

Comments and Responses to the BHA FY 2020 Annual Plan and Five-Year Plan (2020-2024).

The following document contains the comments and responses received on the BHA's FY 2020 Annual Plan and Five-Year Plan (2020-2024). 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, 2019 and the comment period closed on December 15, 2019 with a public hearing held December 9, 2019 at Boston Public Library Copley Branch in Boston at 11 am and another at Boston City Hall at 6 pm.

The BHA took several steps to notify the public of the FY 2020 Annual Plan and Five-Year Plan (2020-2024) 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 Section 8 participants in Boston and nearby towns and mailed out flyers to public housing resident organizations notifying them of the Public Hearing and the proposed Plan Amendment. The BHA also sent letters to many local officials and advocacy groups. The Plan was made available

for review at Boston Public Library Copley Square branch, BHA's headquarters at 52 Chauncy St., and on its website www.bostonhousing.org.

Many comments are specific to Plan attachments:

Admin: Leased Housing Administrative Plan

AP: Annual Plan template

5Y: Five-Year Plan

RAD: RAD attachment

S: Supplement

Five-Year Plan

Comment: (Lsd Hsg and Occ) For over 30 years, Pine Street Inn, Inc. (PSI) has worked in partnership with the Boston Housing Authority (BHA) to provide affordable, supportive housing for homeless individuals. Since its inception in 1969, Pine Street Inn has been serving Boston's homeless through a variety of responsive, community-based programs and services. PSI is now the most comprehensive nonprofit homeless services organization in New England, providing not only food, clothing, and shelter, but also 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 35 locations throughout Metropolitan Boston.

Pine Street Inn has been successfully serving homeless individuals with a myriad of disabilities and difficulties for five decades. Since 1984, PSI has been developing and operating permanent affordable housing specifically for homeless individuals. 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) in order to 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.

PSI enthusiastically supports the Boston Housing Authority FY2020 Annual and Five-Year Plans. 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 areas that were previously unaffordable. As the BHA is able to keep the payment standard the same for current tenants where there is a small

decline in the payment standard under the SAFMR, essentially 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 encourage its inclusion to encourage program property owners to continue in 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.

Another key initiative is optimizing technology to transform interaction with the agency – including landlord and tenant portals, etc. This will lead to improved customer service and minimize frustration and miscommunication.

Continued support of Boston’s Moving On, Rapid Rehousing, and Leading the Way Home programs, as well as the Coordinated Access System Referral, are integral to addressing and ending homelessness. As an example, since April 2017 PSI has helped 35 tenants move out of PSI Permanent Supportive Housing and into their own apartments with assistance from the Moving On program. As a result, 35 additional individuals have been able to transition from homelessness into housing.

We would also like to commend the BHA for the continuation of 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 preference. This is key in permanently housing our most vulnerable constituents.

Pine Street Inn is grateful for and appreciative of our ongoing collaboration with the Boston Housing Authority. The knowledgeable staff, crucial 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 homeless individuals we strive daily to assist and empower.

Response: Thank you for your feedback. We also look forward to continuing this partnership to ensure that together we continue serving this vulnerable population and provide much needed stabilization services for a successful tenancy.

Comment: (CCECR and RED) It is always good, where possible, to establish concrete goals which can be measurable. Other goals are, of course, desirable (for example, “Maintain and improve efforts to support robust tenant

participation”, but it may be difficult to evaluate if they have been achieved. If, on the other hand, the goal is to help a certain number of resident councils to complete their elections in a timely manner, to commence construction and complete certain phases by proposed dates, etc., it is easier to know if this has happened or not. Unforeseen changes or circumstances may affect performance, or may cause a shift in priority, but this can be addressed in Progress Reports and the matter can remain on the “to do” list, but perhaps with an altered time frame. Federal, state, and local funding and support obviously can affect things, as can agency transition. BHA has proven over the past number of years that it is flexible and able to adapt to changing circumstances (and to take advantage of opportunities to support its programs that may be different and challenging).

BHA should ensure that the information in the 5 Year Plan is consistent with other information in the PHA Plan. Thus, for example, there are some discrepancies in the number of public housing and Section 8 units here in comparison with, say, the Template. (It is fine for the BHA to use the 5-Year Plan to highlight its overall operations, and to mention that in addition to the federal units explicitly covered by the Plan, it also

administers x number of state assisted public housing and rental assistance units.)

It would help to break up the Five Year Plan with headings and graphics (the last 5 Year Plan was very inviting due to its format). It would also help to provide concrete examples, such as regarding “better use of technology to deliver housing services”. On the Small Area FMR implementation, it should be noted that BHA is one of the few PHAs brave enough to try this (where it wasn’t otherwise mandated), and it will be important to monitor and provide data on success to encourage other Massachusetts PHAs to do the same and maximize housing choice opportunities.

Six strategic priorities are enunciated here —(1) achieving and maintaining high performer status; (2) strengthen and preserving the BHA public housing portfolio; (3) increasing Section 8 housing opportunities; (4) supporting resident capacity building, self-sufficiency, and quality of life initiatives; (5) identifying and planning for future staffing needs; and (6) improving customer service for residents, applicants, landlords and vendors so BHA is experienced as an efficient, pleasant, and responsive organization. As noted above, it is important to try to identify objective performance goals in these priority areas so that

progress (or the need for further action) can be effectively monitored.

Response: BHA will take the comment under advisement. BHA staff are open to suggestions for metrics and is willing to engage in meetings with the RAB and with advocates.

Comment: (Ops) 1. High Performer Status

--This should reference the Public Housing Assessment System (PHAS) and the Section 8 Management Assessment Program (SEMAP), rather than just PHAS, since the requirements are different.

--Leased Housing has done a stellar job in the last few years to obtain high performer status, but BHA has not had High Performer status recently for Public Housing. The RAB should be given the latest reports.

--While maintaining full/high occupancy is certainly part of the PHAS evaluation, and is an area where BHA has done well and should keep up its good track record, there are a number of PHAS indicators. BHA should share what they are, where HUD has said it has fallen short, and what it plans on doing to achieve and maintain success.

Public Housing: challenge because, when HUD comes out and inspects people in the middle of summer, when people have to have their air conditioners running, and then they say, “Oh, the air conditioner’s blocking the fire exit.” And so, guess what? You get a ding for that kind of thing, and then HUD says, “Oh, we won’t give you quite as much money as we would.”

Response: BHA staff would be happy to attend a RAB meeting and review the latest PHAS reports and performance. It is important to remember that the overall PHAS score is composed of scores in management, capital construction, physical inspection and finance.

Comment: (RED, Budget and Capital) 2. Strengthen/ Preserve Public Housing Portfolio

--Please describe for the RAB/public what is meant by “formalize asset management staffing and systems within BHA’s organizational structure”. What does this mean, and what changes are likely?

--Please describe what level of reassurance of BHA financial stability in redevelopment is contemplated. For example, certain RAD transactions may only yield limited additional subsidy dollars (such as from the “blend” of 25% use of tenant

protection dollars), but it may be that the use of tax credits or other capital may be able to write down rehabilitation costs sufficiently so the development is self-sustaining; elsewhere, though, it may be that RAD would not be sufficient for long-term financial stability. This may be a development by development analysis which should be shared with resident leaders.

--What is the goal for completion of capital needs assessments? Will they all be completed at the end of YR 1, or is it only likely that certain numbers will be completed? Can goals be set down here which can be evaluated at the end of each year of the 5-year plan, both for the needs assessment and for the implementation of each site's strategic plan.

--Regarding the goal of adding to the net stock of deeply affordable units where possible, it may be helpful to establish year-by-year goals and then see how far the BHA gets at the end of each year.

--On the resiliency/sustainability plan, here again, it would be helpful to lay out year by year goals to get to the eventual carbon reduction target. BHA should also set dates for sharing with residents and partners both the vulnerabilities and the solutions.

Response: The Physical Needs Assessments (PNA) are planned to be completed in Year 1 and 2 of the 5 year plan. The PNAs will be used as evaluation tools for a variety of programs for each development. They will assist with capital needs/repairs required at each development whether immediate or planned over the next 5 to 10 years. They also may assist in planning for various potential redevelopment programs (RAD, Obsolescence or other redevelopment activities).

BHA uses "asset management" as a phrase to describe the agency's relationship to its affordable housing resources beyond traditional public housing—for example, those properties that have converted to other subsidy platforms (e.g., Section 8), or that are no longer be directly owned by BHA but rather fall under BHA's regulatory authority (e.g., mixed-finance redevelopment sites). Such arrangements are likely to become an increasingly significant component of the PHA's portfolio, and BHA will need to expand its staffing and adapt its information systems to manage and preserve those resources that fall outside of traditional public housing programs.

As the BHA transitions properties from traditional public housing to Project-Based Vouchers or other types of

funding, still owned by the BHA, the reporting requirements will change. For example: properties with mortgages or limited partnerships may be required to produce separate financial statements instead of HUD FDS reporting. Additionally, redeveloped sites owned by private developers may require BHA to provide pass-through subsidies which are tracked differently. Since BHA's current systems are designed to support traditional public housing, assessments on system changes are needed based on each redevelopment deal.

RED is making property by property assessments of the financial viability of redevelopment. As you suggest, this will certainly be a development-by-development analysis. The principle, however, must be to pursue only those redevelopment options that promise sustainability at the property level and, wherever possible, at broader agency level to further BHA's mission. BHA's primary goal in assessing options for each property is to preserve (or replace) the number of existing units on a one-for-one basis. All things being equal, however, we will prioritize redevelopment plans that produce additional deeply affordable housing. BHA staff will consider how to set reasonable year-by-year goals for redevelopment work as well

as for the resiliency/sustainability plan.

Comment: (Lsd Hsg) 3.
Increasing Section 8 Housing Opportunities

--It would help to know what the turnover times are for PBV units, what causes have been identified for delays, and what solutions are proposed, and set concrete goals (for example, if turnover time is 40 days at a site, set a goal of getting it to 20 days or less within 12 months). Some of this may not be related to repairs, but to system tweaks (such as offers to applicants on the waiting lists) that may cut through bottlenecks.

--It would help to know where ECHO currently stands—how many households have utilized it, and how many have taken advantage of resources/approaches that it offers to be placed into opportunity areas. If it is current in a pilot stage, but appears to be successful, the evaluation should include what would be necessary to bring it to scale.

Response: Thank you for the comment. BHA staff are happy to come to a meeting to have a conversation with the RAB and Advocates. ECHO will get going in 2020.

Comment: (CCECR and RED) 4. Strengthen Resident

Capacity Building and Quality of Life Initiatives

--Rebuilding resident capacity program. The first meeting here was held in October, 2019 and more planning meetings are set. Here again, it would help to include concrete goals to address the concerns—getting x number of elections completed (including simplifying the process to make it less difficult to achieve), helping x number of resident councils get or remain recognized, provided x numbers of trainings (citywide or site specific) on board, financial, and conflict resolution skills. The team should share the metrics that will be used to evaluate performance and there should be regular “check-in” with a broader group of residents and partners to assess where things are and to trouble-shoot. In addition, the team has not yet developed a plan for improving Section 8 resident participation, and this should be part of the goals/objectives.

--In addition to encouraging diversity of participants and their level of participation in LTOs, there are generational issues that need to be addressed with resident leadership, and a discussion about how to bring on and help support leaders of all ages.

--In the area of redevelopment and mixed finance, there have been regular quarterly city-wide meetings involving resident

leaders, BHA staff, and private partners, but not all redeveloping sites have been folded into this. As new initiatives are developed that could be replicable (for example, use of Letters of Reassurance as a vehicle to “bake in” resident protections early, guidelines about how pre-development funds can be used to help support residents in making informed choices), they should be shared.

--BHA should report back within the next quarter about its thoughts on voter registration and recertification. The RAB asked that this be taken up and other PHAs have done it, but there has been no further discussion of the topic.

--During the tenure of Rachel Goodman, there was a lot of integration of family self-sufficiency and quality of life initiatives with overall resident participation, and this is a gap given her retirement. The goal here should not only be increasing FSS participation, but making sure that public housing & Section 8 residents are fully aware of the range of opportunities that can be pursued, and having BHA be a partner with the City on meeting residents’ human service needs and taking advantage of employment/training opportunities.

Response: BHA will take the comment under advisement.

BHA staff are open to suggestions for metrics and is willing to engage in meetings with the RAB and with advocates. The Resident Capacity Team is meeting regularly and along with the Resident Empowerment Coalition has developed several goals to work toward, which include creation of an Election Support Team and development of Peer-to-Peer Learning lunches. Task Force election and compliance status is being closely tracked and the Resident Capacity Team will work on fine-tuning some concrete goals, measurements, and outreach strategies (including a plan to improve Section 8 resident participation), that will be shared at Resident Empowerment Coalition and resident capacity related meetings. For the REC to be successful, strong participation from residents, voucher holders, and advocates is needed.

We agree that the Mixed-Finance Partners quarterly meetings are a valuable forum. BHA has extended invitations to representatives of all of our redevelopment sites; however, it is true that not all sites have been represented at those meetings—or at least not consistently. We will continue to encourage more sites to participate, as it is an important forum to advance best practices

such as the Letters of Reassurance.

Comment: (Admin and HR) 5. Future Staffing Needs & Support for BHA Staff

--This should include institutional transition planning, i.e., as senior staff retire, making sure that key information and strengths are passed along to others, while taking advantage of the flexibility that staffing changes may permit.

--It may be useful to set realistic expectations for staff about what can be handled. For example, residents have felt stress when one manager may be shared among 2-3 sites, or where staff leaves mean it is not clear what the “chain of command” is for residents to consult.

--It is critical that the Mayor address the “acting” status of the Administrator, since sometimes decisions can be affected by perceptions of the support that the leadership team has, and that key vacancies are filled and that lines of communication and accountability are clear.

--If there are bottlenecks, promote mechanisms that will foster creative troubleshooting to expedite resolution of issues (use the organizational structure where it is helpful, and

have alternatives where it is not).

Response: The BHA agrees. Staff transition is of significant consideration for the agency. Given the number of long term employees, the agency’s has taken an approach to conduct systematic reviews of staffing, budgeting and department needs in advance of staff transitions. This has allowed the agency to maintain a full picture of staffing resources in order to ease the effects of staff turnover and allow for preservation of institutional knowledge.

The Mayor’s designation of acting status, provides the Acting Administrator with the same level of authority afforded to an appointed Administrator. As such, the Acting Administrator is allocated full control and authority to act on behalf of the agency and is empowered to lead and effectuate decisions with the support of the City. It is the role of the Acting Administrator to ensure effective communication and accountability through collaboration with key leaders in the city and within the agency. This collaboration has become essential in establishing the expectations around the Acting Administrator’s role.

Comment: (HR and Budget) 6. Improve Customer Service

--Involve residents in the development of the Customer Service Policy, and set a timeframe for development and implementation of the policy. Provide a means for residents to share confidentially their thoughts on staff performance (similar to the surveys used by the Housing Court).

--Set time frames for the development and implementation of on-line payment options (the RAB previously formally requested that BHA move forward on this, but hasn't gotten any further report on progress).

--Involve residents, applicants, and partners in the evaluation and revision of forms, and set concrete goals for particular revisions.

Response: Thank you for the comment.

Comment: (Admin) Hi, I'm Mac McCreight from Greater Boston Legal Services. I work with the Resident Advisory Board. I wanted to talk about that this is a year of a lot of transitions. So, people may remember, as was mentioned earlier, this is the twentieth year, since the PHA Plan hearing that the BHA had. This is the fifth five-year plan that we're about to go into. So, there's a lot of history that's gone on. Some things are changing and are different. Some things are the same

environment that we've had to face for years and years.

On the differences: Bill McGonagle retired from the BHA this year and, unfortunately, he passed away in the fall. We have new leadership at the BHA, now, with Kate Bennett as the Acting Administrator for the BHA. Kate's been someone that residents have worked with for years around redevelopment issues for the BHA. People feel very confident in her leadership and with the existing team of leaders that have been at BHA for a long period of time.

We had a very good RAB Conference, that was done with BHA, in the spring. They gave people a lot of insights into redevelopment. We're hoping that there might be a similar conference sometime this coming year that can get the basic information and the word out to people about things. At the same time, though, there are some things that are still the same. There's not enough money that's coming in from the Federal Government. There's the question about balance. People have been fearful about, "Is BHA working itself out of the business of being in public housing?" and BHA said "No, we don't want to do that. We want to preserve a portion of what we can. We understand that we may not be able to get tax credits the same way the private partners can to do that

but, at the same time, we're one of the city's major employers. We have a core mission and we can't convert all the stock that BHA has – over 60-plus elderly/disabled developments and so forth. So, there needs to be sort of a balance to make sure that all the things that BHA is working on can be done.

Response: The BHA will continue to focus its efforts on preserving its affordable housing units. Given the limited financial resources, the BHA has, at times, assessed where it would be beneficial to residents to secure a 3rd party redevelopment partner to ensure units maintain its affordability while also meeting today's standards of occupancy for families, including a healthier and greener home. However, the BHA will continue to be in the business of providing affordable housing and therefore, will have a focus on balancing preservation of its units under its portfolio, where possible and 3rd party redevelopment when in the best interest of its residents.

BHA agrees that we need to maintain a balance between our goals and realistic expectations. Our overarching priority is to preserve BHA's housing resources—deeply affordable housing accessible to extremely low-income households—and in that sense BHA is in no way working itself out of the business of public housing.

Comment: I have a question because we don't have access to the plans prior to this meeting. So, when you ask for a comment, I really don't know about what is in the plan. It's very hard to make comments on anything that I don't know.

That's why, like in the future, do we – or how do we have access to those plans prior to the meetings that night?

Response: So, the annual plan is available in a few different ways. So first, we send out copies of the annual plan to our Public Housing tenant task forces. And the annual plan is also available by going into the Public Housing Development Management offices and asking for a copy. The Public Housing Plans are also available in the BHA Planning Department offices during regular business hours. There's also a copy of the Annual Plan Documents in the Boston Public Library in the Copley Branch, so that's available also, and it's on our website. If you go to the BHA website and look in the "Planning and Real Estate Development," there's a section there for Annual Plans, and all of the documents are available there.

And the way that residents and the public would know that those documents are available in those places is that we send out letters to – so, we inform

our Resident Advisory Board. We send letters to our Monitoring Committee and to all of the Public Housing Development task forces. We also send a Public Hearing flyer in the rent statement mailing that goes to all of our public housing residents. So, all of the public housing residents get the notice with their rent statement. Then we also send a letter to all of our Section 8 participants with the same information and it's available in three languages – English, Spanish, and Chinese – saying where you can find copies of the annual plan. It's in the mailing that you received about this public hearing. We also put a notice in the Boston Globe.

Comment: (Admin) Like I said earlier, my name in English is Fred Chin (C-h-i-n). I have lived in Boston almost 40-some years. I'm a few weeks short of turning 69. I work as a freelance interpreter. Because I have been wanting to get into a government subsidized housing – either Section 8 or, you know, some kind of like a, some kind of program. Unfortunately, because I also started collecting social security, and also working, I am in kind of like a weird space where my income is too high but yet, my age and my disabled condition, my health condition qualify me, but I can't seem to get into any housing. I have put applications many, many places. I don't own a car; I

don't drive. So, I need to be near subway lines. But, I had applied year-over-year for the past almost eight years. I have not had BHA housing. In the meantime, the threshold seems to go higher and higher.

Also, since I'm collecting social security, my earned income has went higher than the cutoff. So, pretty soon they're going to penalize me for my social security income, which PO me big time. [Chuckles] You know? I know the whole country is suffering from this. So, I am like, if I quit working or work less to satisfy social security, the combined income would not allow me to meet the market rate income. I live in East Boston right now. I've been there for five years because I happen to have – be living in a two-bedroom place for \$1,100, which is very cheap and is overlooking the harbor. I have a beautiful scenic view, but is very old. The wind – winter winds, because of the harbor blows right in and chill my bones. It's on the third floor. And I hurt my knees three, four years ago, so I can't walk well. And this – I know I have to get out of the third floor situation.

So, because of this also I am afraid of knee replacement, you know. I'm like suck in a frying pan and a fire so to speak, whatever that saying is. I know I'm not the only one. I have a lot of people in this predicament. You know? So, do I have to reduce my income so low where I live, you know,

whatever, where people live and I can't imagine how. And as my years age – I have two daughters who are single, and I also help them out financially, you know, because they have their issues. And because of their financial situation, I am – in one of those – I am a renter. They are renter. Should something happen to me, say my knees buckle and I can't go to work, I'll be stuck. I can't go back to a third-floor apartment. You know? So, and I'm not the only one. There are a lot of people in my situation and it doesn't seem like any authority – whether it's municipal, state, or federal – are paying attention to this group of people who are falling through the crack. You know, we are not middle class. We are not, you know, immigrants. I am an immigrant; I've been here for 52 years. But you know, not recent arrival. So, it's – there seems to be no program and, for whatever reason, I don't seem to get call. And nowadays, because the threshold has went higher, I'm afraid that if there's a unit vacant and I want it, I would be disqualified for it because of income. You know? I'm barely making ends meet after taxes. I'm in the 30 – I'm single. I'm a divorced father. So, my tax record is 30 percent. I'm basically living on 70 percent of my earned income, but you take away all the fixed expenses, I have like 20 percent to play with! It's pretty crazy! It's a national problem.

So, I would like to like to appeal to the BHA board here to, you know, to consider these new developments that are out there for Boston citizens. You know. And luckily I'm in East Boston, and also you most likely know, East Boston rent is going up. Where I live on [Border Street 20:24], facing the ocean, they are just waiting for I think landlord to die so that someone can buy and build condos with a harbor view of Charleston. So I said, I'll sit it out. My landlord, luckily, is aware of my situation and he hasn't raised rent every year, you know, but I live in really impoverished situation. The house is like built at the turn of the century.

So that's what I'd like to put an appeal out. Thank you very much for listening.

Response: Thank you.

Budget

Comment: AP: On p. 3, there is a report on an audit finding (about weaknesses in internal controls on reporting). This says this is for the audit for the year ending March 31, 2018. If this was something that was flagged prior to November, 2018, then this strikes me as a FY 2019 issue and not a FY 2010 PHA Plan issue—but it may be that the audit results only came out after BHA

prepared the FY 2019 PHA Plan. Just worth checking.

Response: The material weakness was associated with the FY2018 audit. The issue was flagged in December of 2018 since that is when the FY2018 audit reports were due. In FY2018, there was significant staff turnover and a change in auditors which resulted in loss of historical knowledge and delays in the completion yearend transactions and reporting. These delays resulted in the audit finding. The FY2019 audit shows no findings.

Comment: S: This chart on pp. 24-25 reflects changes in financial resources. It would be very helpful to know what led to changes, i.e., where something changes just because a formula was updated to reflect inflation, etc., and where it was due to, for example, switching from public housing to a Section 8 or RAD funding stream. Thus, the public housing operating fund went from \$62 million to \$66 million, the Section 8 tenant-based number went from \$218 to \$223 million, and project-based Section 8 went from \$7.5 million to \$15 million. The chart also reflects that the CGP/DDTF funding decreased from \$12 million to \$6 million—this is likely because this is transitional funding meant to address the reduction in capital funding as units are removed from public housing, and only

continues for a 5-year period. Presumably as mixed finance redevelopment moves public housing units to RAD or Section 8 funded units, the DDTF funds may again increase for certain sites, and it would be good to know from BHA what the expected trends will be in the next 5 years and how BHA would intend to apply the DDTF funding. Total resources have increased by \$12 million (from \$366 million to \$378 million), but again, it would help to know whether this will be sustainable or reflects one-time sources that may not be replicable in future years.

Response: There was an increase in the proration percentage for public housing operating funds and capital funding which accounts for much of the difference in public housing. The increase in Section 8 is the result of an increase in vouchers associated with programs such as redevelopment tenant protection vouchers. Since our funding is based on an approved federal budget, it is difficult to know whether or not these increased subsidy percentages will continue in the next year.

DDTF funds are not applied any differently than the overall CFP grant funding. DDTF funds are an integral part of the CFP grant—a subset, in other words, of the entire CFP grant. BHA’s overall Capital Fund Program

annual grant. The total CFP grant is calculated based on the number of public housing units in the BHA’s federal portfolio during the year (on a site-by-site basis) times site-specific per-unit funding amounts. As BHA loses public housing units from our portfolio through demolition or disposition, HUD continues to provide CFP funding on those lost units for a period of five years. HUD indicates that this is “transitional” funding that will sunset after five years by identifying the portion of CFP in any given year that’s derived from lost units as the “DDTF” portion. We do expect the DDTF portion to increase and decrease from year to year based on demolition/disposition activity; the important thing, from a planning perspective, is that the capital funding is not affected by any specific demolition or disposition for a period of five years following the loss of any units.

Comment: S: Section 18: Conversion of Public Housing to Tenant Based Assistance: While BHA has not proposed changes here, it has also not updated the numbers, and it should do so. It should provide the current average operating cost and capital cost and total PUM from September 2019, rather than relying on the Section 2018 figure. It is likely that the outcome will be the same (conversion to Section 8

would be more expensive). See p. 80.

Response: The section has been updated.

Center for Community Engagement

Comment: The second thing is that the Resident Empowerment Coalition got reenergized this year and so that’s very important because there are a lot of task forces that need support. It can get difficult sometimes, even though residents are volunteering to help out in their community, sometimes it’s difficult to get elections done. Sometimes there are conflicts that arise that people need to figure those out. There are just a lot of different developments to have to administer, and not that many resources. So, we recognize it’s a challenge. I know that there’s a meeting I think slated for later this week at Groveland of, I think it’s the third meeting that the Resident Empowerment Coalition has since it restarted this fall. Hopefully that will work out. I know Bettie’s here from Commonwealth. They’ve had some issues at Commonwealth. I know I just got an email from Bellflower that said, “Gee! We have five people willing to serve on the board! Do we really have to go through the whole

election process?”

Unfortunately, I had to say yeah, I think, unfortunately, you do have to go through all those extra steps. So, I understand it’s a challenge, and I am very appreciative of the fact that the Authority has been looking at this and trying to make sure it works.

Response: Thank you. Resident Capacity staff and resident leaders have been working closely with local tenant organizations on compliance, training and elections and to re-energize the REC. See related response to an above comment.

Community Services

Comment: (LA) S: The chart on pp. 43-44 is similar in some respects to earlier charts on programs. I would note that here, the number of ROSS units increased (from 500 to 629), but earlier, the outcomes for ROSS were reduced, and it’s hard to reconcile those two. The numbers here on resident employment, while also reflecting an increase (from 97 to 129) don’t quite synch with the earlier chart, and so it would be helpful to explain those discrepancies. The chart on p. 45 on FSS expansion matches that in earlier discussion.

Response: The ROSS number reported last year was an estimate of participation. For this year we are reporting the actual number of families enrolled in our ROSS supported programs. The numbers have been provided by our Service Coordinators and Community Partners providing services at our five ROSS sites.

Designated Housing

Comment: (CCECR) S: As noted here, BHA last had a Designated Housing Plan (DHP) approved in June, 2015. This plan provided for BHA to set aside 80% of its elderly/disabled units for elders, and 20% for non-elderly disabled persons (wheelchair accessible units would be assigned to those requiring that feature regardless of age). BHA also established a pool of mitigation Section 8 vouchers to assist non-elderly disabled applicants who had to wait longer to be placed in elderly/disabled public housing due to the designation.

It should be noted that DHPs usually have a 5-year term, and must be extended or revised every 5 years. BHA will need to do this prior to the FY 2021 Annual Plan, and is likely to want to get this off early in the spring of 2020 so that HUD will have sufficient time to review

and act on the request before the current DHP lapses. The DHP submission is separate from the PHA Plan, and should include sufficient detail so that HUD and the public can see how the current plan is working and how it affects the various populations.

Response: Thank you for the comment. BHA staff are considering extending the Designated Housing Plan.

Comment: (also Lsd Hsg and RED) S: There are some revisions here (total decrease in affected units declined from 3394 to 3179—see p. 76), largely to reflect that certain units have been removed from the elderly/disabled public housing portfolio (Amory Street). It is likely that additional units will be removed between now and the end of 2020 (for example, J.J. Carroll is slated for demolition, disposition and rebuilding as a Section 8 site, and there are a few elderly/disabled sites on the active RAD and demolition/disposition list). While BHA has proposed continuing a similar DHP designation for units within such developments as they switch to Section 8/RAD, and has provided for preferences and points within the Section 8 Administrative Plan to accomplish this—see above and below—there are some questions about how this will work. In public housing, for

example, BHA has a process for “turning on” elder preference points at an elderly/disabled site while it is below the 80% elderly number, but then for turning off” those points when the development hits the 80% threshold so that non-elderly disabled applicants are admitted to maintain the 80-20 mix. See discussion on p. 77. To the best of my knowledge, there is no similar language in the Section 8 Admin Plan, and there should be so that the process can mirror that which has worked in elderly/disabled public housing. In addition, the endnote on p. 79 only refers to removal of units through RAD conversions, but it is quite possible that conversion may happen through the Section 18 demolition/disposition process without RAD (as was the case at Amory Street); the endnote should be revised to cover all possibilities for removal of a development from the elderly/disabled portfolio. In addition, as we noted in our comments on Amendment #2 to the FY 2019 PHA Plan, if there are such conversions, there should be no net loss of access for the non-elderly disabled, nor should there be any loss of wheelchair accessible units; in fact, as was proposed at J.J. Carroll, there should be efforts to increase the number of accessible units Authority and city-wide.

Response: BHA concurs that the intention is that there be no

net loss of access for the non-elderly disabled and no loss of wheelchair accessible units. The endnote will be revised to cover all possible removals from the public housing elderly/disabled portfolio (and not just RAD conversions).

Grievance Procedures

Comment: S: Subsection C, on pp. 34-35, lists management and maintenance policies. It would be helpful to include here the Mixed Finance Grievance Procedure (which applies to all replacement units in mixed finance sites) and the Mixed Finance Tenant Participation Memorandum of Agreement (which reflects the policies that mixed finance owners are committing to with residents in replacement units, consistent with BHA tenant participation requirements).

Response: BHA staff will take the comment under advisement.

Comment: (also Legal) S: Section 6: Grievance Procedure: As noted above, BHA has not made any changes here. However, in response to comments on Amendment #2 to the FY 2019 PHA Plan (which had to do with a number of mixed finance initiatives), BHA agreed that it intended to update this section

of the PHA Plan to incorporate the special Mixed Finance Grievance Procedure which has been adopted for all replacement units in mixed finance sites, whether they are public housing/RAD or not. In addition, while the text on p. 36 says that BHA is allowing residents the option of electing either a grievance panel or a hearing officer, it is not clear that BHA has yet implemented this change, which requires changing its standard forms so that residents are notified of these options, and establishing an implementation date. The text here in fact appears to be updated, so this may have been an oversight to not have checked this on page 1 or to have underlined the change.

Response: The BHA will implement the option of electing either a grievance panel or a hearing officer no later than June 1, 2020. With respect to the Mixed-Finance Grievance Procedure, no update is required, as it is already referenced in Section 6.

Comment: (also Legal) I’m only going to talk about some small stuff in what I was going to mention. One is sort of a lingering thing about grievance procedure. People may remember that a couple of years ago, Bill came to the Resident Advisory Board and spoke with them about difficulties that he thought that there was in recruiting people –

residents – to serve on the grievance panel. The residents didn't want to give up that hearing panel completely, and so the notion was going to be, well, let's have an option for people so that residents can select either that a hearing officer is going to hear their case, or the panel is going to hear their case. There was also going to be some simplification like dropping the second stage of the eviction appeals, which basically can go to court after that first stage that happens with the hearing panel or the hearing officer. Everyone agreed that that could happen, but it hasn't happened. I think it's been two years now since it was approved by HUD after the BHA came out with its modified proposal. It may be that BHA's no longer wanting to do it and wanting to change it and just retain things, but if not, it shouldn't just be that because the forms have to get changed, it doesn't happen. I know sometimes that's the reason why; you don't want to have to redo 15,000 leases, but for this one, you don't have to redo 15,000 leases. It's just a few forms that are in the grievance panel area.

Response: The BHA agrees that only a few changes are needed on the grievance request forms and regrets the delay in implementing the options for either a grievance panel or hearing officer. The

BHA will implement the option no later than June 1, 2020.

Human Resources:

Comment: (also Admin) S: BHA Organizational Chart

As in the past, this is the most interesting single page in the PHA Plan, but there should be some extended discussion of what it means and how it may change. 2019 was a year of big changes at the BHA. The BHA's Administrator for the prior 10 years, Bill McGonagle, retired (and unfortunately passed away in the fall). Kate Bennett became Acting Administrator. This chart provides for two individuals who are special assistants and advisors to the Administrator, but one of them is on leave, may be elected to the Boston City Council. There are vacancies in a number of positions (risk management, budget, resident services). The General Counsel's position is listed as "interim". The Center for Community Engagement and the Resident Capacity Program used to be one entity and there appear to be two lines of direction on this which do not intersect. It is likely that this chart has not completely "gelled" yet and it would be helpful to get feedback from BHA on this.

Response: The organization chart has been updated to reflect all concerns.

Language Access:

Comment: It would appear that there is significant utilization by Real Estate Development of the language access team, which makes a lot of sense given the various RAD/demo-dispo, etc., proposals and the need to be sure that materials and meetings are adequately translated. However, I don't think this is as spelled out in the summary of departments as it could be (and doesn't explain the volume). So it may make sense to do so.

Response: Thank you for the comment. BHA staff have updated the RED summary in the Four Factor Analysis.

Comment: It would also be helpful to say that private partners will be taking on this responsibility over time as sites convert—otherwise, it may be assumed that this would be an ongoing BHA responsibility. BHA has been trying to track what the policies/arrangements will be (such as knowing what LEP policy & practices are followed by the private partner) so that there is no reduction in access by limited English proficient applicants/households after conversion.

Response: Thank you for the comment. BHA staff have updated the RED summary in the Four Factor Analysis.

Leased Housing

Comment: S: Pages 6 through 10 refer to housing strategies, and the only change presented here is to add information about use of the Small Area Fair Market Rents (SAFMRs) as exception rents for zip codes where necessary to make communities accessible and affordable to voucher holders. This was a change which BHA adopted as Amendment #1 to the FY 2019 PHA Plan. We strongly support this change and hope that more Massachusetts communities utilize these options.

Response: Thank you for your comments.

Comment: S: There are no changes proposed in the system for screening or priority for public housing (pages 11 through 16). The only changes proposed for the BHA's Section 8 programs are found on p. 20 (and in the proposed amendments to the Section 8 Administrative Plan, discussed below), giving a priority for applicants who are residents of an expiring use property, converted to project-based rental assistance (PBRA),

located in the City of Boston, where the BHA administers the waiting list and refers eligible applicants for vacancies, as well as preference points for non-elderly disabled (NED) applicants at site which were formerly public housing, were part of a designated housing plan (DHP), and have converted to Section 8 Project Based Vouchers (PBV). The chart on p. 22 reflects 10 points for the NED applicants.

Response: Thank you for your comments.

Comment: S: Here again, the only change is on p. 29, to add language about use of the Small Area FMRs as an exception payment standard, and to reflect the fact that payment standards may be set anywhere from 90% of the SMSA to 100% of the SMSA depending on the current market rental data. HUD has recently updated the FMRs (and SAFMRs) as of October 1. BHA did updates in July, 2019 to reflect adoption of the SAFMR exception rent (and HUD's approval of higher SMSA FMRs as part of a successful rent appeal by BHA and other Massachusetts agencies). BHA should advise the RAB when it will be doing changes again and what the new figures will be (provide charts broken out by zip code).

It should be noted that HUD has issued a proposed regulation on

implementation of rent changes in the Housing Opportunity Through Modernization Act of 2016 (HOTMA), and comments are due back to HUD by mid-November, 2019. It's likely that HUD will not set an implementation date prior to January 1, 2021, but there are many aspects of the rule change which are likely to require PHA Plan, ACOP and Administrative Plan changes for both federal public housing and Section 8. The RAB should stay tuned for this discussion with the BHA in 2020.

Response: Thank you for your comments.

Comment: (also Ops, CCECR, and LA) S: The chart on pp. 32-33 is revised to reflect changes in number of families served and expected turnover for various programs. It's not clear why certain numbers are changing, and it would help to know the assumptions built in here. Thus, for example, the number of families served by public housing went from 8,404 to 10,852, but the number of public housing units has not increased (and in fact has decreased). The number of Section 8 vouchers has increased by 200, and the number of PBVs by 250 (from 1541 to 1791). It's not clear why there is no turnover listed for Section 8 mod rehab; while it might be expected that PBV turnover would be greater (because of the ability to access

tenant-based vouchers after a year's occupancy in good standing), it is likely that some families leave Section 8 mod rehab housing by attrition each year. It should be noted that Resident Services Programs has decreased by about 200 families; is this due to the removal of Amory Street from the portfolio? FSS numbers and turnover for Section 8 and family public housing have increased, reflecting that there will be graduation and new enrollments, which is great (see endnote on p. 34). The Section 3 resident employment figures are markedly higher (from 9 to 65), and it would be helpful to know to what to attribute this success, and if it's expected to continue in the next year. The ROSS numbers have decreased by 100 and Jobs Plus (which is exclusive to Charlestown) has increased by 90, and it would be helpful to have explanations for these changes/trends as well.

Response: The Center for Community Engagement and Civil Rights has applied for the Resident Opportunity and Self Sufficiency Program (ROSS) for the 2020-2023 period. If we get the grant, Charlestown will not be part of the program as the site is served by the Job Plus grant. Thus, the projected number of residents served for the 2020 year is expected to decrease. This; however, will allow us to programmatically focus more on the remaining

four sites (Alice Taylor, Franklin Field, Mildred Hailey, and Ruth Barkley). In addition, we have several community partners offering resident services at many of our family sites.

Turnover in Mod Rehab is expected to be about 75 units per year. That figure has been updated in the plan.

Comment: (also Ops and RED)
S: Section 10: Pets: No changes have been proposed here (pp. 60-62). I would note that if a development is switched to mixed finance, this should NOT change the rights of residents who were previously public housing tenants to have pets in accordance with the prior public housing rules, and this should be something that residents negotiate over as part of new policies. That being said, there may be issues about different treatment of future residents who may no longer have their rights derived from public housing. A number of developments have some problematic policies regarding "pet rent" being charged in addition to regular rent and whether this is permissible for Section 8 participants. In addition, not all owners are good about recognizing that service animals and emotional support animals should be exempt from such charges. This is an area where it would be useful for BHA Leased

Housing and others to develop clear guidance.

Response: BHA agrees that pet policies should be something that residents and new owners negotiate and, furthermore, that "pet rent" would be problematic.

Comment: S: Section 23: Project-Based Vouchers: BHA has updated this section (pp. 85-87) to provide current numbers on the number of project-based vouchers (PBVs) and expected utilization in FY 2020. BHA indicates that the 20% cap is 2951 units, and BHA expects that by the end of 2020, it would be at 2200 units. Moreover, BHA points out that redevelopment projects underway in 2020 and 2021 should be excluded from the 20% threshold as they result from public housing developments converted under RAD and HOTMA (replacement units not counted). The rest of this section includes language that BHA has long had about the factors for PBV site selection.

In the past, GBLS has requested that BHA and the City provide regular information about what was newly added to the portfolio through PBV. Obviously much of the PBV supply will be RAD or Section 18 conversion related—but it is likely that the City will still be reliant on BHA to assist with the development of new affordable housing sites outside of the

BHA's current portfolio. This information has not been provided in the past, and we would request again that the RAB and public be updated about what has been added.

Response: Thank you for your comment. The Leased Housing division is working towards making the PBV numbers and percentages related to the 20% threshold part of the regular internal monthly reporting. BHA staff are happy to engage in meetings with the RAB and with advocates to provide updates upon request.

Comment: Admin: There are a number of changes proposed to the Section 8 Administrative Plan; BHA is to be commended for providing both a summary and the actual pages in the Plan which would be changed.

3.3.6.a: This provides that if a tenant is in a PBV unit and is in "good standing" with the owner, the tenant may apply for Tenant Based Rental Assistance in accordance with the PBV regulations (24 C.F.R. § 983.261). There are three questions/thoughts here: (1) rather than just reference the regulation, anything that may be helpful to include from the regulation in the basic criteria should be added (for example, that generally PBV participants cannot seek the tenant-based assistance unless they have been in occupancy for 12 months or longer); (2) if the

tenant has gotten PBRA as opposed to PBV assistance in conjunction with RAD, there should also be provision for getting priority for tenant-based assistance, albeit at the end of the longer waiting period (2 years) applicable to RAD PBRA, and there should be Administrative Plan language covering this; and (3) since there is always some question about what "good standing" is, and particularly an owner's "good standing" policy may be different than the BHA's, there should be some cross-reference to an ascertainable standard. If, for example, the tenant has been behind on rent but is honoring repayment terms, or if there have been issues of compliance but they're likely to be addressed by relocation (for example, a new setting may have services that will enable compliance, or may not have the same community rules), the compliance issue should not be a barrier to issuing a relocation voucher.

Response: Thank you for your comment.

Comment: Admin: 3.3.6.b: This provides that if an expiring use development has been issued project-based assistance, is located within the City of Boston, and the BHA administers the waiting list and PBRA vacancies are filled from the BHA waiting list, residents at that site may seek tenant-based assistance, but only if

they have been in occupancy for 2 years or longer and are in good standing. It would help for the RAB to have some examples of this, and explain how it works. For example, it may be that a Section 13A development got such assistance. Existing residents at that site will get the benefit of the project-based rental subsidy (to avoid displacement) but will not have any ability to move with a voucher until 2 years thereafter. This would be similar to the rule for BHA's RAD PBRA, but it should be stressed that this category is not RAD-related. (If BHA also wants to include similar language for RAD Component 2 conversions, such as where a Section 8 Moderate Rehabilitation site converts to RAD, this should be added, as such Component 2 conversions are not necessarily "expiring use".) There is a similar issue here about "owner good standing" as in 3.3.6.a.

Response: Thank you for your comment. The BHA added this particular provision to continue to work with and gain benefit from expiring use development that convert to PBRA rather than PBV. PBRA owner's that want to use choice mobility must partner with a housing authority. BHA will provide choice mobility vouchers, but only if we can administer the waiting list for the site and refer applicants under the BHA priority structure. The intent is

to continue to serve BHA applicants even where we are not the subsidy administrator.

Comment: (also CCECR)
Admin: 3.3.7: This provides that non-elderly disabled (NED) applicants to waiting lists at sites that were previously public housing and were part of a Designated Housing Plan (DHP) and were converted to Project-Based Section 8 should be given an admissions preference. This is because they will have lost the ability to access the development through the public housing waiting list and would not qualify for a Mitigation Voucher (since there were no longer on the public housing waiting list). Examples here would include Amory Street and J.J. Carroll. As discussed in comments on the Supplement, above, there is a question about how this preference and the points assigned will work to insure a similar “mix” of 80% elderly, 20% non-elderly disabled, and BHA should have a system to turn on and off elder preference points at these sites similar to what it does in its federal elderly/disabled public housing portfolio to maintain that.

Response: Thank you for your comment. The BHA will maintain those percentages to the best of its ability as allowed by the Section 8 program through designation of units.

Comment: Admin: 3.3.9: These are the preference points for NED applicants—see discussion on 3.3.7 and the Supplement, above.

Response: Thank you for your comment

Comment: Admin: 7.2: BHA proposes to retitle this section “Voucher Term”. It’s fine to do that, but it should be clear that this Section covers more than simply the amount of time listed on the voucher.

Response: Thank you for your comment.

Comment: Admin: 7.2.4: The title of this subsection is “Voucher Suspension Policy”, and it may help to put the term “tolling” in the title. There is also a slightly different concept of suspension/freezes, and that should be discussed somewhere in the plan (and a distinction should be drawn between which section covers which issue). That has to do with situations where an individual can’t be expected to use Section 8 assistance for a period of time, but on the other hand is not simply being terminated from the program and must reapply for assistance. An example would be if someone had to be absent from an assisted unit for longer than the temporary absence” period—for example, they have a prolonged hospitalization, or have to seek extended

rehabilitation related to substance abuse or mental health issues. Such individuals are likely to need the assistance of the Section 8 program after treatment is completed, but if they are simply terminated, it will be years before they are reached on any waiting list. BHA has long had a policy of permitting “freezes” of such individuals (usually for a maximum period of 12 months, but this would be subject to individualized determination, consistent with reasonable accommodation requirements). HUD similarly provides that while PHAs must terminate assistance for an absence longer than authorized by the regulation, and may terminate after a shorter absence, they have the discretion to establish policies for such individuals to obtain continued assistance as may be appropriate. See 24 CFR § 982.312(e)(2). BHA can obviously condition any issuance of a new voucher for such persons on having available funding and on verifying that the household is qualified (for example, if the issue was recovery from substance abuse, that there are reasonable assurances that the family is no longer using illegal drugs or abusing alcohol).

The language that BHA has proposed to add to 7.2.4 on tolling, subsection (c), makes sense. It provides that if a reasonable accommodation request has been submitted,

this will also “stop the clock” on voucher expiration until the request has been acted upon. Sometimes the interactive process on reasonable accommodation requests may be drawn out, and it is neither the BHA’s nor the voucher holder’s interest to have the voucher “time out” in the interim.

Response: Thank you for your comment. Ultimately, suspensions, tolling, and freezes are three words for one action and all are covered under this section.

Comment: Admin: 7.2.5(5): Language on the extension of the voucher search term is revised so that if there is a change in the family composition that would affect the voucher size, BHA may extend the voucher. It may be, for example, that there is one or more minor added to the household due to birth, adoption, or court-awarded custody, or there is the addition of an adult to help an elderly or disabled person carry out the activities of daily living, and the original voucher size is no longer right. Or it could be that the family asks to remove a household member who was putting their tenancy or subsidy at risk, or one or more adults chose to vacate. I would suggest that the language be broad enough to cover situations which may be “up in the air” but which may not

ultimately result in a change in unit size (for example, the tenant has requested to add someone but the BHA ultimately says no, or it turns out that the family change will not ultimately affect the subsidy standard). This is because the uncertainty of the situation itself may affect the family’s ability to secure an appropriate unit, or may draw the process out. If in fact there is a changed unit size, I believe BHA’s past practice has been to issue a new voucher of the appropriate size for the normal full voucher term, rather use the original voucher length with extension and modification of the subsidy standard.

Response: Thank you for your comment. The BHA has not had a past practice of issuing a new voucher for the normal full voucher term. This change will allow the BHA to grant an extension when changes to family composition affect the voucher size.

Comment: Admin: 9.2.3: This would change the time period for initial inspection results to be valid for a maximum period of 120 days (as opposed to the prior 90 day period), and would allow the assisted lease to be effective as long as its start date was within that 120 day period; if it the start date was later that 120 days after the inspection, there would need to be a new passing inspection prior to the start date of the

HAP Contract. This change should be beneficial to the BHA, families, and prospective owners in providing a bit more flexibility where there was a recent passing inspection that can be used.

Response: Thank you for your comment.

Comment: Admin: 9.3: This revises the Administrative Plan to use the HOTMA flexibility of doing inspections every other year. Obviously if a Section 8 tenant has issues about an owner’s failure to make needed repairs, s/he may request interim inspections.

9.3.1: Since inspections no longer have to be annual, the term “routine” replaces “annual” for the periodic inspections required as a matter of course.

9.6: This replaces the term “Elevated Intervention Blood Lead Level” by striking the term “Intervention”, which is not the current terminology, and replacing EIBL with EBLL throughout the rest of the Administrative Plan.

Response: Thank you for your comment.

Comment: Admin: 11.9.1, 11.9.2, and 11.9.3: This language covers the situation where a household’s income is such that BHA is not providing any subsidy toward either the contract rent or tenant-paid

utilities. Under HUD regulations, once this occurs, there is a 6-month grace period. If the household's income or gross rent change during the 6 months (such as if the tenant has an income loss, relocates to a more expensive unit, or the owner is approved for a rent increase) such that any subsidy would be paid within the 6-month grace period, the family continues as a participant. If however there is no change during the 6-months, then at the end the tenant is removed from the Section 8 program, and must reapply to get Section 8 assistance in the future. BHA correctly points out that this is not "suspension of subsidy" (such there is no subsidy that would be paid), but is a suspension of the end of participation. The change in 11.9.3, clarifying that the 6 months runs from the effective date of the certification, is important. As provided elsewhere in the Administrative Plan, BHA normally will give a 30-day advance written notice of rent increase (or in this case, of zero subsidy status), but there can be times where the change is done with less notice or even retroactively (where the tenant did not timely report a change or failed to follow through on recertification steps in a timely manner).

As provided in Section 11.9.1, it is important that households be clearly informed in writing about what's happening, why, and

what they need to do during the 6-month period if they want to keep benefits and would qualify. In addition, since there can be mistakes (it may be that BHA erroneously thought it was a zero subsidy situation), both the initial notice of the start of the six month period, and the final notice at the end of the six month period should provide for the opportunity to request an informal hearing under 24 C.F.R. § 982.555.

The same rules contained here for the normal HCVP program do not apply, however, to certain types of public housing conversions, or where RAD is involved. See discussion in 17.7.1(e), below. As noted there, it would also make sense to have an exception for the Section 18 tenant protection voucher conversions, both within RAD/PBV "blend" properties and as an outright Section 18 conversion. BHA may want to include cross-reference language to alert staff to apply alternative rules in those settings.

Response: Thank you for your comments.

Comment: (also RED) Admin: 13.3.4: This language picks up language from the RAD notice that public housing tenants should not be denied the opportunity to become part of the Section 8 program because of outstanding debts, but instead such debt can be

converted into an enforceable repayment obligation and condition of participation in the Section 8 program, similar to what's provided for in Enterprise Income Verification (EIV) repayment agreements. If the balance is fully paid within the 90-day period before the conversion, then there would be no need to enter into a repayment agreement. This will help to promote the smooth flow of conversions and relocations that may be required in public housing redevelopment. It may be, for example, that BHA has not had any issue about "good standing" as the tenant is honoring a court or management repayment agreement, but it is unrealistic to expect that the remaining balance can be paid before the conversion or relocation. The repayment agreement protects both the tenant's and the BHA's interests.

There is some discrepancy here between the summary and the actual changed pages—the changed pages appear to preserve the 90-day and 60-day notice periods, but this language is deleted from the summary. There is value to having the advance notice periods to help resolve cases and to reduce the stress that may otherwise be involved with conversion and relocation.

It should be noted that there may be cases where the tenant disputes the liability (for

example, she believes that BHA miscalculated the rent, payments were made that were not credited by the BHA, or there would be offsets as a matter of state law that could be applied to fully satisfy or reduce the balance. If there is a dispute along those lines, it may be that the ultimate amount of debt and repayment terms will have to wait for a hearing or further informal resolution, but in the meantime the relocation and conversion process should continue with reservation of rights.

Response: Thank you for your comment. The time frames have been removed from the Administrative Plan, however there will still be a review in advance of the conversion and again after.

Comment: Admin: 14.3.7: This is in the summary, but not in the changed pages provided to the RAB, and would provide that there is only one required meeting per year with the FSS Coordinator, as opposed to two meetings. It is fine to reduce the administrative burden for all concerned; BHA would obviously have the right, in any given case, to set up more than one meeting within a year if needed.

Response: Thank you for your comment. BHA will change the plan to reflect what is stated in the summary.

Comment: (also RED all chapter 17 comments) Admin: Chapter 17: This is a brand new Chapter, and covers the Rental Assistance Demonstration (RAD). (BHA has redesignated what were Chapters 17 and 18 as Chapters 18 and 19 on both Revisions to the Payment Standard and Affordability Adjustments and the Glossary, but without any substantive changes). Here again, there are discrepancies between the summary provided and the changed pages, so it is not clear which one the RAB is supposed to refer to.

At 17.1, there is reference to the site selection standards in Chapter 16 (the PBV chapter), with exceptions as allowable under HOTMA. It would help to spell this out in English for the members of the RAB and the public, even if the language in the Administrative Plan isn't changed.

Response: Thank you for your comment.

Comment: Admin: 17.2.1 is the bar on rescreening or recertification of households. It may be helpful to set forth some content for this. For example, it may be that a household would normally have a recertification done around the time of the conversion—what happens then? Or the household may have notified BHA of some change that would normally

trigger an interim recertification (loss or increase of income, or change in household composition). It is also important that where there are conversions, the normal advance written notices of rent changes are given, and if there is a delay in processing a written notice that is internal to BHA (i.e., not related to the tenant's non-reporting or failure to cooperate with recertification), the tenant should not be adversely affected (for example, have to pay additional rent retroactively or with less than the usual notice period).

Response: Thank you for your comment.

Comment: Admin: 17.2.2 says that households are not to be underhoused. How is this to be addressed? Is the family to be transferred to an appropriately sized unit within the converting development prior to conversion? What if there is no unit of appropriate size?

Response: Yes, in this example, the under-housed family would be provided a transfer to an appropriate sized unit at the converting development. If one is not available, BHA would offer a transfer to another site.

Comment: Admin: 17.2.3: This provides that vacancies at turn over are to be filed in accordance with eligibility

requirements as set forth in Chapters 5 and 16. If this is so, why is there the need for this (since the sections are intended to describe exceptions to simply following Chapter 16)?

Response: Thank you for your comment.

Comment: Admin: 17.3 describes how Housing Quality Standards will be applied, including inspections and inspection approvals. As with the underhoused discussion above, what happens if a unit does in fact have health/safety violations at the time of conversion—what action is to be taken in advance of the conversion?

Response: BHA would undertake the needed upgrades pursuant to RAD or Section 18, both of which have different requirements for HQS and would transfer the current occupant household as needed.

Comment: Admin: 17.4 discusses that the initial rent is set by HUD, based on the amount of subsidy the project was receiving under the public housing program. It should be noted that this is a combination of both the Operating Subsidy and the Capital Fund combined into a per unit figure. In addition, this cap would only apply to the RAD units, and not the units within the development which were assigned tenant protection

vouchers (TPV) under the 75/25 RAD/TPV “blend” authorized in HUD’s RAD notice. 17.4.1 discusses the annual adjustments using the Operating Cost Adjustment Factor (OCAF) published by HUD.

Response: Thank you for your comment.

Comment: Admin: 17.5 references the right to return. It may be helpful to cross-reference what this means. There may be times where the tenant cannot return to the original unit because it was the wrong size, or it has features that are not required by the family (for example, the unit is wheelchair accessible, and this feature isn’t needed by the family, and there are others who do need that feature and unit size).

Response: Thank you for your comment. This references the tenant’s right to return to the property and not to a specific unit. Yes, a returning household would need to return to housing unit that meets its needs in terms of size and features.

Comment: Admin: 17.6 provides that RAD owners are eligible for units undergoing rehabilitation/construction. Presumably this may mean that a tenant is temporarily out of an apartment for a brief period during limited work, but that the assistance payments for that

unit are not abated. It may be helpful to provide more information about what this means.

Response: Yes, that’s right. This RAD provision exists because in most cases RAD conversions are carried out in the context of capital repair work that necessitates temporary vacancy of units.

Comment: Admin: 17.7.1 provides that at the time of conversion, the initial tenant share will be the TTP or flat rent at the time of conversion. It should be noted that “flat rent” is not a term that appears in the Section 8 Administrative Plan, but is unique to the public housing ACOP, and it may be helpful to cross-reference that (or include a definition). Moreover, it should be noted that ordinarily BHA public housing tenants have not paid utilities (they were included in rent), but the converted unit may have tenant paid utilities, and it is not clear how the utility allowances are determined and what role the residents may have in review and comment on the same. The public housing regulations on utilities, at 24 CFR Part 965, are different than those for Section 8. It may be that BHA will grandparent public housing residents to not have to pay utilities, which would avoid some tricky issues.

It would be noted that the Student Rule (referenced as

(c)) is blank and likely needs to be spelled out.

On the Earned Income Disregard (referenced as (d)), the eligibility criteria for this for the Section 8 program are different than for the public housing program (for Section 8, it is only provided to individuals with disabilities, whereas for federal public housing, it is available to all adults). Moreover, it should not depend on whether the person in fact is on the EID—often it can be discovered after the fact that a person should have been given the benefit of the EID but did not. Instead, if there was a qualifying event prior to the conversion, the person should be given the benefit of the EID for the balance left of the 24-month period from the qualifying event. The language here that the participant only receives one EID during the stay in assisted housing is accurate, but it should be noted that, at least for public housing, more than one individual in the household may qualify for the EID. Thus, let's say that 12 months prior to the conversion, the head of household gets employment after being on TAFDC—she would qualify for 12 remaining months of EID. Let's say that the tenant's oldest son is 20 and he gets a job after 12 months of unemployment 2 months prior to the conversion. He should qualify for 22 remaining months of EID.

As noted above at 11.9.1 through 11.9.3, the language at 17.7.1(e) is an exception to the usual 6-month “zero subsidy” rule. It's not clear, however, what the last sentence means—i.e., that normal PBV rules would then apply. Does this mean, for example, that if the household subsequently becomes over-income, the 6-month “zero subsidy rule would be applied? In addition, there may be questions whether, to be consistent, BHA should take the same approach for other former public housing tenants who convert to Section 18 tenant protection vouchers (i.e., that they too would not be subject to subsidy loss because of the 6 month rule, but would be treated in a manner similar to HUD PBRA).

Response: Thank you for your comment. The BHA has revised the Student Rule. The approach to utility payments will be considered closely in the context of each individual site and the financing resources available. That said, BHA recognizes that public housing residents do not currently pay utilities, and that any changes would need close thought and discussion with affected residents—as well as potential counseling in event that changes are made. In no event, however, would residents be asked to pay utilities without an appropriate offset (in the form of

a “utility allowance”) to their rent payments.

Comment: Admin: 17.8.1: This says that there can be a voucher inventory turnover cap if the total number of PBV units exceeds 20% of the BHA's authorized HCVP unit. As BHA says elsewhere in the Supplement, this is not likely to be the case, and in addition, replacement units under HOTMA shouldn't be counted against the cap. However, assuming the cap was reached, this says “BHA may limit the issuance of vouchers to three quarter of its turnover vouchers in any single year to residents of the covered projects.” I am not sure how this language should be interpreted, as it is a little convoluted, and it would be helpful to spell this out.

Response: Thank you for your comment. The BHA must submit HUD's PBV calculation worksheet with each new PBV contract notification. The worksheet calculates which PBV units are counted toward our cap and which are excluded. The worksheet also calculates the BHA's baseline number of units that the cap is calculated on e.g. the excluded units are neither in the baseline number nor the cap number.

Comment: Hello everyone. I'm grateful for the opportunity to speak. My name is David Minott and I live at 166 Terrace Street in Roxbury Crossing, the

Mission Hill neighborhood – the building otherwise known, now, as Oliver Lofts. I've been volunteering with CityLife for over three years now, to help end the displacement crisis for both tenants and homeowners. I was involved in the planning and execution of our Section 8 zip code meetings – by zip code – throughout the city, which we are continuing. It's been a cooperative effort with CityLife, BHA, and Metro Housing. They've been successful because we've had a lot of BHA and Metro Housing tenants sign up for education and for support, to learn their rights. In my building, I'm helping organize tenants – all tenants, not just Section 8 tenants – to make them fully aware of their rights and their legal resources.

To say a little bit about my own story... Part of what was helpful about working with CityLife for three years and learning about my rights was that I had received a 49percent rent increase from my corporate landlord, and that was approved by the BHA. Of course, they send you a letter; you check off "yes" or "no." I checked off "no" and sent it back. A lot of people are afraid to do that because they think, if they say no to the rent increase, they'll be evicted. In fact, my Building Manager had no clue. When I told her I was not going to sign off on this nearly-50percent rent increase, she sort of panicked right in front of me. She said, "Well,

[inaudible phrase 00:14:18]." She didn't even realize that only a judge can evict me. This is part of what I learned at CityLife, and what we teach others.

I learned about this, too, by volunteering through CityLife at Housing Court, every week on Thursdays – which, if any of you have been there, it's sort of like a scene out of a Dickens novel and there's a lot of suffering going on there. Our job, as we see it, is to make tenants aware of their rights so we can grind this unfair system to a halt. But, the whole idea is that, for instance, when I got the rent increase, it wasn't because I was making more; it was because the corporate landlord had decided that that's what the market would bear.

The point I wanted to make, quickly, today, is that market forces are blind, sort of like a serpent with no eyes, no brain, and no conscience; it just devours everything in its path. The corporate landlord, in this case, since their rich, they can demand a lot of the housing market, and of the market in general, while the poor can demand limiting this. Such commercialization and greediness takes no account of the differences in our respective economic status. It's not a level playing field, as you all know, so this whole system is inherently divisive. It has inequality built into it. If the

tenant and the BHA and the corporate landlord all started from the same point, from a level playing field, it might make sense, but it doesn't because we don't.

When these demands were made upon BHA and Metro Housing from the market, neither the tenant nor the BHA possessed the clout to fully fight it. The corporate landlords see it as their prerogative to demand x-amount from the BHA, from all the Housing Authorities, and from the tenants. Otherwise, corporate landlords don't really need us and, as I explained, they see us as a resource to exploit sometimes, or just an annoyance to be dispensed with. Reference my remark to Housing Court. In this inequitable economy, the low tenants, unlike the wealthy, are viewed as contributing little – a scant resource to the market – and, therefore, deserving of little in return. This has got to stop because we represent the new-world superpower, which is people power. This is the most effective tool to accomplish this worthy goal and to follow that path. So, working hand-in-hand with BHA and other Housing Authorities, we can do just that. My message to the Housing Authority would be to take your tenants' need as the measure for your actions and solve the problems that are presented by housing in Boston today. There is no other force. Thank you

very much for the opportunity to speak and take care.

Response: Thank you for your comment.

Comment: Good morning. My name is Judy Burnette and I'm a staff member at CityLife/VidaUrbana. I came here to read a statement from that organization.

Thank you for an opportunity to participate in the hearing, as you plan for the future of Section 8 tenants, as well as other tenants, in the City of Boston. As you may be aware, CityLife/VidaUrbana is an organization committed to housing justice for all. We provide legal and other services to renters and homeowners who need assistance in navigating the barriers which, through no fault of their own, hinder their ability to remain in their homes and communities. CityLife/VidaUrbana has had a successful, collaborative relationship with the Boston Housing Authority and with the Section 8 Tenants, Incorporated – that's S8TI – for several years. By sending out mass-mailings, the BHA has enabled CityLife/VidaUrbana to reach hundreds of Section 8 tenants in each zip code area of Boston. CityLife/VidaUrbana supports the BHA in its implementation of Small-Area Fair-Market Rents and we urge other housing agencies to also adopt Small-Area Fair-Market

Rents. We agree that fair-market rents are a significant factor in providing Section 8 voucher-holders with the support they need to ensure that their homes remain affordable.

We have attached a statement in support of Small-Area Fair-Market Rents from Section 8 tenants in the zip code and area of 02124, who attended a CityLife/VidaUrbana zip code meeting, during the public comment period, when Small-Area Fair-Market Rents was adopted as an amendment to BHA's FYI 2019 PHA Plan. This document still reflects our views. Despite the fair-market rents, Section 8 tenants continue to face a serious threat of displacement, as market rates soar above the payment standard in certain neighborhoods. Again, through our collaboration, the BHA does not always issue a voucher right away when a tenant declines to pay an increase above the 30percent of income. The BHA has been willing to give us time to fight no-fault evictions and keep the tenants in their homes. Through our collaboration with BHA, combined with the organizing actions of CityLife/VidaUrbana, some key real estate corporations have agreed to limit their rent increases to the payment standard, as adjusted by unit size and utility allowance.

As you move forward with the BHA 2020 Five-Year Plan, we urge you to consider a practice in which all Section 8 tenants are provided support whenever they must engage in a prolonged struggle because an unreasonable owner or landlord's rent increase becomes a pretextual cause for eviction. We must urge a practice in which tenants will not be penalized because owners will not accept reasonable repayment plans. And we urge you to accept a practice in which families whose family size or household income changes are given ample time to adjust or move. We would urge BHA workers to be flexible when it comes to changes in family size or how to respond to owners who won't accept a reasonable payment plan through RAB or otherwise. Finally, we would like the opportunity to work closely and cooperatively with Leasing Officers who deal with Section 8 tenants. We understand that Leasing Officers' jobs are hard, as the stress of some difficult landlord-tenant situations can boil over into interactions with the BHA. We want to help foster positive communications that help support residents and community stabilization in a changing environment.

Finally, our aim here today is to provide clarity. CL/VU fights displacement for both renters and homeowners. We have a long history of effectively

fighting no-fault evictions. Our method works and we believe it is a just alternative to tenant displacement. We wish to make sure that our method of fighting no-fault evictions is understood and that BHA workers understand that our method works and, again, is a just alternative to tenant displacement. Thank you.

Response: Thank you for your comment.

Comment: Hi, I'm Michelle Ewing, and I'm a Section 8 voucher holder. About a year-and-a-half ago, after 25 years of being in an apartment, in a six-unit building, my landlord sold it to a developer. Six months after they took over, they decided to jump the rent up to \$700. There were, like, four Section 8 holders in the building, two market. I was the only one out of the Section 8 holders that decided to say that, no, I wasn't going to agree to it. The problem became that they did a no-fault eviction. I started going to CityLife. What I realized is that I had a two-bedroom Section 8 because my kids had grown and moved out; everyone else had a three-bedroom, but we were all at the \$1500 market rent. So, when I had refused, at first, my leasing officer knew nothing about what to do. Eventually, he went to his supervisor and found out about CityLife. It became that they started working together. My only

problem with Boston Housing is the fact of the matter, that a lot of their Leasing Officers don't know about CityLife and they don't know what to do when you decide to reject, you know, the rent increase. It's like, you know, they just accept it. In the meantime, half the time, your apartment – they're not going to fix it and make it up-to-par of what they want for the rent. My thing is that working with CityLife became where it's at least I could realize what I could do and what I couldn't do. So, I ended up winning that; they maintained I stay a two-bedroom for the next couple years. But, in the meantime, I'm just wondering how is it that, if they're raising the rent, that Section 8 doesn't make them, you know, like, update your apartment. I've been there 25 years. I have the same cabinets that I've had for 20 years. I have wooden floors that are the same for 25 years. My thing is that, at some point, maybe CityLife and Section 8 could work this out. Thank you.

Response: Thank you for your comment.

Comment: Other transitions that are happening: we have the Small-Area Fair-Market Rents, as was mentioned earlier by the CityLife representatives. That's a big change for BHA to have gone into that experiment. They're actually the first major Housing Authority to have done that, nationwide, voluntarily.

Other Housing Authorities kind of got pushed into it because HUD said, "Hey, you're out of sync with your market." What we're hoping is that more people realize that this is going to create opportunities to be able to pay the kind of rents in all the communities around Boston, rather than people being forced into particular niches because they can't pay the rents that are in particular communities. So, this is really important. We're looking forward to seeing what the new payment standards will be, we assume, come January.

Response: Thank you for your comment.

Comment: Hi everybody. I ran for Boston City Council. I got one vote, so now I'm a real boy; I used to be a wooden one. I'm gay. That means three billion years of laughing at the worst. The issue is: anytime you're dealing with anybody that finds out your address, or the word "housing," – immediate discrimination, SROs. Any contract should not be locked in for a lifetime. We should go in, like anybody getting property, see all the options, talk with somebody – a consultant, not an Authority – and what's appropriate for the time. I moved into an SRO because I was kicked out for being openly gay and wanted my high school diploma. Thirteen years – still don't got it. Do you think I'm smart enough to get it the first

time? I am. SRO – it was nice while I was in school. Two years of community college – great; still haven't got there, but I'm locked in. It doesn't seem fair.

Let's do these transitional, until something better comes along. Everybody's watched This Old House at least once. He can move an entire house 200 miles. He can do it with Boston. He started with Massachusetts. Let's clean some stuff up; that's what gay people do. We make clutter. We clean things up. I'll take that stereotype.

My thing is, right now, I had to buy a \$25 camera because Hal Keen, my new Assistant Manager, thinks it's okay to ignore me, ignore my employee IRS number for my political designation, which has the word "officer" in it. It doesn't mean I'm going to arrest you. It means "don't do crazy, illegal stuff like entering people's homes in front of me, or doing something to every beautiful citizen here."

Housing – let's call it "American League" or something – gets immediate discrimination. It's been around since the '70s. I live on American soil. That means, if you're not doing everything for me, I get housed, constitutionally, equal to a member of Congress. Go visit Congresswoman Pressley's home in Dorchester; it's easy to get to. It's a good, American

home. If anybody violates your rights, you have the right, as a citizen, to contest State law and go to a Federal supreme review to get your Congresswoman Pressley-sized house. That's America. That's reality. The Constitution should not be so warped that you can't recognize it. The states have their needs. That's why State constitutional laws are important but, you know... Mass.gov – I have 11 years of case law. Case law's easy; you sit in a public court and you pay attention. Then, at school, you review how to approach it, but anybody can do it. Sit in a public civil, criminal, relationships – and, you know what? I can tell all of you can understand what's going on. Thank you. Um, come up with a new name for Housing, you know? It's like, come on. Everybody loves a good before-and-after. That's America. The minute I walk out of this building, there should be a body bag store for gay people. I saw 10 officers on an African American. I'm like, "Ten?" You know, come on. Have a great day. Thank you.

Response: Thank you.

Comment: Hi. My name is Rochelle Altidor. I'm from Lynn, Mass. I want to address a problem I had and, if you can provide more information for people – either in a program or in a handbook – it would be better to have them.

The first time, after I had my voucher, I spent four years in a house. I was happy to have the house. After that, I had a problem with the house. The house was cold. We had to boil water. We told Housing the problem. We went to the Board of Health for inspection – everything. Nothing worked and we had to move out. When we were looking for a house, we moved out because we don't have too much information about what to do. BHA told us we can give them 30 days. After 30 days, if we don't get the house, we can keep 30 days again. After 30 days, we said, "the house, we're already working on it to move in, and it's a nice house." We had children. There's no way the house will not pass inspection. If we have the inspection on the first, the second we can move in. This is how we thought it was. We moved out. We said, "We're going to move our stuff to the U-Haul. This night, we'll go to sleep and tomorrow, they will maybe call us to get in the house." This is all we knew; we didn't know much about it.

Then, after that, we became homeless, without a voucher in our hands, because we didn't know what to do. When we went, they talked to us and they said they can't do nothing. We should wait until they tell us what to do. We went to the Department of [inaudible phrase 00:53:07] if there was a shelter; we couldn't get shelter. After

that, we spent one month paying for a hotel for the children. After one month, they didn't want a family anymore and they asked us to leave. We can't find another house yet. It was hard for us. While we were moving, my son got burnt because we were warming water. All of this came together because we didn't have much information on what to do. If you can give people more information about it, or at least what to do, because sometimes there are rules and we didn't know more about it.

Response: Thank you for your comment.

Comment: Hi everyone. I've been a Section 8 mobile voucher holder for a very long time now. I had been losing – I had lost a battle to live in my private building that I had paid full rent for. So, I wanted to have a – I have a list of things here that I have found in my life – sorry, that's mine and it's [inaudible 22:20].

When I found a large apartment and I needed other tenants to split the rent, the nonprofit agencies called me because they wanted to pay for their non-citizen clients to have a place in my area to live for free. So, I'm a minority here in Brookline now, which is just across the street. Thirty-three to 34 percent Caucasian and yet, I get no priority preference points, no special drawing, and you know of course no accent,

so I don't have any privileges there either. I've lost the lottery several times now and I've been looking for a place that's like my home because I love my home. It's spacious. I don't pay for any of the utilities and I love my neighbors, and that's why I love private housing, because I like my neighbors and I wish not to move at all. But, our landlord has paid off the no-interest loan, which means we're being thrown out, against our will. One hundred and fifty of us do not want to leave. There's 300 people in the building.

I feel that the new private building owners are stealing the rights of others, including taxpayers. Owners have their no-interest loan, perks and privileges as they give less and less to the tenant. And of course, owners buy the land for very cheap and the buildings cheaper than any tenant could ever hope to purchase the land for. They intimidate and harass until they get the land for the price closest to what they want to pay, giving virtually nothing to the tenant. This is not fair. Why can't I use my Section 8 voucher to cover the taxes and utilities of my own apartment?

If I owned my own place, it would be cheaper for everyone involved, and I'd never have to move. Finally, getting rid of the dishonest and greedy bait-and-switch landlords by fining on punitive damages for skirting

the law. And then of course the trick recently with the RAB, I still find it discriminatory when some people take their own cars and other people take transportation to get there. And of course, you can't spend the stipend until you get there, wherever it is that you're going, for the conference that you're attending. I take the commuter rail, which takes much longer to get there. I got yelled at for buying breakfast or brunch with the per diem, which I thought was ridiculous. I don't think it's fair that I should have to wait to eat or drink something simply because I'm taking public transit to get to that conference that day.

And I resent having to fill out the forms of housing with docs of Google.com with my data. As you well know, that men get distinguished while women get old, so this is just wonderful. With my data, Google puts on the internet without my permission. Under the Freedom of Information Act, this does not include my personally-identifiable data, only aggregate data. When looking for an apartment, real estate agents and their owners are not honest on their websites. While others advertise with either the information missing or the real estate company changes their mind about what's included in the rent or who lives there. And again, this should be against the law. This is unfair because it says in writing, "After much search, what is included in the

rent,” and the company changes it without notice. Other times, information is missing. You call to – you call – you call to be lied to when they get back to you, and it’s always a different story. For example, “heat is included.” No, it’s not. When they say one thing and do another, this would be against the law to intentionally mislead the consumer and, at best, the consumer has a right to know what they are buying. Choose a utility and the real estate agent says one thing and does another because the owner knows he can get away with it.

Existing residents should be priority number one and we are not. Expiring use tenants have no priorities or preferences, they’re being forced to move out of their homes. We do not have top priority. And yet, we have no priority on wait lists either, to move.

Public Housing residents get moving fees to move out and back into their units while they’re being remodeled. But yet, Section 8 gets no money, no help with moving whatsoever. And I don’t drive, so as I get older, it’s becoming more and more of a challenge to actually move. You know, I really resent the competition. No more [inaudible 26:59] vouchers. I have too much competition for my new home in private housing already. As it is, I have no priority, no

preference, no special lottery. As a citizen and local resident, I cannot come first because it seems everyone else does, and that’s really a travesty of justice.

Residence should also be five years. This is my opinion and I’m sticking to it. I do not agree that having a parking space means that you are a local resident. What this means to me is that if I have an apartment with a parking space and I rent it out, then the person that I rent the parking spot could claim local resident? I don’t think so. This is why I disagree with the parking spot means you’re a local resident.

And lastly, you know, I understand that a lot of the programs are needed, but at the same time, I don’t need them, don’t want them, and you know...it’s really frustrating to me that, thanks to all of the programs, I am finding extremely difficult to find a place I wish to live. Affordability means rip-off the tenant and pay all utilities and get nothing for it, while the landlord buys the property on the cheap and threatens and harasses others, receives no-interest loan, other perks and privileges. I cannot get a doctor’s note for a place to live because I’m not crazy or in a wheelchair so therefore, this doctor refuses because she’s an honest person, which I shouldn’t have to get a doctor’s note to be able to live in private housing or other housing in my

metro area. So, to have to get a doctor’s note is absurd in the first place. First people have no reason and no need to live in the metro area, you know, just because they need hospitals. What they really mean is they need access to their drugs in all the cities because that’s where it is.

So...let’s see. Sorry. I lost my place. I’m almost done. So in closing, there are more one-bedrooms needed in the Brookline, Boston area, and perhaps Alston, too. No more small or micro apartments that tenants – or having tenants pay for all the utilities. No more one-bedrooms. I don’t know. There’s none like mine: Spacious. I love my walk-in closet. I don’t pay for any of the utilities and I have just what I need. Yeah, it’s spacious, it does have a walk-in closet, which I didn’t know what I was missing until I tried to move. And if you want to be on the list everywhere, especially your age, the census people have an attitude and are overzealous in which the personal data is sold by the workers who have no care for the law. It seems that HUD lets housing do whatever they want. Private housing can have functions and features that keep people up all night because they have no cares about the quality of life for those with less money than others who are paying market rent just to move.

Helicopters or major highways are put against mixed income or low-income buildings because I guess they have less clout for those people in those areas, or those managers. Managers renting to trouble, which is discriminatory against me because then I am thought to be the bad tenant. If you want to be listed everywhere... Wait. So it seems to me that HUD lets the housing do whatever they want, even private housing can have functions and features that keep people up all night. (Oh, I already read you that. Sorry.)

So, I really encourage you to have more stringent rules and, you know, that it's a violation of our quality of life in terms of the existing and the new tenants when we have to live either with noise or troubled tenants that shouldn't be there. So, more stringent rules required for tenants. Our quality of life, and the right to quiet enjoyment of our apartment with city amenities is our right, not a privileges. Also, safety is our right and not a privilege. Now it's sound-absorbent windows. So, I'm still looking for a truly mixed-income building. It seems they're not created anymore. Thank you.

Response: Thank you for your comment.

Comment: (also RED) Another thing has to do with a little tiny thing at Amory Street, but if we're running into it at Amory

Street, I'm sure we're going to run into it at other places that convert. And that is, the world of public housing and the world of Section 8 are a little different. So, sometimes the things that we've come to get used to in Section 8 world really seem really quite foreign when you're a Public Housing resident. So, just to take one example: Residents out there were getting their notices about landlords getting cited for HQS violations. Well in this case, the landlord was the building owner; The Community Builders. They would get these notices and then the form notice would have all the language in there that said, "And by the way, if you don't fix these conditions, tenant, your Section 8 can be terminated." It's like, all that scary language that's in the standard HQS notice. And leased housing's gotten used to it because sometimes, those notices do have the extra thing that the tenants need to take care of themselves within a certain period of time. And yes, they can lose their subsidies for that. But boy, did it cause a lot of concern [laughs] on residents at Amory Street! I know David Gleich was there at that meeting, heard that concern, meant to address it, but it's just one example of things that, as you move from public housing to Section 8, trying to make things seem sort of as seamless as possible, as less scary as possible, so that the

transitions can be as easy for people as possible.

Thank you for the opportunity to speak with you tonight.

Response: Thank you for your comment. We concur, and BHA commits to making any conversion as seamless and less scary as possible.

Comment: Sorry I was late. Okay. So I'm not recording faces but just the sound. Hi! Hello everybody. So, I'm a McCann. That doesn't just mean oatmeal. Doesn't mean 2,000 years of the wrong kind of royalty. It means responsibility. There's something in all of us... We got here because, I don't care how you're keeping time, your family to family to family made it possible that you're not pulling this in 2019. We all belong here. We're the best of everything up until now. I'm no different. My country didn't make me free. My planet didn't make me free. The universe did. I'm a part of everything and I try to make it better. If I have an issue or anything, I look at how I can do something to improve something before I ask you to do it. That's a responsibility. When I said I do politics, I think about it in my history, and all my family's history, the best and the worst examples. That's why I'm here.

Harriett Tubman is a movie, but she was a real person. She brought a lot of population to

this city and my fav – as an artist – my favorite is seeing photos of those freed slaves be put into brownstones, becoming doctors, becoming educated, changing their southern money for eastern money and becoming successful. Boston just isn't Massachusetts's city; it's America's city. What happens here changes the state, the country, on everything, not just housing. Everybody that comes here loves the history. You know? So, I would like housing to treat Boston in its tradition of dealing with the worst case scenario. People come here because they were tortured. People come here because of the worst situations in this country and around the world. I'm one of those. I've worked very hard to make my life better for a long time. If I can't do it, you know, people mistake me. I love making people laugh. I want a home where I can cook the state bird. I don't want to spend years on the same education, facing discrimination where my – you know – no one should face it. Most people are protected as a culture in this state. Abuse of contracts... Anytime liberty is violated, where you can progress and grow, that's the whole point of liberty. Our Constitution and some of the people interpreting from Boston, you know, they knew the word "evolution" without ever saying it. The first time it was said was almost Darwin. Our government is

evolution. You know, Massachusetts, progressively social, progressively responsible. These aren't cerebral cocktail conversations. Denmark looks to us. Scandinavia. We changed so many countries for same-sex marriage. You know, everything we do, you know... I look at myself and my actions. I fix what needs to be fixed and apology was hard when I was younger. Apology is action – love in action. Government is action that loves its people. You know? I made that – Benjamin Franklin. Trust me. I keep voting more about my favorites and, you know, shocking, you know...

I'm donating a painting to the LGBTQ homeless to send to Samuel Cambridge, the first liaison here, to raise money for whatever they want. We don't have an LGBTQ homeless shelter. We don't have somebody in housing going out and representing the languages, the culture shock to help them with the process. There's a lady losing her legs and her feet soon from an Asian country and there's not one person who hasn't been accounted for. The man that was blind at Prudential? I don't know what happened to him. Blind means that you get top of the list. My grandfather who raised me was blind. Top of the list. You know? Good manners are, everybody is your brother and sister or cousin. We're just

not going to leave the planet, but we're all family. You put all of us in a box, it's the same thing as putting us on top of the planet. There's nowhere to go. We're all related. We all come from royalty. We all come from, you know, revolution and good ideas and the best of all our families bring us here to 2019.

Kennedy, [inaudible phrase 45:10]. There are Amish people who don't believe that I talked to them. I've been to Nebraska; I talked to Amish people. I've talked to the people that visit here for medical. They're changing, too. Evolution is possible. Education is possible. Everybody. Me, too.

So you know, I ask: Be patient. I will be patient. I will be more patient. I am not a verbally abusive person. I'm an upset person because I kept doing the right thing over and over again, every day, and I want to cook turkey for my friends and toast Ben Franklin for having a sense of humor about the state bird. Thank you.

Response: Thank you for your comment.

Legal

Comment: S: On pp. 49-59 is the BHA's Violence Against Women Act (VAWA) Policy.

There was a decision from the Supreme Judicial Court in 2019 in a case involving the BHA and VAWA, and BHA may want to revise its policy to reflect what happened in that case. In *Boston Hous. Auth. v. Y.A.*, 482 Mass. 240 (2019), a public housing tenant was being evicted for repeated failure to comply with an agreement for judgment on repayment terms. However, at the time of the last court hearing on breach, the tenant had asserted that she was a survivor of domestic violence and her nonpayment stemmed from the abuser's control of her finances. On the eve of oral argument, the BHA agreed to give the tenant another chance to get into compliance, but the parties also agreed that it made sense for the Court to advise about how such matters should be addressed in the future. The Court made clear that if the BHA or a court becomes aware of domestic violence and a claimed connection with a lease violation, eviction should not proceed. It would be helpful to revise the VAWA policy to make clear that it is "never too late" to look at these issues.

Response: Thank you for the comment.

Occupancy

Comment: AP: Note on p. 1 of the Template that BHA is a Standard PHA, and according to this has a total of 10,852 federal public housing units (which likely includes any public housing units within HOPE VI sites) and 14,758 housing choice vouchers. If later parts of BHA's report uses different figures, there should be an explanation for any differences. On the second page, where it's summarized where there are changes and where there are not, this is not totally consistent with the Supplement (for example, the statement of Financial Resources was revised on the Supplement, but says here that it was unchanged). Under the New Activities, it is stated that BHA is proposing to change public housing to tenant-based assistance, but I don't think that is proposed anywhere (only changes to RAD or to Project Based Assistance). It is also stated that there will be changes in Capital Grant Programs, but there don't appear to be changes (just a report on obligation and expenditure of preexisting funds). BHA should ensure that what's reported here and in the Supplement is consistent.

Response: Staff have reviewed the plan documents to ensure consistency where applicable.

Comment: (also Lsd Hsg)S: The initial chart on p. 2, which provides numbers on the

number of families in various income and demographic categories in the area, and ranking of needs related to affordability, supply, quality, accessibility, overcrowdedness, size, and location, appears unchanged from last year.

The second chart, on pp. 3-4, has data on the waiting list for the Section 8 tenant based program, and does reflect some changes from last year—i.e., the number of families has increased from 503 to 1302, and annual turnover from 50 to 130. It would help to have some explanation about this, since BHA later says that the waiting list is closed for this program and has been for some time, so that does not explain why the waiting list and turnover would have increased. In addition, there has been a shift in the number of families with children on the waiting list (from 50% to 67.7%), and a decrease in the number of families with disabilities (from 46% to 25%). It would be helpful to have an explanation for this shift. As has been noted for some time, while whites, African Americans, and Hispanics are well represented on the Section 8 waiting lists, only 1% of the list is Asian, as opposed to 12% for public housing. This is a disparity which has been identified as a factor in the analysis of fair housing, and BHA was to convene a group to look at priorities/preferences and see if revisions were

needed. In addition, within the Section 8 program, there are really two waiting list pools—the project-based list for Mod Rehab and Project-Based Voucher units, which is open to Priority 1 applicants (and in a few instances of Elderly designated properties, other categories), and the tenant-based program, which by and large only issues vouchers for special purpose programs. Given the makeup of the Mod Rehab/PBV portfolio, it is likely that a large number of the households getting into that portfolio are single persons who are elderly or disabled (with some exceptions for former family public housing sites that are being redeveloped with Project-Based Vouchers); the families with children, on the other hand, are likely the special purpose vouchers, such as those related to the Leading the Way Home and Healthy Baby, Healthy Child program. It may in fact make sense for the RAB and the general public to have separate break-downs on the two aspects of the portfolio, since this will give a more realistic portrait of what housing availability is through the BHA's Leased Housing program.

Response: Thank you for the comment. The HUD template only accounts for the Section 8 Tenant-Based population excluding the many households housed with the Section 8 Project-Based and Moderate Rehabilitation programs, thus

not reflecting the total housed percentage of the Asian population.

Comment: S: The third chart, on p 5, has waiting list data for public housing, and there are few changes from the prior year, except for annual turnover (which reduces from 2300 to 1223). BHA should explain why this turnover number has decreased. It may be that because BHA is conducting a lot of relocation in connection with redevelopment, this means that there are fewer units available for assignment; it could also be that fewer tenants are leaving BHA public housing because there are very limited options in a hot real estate market for tenants to afford anything elsewhere, even if their economic circumstances have improved.

Response: Yes, you are correct. The large number of resident relocations required because of public housing redevelopment activities has resulted in fewer units available for new admissions as well as for transfers. This will continue in 2020. The BHA has also experienced a decrease in regular turnover.

Comment: S: The chart on p. 6, which reflects housing needs of families on the waiting list, shows that over half of applicants are looking for 1-BR units, and another 46% are looking for 2- and 3-BR units.

This is helpful to know in terms of planning for future housing. However, this does NOT reflect the needs of families who are already in public housing who may be in the wrong sized units, and need larger or smaller units. That data should also be captured by BHA and provided to the RAB and the public. Often households languish for years in overcrowded conditions in public housing because of the slow pace of transfer.

Response: As the BHA is reviewing the redevelopment of its properties it is also determining the appropriate bedroom sizes needed by the currently housed population.

Comment: There are issues that we've had around certain populations and BHA meeting some. There's a lot of challenge because there's a lot of relocation BHA is going to have to do as it's redeveloping sites. That means there are fewer units that might be available for people from the waiting list. At the same time, BHA's waiting lists are historically high at the moment. I know that we've mentioned, a few years now, that there's an issue about whether or not the Asian population is being reached as effectively with the Section 8 program and whether or not there needs to be a revisiting of what the Priority-One definition is that works for that.

One of the other things that was identified by BHA was what the bedroom sizes are that people need on the waiting list. One of the things that we've run into, in looking at this issue in Charlestown, is that BHA also needs to consider its existing stats on transfer needs. The stats only talk about the waiting list of the people that are applying to BHA housing, but they haven't added in the statistics about the houses that are already in BHA public housing that are wrong-sized, that, for example, they may have moved in originally, where it was a mom and one kid, and now it's a mom and it's four kids, but they're still in the same sized unit that they were in originally. It takes forever, as people know, to get transferred in the public housing system. We need to have some of that information so that, as BHA plans sites for the future, there's the right bedroom mix to meet what the future needs are. This can be a challenge because, as families move out, there is the Right to Return. We need to make sure that that gets balanced out properly, and it can become a challenge.

Response: Thank you for your comment. Please refer to the prior response.

Comment: The other question that was asked of me was, if a person wants to apply right now at the BHA for a particular development – for instance,

let's say Lenox – and you know that Lenox is undergoing this transformation, is that project off the list, as far as you can apply to them, because of their renovation status? This is a person that just wanted to put down Lenox, specifically, and I told her I'm not sure, because of the fact that they have to hold off all of these different apartments for renovating the buildings that are closed – if she can ask for Lenox at this point? Also, will it take longer on the waiting list for this site? Thank you.

Response: Good morning. My name is Gloria Meneses, Director of Occupancy and I oversee the waiting list. The Lenox waiting list is open and, whenever the BHA completes the renovation and the property's converted to project-based, anyone who's on the waiting list is converted, then, to the Lenox Street new waiting list. So, it is open until we're informed by the Administrator that we're no longer taking any new applications for public housing. Lenox is a family development, so it is Priority One applicants; anyone that's standard would not have qualified to be converted. We will look at each waiting list to determine if they qualify to remain on that list, based on priorities that they may have applied for.

Right now, there's a long waiting list for all of our

properties – public housing and project-based – because of the number of units that are available. We have over 48,000 active applicants on the waiting list, overall, for public housing and Section 8. On the Section 8, alone, it's over 16,000, and public housing is over 40,000 households.

Comment: (also Operations) I'm not real good at talking, but I did have some concerns. My name is Virginia Bias. I used to live in Charlestown and I moved out of Charlestown, I would say, like, three years ago. Now I live in JP. When I moved there, the apartment that I moved into, a month after I moved there, was full of mold. I think that housing needs to get a better – like, they need to check the apartments better. I have a two-month-old baby, a three-year-old boy, and a ten-year-old. The apartment was full of mold. I was in there for one month. My kids were getting sick. It was very, very terrible. Then they moved me to a different apartment, which is the apartment that I live on now. That apartment also has issues. Then, I put up for a transfer and they gave me the transfer, but they gave me a transfer to a place that I cannot go to, because I had a DV situation with somebody that lives there.

So, I think that they need to do a better checkup when it comes – when it comes to moving you around, I think that they need to

have better information so they can move you in the right places. I basically got an apartment – a transfer, which I rejected, because of the situation with the person that I was basically running from. They put me, and they gave me a transfer next to that person, three buildings down from that person’s house. So, to me, that tells me the people that work there – not all of them, but some – need a better training or knowledge of what’s going on with the people that they’re trying to help, just because they didn’t have the right information. So, I feel like they wasn’t really helping me.

I want to know: what do I do next? Because they tell you that, after you refuse an offer for an apartment, you have to wait a whole other year to be able to apply again.

Another thing – I’m going through it now. I live in JP, as I said. That apartment is – I have to say it – full of rats. Videos, pictures, I have it all. They go everywhere. I’m 36 years old and I’ve been living in Boston Housing since I was 19 by myself. I have never encountered that in any of the places. It terrifies me to be in there. My two kids – the two small ones, the three-year-old and the one that is two months – I cannot put her on the floor. I could not. It’s very disgusting. I didn’t even want to get up and say it. It’s disgusting. You see

them running, three or four of them behind each other, and it’s like, by the time you get a broom, they’re gone. It’s very disgusting. It’s very disappointing. It’s draining. I pay rent. I pay \$850 a month of rent and I live in a place that is inhumane; it’s disgusting.

Thank you.

Response: Gail Livingston/BHA: So, I think, after we’re finished, Ms. Meneses can have a conversation with you because she runs the Occupancy Department. You two can talk one-on-one.

On your way to Ms. Meneses, just give me your apartment number. We’ll share contact information and I’ll look into that situation for you, okay?

Operations

Comment: S: Section 20: Occupancy by Over-Income Families: BHA updated its ACOP last year to include an over-income policy, as required by federal law, and this includes an ACOP cross-reference (p. 82). It should be noted that HUD’s proposed HOTMA rulemaking also affects this in indicating what the rent is that should be charged to families that remain over-income, and BHA will need to update that

portion of the ACOP once HUD finalizes that rule.

Response: BHA has initiated its Over-Income Policy effective November 1, 2019. Letters were sent to all Federal program households on January 6, 2020 explaining the policy and how it will affect households that are or become over-income.

Comment: (also Lsd Hsg) S: No Smoking Policy: BHA has not proposed any changes, and this was the subject of extensive public review and comment a number of years ago, as well as a final HUD rule that became effective in January, 2017. See pp. 83-84. The sole comment which GBLS would repeat is that to the extent no smoking policies are adopted in any PBV sites, and tenants are unable to comply, this should not be regarded as something that would put them in bad standing for issuance of a tenant-based voucher, since tenants may be able to find housing in the private market where owners don’t have such restrictions, and relocation of such families may be beneficial to all concerned.

Response: BHA staff will take the comment under advisement.

Comment: (also Occ.) S: BHA only proposed one change in the ACOP—to provide that the Flat Rent Determinations are

done annually. This makes sense since in any given year, a family may want to switch to flat rent (or from flat rent to an income based rent). In addition, the flat rent figure changes each year because of the Congressional mandate that it change to be no lower than 80% of the Section 8 Fair Market Rent. So even though flat rent families do not need to do recertifications every year to get the benefit of the flat rent, the flat rent that they pay will change during those three years. In addition, the “over-income” rule means that BHA must determine whether the overall household income is over the “over-income” limit. In some ways this is similar to the “fixed income” option of triennial recertification provided in the proposed HOTMA regulation—while it will simplify the rent determination process for the family, there may very well be changes for the family over the three years (such as those changes resulting from use of a Cost of Living Adjustment (COLA) to Social Security or pension benefits.

Response: Thank you for the comment. We agree that this is important to make sure that residents are paying the correct rent that is most advantageous to them.

Public Safety

Comment: (also Ops) S: The sole change here is that BHA removed Mission Main and Lenox/Camden from the developments most affected (p. 48). It would be helpful to know why they were removed. While these sites are privately managed, this shouldn't affect the need for collaboration with police on crime prevention; several privately managed and mixed finance sites frequently meet with police to share data on crime prevention strategies.

Response: Mission Main as well as Lenox/Camden are privately managed, and they are both patrolled by private security companies who were hired by the private management company. These private security companies do not fall under the Chain of Command of the Boston Housing Police Department.

The Boston Housing Authority Police Department does work hand in hand with both the Boston Police Department, as well as all other Public Safety agencies with on-going investigations within these properties. This could include video footage (Lenox/Camden), as well as any and all knowledge that our officers have about said developments, and their residents.

The Boston Housing Authority Police Department/Department of Public Safety does receive

Public Safety Emergency Transfers for Lenox/Camden and does conduct the investigation, and will make a transfer recommendation.

The Boston Housing Authority Department of Public Safety Does quarterly request the “Crime Stats” for its properties and both Mission Main and Lenox/Camden are included in these stats. This ensures that we the Boston Housing Authority Department of Public Safety are aware of what is going on within these developments.

Comment: (also Operations) My comment is this: I'm in Commonwealth. I'm Betty Raye Wade and I live at Commonwealth Development. I've been there maybe 11, almost 12 years? My comment is this: I'm on a task force. I'm also a member of the RAB. One of the issues we have is, I have security and safety – safety measures. A few of the residents said to me, “We're not safe!” And I say, “Yes, we are safe.” So, I just want to know where do residents go, how do – how do I make residents feel safe with more than just words? Do I tell them to call the management? Do I tell them to call you, Gail? Do I tell them to call HUD? [Several laugh.] How do residents – I mean really, these are real people who are really fearful. How do you make people not so fearful, like... I just don't know

anymore. How do you make people really feel safe and want to come out? Because I don't see many people here, so people are feeling like there's nothing that they can say anymore that's going to make a difference. How do we get to people? I know we – without just speaking words. How do we get to their hearts?

Response: Those are pretty complicated questions!

It's true, and I don't have – I mean, we don't have to respond tonight, but how do we reach people? I don't know. We also ask you for help, like, how do we get people to come out and participate?

Safety is another very, very difficult issue. You know, the Boston Police Department is responsible for the safety of public housing residents, just like they are responsible for the safety of all other residents of the City of Boston. And, you know, the Housing Authority really can no longer provide police services. So, it's... [Laughs] I can't tell you anything more than that, really.

But of course, you know, the city – the Police Department has folks who will come out and talk to the residents about ways that they can make themselves feel safer, things that they can do, help people organize crime watch committees and some of that kind of thing because

sometimes, when people feel like they have a little more control over what's going on and they have more knowledge about how to protect themselves and others and things that they can do, then that makes them feel safer. So, there are – Boston Police have people who will come out and meet with your resident organizations and help you organize crime watch committees, or just come in and give people information about ways they can enhance their personal safety. Residents and or Task Forces should reach out to their BPD District Community Service Officer to see if there are any available programs/training. There have been times in the past when the Boston Police Department has offered specialized training (RAD-2013) for residents of the City of Boston, as well as the Civilian Police Academy.

Another thought is for managers and task forces to work together to provide important phone numbers to residents for their specific development, including: 911, BPD Tip Line (800) 494-8477, Main phone number for BPD District Station, BPD Community Service Officer phone number, Management's phone number and Maintenance (ERS) phone number.

RAD attachment

Comment: (all RED this section)
This attachment shows which developments have been or are being considered for conversion through the Rental Assistance Demonstration (RAD) program, as well as what particular HUD tenant protections must be provided. There are some thoughts/comments/questions on that attachment.

p.1, third paragraph: This mentions Replacement Housing Factor (RHF) funds. This is no longer the terminology HUD uses, and instead they are called Demolition/Disposition Transition Funding (DDTF). Immediately below this, BHA notes that there may be additional reduction of capital or operating funds because of the outstanding debt under the Capital Fund Financing Program (CFFP) and the Energy Performance Contract (EPD) and that BHA will be working with the bond trustee to address outstanding debt issues. BHA should report further to the RAB (perhaps as part of response to FY 2020 PHA Plan comments) on the results of those discussions with the bond trustee.

Response: The specific funding referenced here is in fact Replacement Housing Factor funding received by BHA over several years prior to HUD's transition to DDTF funding (in place of RHF funding). BHA is

using the RHF Funds accumulated from prior years' grants to carry out work associated with RAD units at Old Colony. BHA plans to use 100% of its RHF funds at Old Colony for work that is currently underway. With respect to the existing bond debt, BHA recently procured two bond underwriters to pursue refinancing options, and we are currently procuring legal counsel in anticipation of refinancing transactions. BHA will update the RAB as that work progresses.

Comment: pp. 2-14: BHA lists here 13 developments which have been or may be converted through RAD. There is missing information in the charts which should be supplemented:

- Except in the instances where the description says "all PBV", it is not clear what form of RAD will be used—PBV or PBRA. If all sites will be PBV, BHA can simply say this. If the answer may vary by site, the information should be provided for each. This can make a difference in tenant's rights and the procedures used (for example, where tenants recertify). After I drafted this, Joe Bamberg responded that at present, BHA is only doing PBRA at one site—Long Glen—although it is possible that for ones not yet firmly decided, they might do this, but the preference would be to use PBV. I have therefore included

some limited comments on PBRA below where it may be used as a BHA RAD option.

Response: Long-Glen is indeed the only site where BHA intends to pursue PBRA. The reason is because Long-Glen is unique. It is a property that was not originally part of the BHA's public housing portfolio, and the nature of supportive services available at the site make it important for the owner to retain management of the waiting list (which would happen under PBRA but not PBV). With all other public housing conversions, BHA will pursue PBV and not PBRA.

Comment: • At some developments, BHA explicitly provided that there might be a Section 18 demolition or disposition (St. Botolph, Bunte, Ausonia, Eva White, J. J. Carroll & Patricia White on pp. 4, 5, 6, 12, 13, and 14), but there were other sites where one would wonder if this was also possible (Lenox Street, on p. 3). BHA should review the chart to make sure that all sites where Section 18 conversion might be done are identified.

Response: Response: The tables in this RAD attachment are specifically meant to describe potential RAD conversions and any associated Section 18 "Blending" that might happen in the context of a RAD conversion. As a separate matter, for many sites BHA is

pursuing a non-RAD Section 18 path as an alternative to a RAD conversion. Those sites are reported under a separate section of the Annual Plan template. As BHA makes progress and secures approvals from HUD for one path or another, we will update the Annual Plan in future years. In the meantime, though, there are many sites that appear in both categories in the 2020 Plan.

Comment: • At Ausonia (p. 6), why is the closing date significantly later than other sites with a similar CHAP date?

Response: For capacity reasons—both BHA staff capacity and the availability of financial resources—we need to pace closing over many months and years. The need for low-income housing tax credits in particular (which are scarce competitive resources allocated by state government) may dictate the sequence of closings. To the extent that Ausonia (or any other site) may not rely on such resources, BHA will look to complete a closing as soon as possible

Comment: • At a few sites, there was no indication of a RAD/PBV 75/25 blend, and not sure why. See Anne M. Lynch Homes at Old Colony (p. 7), Long Glen (p. 8), Heritage (p. 9), Lower Mills (p. 10), and Mission Main (p. 11).

Response: HUD allows a RAD/PBV blend only under specific conditions. For example, the proposed financing plan must result in new investment (on a per-unit basis) that exceeds certain thresholds. Long-Glen, Heritage, Lower Mills and Mission Main have all had significant investment in recent years and would not meet the requirements for new investment. Anne M. Lynch Homes at Old Colony is in a different situation: There the majority of existing units have already received Section 18 Demolition approval from HUD, meaning that a 75/25 RAD blend is not needed.

Comment: • A few sites give expected closing dates in 2019—Long Glen (p. 8), Heritage (p. 9), and Lower Mills (p. 10). Can BHA include the actual closing dates in the FY 2020 Plan submission (since the final version will be sent to HUD prior to Jan. 15, 2020)?

Response: Due to unforeseen delays, these closings did not happen in 2019 and are unlikely to happen by 01/15/2020. BHA does expect them to happen within the first quarter of 2020.

Comment: p. 15: This is a summary of what specific HUD notice provisions will apply, and the applicable notice language is attached (and much appreciated). As noted above, the RAB and the public need to

know which form of RAD is being pursued (if it is too early in the planning process at a given site to know that, BHA can simply say that) to track which language to apply. In addition, going through the notices, there are a number of specific issues:

RAD Project Based Voucher (PBV) Comments

Under 1.6.C.3 of the 2019 RAD notice (p. 61), there is the possibility for either a 3-year or a 5-year phase in of rent increases resulting from the change in rent rules (from public housing to Section 8). BHA should state which one it has elected, and cross-reference the relevant Administrative Plan language.

Response: Thank you for your comment. The phase in provision can be found in section 17.7.1(1) of the Administrative Plan. The phase in period will be 3 (three) years.

Comment: Under 1.6.C.3 of the 2019 RAD notice (p. 62), it's noted that a similar phase in will be applied to non-RAD PBV units at the site to ensure uniformity of treatment. I am not sure that language to this effect was included in the Section 8 Administrative Plan, and it should be (and the cross-reference should be clear).

Response: Thank you for your comment. Please see section

17.7.1 of the Administrative Plan.

Comment: Under 1.6.C.4 of the 2019 RAD notice (p. 63), it's noted that the public housing and Section 8 FSS programs operate differently, and the pre-existing rules for public housing FSS will continue to apply to any public housing tenants converted to Section 8 assistance. I don't believe this is covered in the Section 8 Administrative Plan, and it should be (and there should be a clear cross-reference).

Response: Thank you for your comment. FSS participants at a converted project will continue to receive the benefits they are entitled to.

Comment: Under 1.6.C.6.a of the 2019 RAD notice (p. 64), there is reference to incorporating the federal public housing termination notice periods into the Section 8 tenancies. I believe this is already done through the Mixed Finance Grievance Procedure, which has set notice periods. It should be noted that where there is an overlay of HOME or Leading the Way Home funding, this may impose longer notice periods (30-day notice required in all case), but there would be no conflict since this would exceed the mandated minimum.

Response: BHA concurs.

Comment: Under 1.6.C.6.b of the 2019 RAD notice (p. 65), there is a discussion of the Grievance Procedure. Much of this is addressed in the Mixed Finance Grievance Procedure which was negotiated and approved in the summer of 2019. However, there is one provision here which is not contained in the Mixed Finance Grievance procedure—i.e., the obligation of the owner to notify tenants of grievance rights outside of 24 C.F.R. 982.555(a) which would be under 982.555(c). This is an area where HUD may have made an error, and this is worth following up with them. This is because there are no grievance rights under 982.555(c) other than in the instances addressed by 24 CFR 982.555(a)(1)(i-vi). It may be that all that HUD intended here was that the owner affirmatively notify tenants of grievance rights on matters not being addressed by the PHA (i.e., matters not having to do with rent/income, or PHA termination for alleged breach of family obligations).

Response: BHA concurs.

Comment: Under 1.6.C.7 of the 2019 RAD notice (p. 66), there is a discussion about continuing protections under the Earned Income Disregard (EID), where the federal public housing EID covers more individuals than the Section 8 EID. Similar to comments we're submitting to HUD on HOTMA, we would ask

that the grandparenting also extend to those who had a qualifying event under EID prior to the conversion. There may be cases where the BHA did not properly identify an individual as qualifying for the EID prior to the conversion, but where it is subsequently determined that the option should have been offered. We understand that BHA may not be free to change this on its own, and this may also be a comment to HUD on the RAD notice.

Response: BHA concurs.

Comment: Under 1.6.C.9 of the 2019 RAD notice (pp. 67-68), there is a waiver of the normal HUD rule on loss of the Section 8 if a family remains “over-income” for 6 months or longer, and this applies to both the RAD and non-RAD PBV units in a development. As noted in GBLS’ comments on the Section 8 Administrative Plan, the language BHA proposed in the Administrative Plan is not completely clear on this, as it makes it appear that this may be “one time” for the household, as opposed to a general grandparenting provision for such households. In addition, there should be double-checking the Administrative Plan draft to make sure this is clear for the non-RAD PBV units. There is additional discussion here about how non-grandparented tenants/units are treated, and BHA should review the

Administrative Plan to see if additional conforming language is needed.

Response: Thank you for your comment. Please see Section 17.7.1 in the Administrative Plan.

Comment: Under 1.6.C.10 of the 2019 RAD notice (pp. 68-69), if a family is in an underoccupied unit at the time of conversion, it may remain until an appropriate unit opens up in the development, and HUD has made clear that this language applies to both RAD and non-RAD PBV units. BHA should review the Administrative Plan to see if additional conforming language is needed. (The PBV Chapter in the Administrative Plan is largely designed for newly developed sites, and therefore may not address issues of existing occupants converting from a different program.)

Response: Thank you for your comment. Please see revisions at section 17.2 of the Administrative Plan.

Comment: Under 1.6.D.2 of the 2019 RAD notice (p. 69), there is discussion about making the operating budget available for PHA Board of Commissioners review. At the Boston HA, there is no Board of Commissioners under the BHA’s unique governance legislation. It may make sense for the Monitoring

Committee or the RAB to get this information.

Response: BHA concurs and would be happy to discuss this further with those groups.

Comment: Under 1.6.D.4 of the 2019 RAD notice (pp. 69-71), there is a discussion of transition of the waiting list from the public housing program to a PBV site-based waiting list, as well as other admissions issues. There should be some discussion in the Section 8 Administrative Plan about how this will occur, to the extent existing language is not sufficient.

Response: Thank you for your comment.

Comment: Under 1.6.D.8 of the 2019 RAD notice (pp. 72-73), there can be situations where there can be limits on the number of mobile vouchers issued for PBV participants if the agency has hit a voucher inventory turnover cap. BHA has included language about this in its Section 8 Administrative Plan—see GBLS’ comments on that, and the language in the HUD notice explains where the BHA is not required to provide more than ¾ of its turnover vouchers in any single year to the residents of covered projects. The Notice goes on to say that if PBV participants are turned down for mobility vouchers because of the cap, the PHA must create

and maintain a waiting list in the order in which it received requests. HUD notes that the alternative mobility policy is strictly limited to RAD and does not apply to PBVs entered into outside of the context of RAD. This additional language should also be incorporated into the Section 8 Administrative Plan.

Response: Thank you for your comment. The BHA maintains a waiting list for any PBV to TBV applicant who cannot be accommodated at the time of their mobility voucher request.

Comment: Under 1.6.D.10 of the 2019 RAD notice (p. 73), tenants’ rents at the time of conversion should by and large be left alone, even though transferred to the Section 8 reporting system, and rent changes should only be done at the first interim or annual recertification after the conversion. This policy will be applied to both RAD and non-RAD PBV units. GBLS has heard of some problems with this, and is not aware of language being incorporated into the Section 8 Administrative Plan, but may not have noticed this in the first read through.

Response: Thank you for your comment. Please see revisions at section 17.2 of the Administrative Plan.

Comment: RAD Project Based Rental Assistance (PBRA) Comments

Under 1.7.B.5 (p. 83), it should be noted that the tenant participation requirements for PBRA are not the traditional public housing arrangements found in 24 C.F.R. Part 964, but those contained in 24 C.F.R. Part 245 (HUD multifamily programs). This may change a number of elements in the BHA’s Mixed Finance Memorandum of Agreement on Tenant Participation, and so BHA should ensure a different approach at those sites, consistent with the RAD notice.

Response: BHA will look into such details.

Comment: Under 1.7.B.6 (pp. 84-85), there are both prescribed minimum termination notice periods and a grievance procedure. The notice periods are the same as for federal public housing; HUD multifamily housing regulations do not prescribe minimum periods, but the ones used here are fairly consistent with the existing practice (with the exception of G.L. c. 139, § 19 notices of annulment, which don’t provide any minimum period). All of these notice periods are already in the Mixed Finance Grievance Procedure. In addition, to the extent that any of the sites also get HOME or Leading the Way Home funding, there may be an overlay of the longer 30-day

notice period imposed by federal law and/or City affordability policy in all cases. However, one change would be necessary from the Mixed Finance Grievance Procedure for any RAD PBRA site—the PBRA notice requires the owner to provide all grievance hearings, rather than it being bifurcated between the subsidy provider (BHA) and the owner as to what particular issue is involved. Here again, if in a given case use of PBRA would dictate departing from the Mixed Finance Grievance Procedure, BHA should ensure consistency with the RAD notice.

Response: BHA will look into this in the context of Long-Glen.

Comment: As noted above under the PBV program, under Section 1.7.B.7 of the 2019 RAD notice (p. 85), there is grandparenting for the unused balance of the 2-year Earned Income Disregard (EID) period after conversion. However, it may be that the BHA did not properly identify a household as qualifying for the EID prior to conversion; the grandparenting protection should extend to anyone who had a qualifying event under the EID prior to conversion and within the 2-year window.

Response: Thank you for the comment.

Comment: Section 1.7.C.3 of the 2019 RAD notice (pp. 87-89) provides for the treatment of those on the waiting list at the time of conversion, and the practices that the owner and BHA should engage in to protect those applicants. It may be that this is not an issue at Long Glen if there is a pre-existing site-based list, but this is something that may need to be addressed.

Response: Long-Glen does have a site-based waiting list. (And as explained above, BHA does not expect to pursue PBRA conversions at any other sites.)

Comment: Section 1.7.C.9 of the 2019 RAD notice (pp. 91-92) provides that while there may be owner selection preferences for PBRA, there can be no designated housing per se (units set aside exclusively for the elderly or for non-elderly disabled). This is not likely to be an issue at Long Glen, which is a general occupancy (non-designated) site. However, if RAD PBRA were to be used at BHA elderly/disabled public housing sites in the future, this would come into play. Interestingly, there is no similar language about designation in the portion of the 2019 RAD notice about the PBV program. It is likely that this will not be an issue, since the way BHA's designated housing plan has worked (and would be carried

forward), there is no hard exclusion of particular units as “elderly only” or “non-elderly disabled only”, but instead selection preferences and points used in a manner to maintain a particular mix.

Response: BHA does not expect to carry out any PBRA conversions at elderly/disabled sites.

Real Estate Development

Comment: S: Section 8: Community Service and Self-Sufficiency: The only comment here is to the extent that mixed finance developments have public housing finding, private managers may not be familiar with community service obligations and what is acceptable in terms of showing compliance or exceptions from the rule. (It may be that mixed finance public housing units are exempt.)

Response: BHA agrees that private managers may need special support with respect to community service obligations. While BHA has advised mixed-finance sites in the past, this is no doubt a good topic to cover in the future in the Mixed-Finance Partners forum.

Comment: S: On pp. 63-64, BHA has added language taken from HUD's Rental Assistance Demonstration (RAD) revised notice to exclude certain things as substantial deviations: (1) the decision to convert to either Project-Based Rental Assistance (PBRA) or Project-Based Voucher (PBV); (2) changes to the Capital Fund budget to the extent that developments are removed from it as a result of RAD conversion; (3) changes to the construction and rehabilitation plan for each approved RAD conversion; and (4) changes to the financing structure for each approved RAD conversion.

While the above items may not be a "substantial deviation" requiring a PHA Plan amendment, I would recommend that the BHA notify the RAB when the RAD conversion process is completed for a particular site, and whether the site will be PBRA or PBV. This is important so that the RAB knows which developments are covered by what, and what the tenant expectations would be (for example, if it's a PBRA conversion, all recertification is done on site, and it is longer for the tenant to exercise mobility rights, versus if it is a PBV conversion, there may be recertification both at BHA's Leased Housing Division and at the site (for tax credit or other purposes), and mobility can be exercised within 12 months. In

addition, the removal of these changes from the PHA Plan amendment process do NOT change the fact that: (a) any RAD conversion proposal should be coming to the RAB and the local tenant organization in the first instance; and (b) that there should be extensive discussions and consultation between the BHA, residents, and any developer about all of the details of the conversion, including the use of capital funds, the rehabilitation plan and changes, and the type of project-based assistance, and that changes in those should be discussed with those residents with meaningful opportunities for feedback. In addition, even though HUD may not require sites that have gone through RAD to remain in the PHA Plan and RAB process, I assume that BHA and the RAB would like all such sites to continue to participate in the RAB and the Mixed Finance Residents Group so that there is a uniform approach on residents' rights and an effective forum for monitoring compliance with tenant protections.

Response: BHA concurs with all of these points and commits to exactly the sort of robust consultation with residents that is suggested.

Comment: S: There's nothing new here (p. 65). The HOPE VI which was Phase 2A of the Anne M. Lynch Homes at Old

Colony is completed, and the Whittier Street Choice Neighborhoods revitalization is underway. BHA may want to add a little content about how far along things are at Whittier Street and when work will be completed.

Response: The HOPE VI work at Old Colony (which covered all of Phase Two) was completed in 2015. The Whittier Choice program is about halfway complete with the recent completion and upcoming occupancy (January 2020) of the first phase of onsite redevelopment. The entire Whittier program will be completed by 2023.

Comment: S: This lists, on p. 66, sixteen (16) sites with some level of redevelopment: Whittier Street, Anne M. Lynch Homes at Old Colony (Phase 3), West Newton, Clippership, Amory, St. Botolph, Bunte Apts., Ausonia, Long-Glen, Eva White, Mission Main, Heritage, Lower Milles, Lenox Street, J.J. Carroll, and Patricia White. In addition, a number of these sites and others (Charlestown, McCormack, Hailey) have or will have demolition/disposition applications with HUD under 24 C.F.R. Part 970, as contained in the next part. It's not clear that there is any change to this Section from what was in Amendment 2 to the FY 2019 PHA Plan (BHA has not yet gotten word from HUD if that

amendment has been accepted).

Response: There have not been any changes in this section from what was included in Amendment 2 to the 2019 Plan. That amendment was approved by HUD on 11/21/19

Comment: S: This lists sixteen (16) sites where either demolition/disposition applications have been or will be submitted to HUD (pp. 67-75). Here again, much of this was contained in Amendment 2 to the FY 2019 PHA Plan. The changes that BHA has highlighted are: (a) at Old Colony, Phase 3A demolition of 115 units started March, 2019, Phase 3B demolition of 136 units starts December, 2019, and Phase 4 (remaining units) has a start date for demolition yet to be determined.; (b) Whittier is revised to clarify that demolition approval was granted for all phases in September, 2017, and disposition for Phase 1 in December, 2017, with actual demolition start moved back to January 2018; (c) at Amory Street, the actual disposition date was changed to 12/28/18, and the description was revised to reflect that BHA requested and received tenant protection vouchers that are BHA project-based at the property; (d) Clippership was revised to change the start date to June 2019 and a projected end date of late 2020; (e) West

Newton/Rutland/E. Springfield description was revised to reflect that 36 units were converted to PBVs in Feb. 2019 at the time of RAD conversion of 110 units; (f) at Hailey, there is a projected demo/dispo application for an unclear date, but not 2019; (g) at McCormack, there is a project application date of “2019 or 2020”, and it spells out that there is a replacement of all 1016 existing public housing units on a one-for-one basis, and that the total number of units is “over 3000” (rather than just “3000”); (h) at Lenox, there is an indication of a projected submission date of late 2019; (i) at J.J. Carroll, there is a projected submission date of late 2019.

Response: BHA concurs with these points.

Comment: In addition to the typo identified above, the Charlestown description seems wrong, as it only refers to disposition, and not to demolition. Currently there is planning (subject to obtaining necessary approvals) to begin Phase IA relocation and demolition in late 2020. This also says “Projected start date of activity” as 2019, and depending on what “activity” is involved, this likely needs to be shifted to 2020.

Response: Although this may not be a meaningful distinction, the Section 18

Demolition/Disposition request for Charlestown was categorized as disposition (rather than demolition) because BHA does not intend to use capital housing funds to carry out the demolition. That said, the plan to demolish the existing buildings was clearly explained in the BHA’s request (and is reflected in HUD’s approval). With respect to the “projected start date” it is true that relocation will not begin until 2020; arguably, however, the formal relocation process dates to issuance of the “Letter of Assurance” by BHA, the developer and the Charlestown Resident Alliance (local tenants’ organization) which occurred in 2019.

Comment: Since there will be a number of demolition/disposition applications which could be submitted between now and the end of 2019, the RAB (and GBLS as technical adviser to the RAB) should get the full applications as they are available so there can be meaningful comment. It may be difficult to do the level of detailed analysis on this at the same time as the PHA Plan is being assessed. BHA should also insure that as additional demolition/disposition applications are prepared, they are promptly forwarded to the RAB and GBLS for review and comment, with information provided about when feedback is needed.

Response: BHA commits to providing draft applications to the RAB and GBLS, as has been done in the past.

Comment: S: Other Capital Grant Programs: This refers on pp. 89-90 to various past capital grants, reaching back to 2012. It shows that funds were fully obligated (and partially expended), largely for Phase 3 at Old Colony (and in part for Washington Beech Phase 2). This refers solely to this as Replacement Housing Factor (RHF) grants. However, as noted above in Section 3, the DDTF (demolition/disposition transitional funding) replaced the RHF a number of years ago, so BHA should utilize that term here as well. BHA should include that these figures match those other figures. To the extent that this section needs to be updated to cover periods after FFY 2017, it should do so.

Response: As explained above, the funding presented in this section is specifically Replacement Housing Factor funding accumulated by BHA over the years prior to HUD's transition to DDTF. There will not be any future RHF funding. (DDTF funding will continue; however DDTF funds are merely an integral part of the annual CFP grants, and not their own stand-alone grants in the way RHF used to be.)

Comment: Hello. My name is Steven Tracy. I'm a member of

the BHA RAB – Resident Advisory Board. Five years ago, the then newly-elected Mayor of Boston got elected to help solve housing crises in the City of Boston. The current five-year plan seems to reflect that the crisis still exists. At the time, community mixed-income development was the way to go. Today, a RAD – or Rental Assistance Demonstration – is becoming the savior of stable funding of low-income housing. Being a project-based Section 8 voucher holder, I am saddened because the mixed-income solution would likely be the best for Boston's inhabitants. However, the reality beckons. The augmented reality of swimming pools, restaurants, shops, and in-house medical care, as seen on the media, is not for low-income elderly of Boston. Hopefully, low-cost robots to administer care is not also.

Response: RAD is specifically a tool to preserve public housing. While it may be possible to use RAD in a broader mixed-income strategy, the emphasis is on preserving existing subsidized housing.

Comment: (also Grievance) In addition, there has been \$30 million in city funding that's been devoted for Charlestown, which is a new development for this year. BHA is moving forward with its private developer partners and with the Resident Alliance in

Charlestown over a major redevelopment of over 1,000 units of public housing that are located there, with groundbreaking expected to happen in the fall of 2020. This is new, it's huge, and it's the first in what we expect will be a wave of similar conversions that are happening. Mary Ellen McCormack is of similar size. It's a little bit slower in the pipeline but, similarly, there are similar expectations around that.

Obviously, at the same time, we've been talking about RAD and Section 18 conversions at a variety of sites, where we'll supply the kind of money that isn't available through Public Housing Operating Subsidy and through the Capital Fund. So, to you, Section 8 funding, particularly, has been a boon to have that kind of funding come in. At the same time, though, people are very nervous about losing the key tenant protections that have existed in public housing, and wanting to make sure that all of that remains in place.

Another transition thing that BHA did this year was they did a Mixed-Finance Grievance Procedure to make sure that, regardless of whether or not somebody's unit is called "public housing" or called "project-based voucher" or was under the RAD program or whatever – that people will end up having the same set of procedural rights, have the Grievance Procedure available

to them. Where there are disputes happening with their landlord, we'll have a hearing process available; with leased housing, where their issues are with the Leased Housing Department. And, as BHA's had for a while, similar to Participation Rights, so there are Memorandums of Agreement with the private owners.

I think, a week from now, we're due to have another one of our quarterly meetings of the Mixed-Finance Residents Group, which brings together our Resident Leaders, BHA staff, and the private partners that are doing redevelopments at a variety of sites. We only expect those meetings to continue to grow, as more sites go that way but, again, it's really important to make sure that everyone's following through on the kinds of basic protections that are there.

Response: BHA is committed to preserving key public housing tenant protections as housing communities transition to different programs; and we concur that the Mixed-Finance Partners forum will only grow in importance as more sites go through conversions and redevelopment.

Comment: My name's Janis McQuarrie. I'm a resident at Lenox Camden. I'm also a Resident Advisory Board Member for the BHA. I live in a development that is being

renovated. A lot of the people that are moving to different apartments wanted to know if they can request to return to the same unit, as well as the same development, after renovation is over, or if it's just the same development.

Response: Hi everybody. I'm Joe Bamberg, Director of Planning and Development for BHA. I think it's absolutely fine for someone to make a request and we will keep track of that but I think it's impossible for BHA to make any promises. What we need to do – what we have to keep front and center, at all costs – is to make sure that people are placed back into newly-renovated apartments that match their needs, and that's not always the case with the apartments that some folks live in right now. I think the plan for Lenox, much as it has been at Camden, is to carry out the renovations, entryway-by-entryway. Families, households will end up sort of sticking together with their neighbors that are closest to them, as they go through the process, and there is a good chance that a family could return to the same apartment. I just can't promise it.

Comment: I live in Charlestown and I would like to ask, because I have missed the bigger part of this meeting, what is going on with Charlestown. There is nothing going to happen in the next, let's say, year or two

years? I would like to know because I'm currently in a situation. I do have a current Section 8 voucher but, from what I have seen so far – I am a single person, with no dependents, on a fixed income. From what I have seen so far in Boston, I'm at a loss, because it is extremely hard to find an apartment which would match requirements. Therefore, I'm not sure. I probably will have to stay in Charlestown. I'm living in difficult conditions; I have to say that.

I just have to make a remark of that, because I have been the subject of harassment, just like the previous gentleman, for whatever reason he was – for another reason. I do not know why I'm so hated so much. I have been the subject of harassment, and there is another circumstance. The matter is that I was born and accustomed to housing conditions – I come from the former Soviet Union. I know it sounds funny, because the country was disintegrated 30-plus years ago, but I still say it, because it still is in my Soviet passport; it's the official name of the country that I came to America from. So, in the Soviet Union, I was born and accustomed to housing conditions which provided five-times better soundproofing than what I experience right now. What I mean is that solid concrete walls block sound five times better than plasterboard or drywall, as they call it in the

US. My conditions were just unbelievable. What I'm doing – I'm simply soundproofing my apartment from all the sides, which is difficult, having a fixed income. But, being a well-educated person, I'm doing just that.

I would like to know what is going on in Charlestown, because I would like to know...

I have been living in Charlestown for five-plus years and I'm simply taking measures to isolate this harassment. I would like to know what to plan for, because I'm recuperating after a rather difficult period of my life. I planned for better change in my life, and I would like to go forward and I would like to know what is going on in Charlestown. Right now, what do you plan? Could you, honestly, please tell me? I am taking care of the situation, but I also would like to please know what is going on. Of course, I will apply for other housing as well. But, from what I have seen with Section 8, it doesn't look very promising to me, personally.

Response: I'll speak with you after, because I want to get some information about your current situation so I can speak with the management at Charlestown. [Also from Joe Bamberg:] I'm happy to speak with you, individually, as well – as others have said today, Charlestown is a large site. It's over 1,000 apartment units. The BHA is working through a

plan to redevelop the site. As recently as the week before Thanksgiving – so, a couple of weeks ago – we, in conjunction with the Charlestown Resident Alliance – that's the task force at Charlestown – held a meeting at the site. We will continue to hold those meetings.

Very briefly, the redevelopment plans are going forward. The Housing Authority has procured, at this point, a team to help us with relocation.

So, part of the question is, are we still at a frozen point? I would say no. The next step is permitting. A large redevelopment requires approval through City agencies – land-use approvals, building permits, that sort of thing – and we are making plans to try to secure those approvals within the next six to nine months, with an aim of actually starting before the end of next year. We can talk about specifics on phasing, as BHA has been doing with residents, generally, at Charlestown. We will continue to do that. I'm confident that you'll see actual activity within the next year.

I'll be sure to have someone from that team be in touch with you. Let's certainly talk.