight to actually get that money. And it's especially striking when, compared to the situation in McCormack where, and I don't have the thing right in front of me, but I believe it was a similar amount, I think another 50 million that was secured to help win in its redevelopment, if I'm not mistaken.

And then on this topic of the assurances, there's all sorts of assurances that have been made about these plans to convert to Section 8. In particular, permanent affordability and stuff like that that are supposed to be recorded in these legal documents, but these legal documents, I mean, well, they're difficult to access and it'd be good if people were able to access more. But if you do get to them, they seem pretty flimsy. And I mean, does 30% of 80% AMI, which means \$2,400 a month in rent, does that seem very affordable? Because that is what is written in the contract at Lenox, where it says, "In the case that the Section 8 contract no longer applies, we guarantee affordability at this level of 30% of 80% Area Median Income," which behind all that jargon means \$2,400 a month for a family of four.

So, yeah. I mean... these promises, they seem very, very flimsy. And the lack of will to fight for actual public investment in public housing, while keeping the same rights that people enjoy under public housing, is really a terrible thing that is being done to not just current residents, but to the population as a whole, because we desperately need more of that. Not less.

Response: BHA is committed to preserving BHA communities as deeply affordable housing for low-income households. That means that households pay rent based on their actual household income. In federal public housing—as well as with the federal Section 8 program—households pay 30% of their household income as rent. In many situations, 30% of household income would be lower than 30% of the Area Median Income. If income falls (because, for example, someone loses a job or cuts back their work hours, or for any reason) then BHA does a new income certification and the rent is adjusted down accordingly. At Lenox and at all BHA redevelopment sites, the BHA is

providing Section 8 subsidies or public housing subsidies that will ensure that same level of deep affordability. The subsidies will be attached to the property forever, as long as those vital federal programs continue to exist. That's why it is always critical—now and into the future—for concerned citizens to advocate for those programs and programs like them.

BHA is grateful for the commitments of the City of Boston to invest in BHA properties and in affordable housing. The City of Boston is required by its charter to appropriate funds through a public budgetary process. The BHA appreciates the partnership of the Mayor and Council and looks forward to informing and supporting any relevant budgetary requests.

Comment: Okay. I have a few things. I first wanted to know if you have any... what the other person just said about... that in these contracts, if the Section 8 thing doesn't get renewed, then you can... you call it deeply affordable to have rents at 80% AMI? Do you have any comment on that?

Response: The Section 8 subsidy will always get renewed just as long as the federal program exists. But in any event, the BHA controls the contract for the Section 8. And as long as there are Section 8 funds for the BHA, the contract won't terminate. It's not like someone else can decide that they're going to change to market rent. The BHA provides the vouchers. The BHA has the contract for the vouchers. They're not through any other entity. They're ours and we have that contract.

Comment: Okay. Another question that I put in the chat was, who is the company that's going to be doing these inspections at Hailey? We've asked multiple times publicly and you've never said who this company is that's supposedly independent. So you're doing inspections in [inaudible 01:57:29] Apartments.

Response: So I believe it's called the McCright and Associates. Nothing to do with Mac of GBLS. They haven't begun the inspections yet, but there will be notices going to residents and they will be accompanied by BHA staff.

Comment: (also Ops) Okay. Another comment I wanted to make is following up on the stuff that Tia was saying about the doors and the buildings. It seems pretty clear that the BHA's goal is to try to depopulate these parts of the projects that they're trying to privatize as much as possible. Otherwise, I can't see any reason why, in so many projects, they just leave doors to the buildings with broken locks. It's pretty clearly a tactic to terrorize residents because this allows random people to come in, urinate on the floor, often inject drugs, and overdose right in the hallways... to turn this into a place that people feel so uncomfortable living in that they just want to leave or accept these privatization plans.

And we've seen also residents who have asked for a transfer for medical reasons that they couldn't be on the floor they were on and things like that. And then the BHA tries to transfer them into Section 8 housing without adequately explaining what that is: the fact that there's often much higher costs associated, that they don't have the same

kind of rights that they do in public housing... So, it seems pretty clear there's kind of an overall strategy to clear people out of these buildings so that they won't have resistance to your plans to basically sell these buildings off and get rid of the public housing units that were there before... replacing them with Section 8 and adding in all these much more expensive apartments.

Also, about these inspections, because you keep telling people they need to get independent inspections from Boston Inspectional Services, but the inspectional servicing people, they don't do anything. They often threaten residents. Related to mold, one inspector told us that their inspections are purely visual and they're not able to test for mold. So they can't write down that there's mold, even when they know that there's mold. And when asked whether they could provide or call somebody to bring in and do a mold test, they said, "No, you have to do it yourself." They specifically said, "It's a visual inspection. So when I come back for my follow up inspection, if I can't see the black substance on the wall any longer, then I will mark it as fixed." And we've said, "Even if it's painted over?" He said "Yes."

So it's pretty disturbing how dysfunctional all of these organizations and that they're clearly working together to cover up the structural issues that are related to leaks and moisture inside all the walls that they deny is there.

Other speaker: I feel like they're working together. Definitely there's a lot of working together. I do feel that because they don't do nothing at inspectional services. They don't. They really don't. So I feel like a lot of people are working together. A lot of the agencies, you all... it's just sad. They don't.

First speaker: And not only that. Management will often retaliate against people, not even just for organizing, but just for going in and asking for something to get fixed and coming back when it doesn't get fixed, or coming back when their work order doesn't even get put in or gets marked as complete when nothing happens. People get threatened by managers. They tell them not to work with our organization. They make it very hard for us to get meeting space. We've requested space for meetings in the community spaces in the buildings. And we've been told "No" in several places or we've been told we would have to be there to facilitate the meeting and watch you, which I... seems pretty disturbing. Doesn't really seem how these things should be. Tenants should have rights to organize, to improve their conditions, even if it's outside of the existing tenant organization.

Response: And certainly I just want to respond to your allegation that there is some plan to depopulate the BHA and public housing. That is not the case.

## **Resident Empowerment**

Comment: (5Y) Pp. 12-13, Rebuild resident capacity programs: BHA continues to have the challenge of how to keep resident participation efforts vital during the pandemic, and has continued to have a number of virtual events (and a few small in-person events where consistent with public health protocols). It was appropriate to remove the reference to census efforts for this year, and the reference to digital equity (distributing laptops and tablets) are both good LTO Board trainings through Mel King Institute (for

Commonwealth, Hailey, and Charlestown). More detail about the “Powered by the REC” initiative that started in Oct. 2021 (or a cross-reference to where people can get more information) would be helpful. In addition, on digital equity, BHA should identify any barriers that may exist for LTO participation that it might be able to remedy through simple capital fixes, such as making sure that there is a good Wifi connection or hot spot in areas that resident organizations can use, and by permitting hybrid meetings where that may work (for example, the RAB Budget Committee has used this successfully). BHA should also commit to getting timely information out to residents and resident organizations about how things may evolve under COVID protocols (such as how many people may utilize BHA space, updated election protocols and extensions/waivers available until election protocols are worked out, etc.

Response: The Powered by REC initiative is a lineup of virtual events held to encourage residents to be more involved with their LTOs and the REC with our new "Community Events Checklist". By participating in REC and LTO events, residents build and improve their community, meet their neighbors, connect to helpful resources, while earning fun prizes, participate in REC giveaways, and much more! We highly encourage residents to involve themselves in their LTOs as well as other community issues and opportunities that arise within their development. More information can be found on the BHA website: <https://bostonhousing.org/en/Center-for-Community-Engagement/Resident-Empowerment.aspx>. We are currently planning out the calendar of events for January – June. Flyers about the event lineup will also be sent out to LTOs and managers in order to reach more residents. Information on the initiative will also be shared in our REC newsletter (sign up for the newsletter here: <https://tinyurl.com/bharecnews>). Our goal is to really involve the LTOs more and work with them to identify the needs and resources of their residents and help to promote activities they have scheduled and /or help to plan necessary activities. This may include online workshops, trainings, social events, etc.

In regards to Election Protocols, last year the BHA issued a waiver for elections and updated the Tenant Participation Policy to formally allow online/virtual meeting which would be helpful when planning election related events, like candidate info meetings and forums.

The BHA has collaborated with the City of Boston whereby a city contract is laying fiber to BHA developments; the BHA is in process of installing inside wiring to 17 developments that will allow for Wicked Free Wifi to be expanded to inside common areas and task force spaces at those developments. It is anticipated that the 17 sites will be connected by spring and that this work will expand to additional developments in 2022. When the wiring is installed, BHA will then install desktop computers for task force and resident use in common areas. About 10 BHA locations currently have the new desktop computers set up and work is ongoing to get them installed at all BHA sites, with wifi connectivity. In addition, in collaboration with partners and via BHA staff, BHA is providing free Technology Goes Home classes and devices at some sites. In partnership with the Boston Public Library, BHA is working to distribute free routers for in home use to residents who do not have connectivity, through the library’s long term

lending program. Task forces that need assistance with connectivity should contact the Resident Capacity program to receive assistance and devices if needed.

Comment: (5Y) (also RED) p. 13, Institutionalize resident protections: In addition to what's stated above regarding the ISHI toolkit, the text here also mentions hosting the materials on the BHA website. This is good, but it may also be good to convene a forum (as suggested above) open to all sites/residents so they can be briefed about these materials. In addition, just as BHA worked the Mixed Finance Tenant Participation MOA and Mixed Finance Grievance Procedure into standard closing materials for redevelopment, the same should be done with the Letter of Assurance (on relocation and rehousing guarantees) and other standard Management Protocols which are meant to carry over certain key BHA public housing protections/standards of practice into Replacement Housing communities.

Response: The Resident Empowerment Toolkit is close to being completed and shared with residents. We hope to use feedback from Mixed Finance residents to continuously improve it and update it so it will be helpful throughout redevelopment projects. We have also discussed having a forum in late 2022 as part of our Tenant/Resident Empowerment initiative. We are still in early conversations about what it will look like and how best to host it given COVID.

Comment: Okay. So I had several other things I wanted to bring up. First, I think I sent a link to somebody else so they had sent a message under my name that said, "Do residents have access to the RAB meetings?" That wasn't for me, but I'll just put that out there if anybody wants to respond to that. And when is the next meeting?

Response: Yes, all residents and participants of the BHA have access to the RAB meetings. Due to Covid, the RAB is currently meeting via zoom on the second Thursdays of every month from 6pm to 8pm but has made a change for the Jan 2022 meeting to the first Thursday. Details on the RAB meetings, including meeting minutes and the zoom meeting instructions, can be found on BHA's website: <https://bostonhousing.org/en/Center-for-Community-Engagement/Resident-Empowerment/RAB.aspx>. One of the main functions of the RAB is to work with the BHA on the annual plan so the January 2022 meeting will be held on Jan 6<sup>th</sup>.