

Comments and Responses to the BHA FY 2018 Annual Plan.

The following document contains the comments and responses received on the BHA's FY 2018 Annual Plan. BHA staff met with the Resident Advisory Board from September through December discussing the Plan process and documents and sent copies of the Plan to the RAB and Local Tenant Organizations. The Plan was put out for public comment on November 1, 2017 and the comment period closed on December 15, 2017 with a public hearing held December 11, 2017 at the Boston Public Library Copley Square Branch at 11 am and another at Boston City Hall at 6 pm.

The BHA took several steps to notify the public of the FY 2018 Annual Plan and the opportunity to comment. The BHA placed an advertisement in the Boston Globe, included a notice with the rent statement of public housing residents, sent a mailing to 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](http://www.bostonhousing.org).

## **Administration**

Comment: (also Lsd Hsg & 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 organization of its kind in New England, providing not only food, clothing, and shelter, but also day and night-time street-based outreach, access to health care and literacy classes, job training, affordable housing and other critical resources for more than 1,900 men and women each day and night at its 41 locations throughout Metropolitan Boston.

Pine Street Inn has been successfully serving homeless individuals with a myriad of disabilities and difficulties for over four 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 nearly 1,000 units of permanent supportive housing in the portfolio, PSI serves as a prominent provider in Boston's homeless services Continuum of Care.

PSI is pleased the Boston Housing Authority FY2018 Annual Plan includes elements that specifically address homelessness. The BHA's planned inclusion of targeting assistance to families and individuals who participate through Boston's Leading the Way Home, Moving On for the City of Boston, Rapid Rehousing Program, and City of Boston Coordinated Access System Referral is particularly encouraging, and supports a comprehensive Citywide strategy to end homelessness.

Similarly, the Homeless Service Organization Preference provides a seamless path for our most vulnerable citizens and allows those most in need to obtain housing through site-based wait lists, in locations where the specific supportive services needed are readily available. This innovative practice has streamlined processes and reduced the length of emergency shelter stays.

One of the most promising tools to retain affordability is the conversion of tenant-based assistance to project-based units. This process will assure that market fluctuations do not affect affordable units in a tight rental economy. PSI currently operates over 40 BHA project-based units located throughout the neighborhoods of Boston, and concurs that this conversion will encourage new construction and rehabilitation.

Pine Street Inn is grateful for and appreciative of our ongoing collaboration with the Boston Housing Authority. We applaud the efforts of the staff and residents of the BHA who diligently created a plan that is fair, progressive, and designed to increase affordable housing and decrease homelessness. 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 these comments and for the continued strong partnership between PSI and BHA. We value this work together and will continue to maximize the use of project-basing vouchers per your suggestion.

Comment: (also RED) There was some discussion about what the ramifications would be of the pending tax bill on public housing redevelopment. Back in 2013, during sequestration, BHA had to take many cost-saving steps to remain within its Section 8 budget, and had contingency plans about which families might be removed from the Section 8 program if there was insufficiency funding. It was noted that the tax credit program was a big incentive for developers, and it was one of the best levers to help create or preserve affordable housing—it would be terrible if this tool was lost. There was discussion about organizing and needing to stand up, speak up, go to Washington by bus, with T-shirts, and make sure that leaders know public housing & Section 8 residents as people, not just statistics—proud to say who you are.

Response: The impacts of the recent tax reform legislation are still being evaluated by the affordable housing community nationally, by advocates locally, and by the BHA.

Comment: (also Public Safety) Concetta mentioned the recent shooting at Mary Ellen McCormack. It was noted that there's a gap in funding for BHA public safety. During the Menino administration, there was a handshake on revenue from a city parking garage used to help plug this gap. This is no

longer feasible. There was a discussion with the Walsh administration about redevelopment in that area which might cast a shadow on the Common, but which could help create affordable housing (and also help cover these public safety costs).—\$20 million for the BHA, and a majority of RAB members wrote a letter supporting this proposal. However, it's not clear where things stand on this. People thought this was an important topic to flag for the public hearing, and that it might be good to ask for a public hearing from the Boston City Council on this issue (both the funding support for the BHA and the public safety needs). John cross referenced p. 9 of the 5-Year Progress Report, which talks about the operating deficits with unfunded public safety costs.

Response: The Winthrop Garage proceeds noted above have not yet been collected by the City and the timing is unclear. The City has committed \$25 million to redevelopment efforts at Old Colony and \$10 million to redevelopment efforts at Orient Heights. In 2017, the City provided \$4 million to BHA to help fund public safety, including both BHA police and public safety officers at Elderly/Disabled sites. The BHA has requested this funding again for 2018.

Comment: The Progress Report focuses a lot on the challenges facing the BHA with long term funding/commitment for public housing and Section 8. The RAB may want to talk with BHA and community partners about having a symposium on this in the new year, talking about how reserves work, and discussing best strategies.

Response: The BHA is supportive of this idea and would help to plan and implement such a symposium if there is sufficient interest on the part of the RAB.

Comment: Hi. My name is Joan. I'm actually a recent resident in Boston, in a Boston Housing Authority apartment complex down in Dorchester. So, all of this is pretty new to me. I didn't even know there was a plan. I'm somewhat grateful there is a plan; I haven't seen the plan. It's just been – for myself – a little bit chaotic, moving into an apartment during the summer. Waited four months for screens to be put in, for other repairs to be done, which is not particularly what you want. So, on a very particular level, there's been some issues with the place that I'm living in. But I think in general, I see a city that I'm getting the sense is leaving actual public housing kind of withering on the vine. There's more and more talk over the past few years about affordable housing, however, I don't think

apartments that are renting for \$3 or \$4,000 are “affordable” for a good chunk of the population in the Boston area.

I also don't think that developers who are looking to build in this city, who are putting up one luxury high-rise after another are paying their share and assuming their burden of running the city in a responsible and fair manner.

And, it's kind of really outrageous that there isn't more of an outcry and that there isn't more demand upon the part of all of our public officials, be it in the city or in the state, to insist that these people do what they need to do to make this an equitable and fair living environment for everybody who wants and needs to live here. There should not be an exodus of low-income and working-class people out of this city to wherever they could find a place to live, because nobody in the city cares enough to make sure that they get what they need and rightfully deserve.

I really wish that the Public Housing policies reflected that. I don't want to hear about affordable housing unless you include the figures for low-income subsidized housing. And I want to hear the figures about how many people need subsidized housing – not affordable housing. I want to know about how many people, like you say, in Section 8 housing have a Damocles sword hanging over their heads

because they never know, with the sifting economic landscape, how long they're going to be able to hold on to the place that they have, or how many additional financial burdens they're going to be expected to assume just to keep what they have already had and pray that wherever they may be forced to go to would be at least equal – not even superior but equal – to their current living situation.

I don't hear a whole lot from the city – I don't see a whole lot in the papers about these kinds of situations. I don't want to see another politician with a shovel in their hand anywhere in the city [chuckles] unless they're laying a foundation for a soon-to-be completed quality, low-income, subsidized housing. Let us know how many people are going to be housed, when they're going to be housed, how far down the road all the people that are still on a waiting list for subsidized housing will get housing. And the surrounding communities are not any better. When you get mail back that will say you could wait anywhere from 48 to 72 months to get housing in any number of the surrounding communities, especially if people are older. I mean I'll be 67 this winter. You know, 72 months is a really long time to wait to get and keep a roof over your head. We're not talking anything palatial, anything fancy in the least; we're just talking about just the basics in terms of housing. I

really don't hear as much as I feel – I know Mayor Walsh's administrations fairly new. But still, these problems – he's been on Beacon Hill for a number of years and there's been any number of other people in the city who've worked for the city, worked in the city for a number of years who pretty much know the political and economic landscape here. They all need to be pulling their weight to make sure that everybody gets a seat at the table and everybody gets the housing that they need.

Let me just kind of finish up a couple things. When you talk about homelessness, people don't go applying – whether you're chronically homeless or homeless for the first time – homeless is homeless.

They're making all sorts of reasons that people end up being homeless. A lot of times they're not at fault, so I really hate to be in a situation where there's a divisiveness against people that are very much victimized.

The other issue too, about people who are on drugs: It actually crosses all age groups. It's kind of amazing, where I lived a few years ago to see elderly people with drug addiction problems, elderly people who may be selling their own prescription drugs – you know – deciding to do without or because they kind of need

the extra income that that will bring in. So, I think we need to be careful about how we, say, target or define various groups of people. We need to do that in a way that's productive and inclusive.

So, I'll stop for now and let anyone else who wants to talk, talk. [Applause.]

Response: Thank you very much for these comments and we will consider ways to incorporate this feedback.

Comment: (also Pub Safety) One of the big issues that was talked about this morning was also about city funding and city guarantees. So for example, BHA has had a problem in its developments with public safety money. Public safety money is the safety officers who are at the front desks at the elderly and disabled developments. It is some of the BHA police. That money has always been short. There was a special grant for it years ago that was done away with in the early days of I think Bush 2. So, the problem is that the city was giving some money from a parking garage that was located near the BHA, but that parking garage is now getting redeveloped. Then the question was, the redevelopment plan was the one that got into the controversy about the shadow on the common. There were a number of pledges that were made about being able to – if

that redevelopment happened – if there would be significant additional money that could come for the BHA and other sources. But at this point, no one knows exactly where that money is. That's a real problem for BHA's budget. That's something that we need to talk with the mayor about, that we need to talk to city council about, we need to talk with the state legislators about because those are all some pretty good promises that were made but unless there's follow through on those promises, it has a direct impact on the quality of life that people have living out in the development.

One of the other discussions this morning relates to what people may have read in the last couple of days in the Globe. So in the Globe, there have been these articles about "is racism better or worse in the city of Boston lately?" The question particularly of, are there new communities of just wealth that are being created that people don't have an opportunity to go into with Seaport being the primary example that's given but of course is not only the one. This relates directly back to the [affirmatively inaudible 46:17] housing discussion with the BHA, which there have been a number of discussions with the Resident Advisory Board about. But, it needs to be that if there's going to be inclusionary development or other types incentives to try to create

affordable housing, the question of what is affordable is the key question. If the affordability limits are 70 percent of area median income or higher, you cannot place a Section 8 voucher in those communities; the rents are simply too high. So, there needs to be guarantees that whatever gets created has some sort of set-aside that's going to work and will work for all of Boston's communities to be inclusive.

I know that BHA has been talking about the challenges that exist in its fiscal budget. This morning people were talking about all the challenges with the low income housing tax credit program, everything being up in the air with what's going on in Washington right now, and BHA's relying a lot on low income housing tax credits to get developers to help redevelop its public housing so it will be good for 30 years or 40 years from now, as well as to help do the redevelop communities that will use a leveraging of private market development – like in Charlestown – to then retain the 1,100 [inaudible 47:42] units of [deeply 47:45] affordable housing there that will be 30 percent of income and targeted to people at 30 percent of income or below. But, if you don't have tax credits, that may not work, the leveraging may not exist. Those are some open questions that no one knows the answer to. So, when

the RAB was meeting about this last month, they were talking about how it would probably be good to have some kind of community forum or community partners – BHA and residents – all come together to talk about those challenges and what can be done and what's the common vision and some common strategies.

Thank you.

Response: As noted above, the BHA would welcome the opportunity to have a community forum on these issues and would help to support such an event. We will follow up with the RAB.

Comment: When you're talking about affordable housing and there's this general understanding, there's a ceiling in terms of your income where you're going to qualify, but there's also a floor. There are a lot of very low income people that can't afford affordable housing.

I never see any discussion whatsoever from any source, any forum, any anything about those people: How many there are, what's being done. I mean they're literally left out in the cold. That's why this whole term "affordable" has a really kind of shady aspect to it, because it's not really fundamentally, directly geared towards the different populations that need to be on the list and need to be talked

about. I don't know what's in your plan!

Response: Thanks for making the point that when people talk about affordable housing, there's a huge range. So, affordable housing that is geared to people who are making 70 percent of the median income is one thing, but that does not serve the population that the BHA serves. So, what we're not making more of right now is deeply affordable housing, and the 40,000 people on the BHA's waitlist are keenly aware of that. You guys can always help us make that pitch to politicians and everyone else.

We are keenly aware of this issue. Staff at the Hearing told the commenter about places where the Plan was available for review.

Comment: PR. P.1; In the background piece on the first page, it may help to have some additional statistics—i.e., how many elderly, how many non-elderly disabled, and how many families with children are served in each of the programs. For the public housing program, it should be noted that the demographics are different than for the public housing eligible population for Boston: thus, as reflected in the Supplement above, 43% of eligible households are white, 27% are African-American, 18% are Hispanic, and 8% are Asian—

but this shows a significantly larger Latino population (42%) and smaller White population (16%). It may be helpful to have information on trends—i.e., in 2007, the figures were x. All of this is relevant for the Analysis of Fair Housing (due to be completed soon). It would also be helpful to have similar demographic information for the Section 8 program and to know how many BHA Section 8 households are located in Boston and how many outside of Boston (and how many in what communities), as well as those demographics—i.e., is the Section 8 program providing an opportunity for families of color to move to largely white suburbs, or are participants concentrated in minority communities outside of Boston?

Response: Staff will take the comment under advisement when we update the 5 Year Plan.

Comment: PR. On p. 3, it's stated that BHA is unable to keep its operating reserves at the HUD recommended level. What is the HUD recommended level and what are BHA's current levels?

Response: HUD recommends that Housing Authorities have 4 months of routine expenses. We have approximately 2 months of routine expenses.

Comment: (also Pub Safety) PR. On page 9, public safety

expenses are part of the operating deficit—this says that “the BHA is working with the City of Boston to address unfunded public safety costs”, but it doesn't provide any specifics in terms of what the City will be doing, any timeline, or options that are being discussed. All of this should be shared with the RAB and the public.

Response: In 2017, the City provided \$4 million to BHA to help fund the gap in our public safety expenses, including both BHA police and public safety officers at Elderly/Disabled sites. The BHA has requested this funding again for 2018.

Comment: Finally, in terms of public safety, I am very concerned about public safety issues because I live in this area and, just over the weekend, there were gunshots in my development. We have gun warfare going on between some of these developments. So, I am calling for someone to take a serious look at bolstering housing (inaudible, audio interference 00:14:39) nationwide. The job crisis and rate of violence has created a feeling of uncertainty among tenants like me. There are not enough police to go around. Cops nowadays have to act like mental health experts and they are not medical personnel. We can't just rely on city police departments; they are already stretched. So, I'm calling on

HUD to give local housing authorities some part of money for housing security. I'm also calling on the Boston City Council to hold a public hearing to look at funding sources for BHA police, okay? Public safety at your housing developments has been unfunded for years, especially now that BHA's operating with a significant yearly deficit. This uptick in gun violence may be a byproduct of not having enough housing police. When we measure this against the collective trauma, the socio-economic disruption, and also life and property damage, I'm just asking for the City of Boston: we need to start finding creative ways to pay for security at our housing developments.

Response: The BHA shares many of the commenter's concerns and completely agrees that the solutions to these public safety concerns need to be prioritized by the BHA, the community and the City.

Comment: Now, the reason I'm here: it's come to my attention that there may be a gratuitous cut in Housing and Urban Development budgets, to the tune of \$6 billion. Due to this gratuitous cut, Boston Housing Authority has a debt overshadowed by the US government. This appears quite ominous. The US government is suggesting non-traditional funding methods.

These, in particular, involve fixed-income development and rent assistance demonstrations. (Inaudible phrase 00:08:21) troubling times. (Inaudible phrase 08:24:00), we can only hope that our country, our city, will be able to continue our way of life and our freedom. Thank you.

Response: We agree that such a cut to the HUD budget would be disastrous and also hope that it will be prevented.

Comment: Good morning. My name is Meena Carr. I am part of the RAB. I am also a resident and I am also the Executive Director of my tenant organization. I am here to speak on behalf of the residents. I love myself. I want to be happy where I live. I think that we, as residents in public housing - we need to take a stand. It's our lives, our children's lives, and the people around us who are our neighbors. So, what I want to say to the residents and to Boston Housing: we know there is a tight budget. We are aware that all developments under the Boston Housing Authority are stretched. But we, as residents, must take it and start policing our own development. We have to be the eyes and the ears. We have to teach our children respect. That is the most important thing that we have to do. If we respect ourselves, we will respect others and we will respect

authority. We need to stand up. We have police officers in our district. Everybody who lives in Boston lives in a district. We have to make that district responsible. We have to call on them, not only when there is a crisis, but we have to call on them to come into our community, let the young people know that, so that they will not be afraid, when they see something going wrong, to call in. But, in order to do that, we have to have trust. So, today, I don't know what Boston Housing can do, but I think, if we, as a people, get together, we can go to City Hall and let them know our concerns. One person speaking is a trouble maker; that's me (laughs). But if every one of us here goes to City Hall to let them know our concerns, not only once, but we have to be a consistent presence. We have to go up to them and let them know that it's not a one-time thing. We will get results, but it has to start with you, the resident.

Thank you. (Applause)

Response: Thank you for these comments.

Comment: In the five-year progress report, there has been a continued discussion about the challenges that are facing the BHA because of the fiscal situation. Because of that, BHA has had to propose redevelopment of its Mary Ellen McCormack, its Charlestown and Hailey developments,

where that will be, basically, taking down the existing developments and then building the new developments, which will have a major market components that will replace the number of public housing units there with equally-affordable units. As Concetta pointed out, a lot of this counts on things like low-income housing tax credits and other sorts of incentives that we don't know where they may be, these days, in terms of the overall climate. So, there's a lot of uncertainty that the Housing Authority is in, and the country in general, is in, about all of these areas.

At the RAB's Reading Committee, there was a discussion about convening a meeting, perhaps this spring, to discuss with the BHA, with residents, and with community partners. Again, where are we on the challenges? What are the best ways to approach that? The BHA has been proposing things like the Rental Assistance Demonstration program at a number of different sites and it looks like that will be a promising way to be able to get additional financing and funding in. But, of course, all these other things affect it. And it's also a way to avoid misunderstanding or tensions and it just would be good to get all those things out in the air and out in the open and to have a good dialog about those issues.

Concetta also mentioned and others have also mentioned the issues about security. Just to back up, BHA was getting some money regularly from a garage that was located in the area not too far from the BHA. That garage is no longer going to be generating parking revenue. The alternative has been major redevelopment, which reflects on the conversation of the “Shadow on the Common” question. There have been pledges made to the Authority and other community partners about ways in which that redevelopment can happen and additional money that could come in that would then be pledged to help support the BHA’s programs, addressing the continued budget deficit of our public safety. We don’t know where that stands right now. It would be good to find out. We are tackling that stance and, so, the call for “What’s going on with this?” with the City Council, checking in with the Mayor, checking in with the state legislature makes a lot of sense because that’s a big hole in the budget that could be a problem down the line.

Response: Please see above responses 1) regarding public safety funding and 2) the BHA welcoming the idea of a community forum to focus upon challenges that the BHA and residents collectively face.

## **Assessment of Fair Housing**

Comment: Finally, I know, Mr. Tracy mentioned the issue about the Affirmatively Furthering Fair Housing analysis. I know the BHA and the City know that they need to do a little bit more work on that and, so, didn’t get it out until the end of fall. I’m sorry; we’re still in the fall. They didn’t get it done earlier in the fall as was anticipated and, I think, have gotten an extension on it. A lot of these issues are related to the larger pictures of Boston. People have been following the stories in the Globe for the last two days, for example, today, the story about the Seaport and the whole issue about “are we recreating entirely white communities that are wealthy and not creating communities that are diverse and not creating opportunities where we can place our housing, where vouchers can be placed?” If what you have is an inclusive development policy where the rentals are essentially where you can’t place a voucher there, there’s obviously a problem. We understand that the Authority is not in total control. This is a discussion between the Authority and the City as a whole. But we look forward to seeing what comes out of the final Affirmatively Furthering report, particularly about making sure that all these goals work together to try to create an inclusive community and

creates affordable housing opportunities and preserves affordable housing. Thank you. (Applause)

Response: As of January 5, 2018 HUD issued a notice advising consolidated plan programs, i.e. local governments that the deadline for submitting the assessment of fair housing (AFH) is extended to October 2020. No submission is required before this date.

While the BHA is seeking direction from HUD on how the notice applies to public housing authorities HUD as previously advised public housing authorities that they need not take steps to initiate the assessment of their housing programs until a revised assessment tool becomes available.

Comment: So, I’d just like to say in terms of the assessment of fair housing, it replaces a former analysis of impediments to fair housing, I don’t even remember that being discussed on the RAB board. I’m just wondering how much time and money is being spent on drafting FHR priority preference points that excludes the average low-income person, aka, the people with the least amount of earnings. Who are the leadership team and different city departments and all these different agencies – there are so many of them – I’m

just wondering how much money do they get (each agency) instead of putting the money towards housing instead?

Response: HUD is providing no additional funding to support the efforts to complete the AFH. It is an unfunded mandate which has required the individuals involved to devote substantial time over the past 14 months to completing the Assessment. The obligations arising under the Affirmatively Further Fair Housing regulation will not end with the completion of the assessment, however. The goals developed as part of the Assessment will be incorporated into the BHA Annual Plan and the Consolidated Plan for the City of Boston. Each agency will be expected to work toward completing those goals over the next five years at which point it will be necessary to complete the next assessment.

## **Budget**

Comment: On AP p. 3, BHA reports that there were findings in its latest audit, indicating there were delays in posting entries for closing of books, but that BHA had submitted its financial data in a timely manner.

Response: BHA staff furnished a copy of this audit.

Comment: S. Financial Resources (p. 24)

Some description here would help. I assume line 2a, for almost \$11.5 million under “CGP/DDTF” is what used to be known as Replacement Housing Factor (RHF) funds, i.e., transitional capital funding that comes in for units that are removed from the public housing inventory as part of demolition/disposition. In 2013, as part of revision to the Capital Fund regulation, HUD replaced the term RHF with Demolition/Disposition Transition Funding (DDTF). See B.25, p. 81, below. Here or elsewhere in the Plan, it would be helpful to know where these funds came from and how BHA is planning on spending them. Including use limitations. It would help to explain the discrepancy between the figure here (\$11.5 million) and the \$5 million discussed below in Section B.25.

Line 2.b has \$26.4 million for HOPE VI; this doesn't seem right in terms of what BHA's currently receiving from HOPE VI, but may be intended to cover the Whittier Street Choice Neighborhoods grant.

Response: The \$11.5 million includes both CGP/CFP and RHF/DDTF as per the HUD form description. \$6.3 is CFP and \$5.2 is RHF/DDTF.

Line 2.b has \$26.3 million not the \$35.6 million mentioned. The \$35.6 million is under dwelling rent not HOPE VI as commenter says. Yes, the \$26.3 M is Whittier Street Choice Neighborhood. It is categorized as HOPE VI in the HUD funding system.

## **Center for Community Engagement**

Comment: PR. On pp. 5-7, the summary here as in the past of the accomplishments of the Center for Community Engagement and Civil Rights (CCECR) is impressive. It would help, however, to identify, both here and under Education & Jobs, how both the public housing community and Section 8 residents are served—and particularly what programs will be available for residents as they transition in Mixed Finance, RAD, and redeveloped sites.

Response: As noted on pp. 5-7 of the 5 Year Progress Report, CCECR works with residents and a broad range of community partners many of whom are able to provide services to both the public housing and Section 8 residents. The leadership development and participation in the REC includes both groups of residents. In terms of

the specific programs related to Education, jobs and health, the Family Self-Sufficiency (FSS) and its state program, Mass LEAP, serve both public housing and Section 8 (Voucher) program residents. The Boston Tax Help Program is another example of free tax assistance and financial coaching that all residents are able to take advantage of; the information about these programs are widely distributed to residents via mail, email, BHA Website and social media in coordination with the Boston Tax Help Program. BHA staff are willing to meet with the RAB and discuss resident needs as they transition in Mixed Finance, RAD, and redeveloped sites.

## **Communications**

Comment: PR. On p. 10, there is a discussing about having mandatory trainings for all staff who interact with residents, and an updated manual on the basics of customer/constituent service etiquette. It is likely that RAB members and resident leaders would be interested in reviewing this and giving feedback on what would be useful for the training and for the manual.

Response: Prior to finalizing the handbook or manual that would

give the basics of customer/constituent service etiquette, BHA staff will share with the RAB and resident leaders a draft and solicit feedback.

## **Community Services**

Comment: (also RED) Concetta asked why there was no public housing ownership program. John noted that it was a precondition of the Section 8 homeownership program that you had to have been a participant in the Family Self-Sufficiency (FSS) program, and about 15 families over time had built up sufficient funds through that and otherwise participated in homeownership counseling, etc. so they could take what previously had been paid as rent to be applied toward paying the mortgage. He noted that a few years ago, BHA expanded the FSS program to the public housing program, and so there may be a question whether, at the very least, public housing FSS participants could be eligible for the homeownership program. By and large these were units that people found in the private market, rather than their existing housing. John, Meena, and Mac also noted that at Washington Beech and Maverick, there had been some ability of families going through the HOPE VI program to purchase units in the private market, and they would use the HOPE VI programs to help with

that (rather than for a long term affordable unit at the redeveloped site). While there had been discussion about homeownership programs in Tampa (at a NARSAH conference), the dynamics of markets can be very different—in some parts of the country, it can be far more realistic to purchase an affordable housing than here.

Response: The BHA through its Public Housing FSS Program does offer homeownership as a major goal for its participants and has assisted 7 families to become home owners. They have done so through their escrow savings accounts, which they used to help finance homeownership in conjunction with participation in the financial counseling, credit repair and home ownership counseling offered in partnership with the City's Office of Financial Empowerment.

Comment: S. On p. 43, BHA notes that there are supposed to be 50 public housing participants in FSS, and the number currently is 44 (with 4 more in process). BHA says, in response to a question about maintaining minimum program size, and what steps are being taken, that this is not applicable for Section 8, and minimum program requirements are fulfilled. There is no response as to public housing; even if BHA has met minimum requirements, since it is below

the “required number of participants” for public housing, it should provide some response about what it intends to do to achieve 50 public housing participants.

Response: The BHA is continuing to outreach and enroll public housing residents into the FSS Program and once it has filled the 50 openings for public housing participants, it will maintain a waiting list for interested residents and will enroll new families as soon as there is an opening.

## **Grievance Procedures**

Comment: Hi. I’m Mac McCreight from Greater Boston Legal Services. With work closely with the RAB and BHA. Just a few things: one is, we want to recognize what BHA did last year to change what its proposal was in the grievance procedure. It’s a good example of a situation where the BHA listened to some of the public comments that were coming back and decided to modify their proposal somewhat. And, so, they’re coming back this year with a slightly different proposal which gives people the option of either having their grievance decided by the Grievance Panel or it can be decided by an individual hearing officer. That choice will be up to the individual that files

for the grievance at the beginning. So, the proposal is out there. We’ve given a few feedbacks to that proposal. In general, it looks pretty good and it’s been a good example of collaboration between the Authority and residents about a proposal that would work.

Response: Thank you for your comment. No response is required.

Comment: On S. p. 33, in addition to the policies listed there, there are two separate policies for Mixed Finance sites regarding Resident Participation and Grievances, and these should either be listed separate here under Public Housing Maintenance and Management or in a special section for Mixed Finance.

Response: Thank you for the comment.

Comment: This is intended to reflect the revised procedure that BHA agreed to earlier this year when it decided to not proceed with a proposal to eliminate the grievance panel. The underlined portion of the policy reflects the changes that BHA is making to the current policy. Here are some thoughts:

a. BHA should state, somewhere early in the policy, that this is just the policy for non-Mixed Finance developments. If the

development is a Mixed Finance development, the Mixed Finance Grievance Procedure should be applied instead. It would help to have a list of which sites follow which procedure, and to update that as there may be changes.

Response: At the time of implementation the BHA will include as part of the instructions any limitations on the application of the revised policy.

Comment: b. In Section 3.C, BHA may want to consider whether it makes sense to keep the 5-day grievance period for certain types of cases. By and large, this never comes up, and usually if a case is grievable, there would be a 14-day or 30-day period, the same as the notice to quit period.

Response: At the present time the BHA elects to keep the 5–day grievance period for certain types of cases.

Comment: c. Section 4.A provides that residents can choose to have their cases heard by either a hearing officer or panel, and can change their minds up until the time the matter is scheduled. If, however, for some reason a quorum can’t be assembled, the hearing will default to a hearing officer hearing. It may be helpful to discuss this.

Response: It is hoped that this situation will occur only rarely in which case the preferred option would be to reschedule the hearing. If, however, the inability to assemble a quorum becomes a matter of regular concern and has contributed to delays in the ability to hold hearings timely the hearing will default to a hearing officer.

Comment: d. Section 5 discusses the hearing panel, which consists of 3 BHA residents or program participants (i.e. public housing or Section 8/MRVP tenants) and 2 BHA staff members. The Hearing Panel Coordinator selects those who serve on each panel from those who've completed training required by the BHA. Resident panel members are paid on a per diem member and serve at the pleasure of the BHA, but participation as a Panel member shall not be unreasonably denied. Each panel selects a Presiding Officer. There are provisions to guard against potential conflict of interest, and members should not sit on any matter involving their own development or if they are related to the grievant or any witness who would be appearing.

Response: Thank you for your comment. No response is required.

Comment: e. Section 5 also discusses the hearing officer.

This language is the same as what BHA had provided last year, but it is not the language in the current policy, and so it too should be underlined. It may be helpful to look back at comments people had last year if there are any concerns about how the hearing officer will operate. There is no provision here that the hearing officer has certain minimum training or qualification, and there should be. In subsection 4, it is not clear what the statement, "An interim hearing officer may be evaluated by the BHA to be hearing officer in the manner set out herein", means, and it may be that there is some missing language. Presumably an interim hearing officer could be removed for cause (as is the case under subsection 3 for regular hearing officers) and would need to meet the standards of impartiality found in subsection 2.

Response: Subsection 4 contains a typographical error. The language will be revised to read "An interim hearing officer may be interviewed and selected by the BHA to be a hearing officer in the manner set forth above."

The BHA does not agree that the Grievance Procedures should set forth the minimum training or qualifications for the hearing officers. The authority is satisfied that there is sufficient experience within the agency to select qualified

individuals to serve as hearing officers and as with all positions with the BHA there is a job description.

Comment: f. Section 6.F is a suggestion that GBLS made last year, and matches what hearing officers have the discretion to do already in tenant selection and Section 8 termination hearings—i.e., to hold the record open and given the parties an opportunity to submit additional materials. This has been important in a number of cases. It should be noted that if a reasonable accommodation request arises at a hearing, BHA's Reasonable Accommodation Policy may require, in certain instances, that the hearing be adjourned so that the BHA may engage in an interactive process with the grievant regarding the reasonable accommodation request, and it may make sense to cross-reference that policy, either here or in the opening Section 1 (which also discusses Reasonable Accommodation.)

Response: Thank you for your comment. No response is required.

Comment: g. It should be noted that Section 7.A is different than BHA's current practice, and would eliminate the 2nd step grievance appeal in eviction cases; instead, those cases would go directly to court if the hearing panel or officer has authorized this. It will be

important, once the revised policy is implemented, to set an effective date so it's clear when the new rules will be applied.

Response: This should happen as a matter of due course. Once the annual plan is approved the BHA will take steps to implement the revised grievance procedures and at that point set the effective date. We anticipate this date should not be later than the end of April 2018.

## **Leased Housing**

Comment: There was some discussion about the part of the PHA Plan that discusses mandatory conversion to Section 8. Mac and John both said this was an odd part of the 1998 legislation, which requires housing authorities to figure out if it would be cheaper to convert public housing to Section 8. However, as the BHA chart shows, it would be significantly more expensive to operate the housing as Section 8 because the sum of public housing operating and capital subsidy (and tenant rents) is significantly lower than average Section 8 subsidies and tenant rents.

Response: Thank you for your comment. The BHA is exploring all tools and options that will

enable the preservation, sustainability and/or the expansion of deeply affordable housing. The BHA continues to conduct thorough analyses to determine what actions will increase the potential of long term sustainability of affordable housing. In some cases, the analysis may lead to conversion of Public Housing to Section 8 through tools provided by HUD and partnerships with other stakeholders. As changes are proposed, the BHA will continue to keep residents and interested parties informed.

Comment: A question came up—is Section 8 such a good bet? A lot of the redevelopment proposals talk about replacing public housing with Section 8. However, Congress and HUD don't increase the Section 8 budget much—and if the average rents increase, and more is spent per unit just to keep landlords on the program, this means ultimately that fewer people can be served. Mac noted that Marilyn O'Sullivan from HUD had done a recent presentation to CHAPA where she said the average HAPs had increased by \$200/month/unit over 5 years. On the other hand, there are some additional protections against rent increases with the Section 8 project-based voucher program, since: (a) tenants are guaranteed that their rent will not exceed 30% of income, unlike the regular voucher program, where tenants may

pay significantly more; and (b) in the project-based program, BHA has more say over overall rent increases

Response: Thank you for your comments. Please see previous response.

Comment: There was some discussion that it might be beneficial to convene a meeting in Roslindale of Section 8 participants about issues that they have. It may be that space would be available at Washington Beech for this. BHA had cooperated with City Life/Vida Urbana about doing similar community forums for Section 8 residents in different parts of the City—RAB may want to discuss this with them.

Response: Thank you for your comment.

Comment: So, my name is Karen. I'm a Section 8 tenant. (They have my last name.) Anyway, I'm also a Brookline, Boston border resident. The state and federal government share an obligation to existing tenants first and foremost. All Section 8 tenants are given a promise of stability in the form of a rent contract with the Housing Agency agencies. The landlord and the federal government. Because of regulations regarding rent control, many landlords bought buildings for almost nothing, and tenants of those buildings had reduced rent. The problem

is that if there is no increase in the amount of rent being subsidized by the government over time. The landlord will eventually expect Section 8 tenants to pay rates comparable to nearby other private housing, which will result in tenants being forced out for the second or third time in some cases.

In my building, some of the tenants are 90 years old and prefer living in a mixed-age community, rather than one of elderly tenants only. Nearly all of us have lived here for decades, but there are no comparable places nearby for us. Every town and city needs to have 10 percent affordable, private housing units of mixed income, not market-rate housing. Yet, market tenants in my building want to follow the next maximum comfort for the minimum price, and the next building like ours but so far, there isn't one.

All people would be better off if existing seasoned, long-term Section 8 tenants are kept housed in the same place, or at least if these displaced tenants were to be the first to be rehoused in the same area radius, not the same as zip code, which there's a lot of politics and just dirty pool in zip codes, so that's why it's unfair. We are the proven tenants that are your neighbors. When I say "the same area," I mean referring to geographical distance, not to be confused with zip code because as we

know, the zip codes make no sense. Of course, the tax address – go figure that out – at the Brighton and Boston and Brookline...

Existing Section 8 tenants should also get the same 30 days to move into a new apartment. In other words, to have all of our paperwork switched over to the new unit with respect to administrative versus other types of transfers, tenants [in expiring] these buildings and those with landlords who have completed the payment of the no-interest loan should be placed at the top of the list for the unit of their choice, aka, housing choice voucher. I fail to see how it's a choice. HUD does not do what the general public wants, which is why I think the budget is shrinking, which is to have quiet, responsible neighbors. Instead, HUD and Housing Authorities have made housing the chronically homeless their first priority without RAB approval or vote. Everyone knows that the chronically homeless are chronically homeless for a reason. They have not proven themselves to be good neighbors. Public housing exists for a reason. Chronically homeless do not have borders. This, again, is a travesty of justice. Housing should be about area radius rather than zip code. It may be hard for someone who has never been in this situation to imagine how arbitrary borders can inequitably impact

a person's living and health situation. There should be a category for seasoned, long-term Section 8 tenants, as this is a private market. We are also more likely to be with a landlord who wants every penny he can get from everyone and every given year. The criteria would change to reflect long-term Section 8 tenants who either need to move or want to move to another private development. Separate criteria would be established for private market versus public market, favoring existing tenants. Another problem is that RAB wants the Section 8 money for public housing, which would not be acceptable or fair. Reasonable accommodation should include quiet, which would mean allowing moving to a nearby building if that's what's available; it's necessary. Section 8 costs more, but it is also a much more responsive development – this environment – versus a toxic environment and toxic people. Urban planning can be done in a way that is responsible to constituents and abutters if everyone participates, not just responsive to the need for more housing in general, but the quality of life for many residents with the decrease in... So, the quality of life for many residents will decrease if Boston becomes just another overcrowded city. So, there's too much money spent on public housing if now

considering getting rid of Section 8 or not keeping the program as it is for us to stay in our homes and/or in our communities. It is not right that you, HUD and agencies, take all the money from housing for drug epidemics. The addicted are mostly teens and 20-somethings, yet the rest of us, particularly the Section 8 tenants, are supposed to suffer the consequences with no increase in Section 8 vouchers, aka, payment standard funds to landlords. BHA, maybe even HUD, took away our ability to have electricity paid under our lease. Instead, it's paid out of our pocket. HUD says they cannot afford Section 8 certificates, and they have yet to continue to give out more and more Section 8 vouchers, even though they can't afford the ones they have. How about, as we as a society, give a promise to the federal government and then take it back. Does Section 8 belong to the only undesirable places, aka, the landlords that are desperate to have tenants? These comments are being taken to every agency possible and yes, I have people counting on me.

To conclude, I would like to say that HUD and the other organizations that we, as people; we're not the ones in the buildings to make all the questions. Every city is different. I don't know why we have to follow every other city.

For my very last comment, I'd like to know why being a RAB board member, there is no one to answer Section 8 questions. We have to wait until someone specific shows up. I just think there should be someone of BHA staff on the RAB board to be able to answer our questions instead of waiting three months. Thank you.

Response: Thank for your comments.

Comment: Good evening everybody. Please be patient with my English. [Laughs] My name is Rose. My concern is, I have been homeless twice with no fault of me. It was [inaudible 18:02]. In both cases, those people said they need the apartment for the family. It is not true. Next thing, one to three months, and then the apartment had been rented with this certain company, Boston Housing, 52 Chauncy Street. I don't know if [inaudible 18:29] to that or not.

My second concern is, many places I go – private or commercial – they prefer metropolitan voucher than Boston Housing voucher. I don't know why exactly. If you ask, they don't tell you; they just tell you they prefer that one to the... I contacted two people and when they ask me what is my voucher, I say it's Boston Housing. Clearly, they told me, "No, no, no. If it was metropolitan, we would take you."

The third thing and last thing is, not everybody – I have been with Section 8 since 1997, after I become sick and I lost my house. I'm grateful to that and to the people who serve us. But there are some people over there who [inaudible 19:42] and that hurts your feelings sometimes. I can understand you're dealing with many people. I can call you today; you cannot answer me. Call me back tomorrow, after tomorrow. But sometimes, you don't know exactly what is your problem. They take two, three weeks after you call many times, to return your call. That's a little shaky because being homeless is that it would take – especially if it is not your fault – you do your mess, to pay your rent, keep the apartment clean, respect yourself, respect your neighbor, and then I feel like even [inaudible] but they let us down sometimes. [Inaudible phrase 20:30.] That's a little shaky.

I say thank you. I hope [inaudible phrase 20:44.] Like I just said, is this can be a [culture 20:51] to this thing would be having some people. I don't want to speak out because they are afraid of losing their Section 8 voucher.

Thank you for the time. [Applause.]

Response: Thank you for your comment.

Comment: One of the things that's a problem that the BHA

has that [Inaudible O'Sullivan] spoke about when she went to the Citizen's Housing and Planning Association homelessness meeting last month is the fact that BHA basically has a set Section 8 budget, but because of what's gone on with the market, that a number of people spoke to, that budget gets eaten up. So, that budget ends up serving fewer people each year because that's the consequence of not having a budget grow. She was talking about how the average I think per individual HAP cost went up from about \$1,000 per individual to about \$1,200 per individual during the last five year. It's relatively easy to figure out when you're talking about somewhere between 12,000 and 14,000 individuals how that translates out and what that means in terms of the whole in how many people can get served.

It then means that when there's attrition in the program that normally would go towards somebody else on the waiting list moving up with a voucher, that can't happen, or it may mean things like people that are in project-based voucher units that normally could transition to the Section 8 program may have to wait a very long period of time. And that also means that other people who are homeless or are waiting for a long time can't get into the project-based voucher units because you can't get in unless someone moves out of those

developments. That's a real dilemma. I know that people have been talking about is there any change in sight on any of that stuff in terms of what may happen with prices, what may happen with the budget. I know that the picture for project-based vouchers is a little bit better because tenants don't have to absorb those rent increases; those are guaranteed at 30 percent of income and BHA has more control over those longer-range contracts that exist, but I know BHA has been trying to create more of that project-based voucher housing, both within creating the affordable replacement public housing units when units are redeveloped, and maintaining the same number and increasing the same number. But, it is a real problem with the program.

Response: Thank you for your comment.

Comment: So, I can tell you about all the developers. These developers – they develop so-called “luxury” without even walk-in closets in our units and then, they tell lower-income people, especially Section 8 tenants, “Oh! Well, now you have to pay sewer fees!” which is an additional \$200 to \$400 a year and they can't even be honest how much it's going to cost. These developers, they want to develop because they do get these no-interest loans,

and then they get tax credits and all kinds of incentives to develop, leaving us behind, of course.

Then as far as tenement housing, this is something that Walsh believes in, which, in my opinion as someone who studied urban planning, is not quality housing. I really want to address the fact that everything is paid from the housing budget. I don't agree – I strongly object – that everything is paid out of the housing budget. You know, there is a drug epidemic and that, too, is coming out of housing. You go down to – for example, you go down to Chinatown (and my allergist will confirm this) you go down to Chinatown, there's a whole bunch of homeless youths begging for money. She's afraid to be there in the early morning to walk around! She's afraid to be there when it gets dark! That's absurd. That's the only exercise she gets and now she's afraid to do this. So like I said, the drug epidemic is mostly – not exclusively – but mostly teens and 20-somethings, but in the housing budget, we're paying for that, too.

So, I think that, you know, with all the drugs and everything, that is a big factor in being chronic homeless versus just homeless once in a while, a non-chronic homeless because obviously, the market is very volatile when it comes to a Section 8 tenant. And, even in my building, out of 300 tenants,

150 of us are going to have to move in 2019 because the landlord has repaid his no-interest loan.

I'm just wondering: Does Section 8 belong to undesirable landlords and neighborhoods? Because that's what I'm hearing and that's what I've also experienced before I got my Section 8 certificate, because I was working and denied places to live, denied fuel assistance; denied possibly everything you can think of. So like I said, in 2019, 150 people out of 300 have to move. Nothing in our area at the same price range. I really do think that sometimes people say anything to get priority preference points because housing is so difficult and it's such a premium. I really do think that many areas are now overdeveloped, like just another city, and I personally – I need the train because I don't drive, but some areas are so overdeveloped that I don't want to live in a zoo, as much as I don't want the zoo – the sound and noise – in my building.

Thank you.

Response: Thank you for your comments.

Comment: The term "Mitigation voucher applicants" (S. p. 4— see also p. 22) should be explained. As I understand it, these are the vouchers assigned to non-elderly disabled applicants for elderly/disabled public housing

who must wait longer for placement due to the changed designation percentages.

Response: Thank you for your comment. The explanation above is correct. See BHA Administrative Plan for Section 8 Programs §3.3.5.

Comment: On S. pp. 6-10, Strategies: It would be helpful to know what changes BHA has made in this document from the prior year. Is the language on pp. 8-9, "Rapid Rehousing", "Moving On for the City of Boston", and "City of Boston Coordinated Access System Referral and NED Program in Section 8", new? If so, it would help to have a description of any new initiatives or collaborations. (See also pp. 19-20, describing preferences for Section 8.)

Response: Thank you for your comments. These programs have been added within the last year and are described in the BHA Administrative Plan for Section 8 Programs §3.3.5.

Comment: (also Occ.) On S. pp. 19-20, it's not clear if the "other preferences are listed here in order, or are essentially equally ranked—it would help to clarify this. Some of the categories appear to match the Section 8 Administrative Plan and PHA Plan amendments done earlier in 2017. It's also not clear if what's listed here has been reconciled with what's on pp.

21-22, and if not, there should be some redrafting.

Response: Thank you for your comments. The categories as listed are not in rank order (19-20), but are listed in rank order on p.22 of the Supplement. They are also listed in rank order in the BHA Administrative Plan for Section 8 Programs §3.3.5.

Comment: S. (pp. 25-29) Rent Determination

BHA has not made any changes here. As in the past, it would be helpful to get data on rent burden and success rates for BHA Section 8 participants, and compare it with past data.

Response: Thank you for your comment.

Comment: S. In addition, there is a discrepancy between the turnover in vouchers listed here p.31 (720/year) and that on p. 3 (110 annual turnover)—these differences should also be explained.

Response: Thank you for your comment. The turnover vouchers that are referenced on pg. 31 refers to the participant turnover per year. The turnover on pg. 3 refers to the waiting list.

Comment: S. (p.71) Conversion of Public Housing to Tenant Based Assistance

This was a subsection of the original PHA Plan established by the Quality Housing and Work Responsibility Act (QHWRA) in 1998. Under it, PHAs were to convert public housing to Section 8 if it could be shown that it was cheaper to administer the program this way. Ever since BHA started to do this analysis, it has concluded that conversion would be more expensive (since Section 8 subsidies are substantially higher than public housing operating and capital funds). The only change here is that BHA has updated the Per Unit Monthly (PUM) cost to reflect current figures.

Response: Yes, the only change was to update the PUM.

Comment: S. (pp. 78-80) Project Based Vouchers

Most of this text remains the same as in prior versions of the Supplement, and merely discusses the criteria that BHA uses in deciding to create additional Project-Based Voucher (PBV) units. It does reflect that as of the end of FY 2017 (March 31, 2018), BHA anticipates that it will have 1,521 PBV units, which is less than the statutory cap of 2,896. BHA further notes that in 2018 and 2019, it anticipates to have a number of PBV projects that will be excluded from the 20% cap because they are replacement units for converted public housing units under

HOTMA. BHA added language to its Section 8 Administrative Plan and did a mid-year amendment to the FY 2017 PHA Plan to utilize this HOTMA authority. As discussed above, to the extent that any public housing redevelopment is done off-site (as is under discussion for Charlestown), this may affect the HOTMA exemption. BHA should furnish the RAB with a report, at the end of FY 2017, as to all additional PBV units created in FY 2017.

Response: Thank you for your comment. BHA staff would be happy to come and present at a future RAB meeting.

Comment: PR. Page 4 discusses the ebbs and flows of voucher issuance/ utilization—i.e., that for most of 2016 and beginning of 2017, BHA was issuing no vouchers except for VASH, and this only changed once the 2017 funding aware was received. It would be good for BHA to have periodic reports to help the RAB track what's happening with the program—perhaps every quarter? It was very beneficial when the BHA convened a meeting with residents and advocates in 2014 to update on progress coming out of sequestration. This should also discuss the problem posed by rent increases—i.e., in periods when the market continues to rise, rent reasonableness analysis may result in rent approvals that equal or exceed payment

standards, and where funding does not make this level, fewer families are likely to be served and shortfall is again likely.

Response: Thank you for your comment. BHA staff would be happy to come and present at a future RAB meeting.

Comment: Hi, my name is Rose Marie. I have Section 8. I don't know my rights, like, all of my rights as far as, like, when I leave my apartment, is there somebody that could come in there when I'm not there. And, also, I feel like I'm being forced out of my apartment and it's very scary for me. Also, some of my clothes are missing from my apartment and some of my clothes (have been) destroyed, either cut up or paint or bleach on it. I took pictures and I brought it to the police station to make a report and they told me they can't do nothing about unless it happened within the week that it happened. So, I guess there's nothing being done about it because I'm scared to go to the police because they're not going to help me. I don't know. I really do need Section 8 help but I think I'm going to come off of it because I can't take this anymore. That's all I have to say. (Applause)

They think, if you have Section 8, that they can just treat you any way how they want. That's all I have to say.

Response: Leased Housing staff at the Hearing gave them their card to followup with a phone call.

## Legal

Comment: Was the VAWA Policy revised/updated? Is the underlined language in the VAWA Policy on p. 51 new, or it is just underlined for emphasis? (This refers to situations where there is bifurcation and the removed individual was the sole tenant eligible to receive assistance, and that the remaining individual will get the opportunity to show eligibility.)

Response: There were no revisions to the VAWA Policy during this annual plan cycle. There have been revisions to the Admissions and Continued Occupancy Policy and the Administrative Plan to ensure that they comply with the VAWA policy and HUD VAWA regulations.

Comment: It would probably make sense to remove the number 13 before the VAWA policy on p. 48, since this is all being done not as part of B.9, and the next section is B.10. It should also be noted that, at least on my version, there are two page 50's with different content, and this should be fixed.

Response: The number 13 has been removed and page numbers have been addressed.

## Occupancy

Comment: On S. p. 4, as has been noted for a number of years running, the number of Asian families on the Section 8 waiting list is not reflective of the income-eligible population (less than 1% versus 8%), and likely reflects that the current Priority 1 categories used to select for the Section 8 program are not adequately addressing this community's need. BHA and the City have indicated, in the draft Analysis of Fair Housing, that revisions to priorities may be needed and that action is planned.

Response: Thank you for your 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 total housed percentage of the Asian population.

Comment: On S. pp. 5-6, as has been stated in the past, it would be good to have separate breakouts for the waiting lists for family public housing and elderly/disabled public housing, since the priority systems, etc. are likely different.

Response: Thank you for your comment. The data is provided as requested by the HUD template.

Comment: On S. p. 11 and on p. 18, BHA revised the policy to indicate that it is not accessing FBI records yet since protocols have not been established, but it is requesting records from DCJIS and local law enforcement (for example, where an applicant recently resided in another state).

Response: Thank you for your comment. We will add language to clarify that out of state criminal records are requested for applicants who have resided outside of Massachusetts following each respective state criminal record request requirements including Puerto Rico.

Comment: On S. p. 12, there is a list of mixed finance developments with separate waiting lists (including Old Colony Phases I-IV), and it's stated that there are no new site-based lists. This list should be checked—I believe as other sites are redeveloped through RAD or Choice Neighborhoods, there would be additional mixed finance sites that should be on this list.

Response: Thank you for your comment. We will add language indicating BHA will update

waiting lists as properties are converted.

Comment: On S. pp. 13-14, for residents and members of the public who might not have followed the evolution of transfers at the BHA, it's important to note the elimination of what were called "emergency" transfers, and the use of three categories—administrative transfers, substantial cause transfers (with a significant amount of over- or under-housing), and transfers of those with a lesser degree of over- or underhousing, and the relative rates and conditions for such transfers.

Response: Thank you for your comment. Just a clarification, the three transfer categories in ranking order are:

- 1) Administrative transfers which also include Domestic Violence related transfers, and over housed by 2-bedrooms or more;
- 2) Special Circumstances which also includes under housed by 3-bedrooms or more; and
- 3) Under or Over-housed transfers.

Comment: (also MIS) S. (pp.69-70) Designated Housing for Elderly and Disabled Families As noted here, in the summer of 2015, HUD approved a revised Designated Housing Plan for the BHA, permitting it to shift the allocation of elderly to non-

elderly disabled units in its federal elderly/disabled public housing from a 70%/30% split to a 80%/ 20% split. BHA exempted wheelchair accessible units from the designation (making them available to all eligible applicants needing such features, regardless of age) and also established an additional set aside of 200 Section 8 vouchers targeted to non-elderly disabled public housing applicants who would have to wait longer for public housing admission due to the changed split. As noted in the text, BHA "turns on" and "turns off" elder preference points for a development depending on how close it is to the split. In reviewing the chart, it would help to know what the distinction is between the 2nd column, "wheelchair", and the last three columns (breaking down how many studio, 1-BR, and 2-BR units are wheelchair accessible). It may be that the first column is meant to reflect how many wheelchair accessible units BHA was required to provide at particular sites under a Voluntary Compliance Agreement (VCA) with HUD, and the last 3 columns reflect how many units at particular sites could be used by persons in wheelchairs.

Response: Thank you for your comment. Wheelchair units are exempted from the Designated Housing Plan thus the columns: 1) Available Units shows the

total number of available units at the site which includes Non-wheelchair and Wheelchair accessible units; 2) Wheelchair units shows the number of existing wheelchair units; and 3) Adjusted Available units shows the number of units that are included in the Designated Housing Plan or another way of looking at it is available units minus wheelchair accessible units equals adjusted available units. The final three columns 0 BR with W/C, 1 BR with W/C and 2 BR with W/C adds back in the wheelchair units into the totals so in most cases you can figure out the number of bedrooms for the units that are wheelchair units. There are zero existing studio wheelchair accessible units. A note has been added to the table

Comment: S. (p. 80) Units with Approved Vacancies for Modernization. The text makes clear that the Admissions and Continued Occupancy Policy (ACOP) has language on approved vacancies for modernization, but that BHA doesn't currently have any units officially offline as funded for modernization in HUD's electronic database (PIC).

Response: The BHA does not have units off line for modernization purposes. There are units currently vacant and awaiting redevelopment. These units cannot be removed from PIC until the demolition/disposition

application is approved. There is an interim status in PIC that will be used when the demolition/disposition application is submitted.

Comment: PR. On p. 10, there's a discussion about the increase in the need for affordable housing and BHA's discussion "with various PHAs nationwide best practices". Can BHA share with the RAB what it has learned about best practices and what it may be considering; obviously some of this may need to be a collaboration with the City and with other entities (MBHP, developers, etc.). How will software changes discussed here "assist with managing applicants' need to access their applicant information"?

Response: Thank you for your comment. Yes, the BHA may arrange a presentation for the RAB.

## Operations

Comment: There was also some discussion about flat rents and ceiling rents. John and Mac noted that ceiling rents were largely a pre-1998 thing, whereas flat rents are an option for federal public housing tenants since 1998. By and large the flat rents and the ceiling rents are the same. A few years ago, Congress mandated that flat rents have to be at least 80% of the Section 8 fair market rent (FMR). This

means each year (around October 1), HUD sets new Section 8 FMRs, and they generally have gone up. Janis thought that flat rent had been adjusted twice in less than 12 months; John and Mac thought this shouldn't be the case. There was also the question of the language that says that you don't have to be recertified except for every 3 years if you have a flat rent. However, residents have the option to request the information about whether they would have a lower rent based on their income, and to switch to an income-based rent if so. The 3-year rule doesn't mean that flat rents stay put for 3 years, since the FMR adjustments are done each year.

Response: Janis is correct. Flat rents were adjusted on April 1, 2016 and February 1, 2017, less than 1 year apart. However, the April 1, 2016 flat rents were actually the flat rents calculated based upon HUD's FMRs for 2015. HUD did not publish the FMRs until December 2015, therefore the flat rents were adjusted late. Flat rents will be adjusted again on February 2018. Going forward, the BHA will attempt to adjust flat rents every January. Residents who elect the flat rent do not have to recertify their income every year, but do have to recertify their household composition and at that time can also elect to pay income based rent.

Comment: (also Lsd Hsg)  
There was some debate about whether the public housing rent structure acted as a disincentive for families to stay employed and to get better wages. Some thought this was the case; others thought that even though higher income means higher rent, it is still only 30%. There was some discussion about "cliff effects". Mac noted that for the public housing program, under HOTMA, there will be a 2-year period that if the family has an income above a certain amount, it will no longer be eligible to stay. However, currently under the Section 8 program, this is actually worse: if a family has sufficient income that it would be "zero subsidy", it is given a 6-month period of time to see if there is a change in circumstances where subsidy would again be paid; otherwise, the family is removed from the program. If the family's circumstances changed at say Month 9, that would be too late, and the family would simply have to reapply for the very long waiting lists for Section 8. Some wondered if there would be a way to build up an escrow for these families; Mac noted that DHCD had a program like this at one point in state public housing, kind of like FSS, but you would have to leave public housing (as opposed to using the escrow to achieve other goals, like homeownership, higher education, buying a car

to enhance economic prospects, etc.)

Response: HUD has not yet issued regulations regarding HOTMA. BHA will consider any discretion available in its treatment of over-income public housing residents when regulations are available.

The six-month limit for Section Eight participants is regulatory.

Comment: Mac noted that a significant issue he and other advocates have seen is the problem with family members who turn 18 (or who are older but who finally move out of full-time student status); many of these family members don't realize/accept that they must contribute 30% of income to the family or there is a risk of eviction. While this is predominantly an issue to be discussed within the family, it wouldn't hurt to have this be part of the recertification discussion that happens with every family member as they turn 18, since this is something that's a problem for both BHA and the family.

Response: The BHA requires releases from all family members 18 and older at recertification so that income for these individuals can be verified. This is discussed with the head of household.

Comment: My name is [Inaudible 35:05]. I've been at

the Dorchester development for – since 2013. Prior to getting into the development, I was homeless for a year and a half.

Can you hear me now? As they say at Verizon. All right.

Prior to getting into the development, I was homeless for a year and a half. That was a treacherous experience. It was an experience of being taken advantage of a lot. Anyway, I came in 2013. I actually came in April the 2nd, although I've been marked as coming in March the 31st. I have found myself to be very distant, difficult to be friendly to people – I want to be but it's very difficult. I would really just like to get out and let somebody else get in and do whatever. You know. But, the difficulties I've experienced is – well, when I first in, I didn't get a job until 11 days. Say things are going to be fixed; they're not really fixed. People come into service the apartment, say if you have to do, do. Pest control recently was done. Set down one trap, couple of squirts, that's it. And what I've done is purchased my own mouse traps for my particular facility.

When I've called for a work order for – there's a door for a bottom lock – there was a mix-up with that. I called for that because it seemed like my door was tampered with and I came in and my door was different. I actually got locked into my own apartment. They sent in – took a few hours – a

carpenter. It was Labor Day 2016. Still haven't had that lock changed.

I'm distant with people because to me, there's just the dynamic of being taken advantage of and I just have my walls up all the time. But anyway, when I do try to make a call – it seems like when you call into the office, it goes all over the place and you really can't get through to who you need to get through to. So, you know...there's a language barrier. When there are notices – people who have come into the apartment to do work, they seem to be shady. It's not all the time, but one time, they were talking about having to fix the sprinkler; the sprinkler did not need to be fixed. It's just different dynamics of just...I don't know, mistreatment to me. I know I have a lot to offer, but it's a language barrier with management. If you go through paperwork, you're basically going through very quickly with paperwork and there's no real understanding to things.

I know that I can be a positive impact to the community, but...I've endured much the past few years and quite frankly, I'm just tired, very tired. So, this RAB thing, I would like a copy of it. I noticed it mentioned you could get a copy of it. If I could have a copy of that, I don't know... Other than that, I'd like to help and I'd also like to be a positive impact, but these past few years, I have found it very

difficult to be that way but I know I can. Thank you for your time. [Applause.]

Response: The comment was referred to the appropriate manager who spoke with the commenter and confirmed that the door fob was working, that the exterminator had inspected the apartment and was following up on the door. Staff at the Hearing provided a copy of the RAB materials.

Comment: AP p.1: This says BHA is a standard PHA, administering 10,343 federal public housing units and 14,481 Section 8 vouchers, for a total of 24,824 units/vouchers administered. As noted below, BHA uses a much lower number of federal public housing units elsewhere in the Supplement (8,404 units—see p. 31). The discrepancy should be explained.

Response: The 10,343 number is the number of federal ACC units: 8,702 of these are BHA managed and 1,641 are HOPE VI or mixed finance units.

Comment: S. (pp. 76-77) Non-Smoking Policies

HUD issued a mandatory no-smoking policy for all housing authorities in the fall of 2016, and unveiled it in a press conference at Washington Beech. While BHA has had a no-smoking policy in effect for a number of years, it appears that

in a few minor respects, the HUD policy varies from that in place at the BHA. It would be worth reviewing this and finding out if HUD is willing to grandfather the BHA policy; if not, some minor tweaks would be needed.

Response: HUD will not grandfather BHA's non-smoking policy. BHA has adopted HUD's rule with regard to no-smoking within 25 feet of a building and also does not permit use of a hookah or waterpipe.

Comment: S. (p. 82) Boston Housing Authority Organizational Chart

The Organizational Chart is dated 10/8/15, but there should be at least one change: Paula Saba has retired as Chief of Leased Housing and has been replaced by David Gleich. There may be other changes (or shifts in the make-up of the Executive Committee) and this should be reviewed.

Response: The Organizational chart has been reviewed and updated. Thanks for the comment.

Comment: PR. On the bottom of p. 3, it's stated that BHA's goal is to achieve and maintain high performer status for public and leased housing. I asked if John Kane could provide the latest Public Housing Assessment System (PHAS

and Section 8 Management Assessment Program (SEMAP) scores from HUD to show its status. John Kane did provide these. There was a recent SEMAP score of 100% and BHA does have high performer status. BHA staff should be congratulated on maintaining high performer status and getting such a great score. For the PHAS program, on the other hand, it appears that the PHAS assessment may have been done prior to the FY 2017 PHA Plan submission, but may not have been finalized until the spring of 2017, and it shows BHA as a Standard Performer with a score of 75. This should be shared with the RAB and BHA should identify, in the Progress Report, any response to this and any steps it is taking to achieve high performer status for public housing.

Response: Thanks for your comment. BHA staff is available to review the PHAS system and scoring with the RAB.

Comment: PR. On p.4, there is a discussion of full Occupancy. While BHA's continued good achievement in this area should be praised, as stated in the past, BHA should provide details throughout the program, so that if there are portions of its portfolio where these goals are not being achieved, they are identified along with steps to improve performance. Moreover, the other goals which relate to having a good PHAS

score, such as turnaround time for vacancies, time within which emergency and standard repairs are addressed, and the like, are included as benchmarks and performance and improvement strategies tracked.

Response: BHA development specific occupancy information is available; please see response to the above comment.

The PHAS system no longer evaluates unit turnaround time or work order completion time as part of its scoring.

Comment: PR. On p. 8, it would be helpful to get copies of the Resident Service Coordinator Contracts and know which agencies have been assigned to which sites, and for what time period. It would help for the RAB and LTOs to know when the community/ neighborhood audits are to be done and what is involved in them, as well as to know when the health and well-being service events are to kick off at which sites.

Response: The Resident Service Coordination contracts have a two year term. Copies of the Resident Service Coordination (RSC) contracts are available upon request and a chart of the developments being served by each agency is also available. The neighborhood/community audits are performed on a daily basis

by the RSC. The audits consist of the RSC and/or their affiliated agencies reaching out to other service providers in and outside of the neighborhood in which they work and having those agencies visit the development or provide literature regarding their services to the development. Well-being service events are posted via a monthly calendar at each site by the RSC.

Comment: Let me just add a little something: my washing machine just stopped with clothes in it from Sunday. Now, I'm not saying it as a personal complaint; what I'm saying is that we don't have enough electricians to take care of those minor issues that we jot down as "not important." One of the other sources that I would like BHA to look at - and I know that cash is strapped - is funding for more electricians, possibly, but I do understand (inaudible phrase 00:16:20).

Thank you.

Response: Thank you for your comment. The BHA regularly reviews staffing based on work requirements.

Comment: James Abraham, from Logan Way Mary Ellen McCormack. I just have one issue - two, actually. Let me say that the Section 8 vouchers are not good anymore with these new facilities going up; the landlords will not accept them. Also, I've been living

there for 16 years and this is the only issue I've had with them, is that they never wash the windows - 16 years. They've had two constructions on the roof and they've never washed the windows - 16 years.

Response: Noted, thank you.

Comment: Good morning everyone - Mike Woods from the Charlestown development. This is probably a local situation but, on our front door, 50 Monument Street, somebody keeps sticking something in the keyhole that nobody can use their key to open the door. I keep telling the office guy; don't get a response.

That's it, thanks.

Response: The comment was sent to the appropriate development manager who had staff followup on the door. Maintenance has addressed the building doors and sent the carpenter to remove the key and ensure the building door lock is operational. Also management sent flyers to the residents at 50 Monument St. informing them to make sure the building doors are locking and if they are not to inform the management office.

## **Public Safety**

Comment: S. (pp. 46-57)

It's not clear how this section has changed from the past—is it just in the developments

highlighted that may have greater issues (identified as Hailey, Charlestown, Mission Main, Alice Taylor, Franklin Field, Lenox Camden, Mary Ellen McCormack, and Barkley-p. 47)? Or are there other changes?

Response: The developments listed are the same as last year. The only change was to update the crime prevention activities under B.1.Other: #8 to Directed Patrols / code 19s to address drug issues and violent crimes in high risk areas.

## **Real Estate Development**

Comment: Janis noted that she had received a certified letter as a Lenox resident regarding the RAD conversion at her development. John noted that as the RAB had requested, Joe Bamberg would be coming to the RAB meeting in December and could give updates on RAD and other mixed finance redevelopment. Janis said that the manager had said that the first 12 families at the development wouldn't be coming back (as their units would be used as relocation units for other families); several people thought that wasn't accurate, since under RAD all families are guaranteed the right of return. Mac noted that at each site, it's been BHA practice to negotiate with the local tenant organization (LTO)

about the order in which people would be relocated and return. Meena noted that at Washington-Beech, their LTO had agreed it would be a lottery for Phase I. Of course, some families who had relocated off site during rehabilitation with either vouchers or to other public housing might decide that they didn't want to return. It was noted that people also needed to be "in good standing" to return, but a number of people doubted if there were 12 families identified as not being in good standing, Janis said there were 28 families who had "unconfirmed status" at Camden/Lenox. We should get more information.

Response: With regards to the rumor that 12 families at Lenox/Camden will not be able to return, this is NOT accurate. It WILL be necessary to move 12 families at Camden in order to complete renovation work, but these families will be able to return once the renovations are complete. We will continue to work with the Lenox/Camden Task Force and resident community to ensure that updated and accurate information is being received.

Comment: The Reading Committee took a look at Chapter 19 in the Supplement, which refers to the different sites that are being redeveloped. John noted that some of the sites included here are ones which the BHA hadn't

yet met with the LTOs when it discussed RAD expansion in October, but now has select, including St. Botolph, Ausonia, Walnut Park, and Eva White. Mac said he thought Eva White was a little different; in addition, BHA had identified Long Glen (which was off-site housing created in Allston as part of Orchard Park redevelopment in the 1990's) as a RAD site, but it wasn't included here. We can get better information on this when Joe comes to the meeting.

Response: The BHA has not met with all of these resident communities.

Comment: There was some discussion about what's going on in Charlestown—that proposal is not RAD, but is to tear down the units but replace all of the affordable units and also develop additional market units. People wondered how it would all fit and had heard there was community opposition to having the development be so dense, and they had heard about off-site housing. Mac and John said that this was still up in the air—BHA and the LTO have been discussing this, and the off-site units would be elsewhere in Charlestown, but not immediately adjacent to the current development.

Response: The BHA and its developer partner have been working to respond to community concerns around the

proposed density to the new development. One idea is to move a small number of units to another parcel in Charlestown in order to spread out all of the new units. It is correct that this idea is still up in the air and nothing has been finalized. The BHA is working closely with the Charlestown Resident Alliance (CRA) the local tenant organization.

Comment: There were some rumors that BHA was creating additional units for students. John noted that BHA isn't partnering to provide student housing. It's true that there is redevelopment at Whittier Street (near Northeastern), but all 200 of the public housing units there will be preserved as deeply affordable housing; however, there will also be market rent housing created there as well.

Response: The BHA is not creating any student housing.

Comment: Hi! God bless you. My name is Sister Myra Martinez. I live in Charlestown in the development over there. I'm just going to pick up where the last person that was speaking. You cannot stereotype people when they're homeless. I understand where she's coming from, from the Section 8, but you cannot stereotype homeless people. You cannot stereotype drug addicts because like the person said that was sitting here

before, you don't know their history. You know? So, if you're going to take that paper – you know – where you said you was going to take it, I feel, as a resident – okay – I feel like you should use your synonyms and reword your words, you know, because some of the stuff that you did say there were very harsh and it could hurt other people. I know where you're trying to get at, but you know, you need to use your words carefully.

And also, I live in Charlestown, so in 20 – like, this year, 2017 – in January, we were supposed to get relocated. The HOU was in the process – Charlestown 1 was there as well. I don't know what happened. We haven't heard anything. As a matter of fact, I feel like – I don't belong to the RAB – but I feel like somebody from the tenant task force should have been here in this hearing – this panel hearing – to let us know what's going on. There has not been any meetings. I mean, it's just like pshh! They came in. They did whatever it was they did. They gave us a dream and psh! They're gone. So, that is one of my main concerns because a lot of Charlestown people in the BHA are concerned about their homes. They said they were going to relocate us to different developments. They also talked about Section 8s and all this. They came in here, giving us a big dream. And, I've been there since 1984. Okay? I

came in there with a dream. Unfortunately, I'm still there. Like I said, time goes by and before you know it, you get caught up and you're still there. But you know, it's not – I feel it's not right to – you know, the permits, the other Charlestown developments, just like she said, that come in here and you know, they want to make high risers; they want to have the marketing rent and they're all going to put us in there, all happy, all lovey. They're not even going to know we're from the BHA. Nonsense! You can tell who got money and who don't. So, that's one of my main concerns about what is going on with Charlestown 1. What is going on with the development? What is going on?!? Do we still have a home? I mean it's up in the air and that's something that uh...ah...what's his name? What's your name again?

Yes, Mac. You have been to the meetings. You know about what's going on. So, I'm just concerned, as a Charlestown, Boston Housing resident. You need to go back or you need to talk to the new task force or whatever they want to call themselves now, and you know, and have a meeting, you know, and so people know where we stand. A lot of people come and ask me and I just can't tell them, "No, this, this and that." If I don't know, I'm not going to say! But then again, I don't know who to talk to. I don't

know who to call because nobody knows nothing. I have even called a conference myself. They don't know. So, who knows? So, what happened to – what happened to our dream? What happened to them coming in here, talking about we're going to get relocated? What happened to all that? I think that is wrong. That is totally uncalled for and that's all I have to say. Thank you for your time and if I said anything to offend you, I didn't mean to, the only RAB representative. Okay? Thank you. [Applause.]

Response: Staff from Real Estate Development phoned the commenter to update her on the Charlestown redevelopment. In general, this site is still in predevelopment planning. We will continue to hold meetings and send written information to update residents.

Comment: S. p.62, HOPE VI or Choice Neighborhoods

BHA should use the same heading here as on the cover page of the Supplement, and leave other items for later headings

Response: The change to the Supplement has been made.

Comment: S. p. 63 Mixed Finance Modernization or Development

Where there are further discussions of the specific mixed finance activities in other parts of the Supplement for Charlestown, West Newton, Amory, Lenox, Clippership at Heritage, Whittier, Mary Ellen McCormack, Hailey Apartments, Eva White, and Old Colony Phase III (for example, Whittier Street is discussed in subsection B.14), they should be cross-referenced here. Shouldn't there also be cross-reference to other sites for which BHA has submitted RAD applications to HUD?

Response: All of these sites are described in the Demolition and/or Disposition Section. We have added a note referencing this to the Supplement.

Comment: S. (pp. 64-68), Demolition and/or Disposition

All of the demolition/disposition proposals outlined here which have not yet been submitted should first be shared with the RAB for review and comment. In addition, if any of them will reduce the number of public housing units—even if they replicate the same number of “affordable” units—they must go through the BHA Monitoring Committee, and BHA should share with the RAB when this has occurred. For any of these, it would be helpful to know how many existing units are involved and what the post-disposition make-up will look like (how

many public housing, how many PBV, how many LIHTC).

Response: Agreed. We will release drafts of these disposition plans to the RAB ahead of submission to HUD. We will provide the information requested above.

Comment: S. On p. 66, Charlestown, it would be helpful to share with the RAB updates on Charlestown redevelopment. While HUD gave demolition/disposition approval, recent discussion with the larger community about density concerns has led to consideration of some amount of off-site redevelopment, and that obviously is different than what was in the original submission that was discussed with the RAB.

Response: As noted above, the Charlestown initiative is still in a preliminary phase without a final financing plan and program. That said, we will continue to update the RAB on a regular basis on the project.

Comment: S. On p. 66, Amory has largely been discussed as a RAD conversion. Demolition/disposition may make sense to utilize undeveloped portions of the site.

Response: The BHA does plan to dispose of the Amory site to its designated developer partners to renovate the

existing 125 Amory building as well as to add new affordable, moderate and market units elsewhere on the site.

Comment: S. On p. 67, Clippership at Heritage, I don't recall the BHA bringing this demolition/disposition proposal to the RAB for review and comment. (BHA did include a "placeholder" provision for this in the prior PHA Plan, but that's different than getting the actual proposal, as was done with Charlestown. The description here doesn't give any meaningful information about why 20 Section 8 project-based units are being lost and what will be done for both the families and to replace the units. More should be detailed, even if demolition/disposition requirements do not formally apply to Section 8 units—these were originally public housing units which were subject to conversion to project-based Section 8 assistance a number of years ago along with other Heritage units.

Response: We have updated the description to clarify that while 20 existing PBV units are being demolished 22 new PBV units will be constructed in their place. In addition 30 new homeownership units, including 14 affordable homeownership units, will be added to the site. The Clippership units were already disposed of through the earlier Heritage PBV conversion. That said, the

disposition is being updated to reflect this new initiative and we will share the Disposition Plan with the RAB.

Comment: S. On p. 67, while West Newton/Rutland/East Springfield is by and large a RAD conversion, 3 units at East Springfield have been uninhabitable and don't make economic sense to include. Proceeds from sale should be utilized for BHA's affordable housing programs.

Response: We agree and that is the plan. We hope to implement the disposition in 2018.

Comment: S. On pp. 67-68, Hailey Apts. Phase 1, it would help to know more about this proposal, and how it's similar and how it would differ from the Charlestown and Mary Ellen McCormack redevelopment proposals. As described here, it would only be a portion of the site, but would involve both demolition and disposition.

Response: We have added the requested information to the Supplement.

Comment: S. On p. 68, Mary Ellen McCormack, it would help to have a full description of this proposal, similar to what BHA provided to the RAB for Charlestown redevelopment.

Response: We have added the requested information to the Supplement.

Comment: S. (pp. 72-75) Conversion of Public Housing to Project-Based Assistance under RAD

This outlines that BHA has approved RAD applications for West Newton St., Lenox St., and Amory St. (with CHAPs at the latter two sites issued in mid-October, 2017). It has also recently submitted RAD applications for St. Botolph, Walnut Park, and Ausonia Homes. This references a possible RAD disposition for Eva White (it is not clear if that would be RAD or just a regular demolition/disposition application). In addition, there is no discussion here of the other RAD submission BHA made for Long Glen, an off-site component of the Orchard Gardens site. In addition, BHA had sought to include RAD as a component of its Choice Neighborhoods submission to HUD, and HUD had approved this. It may be that BHA needs to revise this description regarding Whittier Street, Long Glen, and Eva White. BHA also only gave the RAB a limited account of the new RAD submissions since it had not yet completed the process of discussions with residents at the sites; a fuller description should be provided to the RAB now.

Response: Please see clarified information in Supplement sections noted above.

Comment: S. (p. 81) Other Capital Grant Programs

This uses the term Replacement Housing Factor (RHF) Funding, which, as noted above (see B.3, p. 24), has been replaced by the term Demolition/Disposition Transitional Funding (DDTF). This indicates that over \$5 million in such funds will be used to assist with the construction of Old Colony Phase III. It may be helpful to get more of a description about how these funds are used so that RAB members feel comfortable with this or can discuss any other options.

Response: Prior to HUD's implementation of the Public Housing Capital Fund Final Rule in late 2013, HUD used to award RHF funds to offset the loss of public housing units that occurred through redevelopment activities. RHF funds were awarded in multi-year grants—typically up to five years of funding as a “first increment” renewal for up to an additional five-year “second increment” of funding. While HUD stopped awarding new RHF funds starting in 2013, HUD has continued to provide the final years of RHF grants for units removed from the public housing inventory prior to October 2013. RHF grants,

unlike the new DDTF funding, must be used to develop replacement housing units. BHA has continued to receive RHF funds in recent years to offset units that were lost prior to October 2013. In addition, in accordance with HUD rules, BHA has been able to accumulate past RHF grants in order to amass sufficient funding to carry out redevelopment. For many years BHA has declared its intention of using its final years of RHF funding to support phase three of the redevelopment work at Old Colony.

Comment: PR. On page 4, there is the discussion about the alignment between the BHA's and the City's Housing Strategy. This discusses 4,000 redevelopment units and another 4,000 units of “moderate and market housing”, but it is not clear how many of the “moderate and market” units are “affordable” and what “affordable” means—more specific data on that would be helpful.

Response: We have distributed a breakdown of planned units by affordability (ie deeply subsidized ie. public housing or Section 8, moderate units and market units) to the RAB at the December 2017 Board meeting and will continue to update this chart regularly per this request.

Comment: PR. On page 5, there is reference to Eva White

redevelopment (as there is in the Supplement, see above), but no specifics have been presented to the RAB on that.

Response: The Supplement has been updated. We reviewed this project at a recent RAB meeting and we are happy to discuss it in more detail at one of the upcoming RAB meetings.

Comment: Hi, good morning. My name is Concetta Paul and I am on the Boston Housing Authority's Resident Advisory Board. I am from State Funding Public Housing West Broadway (inaudible 00:11:00) and South Boston. Just a few comments, in terms of home ownership. I'd like BHA to focus more on home ownership programs for public housing tenants. There's already a component like this for Section 8 tenants but, as a public housing tenant, I'd like BHA to focus on the home ownership aspect for public housing tenants. For instance, we could get some pointers from the city of Taunton. In Taunton, they have a Center for Affordable Home Ownership and it is actually part of the Town's Housing Authority's real estate department. It used to be run by the city, but the Housing Authority thought it was more effective if the Housing Authority ran it. They assist public housing tenants. They assist Section 8 and also the wider community, holding income guidelines to buy

homes. In order to encourage public housing tenants not to depend on public housing, one thing Taunton Housing Authority does, and which I would like Boston to take some pointers from, is they run first-time homebuyer education classes, they have a foreclosure intervention and default counseling, they offer pre-purchase counseling, and they also have run courses like home maintenance, and they have various eligibility requirements. One of this, similar to the section 8 one, is that, to participate, in the self-sufficiency programs. Also, with Taunton Housing, if you serve in the military, you can get VA loans. I know, of course, Boston Housing is also making veteran housing a priority. However, homeownership programs encourage and help low-income tenants like me to buy homes and that frees up units for the 36,000 hopeful residents that BHA has on its public housing waiting list.

Response: The BHA is happy to consider ways to incorporate more homeownership programs into the public housing program. We will follow up with the City on this suggestion.

Comment: Now, in terms of that tax incentives that developers get to build low-income housing - I'm very concerned about that when we are awaiting this new tax plan being debated in

Congress because tax credits are used to lure developers into building and financing low-income housing. Now, if those tax credits were to disappear, I'd like to hear how HUD - because I know HUD is going to read this - I'd like to know how HUD plans to maintain its public housing portfolio, especially as developments like BHA are already operating on a deficit within low and middle-income housing. Now, I always like to say this - you may have already heard me say this before: a minimum wage earner in Massachusetts, paid on the top-tier of minimum wage, if this person earns \$11 an hour, that's \$88 you earn in one day. That's \$440 a week. That's \$1,760 in one month, before taxes. We look at median rent in Boston; it's about \$3,000. The median rent is almost two times more than a minimum wage earner earns in cities like Boston. Therefore, we cannot afford not to have low- and middle-income housing.

Response: Thank you for these comments. We completely agree.

Comment: PR. On p. 9, BHA's initial progress in 12/15 on greenhouse gas reduction was great, but it would help to know what the goals are supposed to be in each sustainability area and how the BHA has been doing in achieving those goals since 12/15. It would help to get additional details on what

site-specific RAD proposals for energy, health, and resiliency upgrade are being made, and for those sites that are not going through the RAD process, what the Energy Performance Contract (EPC) will be proposing—as well as the time line for all of this and a report back to the RAB as this is closer to being rolled out.

Response: We do track our progress in a number of areas related to sustainability and energy conservation, and we will post this information on the BHA web site and can make a presentation to the RAB upon request.