Rental Assistance Demonstration Attachment to Annual Plan

The Boston Housing Authority (BHA) has been a successful applicant in the Rental Assistance Demonstration (RAD) program, and to date BHA has successfully converted several former public housing communities to RAD. (Please see past Annual Plans for details regarding properties that have already converted to RAD.) The purpose of this current Attachment is to provide details regarding upcoming or proposed RAD conversions.

As a result, BHA is pursuing conversion of public housing dwelling units at several sites to Project Based Vouchers or Project Based Rental Assistance under the guidelines of H-2019-09 PIH 2019-23, REV-4 and any successor Notices.

In addition to conversions of existing public housing, BHA intends to is pursueing opportunities to convert newly constructed (and unoccupied) public housing to be developed using BHA's "Faircloth" capacity. In July 2023, HUD issued Supplement Notice 4B to its RAD Notice (H-2023-08 PIH-2023-19) which, among other things, provided guidance about how housing authorities could use their Faircloth capacity in conjunction with RAD to create new project-based voucher units through a Faircloth-to-RAD mechanism. In November 2024, HUD rebranded Faircloth-to-RAD as "Restore Rebuild.", which HUD has now referred to as Restore Rebuild. BHA intends to diligently pursue this new pathway.

One particular goal is to leverage publicly owned land as sites for Faircloth to RADRestore—Rebuild housing development. BHA will-has worked closely with the City of Boston to identify opportunities at what the City considers "High Opportunity Sites" as identified in its 2022 Public Land for Public Good: Citywide Land Audit." In addition, through a series of public procurements beginning in December 2023, BHA has solicited proposals from private developers to create new Faircloth-to-RADRestore—Rebuild- housing units. BHA is pursuing many of the resulting proposals both at publicly owned and at privately owned sites.

RAD conversion, whether using Project Based Voucher (PBV) subsidy or Project Based Rental
Assistance (PBRA), entails adoption and implementation of certain rights and protections for
residents and applicants. Upon conversion of a public housing unit to a Project Based
VoucherPBV unit, the BHA will adopt the resident rights, participation, waiting list and grievance

procedures listed in Section 1.6 of H-2019-09 PIH 2019-23, REV-4 and H-2016-17/PIH-2016-17; - upon conversion to Project Based Rental Assistancea PBRA unit, the BHA (or the property owner as applicable) will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.7 of H-2019-09 PIH 2019-23, REV-4 and H-2016-17/PIH-2016-17. These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, the BHA certifies that it is currently compliant with all fair housing and civil rights requirements.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing public housing authorities with access to private sources of capital to repair and preserve its affordable housing assets. (The Faircloth to RADRestore—Rebuild mechanism further allows public housing authorities to develop brand new public housing assets that will convert to RAD.) Please be aware that upon conversion, the Authority's public housing Capital Fund will be reduced by the pro rata share attributable to the Public Housing Developments converted through RAD. BHA may borrow funds to address capital needs, and BHA may also contribute Capital Funds (including Replacement Housing Factor funds) towards the RAD conversions. BHA currently has debt under the Capital Fund Financing Program and will be working with its bond trustee to address outstanding debt issuesobligations, which may result in additional reductions of Capital Funds. The BHA currently has debt under an Energy Performance Contract (EPC) and will be working with that bond trustee and its EPC partner, Ameresco, to address outstanding debt issuesobligations, which may result in additional reductions of Capital or Operating Funds.

Below, on the following pages, please find specific information related to the Public Housing Development(s) <u>and proposed Restore-Rebuild housing developments</u> for which BHA is currently pursuing RAD conversions. (Please see past Annual Plans for details regarding properties that have already converted to RAD.)

-In addition, the BHA is also engaged in the conversion of Moderate Rehabilitation/Rent Supplement Sites pursuant to Component II of the RAD notice. As an integral part of these conversions the BHA is partnered with the Developer/Owner as the subsidy administrator and provides choice mobility to these residents. Following the Public Housing Developments listed below, is a list of the Moderate Rehabilitation sites which have or will be converted to Project Based Section 8 via RAD.

-The information referenced above regarding resident rights, participation, waiting list and grievance procedures is appended following the information related to each development.

Development Name	PIC Development ID	Conversion Type	Transfer of - Assistance
West Newton- Rutland-East- Springfield Street	MA002000158	PBV	N/A
Total Units	Pre-RAD-Unit Type	Post RAD Unit Type	FY24 CFP Allocation
146	Family	Family	*\$164,074
Bedroom-Type	Units pre-conversion	Units-post-conversion	Change
Studio/Efficiency	44	44	
1BR	58	58	
2BR	20	20	
3BR	11	11	
4BR	12	12	
5BR	1	1	
6BR			

.

RAD/Section 18 Blend with 110 units converting to RAD and 36 converting to PBVs

CHAP date: 03/01/2017

Closing date: 01/31/2019 (completed 2022)

3 uninhabitable units (long term vacant due to fire damage) at 34 East Springfield treated as a de minimis removal (disposition completed 2022)

*Award as Demolition and Disposition & Transitional Funding (DDTF)

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Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
Ausonia	MA002000261	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24-FY25 CFP Allocation
100	Elderly/Disabled	Elderly/Disabled	\$ 384,844 <u>389,516</u>
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency	93	93	
1BR	7	7	
2BR			
3BR			
4BR			
5BR			
6BR			

- Due to high capital needs, BHA separately pursued a Section 18 disposition, and that
 application was in fact approved by HUD. The final conversion may nevertheless involve a
 RAD/Section 18 Blend—and for that reason we are mindful to keep Ausonia in this RAD
 Attachment.
- CHAP date: 02/20/2018
- Closing date: Expected 20262027

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Anne M. Lynch Homes at Old Colony	MA002000124	₽BV	N/A	
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24 CFP Allocation	
28	Family	Family	\$0.00- (previously- converted)	
Bedroom Type	Units pre-conversion	Units post-conversion	Change	
Studio/Efficiency				Formatted: Centered
1BR	13	13		Formatted: Centered
2BR	11	11		Formatted: Centered
3BR	4	4		Formatted: Centered
4 BR				Formatted: Centered
5BR				Formatted: Centered
6BR				Formatted: Centered
		tes		
	◆ CHAP da	ate: 02/22/2018		Formatted: Normal, Centered

Closing date: 08/08/2019

These 28 PBV RAD units are part of the Phase 3A phase of new construction redevelopment, which was completed in 2022

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Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
Orchard Offsite Phase II — Long-Glen Apts	MA002002119	PBRA	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24 CFP Allocation
34	Family	Family	\$0.00 (converted in 2021)
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency	10	10	
1BR	14	14	
2BR	9	9	
3BR	1	1	
4BR			
5BR			
6BR			

Motes

- Long-Glen is an existing mixed-finance redevelopment that is not owned by BHA.
- There are 34 public housing units plus 25 non-public housing units at the property; all 34-public housing units have converted to PBRA RAD.
- CHAP date: 03/02/2018
- Closing date: 03/01/2021

Development Name	PIC Development ID	Conversion Type	Transfer of- Assistance
Heritage	MA002002141	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24 CFP Allocation
31	Elderly/Disabled	Elderly/Disabled	\$0.00 (converted in 2022)
Bedroom Type	Units pre conversion	Units post conversion	Change
Studio/Efficiency	22	22*	
1BR	3	3	
2BR	6	6 <u>*</u>	
3BR			
4BR			
5BR			
6BR			

- Heritage is an existing mixed finance property that is owned by an instrumentality of the
- There had been 31 public housing units plus 245 PBV units; 28 public housing unitsconverted to PBV RAD. *One Studio public housing unit is an agency unit and two 2BRunits are employee units.
- CHAP date: 11/30/2018
- Closing date: 09/30/2022

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
Lower Mills	MA002002142	₽BV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24 CFP Allocation
19	Elderly/Disabled	Elderly/Disabled	\$0.00 (converted in 2022)
Bedroom Type	Units pre conversion	Units post conversion	Change
Studio/Efficiency	9	9	
1BR	8	<u>8*</u>	
2BR	2	<u>2*</u>	
3BR			
4BR			
5BR			
6BR			

- Lower Mills is an existing mixed finance property that is owned by an instrumentality of the BHA.
- There had been 19 public housing units plus 159 PBV units; 17 public housing units
 converted to PBV RAD. *One 1BR public housing unit is an agency unit and one 2BR is an
 employee unit.
- CHAP date: 11/30/2018
- Closing date: 08/31/2022

Development Name	PIC-Development ID	Conversion Type	Transfer of Assistance
Mission Main (Phases I, II, and III)	MA002002114 MA002002117 MA002002118	PBV	N/A
Total Units	Pre-RAD Unit Type	Post RAD Unit Type	FY24 CFP Allocation
445	Family	Family	\$ 382,583*
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency			
1BR	120	120	
2BR	150	150	
3BR	125	125	
4BR	48	48	
5BR	2	2	
6BR			

Motes

- Mission Main is an existing mixed-finance property that is not owned by the BHA.
- There had been 445 public housing units and 90 non-public housing units at Mission; all 445 public housing units converted to PBV RAD/Section 18 Blend pursuant to Notice PIH-2021-07.
- CHAP date: 11/30/2018
- Closing date: Dec 2022
- *Award as Demolition and Disposition & Transitional Funding (DDTF) against the subsetof units (178 units or 40% of the total) that converted through Section 18

Development Name				4
Eva White Apartments	MA002000241	PBV	N/A	•
Total-Units	Pre-RAD Unit Type	Post-RAD Unit Type	FV24-CFP-Allocation	4
102	Elderly/Disabled	Elderly/Disabled	\$373,731	4
Bedroom Type	Units pre conversion	Units post conversion	Change	4
Studio/Efficiency	34	34		•
1BR	57	57		•
2BR	11	11		4
3BR				4
4BR				4
5BR				4
6BR				4

Notes

- RAD/Section 18 Blend pursuant to Notice PIH 2021 07, with 20% of units converting to RAD and 80% converting to PBVs
- CHAP date: 05/31/2019
- Closing date: December 2024 with RAD effective 01/01/2025.

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Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
Orchard Gardens (Phases 1&2, and 3)	MA002002113 MA002002115	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24-FY25 CFP Allocation
282	Family	Family	\$ 512,550 <u>519,814</u>
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency			
1BR	73	73	
2BR	87	87	
3BR	94	94	
4BR	23	23	
5BR	5	5	
6BR			

Notes

- Orchard Gardens is an existing mixed-finance property that is not owned by the BHA.
- There are currently 282 public housing units and 49 non-public housing units at Orchard Gardens; all 282 public housing units will convert to PBV RAD/Section 18 Blend pursuant to Notice PIH 2021-07.

CHAP date: TBD7/11/2023Closing date: Expected 20276

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
Mildred C. Hailey Apartments	MA002107119	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24-FY25 CFP Allocation
516	Family	Family	\$ 2,184,837 2,212,654*
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency			
1BR	67	67	
2BR	202	202	
3BR	182	182	
4BR	51	51	
5BR	12	12	
6BR	2	2	

Notes

- BHA received Section 18 Demo/Dispo approval for these 516 units in October 2023.
- BHA is keeping the 516 units listed in this RAD Attachment solely to preserve flexibility if for any reason a partial RAD conversion becomes helpful.
- BHA intends to continue to own (through affiliated entities) and operate the modernized buildings.

CHAP date: TBDClosing date: TBD

*516 units times \$4,234.184,288.09/unit FY2524 CFP allocation

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
General Warren	MA002000241	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24-FY25 CFP Allocation
96	Elderly/Disabled	Elderly/Disabled	\$ 345,817 <u>349,849</u>
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency	56	56	
1BR	36	36	
2BR	4	4	
3BR			
4BR			
5BR			
6BR			

- RAD/Section 18 Blend pursuant to Notice PIH 2021-07
- In the event of high capital needs, BHA would separately pursue a Section 18 disposition that would result in a 100% PBV conversion
- BHA plans to pursue a RAD conversion on its own without a development partner.
- CHAP date: <u>10/1/2025</u>TBD
- Closing date: Expected 20276

Development 12 Restore-Rebuild Site 1

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
West End Library	N/A	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24 FY25 CFP Allocation
TBD	N/A	TBD	N/A
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency			
1BR	N/A	28	
2BR	N/A	4	
3BR	N/A		
4BR	N/A		
5BR			
6BR			

Notes

In 2022, BHA and the City of Boston issued a join Request for Proposals for the
redevelopment of the City-owned property that is the current site of the West End
Library branch of the Boston Public Library. The RFP called for development proposals
that include Faircloth public housing units; pursuant to Supplement Notice 4B to the RAD
Notice (H-2023-08 PIH-2023-19) BHA proposes to convert any newly development
Faircloth public housing units at the West End Library to RAD upon completion and prior
to occupancy.

Development 13 Restore-Rebuild Site 2

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
Faneuil Gardens	N/A	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24 FY25 CFP Allocation
TBD	N/A	TBD	N/A
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency			
1BR		54	
2BR		72	
3BR	Zero federal units	45	
4BR		9	
5BR			
6BR			

Notes

Faneuil Gardens is a 258-unit state public housing community in Brighton. BHA and its
procured developer, The Community Builders, in collaboration with the Faneuil Gardens
Tenant Task Force, have developed a master plan to redevelop the site. Up to threequarters of the replacement units may be created through the Faircloth to RADRestore
Rebuild process. Phase one (out of five phases) is projected to include 8532 Faircloth toRADRestore Rebuild units.

Development 14Restore-Rebuild Site 3

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
Parcel P-12C	N/A	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24 FY25 CFP Allocation
TBD	TBD	TBD	N/A
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency			
1BR		2	
2BR		14	
3BR	N/A	13	
4BR			
5BR			
6BR			

Notes

• This is private development being undertaken by a joint venture of two local nonprofits (The Community Builders and Asian Community Development Corporation) on a parcel in the Chinatown neighborhood.

Development 15 Restore-Rebuild Site 4

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
Allston Senior Housing	N/A	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24 FY25 CFP Allocation
TBD	TBD	TBD	N/A
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency			
1BR		47	
2BR		3	
3BR	N/A		
4BR			
5BR			
6BR			

Notes

• This is private development being undertaken by the Allston-Brighton Community Development Corporation in the Allston neighborhood.

Development 16 Restore-Rebuild Site 5

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
Our Lady's Guild House	N/A	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24-FY25 CFP Allocation
TBD	TBD	TBD	N/A
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency	10	10	
1BR	10	10	
2BR			
3BR			
4BR			
5BR			
6BR			

Notes

• This is private development being undertaken by a joint venture of two local nonprofits (The Planning Office for Urban Affairs and the Fenway Community Development Corporation) in the Fenway neighborhood.

Development 17 Restore-Rebuild Site 6

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
Building 104	N/A	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24-FY25 CFP Allocation
TBD	TBD	TBD	N/A
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency			
1BR	20	20	
2BR			
3BR			
4BR			
5BR			
6BR			

Notes

 This is private development involving the renovation of an existing apartment community being undertaken by nonprofit developer The Community Builders in the Charlestown neighborhood.

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Development Name	PIC Development ID	Conversion Type	Transfer of Assistance		
495 Dorchester Av	N/A	PBV	N/A		
Total Units	Pre-RAD-Unit Type	Post-RAD Unit Type	FY24-CFP Allocation		
TBD	TBD	TBD	N/A		
Bedroom-Type	Units pre-sonversion	Units post conversion	Change		
Studio/Efficiency	-	2		Formatted: Center	ed
1BR	-	17		Formatted: Center	ed
2BR	N/A	3		Formatted: Center	ed
3BR				Formatted: Center	ed
4BR				Formatted: Center	ed
5BR				Formatted: Center	ed
6BR				Formatted: Center	ed
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This is private d	development being under	taken by a joint venture (of two local developers	Formatted: Norma	al, Centere

This is private development being undertaken by a joint venture of two local developers (Core Investments and Dream Development) in the Dorchester neighborhood.

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Development 19 Restore-Rebuild Site 7

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
290 North Beacon St	N/A	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24-FY25_CFP Allocation
TBD	TBD	TBD	N/A
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency			
1BR		42	
2BR	N/A	50	
3BR		22	
4BR		19	
5BR			
6BR			

Notes

BHA has been designated by the City of Boston to redevelop this City-owned parcel
adjacent to BHA's Faneuil Gardens state public housing community. It will be a mixed-use
redevelopment including musician rehearsal/studio space and other complementary
arts-and-culture space in addition to RAD rental units.

Development 20 Restore-Rebuild Site 8

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
120 George St	N/A	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24-FY25 CFP Allocation
TBD	TBD	TBD	N/A
Bedroom Type	Units pre-conversion	Units post-conversion	Change
Studio/Efficiency			
1BR		6	
2BR		9	
3BR	Zero federal units	5	
4BR		1	
5BR			
6BR			

Notes

This is a property BHA currently owns and which is in BHA's state public housing
 "Scattered Site" portfolio. BHA is replacing those state-funded units at a new location,
 which will permit new development of 21 RAD units at 120 George Street through HUD's
 Restore-Rebuild program.

Development Name Hartwell House	PIC Development ID	Conversion Type	Transfer of Assistance
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24 FY25 CFP Allocation
6	Rent Sup	Supportive Services	N/A
Bedroom Type Studio/Efficiency	Units pre-conversion	Units post conversion	Change
1BR			
2BR	17	6	These units were not- previously BHA. BHA- was designated as- subsidy administrator
3BR			
4BR			
5BR			
6BR			

Motor

- RAD Rent Supp Conversion
- CHAP date: N/A
- Closing date: RAD effective 02/01/2015.

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
Nueva Vida	MA002R20003 MA002AF0035	₽BV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24 FY25 CFP Allocation
\$	Moderate Rehab	PBV- Supportive- Services	N/A
Bedroom Type	Units pre-conversion		Change
SRO/Studio/efficiency	8	8	
1BR			
2BR			
3BR			
4BR			
5BR			
6BR			

- RAD Moderate Rehabilitation conversion to PBVs pursuant to (PIH) H 2019 09 PIH 2019-23 (HA), Rental Assistance Demonstration — Final Implementation, Rev 4.
- CHAP date: N/A
- Closing date: RAD effective 08/07/2023.

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
Bishop Street/ Elsie Frank	MA002R20004 MA002AF0036	₽BV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24 FY25 CFP Allocation
9	Moderate- Rehabilitation	PBV-Supportive- Services	<u>N/A</u>
Bedroom Type	Units pre-conversion		Change
SRO/Studio/Efficiency	9	9	
1BR			
2BR			
3BR			
4BR			
5BR			
6BR			

- RAD Moderate Rehabilitation conversion pursuant to
 (PIH) H-2019-09 PIH-2019-23 (HA), Rental Assistance Demonstration—Final Implementation, Rev 4.
- CHAP date: N/A
- Closing date: RAD effective 04/30/2024.

Development Name	PIC Development ID	Conversion Type	Transfer of Assistance
123 Crawford	TBD	₽BV	N/ A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24 CFP Allocation
17	Moderate Rehabilitation	PBV Supportive- Services	N/A
Bedroom Type	Units pre conversion	Units post conversion	Change
SRO/Studio/Efficiency	17	17	
1BR			
2BR			
3BR			
4BR			
5BR			
6BR			

- RAD Moderate Rehabilitation conversion pursuant to
 (PIH) H-2019-09 PIH-2019-23 (HA), Rental Assistance Demonstration—Final Implementation, Rev 4.
- CHAP date: N/A
- Closing date: TBD

	PIC Development ID	Conversion Type	Transfer of Assistance
Tuttle House	TBD	PBV	N/A
Total Units	Pre-RAD Unit Type	Post-RAD Unit Type	FY24-FY25_CFP Allocation
26	Moderate Rehabilitation	PBV-Supportive Services	<u>N/A</u>
Bedroom Type	Units pre-conversion	Units post-conversion	Change
SRO/Studio/Efficiency	26	26	
1BR			
2BR			
3BR			
4BR			
5BR			
6BR			

- RAD Moderate Rehabilitation conversion pursuant to
 (PIH) H-2019-09 PIH-2019-23 (HA), Rental Assistance Demonstration Final Implementation, Rev 4.
 CHAP date: N/A
- CHAP date: N/AClosing date: TBD

APPENDICES

Resident Rights, Participation, Waiting List and Grievance Procedures

Copies of the documents referenced in the third fourth paragraph of this RAD addendum - Attachment to Annual Plan are attached hereto in their entirety:

- 1. -RAD Fair Housing, Civil Rights and Relocation Requirements (Notice H 2016-17/PIH 2016-17)
 Posted by HUD to its RAD Resource Desk on 12/02/16 and downloaded by BHA on 10/26/24
- 2. RAD Notice H-2019-09 / PIH 2019-23 REV-4 as amended by Supplemental Notice 4B Posted by HUD to its RAD Resource Desk on 7/23/24 and downloaded by BHA on 10/26/24