

Comments and Responses to the BHA Federal Five-Year (April 2025-March 2030) and Annual Plan (April 2025 through March 2026).

The following document contains the comments and responses received on the BHA's Federal FY 2025-2029 Five-Year and FY 2025 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 Plans to the RAB and Local Tenant Organizations. The Plans were put out for public comment on November 1, 2024 and the comment period closed on December 15, 2024 with a virtual public hearing held on zoom December 9, 2024 at 11 am and in-person hearing at 6 PM the same day at Boston City Hall. BHA also hosted an event November 9<sup>th</sup> to gather the community together and share the draft Five-Year Plan and discuss the future of the BHA that included a presentation by the Administrator along with more than a dozen resource tables.

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

Many comments are specific to Plan attachments. Comments on the Five-year Plan are grouped together:

**AP:** Annual Plan template

**S:** Supplement

## **Administration**

Comment: Pine Street Inn, Inc. (PSI) is pleased to comment on the Boston Housing Authority (BHA) FY2025 Annual Housing Plan.

For over 30 years, Pine Street Inn has partnered with the Boston Housing Authority to provide affordable, supportive housing for persons experiencing homelessness. Since its inception in 1969, Pine Street Inn has served persons in Greater Boston experiencing homelessness through various responsive, community-based programs and services. PSI is the largest nonprofit homeless services agency in New England. PSI provides food, clothing, shelter, day and night-time street-based outreach, access to health care, job training, affordable housing, and other critical resources for over 2,000 individuals each day and night at its 45 locations throughout Metropolitan Boston.

Pine Street Inn's mission is to end homelessness by making permanent housing a reality for all.

Pine Street Inn has successfully developed and operated affordable, permanent housing for individuals experiencing homelessness and various other hardships for over 50 years. Pine Street Inn has designed housing and housing-based services for persons with disabilities, including mental illness, HIV/AIDS, chronic substance use disorder, dual diagnosis, and mobility limitations. Units meet the complex needs of the hardest-to-serve homeless individuals. With 1,100 units of permanent supportive housing in the portfolio, PSI is a prominent provider in Boston's homeless services Continuum of Care (CoC). PSI also participates in the Consolidated Plan as a developer and provider of affordable supportive housing and street outreach and is pleased to see the BHA's commitment to the Consolidated Plan. This commitment will enhance the BHA's community partnerships, including PSI's Street Homeless Housing project, which provides supportive services to formerly homeless individuals who now reside in BHA housing.

PSI enthusiastically supports the Boston Housing Authority FY2025 Annual Plan. Among its impactful policies are the BHA's plans to increase the number of project-based vouchers and to convert tenant-based assistance to project-based assistance. With more than 4,000 project-based units under contract with the BHA by the end of 2024, PSI is pleased that the BHA will continue to provide essential opportunities and funding to support homeless individuals. With homelessness surging in the City of Boston, these plans provide needed additional resources to address the homelessness crisis.

PSI also commends the BHA for continuing to include homeless individuals as priority and preference populations. The Boston Housing Authority is one of only a few, if not the only, Housing Authority in Massachusetts with this priority admissions preference. This preference is critical in permanently housing our most vulnerable constituents. In order to better support individuals experiencing homelessness, PSI urges the BHA to adopt HUD's definition of homelessness. As it currently stands, the BHA's definition does not include individuals exiting an institution where they temporarily resided, such as a correctional or medical facility. HUD's definition of homelessness expands upon the BHA's definition, and its use will create consistency between housing programs in the City, as well as allow the BHA to serve more individuals experiencing homelessness.

Additionally, PSI appreciates the BHA's efforts to identify the need for one-bedroom permanent housing units and to use Small Area Fair Market Rents (SAFMRs) to reduce artificial rent inflation. These policies will expand housing options for the extremely low-income tenants PSI serves, giving them access to previously unaffordable areas. PSI requests that the BHA include SAFMRs in all project-based voucher programs to make this opportunity available for a greater number of tenants and to encourage property owners to collaborate with the BHA.

Pine Street Inn is grateful for and appreciative of our ongoing collaboration with the Boston Housing Authority. We hope to continue this collaboration by housing individuals with BHA vouchers in PSI units, including those with mitigation vouchers.

Additionally, we aim to facilitate information sharing between tenants, the BHA, and PSI in order to help tenants retain housing. With the BHA's support, PSI will soon open a new affordable housing facility at 900 Morrissey Boulevard.

BHA's 16,651 vouchers are crucial to the availability of affordable housing in Boston. The BHA's knowledgeable staff, essential services, and informed guidance are invaluable. We pledge to work together in partnership with the Boston Housing Authority to preserve, create, and provide access to affordable housing for people experiencing homelessness.

Response: We appreciated the positive comments and the continued partnership with Pine Street Inn.

Comment: S. p.3--Number of eligible households in Boston increased by 14,000 to 139,000, and 2024 draft Con Plan and Community Survey added as sources of data. Does BHA/City know when draft Con Plan will move from "draft" to final?

Response: BHA staff were informed by City staff that the approved version has been posted by the end of December 2024.

Comment: S. p. 9—this discusses increasing employment and training of targeted Section 3 workforce and expand M/WBE contracting and subcontracting opportunities, including through Project Labor Agreement mechanisms. Is this discussed further elsewhere in the Plan in terms of what new efforts BHA is making? If not, that should be detailed.

Response: Please see Five Year Plan goal on creating economic opportunity.

Comment: S. (also Capital) B.2.25, Other Capital Grant Programs (p. 91)  
BHA says that there are no changes here (p. 1), and the text summarizes grants that were received from other sources in 2023 (such as for work at Ausonia, McCormack, or ARPA healthy homes or housing hazard money). As with other statements of financial resources, this should be double checked, and if there is anything else that has been received or anticipated for receipt beyond regular HUD public housing capital grant sources, this should be updated.

Response: The information in the table is accurate.

Comment: (Administration / Human Resources)S. B.2.26, Organizational Chart (p. 92)  
This has been updated, and as in the past, this is a very important document for the RAB and residents to help navigate who is responsible for what at the BHA and how supervision works. There are a number of changes (including some important vacancies that need to be filled). The RAB may want to go over this at a future meeting with BHA staff. It would be helpful for the RAB and resident leaders to get periodic updates to this chart if there are changes, rather than having to wait for this until the next PHA Plan cycle. Can BHA do that?

Response: Yes, an updated Org Chart (outside the 5-year plan cycle) can be distributed upon written request to the HR Director.

Comment: AP. p. 1 – Note reduction of federal public housing units by roughly 500, and increase in Section 8 units by over 1,000, with net gain of over 600 units in comparison to last year's template.

Response: Thank you for the comment.

Comment: AP. p. 2, Section B.1 - As noted in comments on Supplement, BHA may want to revise this as to what portions of the Annual Plan have been changed and which have not. For example it is likely that the statement of Financial Resources is not identical to those for last year. Since the Limited English Proficiency Four Factor Analysis is now done and has been provided, BHA should update the statement about "will be available soon".

Response: The Annual Plan template has been updated to reflect sections that have or have not been revised.

Comment: AP. p. 2, Section B.3, Progress Reports, BHA has clarified that since it is submitting the next 5-Year Plan this year, it does not submit a progress report for the past year, and will instead submit Progress Reports in future years regarding the new 5-Year Plan. Nonetheless, it would be helpful to know how BHA ultimately did in meeting 5-year goals in the last Plan.

Response: Thank you for the comment. BHA staff meet throughout the year with the RAB and are available upon request to attend a Board meeting.

## **Admissions**

Comment: Can you help me transfer my re-occupancy to help a fellow BHA housing tenant who is a US veteran?

Response: Thank you for your comment. Please contact the Transfer Process Coordinator by calling 617-988-4545 or the status line at 617-988-3400.

Comment: S. Pp. 3-6—No changes are noted in the waiting list figures (for Public Housing and Leased Housing). It would be helpful if BHA could show how any of these changed from last year's report. As has been noted in many RAB/GBLS comments in the past, there is a marked discrepancy between the number of Asian households on the Leased Housing waiting list and the Public Housing waiting list (1% versus 8%) and it's likely that this is due to Priority 1 playing a much larger role with Section 8 admissions and Priority 1 categories possibly not matching priority needs in the Asian

community (fewer households that are listed as homeless, and more that are severely overcrowded or doubled-up). BHA has promised in the past to study the priority categories and make adjustments. Where does this stand?

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

Comment: S. p. 8—Strategy to Target Available Assistance to Families with Incomes at or Below 50% of Area Median—this is revised to eliminate the Home Base Program, and to add an additional title (Living Well at Home) to several existing programs. BHA should explain why the HomeBase program was removed.

Response: This is a cleanup following the expiration of our partnership with MHB in 2017.

Comment: S. On pp. 14-15, for Public Housing Admissions, BHA revised the elder/disabled preference language for such single persons over other single persons. This is also captured in ACOP revisions.

Response: Thank you for your comment.

Comment: S. On p. 20, for Leased Housing Admissions, the Priority 1 list is revised to include applicants (i) with mental and/or physical disabilities exiting institutions or who are at serious risk of institutionalization, (ii) who are referred by partnering homeless service organization or consortia of homeless service organizations, or (iii) who are homeless in or displaced from Boston twelve (12) months or longer as defined in the plan. This is not new under the Admin Plan but these additional groups weren't fully listed in the prior PHA Plan description.

Response: Thank you for your comment.

Comment: S. On p. 22, for Leased Housing Admissions, the preference point chart is revised to also capture preference points for former Section 8 Mod Rehab participants who were converted to Section 8 Project Based Vouchers under the Rental Assistance Demonstration (RAD) program.

Response: Thank you for your comment.

Comment: S. B.2.20, Occupancy by Over-Income Families (p. 84)  
There are no changes proposed here (p. 1), and BHA included an Over-Income Public Housing policy a few years ago and subsequently updated it as required by HOTMA. Note that the Over-Income policy for Public Housing has longer transition periods than the Leased Housing program (where tenants are only given 6 months of zero subsidy status before they will be removed from the program).

Response: Thank you for your comment.

Comment: S. B.2.21, Occupancy by Police Officers (p. 84) There are no changes proposed here (p. 1), and unlike other parts of the country, while the option is open under the ACOP, there are no public housing units occupied by police officers.

Response: Thank you for your comment.

### **Admissions including ACOP**

Comment: In General - As BHA mentions at beginning and with reference to Chapter 9, certain terms have been replaced by others. The Executive Office of Housing & Livable Communities (EOHLC) is now the new State housing agency, in place of the Department of Housing and Community Development (DHCD). And the old term “Tenant Status Review (TSR)” is replaced by “recertification”.

4.4.2 ( pp. 26-27) In the Priorities and Preferences charts, additional points were added to the Administrative Transfer category (boosting it from 50 to 175), word “Applicants” added after “Super Priority” to make this clearer, Priority 1 categories were deleted (as they are listed elsewhere), and chart reordered to match how points are ranked. Does the underlining of “Veteran” mean this is a new preference for the Federal program—thought this was already the case?

Response: No, this is not a new preference.

Comment: 4.5.3 (p. 29) In addition to Super Priority Applicants, Super Priority can apply to Participants who are in good standing, such as those who are in the Section 8 PBV program who are in wrong-sized units or who do not require the accessibility features of a unit and there are others who do. It would be helpful, for reviewers, to have the portion of the ACOP that defines “Participant” so it’s clearer about what this means (i.e., that Section 8 PBV participants can be switched to a public housing unit) and “in good standing” (for example, if a Section 8 PBV participant is on a repayment agreement and is honoring that agreement, is the person in good standing). Does Super Priority for Participants solely apply to PBV (as in the specific examples included in the text), or could it apply to a regular HCVP, MRVP, or City Voucher Participant? What about situations where all of the units in a PBV development have certain accessibility features (such as elevators)--should avoid a situation where a PBV participant is displaced due to not having needs for accessible unit where the situation is no different from anyone else in the building.

Response: Thank you for your comment. We agree that it would be helpful to define both “participant” and “participant in good standing.” We have added these definitions in response to this comment. For details, see Chapter 11: Definition. The ACOP will define “participant” and “participants in good standing” in the context of federal and state public housing, while the Admin Plan includes definitions for Section 8 participants and

participants in good standing. Additionally, the super priority for PBV families residing in a PBV unit, where the BHA determined that the family is occupying the wrong size unit, applies only to PBV participants. This does not include HCVP, MRVP or City Voucher participants.

Decisions about unit assignment and accessibility features are made based on a variety of factors, including individual needs, available resources and overall unit accessibility. BHA will not unnecessarily displace a household without finding alternative suitable replacement housing.

Comment: 4.6 (p. 38) The word “Admissions” is added before “Preferences” and the overall text is revamped to clarify how Preferences are applied within Priority categories to those on all open waiting lists, to clarify this section.

Response: Thank you for your comment.

Comment: 4.6.1 (pp. 38-40) BHA has revised the language on how elder and non-elderly disabled preferences work within federal and state elderly/disabled developments, consistent with EOHLC regulations, and has removed the veterans preference language here (it is discussed later). There is no change in how the federal Designated Housing Plan (or for State units, EOHLC regulations) operate aside from incorporating EOHLC changes.

Response: Thank you for your comment.

Comment: 4.6.2 (pp. 40-41) The single elderly/disabled preference is revised to make clear that it does not apply to someone who is pregnant or is in the process of obtaining custody of a minor (such persons will not be considered single persons for the purpose of this preference).

Response: Thank you for your comment.

Comment: 4.6.3 (pp. 41-43) The Veterans Preference is found here (and, as noted, deleted from its earlier placement), and the Elderly/Disabled Designated Housing Preference that was here is deleted (and moved to 4.6.1). Note that consistent with the HERO Act, EOHLC has recently revised its Veterans Preference, and it may be that different preferences would apply to the State and Federal programs. BHA should review this and advise the RAB/public if any further tweaks are needed here to conform to these recent changes.

Response: Thank you for your comment. BHA has reviewed, no additional edits are necessary at this time.

Comment: 4.6.4 (pp. 43-44) Language has been removed from the Displaced Boston resident preference to remove the requirement that the applicant show that the Boston residence was the last permanent placement. It would be helpful for BHA to explain

why this change was made, since most displacement preferences, following on the old “federal preference” model from the 1990’s, provide that preference can be lost if the person subsequently obtains standard permanent replacement housing (even if that housing ultimately turns out to be unaffordable or unstable). BHA has also expanded the list of verifications that can be used to show this status, which is helpful.

Response: BHA removed this language because we were not capturing households originally displaced from a unit in Boston who later had to relocate outside of Boston due to their circumstances.

Comment: 5.3.5 (pp. 54-55) The language on verification of student status is revised, so the existing language is limited to the federal program, and for the State program, recent EOHLC revisions are incorporated that expand eligibility to students that are at least half-time.

Response: Thank you for your comment.

Comment: 5.4 (p. 60) Language is added prior to 5.4.1 to make clear that for the State program, the following list of acceptable verifications is not exclusive, and other forms of verifications may be acceptable as provided in EOHLC regulations. This change wasn’t noted in the summary of changes.

Response: Thank you for your comment.

Comment: 5.4.1 (p. 60) Language is added that for the federal program, BHA will ask for the two most recent and consecutive pay records, and for the state program, BHA will require tax reporting forms. The 2 paystubs change is welcome, and the State change is required by EOHLC. BHA may want to consider, if in any site it (rather than a Mixed Finance partner) is administering LIHTC along with federal public housing subsidy, including similar ACOP language on tax reporting forms, so that it is not necessary to do this twice.

Response: Thank you for your comment.

Comment: 5.4.4 (pp. 60-61) Language is added distinguishing what’s required for federal and state programs and adding EOHLC required language for State programs (regarding use of tax reporting documents to verify business income).

Response: Thank you for your comment.

Comment: 5.4.5 (p. 61) For households reporting zero income, BHA has revised the language to mandate always providing a budget or explanatory statement, but has left this as something that may be required. The language is clarified so that sources of regular cash expenditures for the household are counted as income. It may be helpful, either in the ACOP or in other internal guidance, to distinguish between situations where contributions are “sporadic” (such as gifts or occasional contributions from family or



friends) and non-countable from what would be considered “regular” and countable. As provided in prior HUD guidance, it is also important for families to understand that the counting of regular contributions is not evaded where the contributions are indirect (for example, regular purchases of groceries, or regular paying for cable or internet).

Response: Thank you for your comment. BHA will work with staff at regular meetings to discuss and decipher examples of sporadic and regular income.

Comment: 5.4.7 (p. 61) Verification of assets is revised so that only one statement of assets is required, as opposed to prior language that required two statements. BHA should, here or in the HOTMA Appendix (see below), identify if there may be additional changes regarding asset verification that it is required to, or may as a matter of discretion, adopt consistent with HOTMA changes once there is a HOTMA implementation date.

Response: Thank you for your comment.

Comment: 5.4.9 (pp. 62-63) BHA caught a couple of typos in the existing text here, both in the title (a missing “of”) and in the text (deleted a “not”). This was not noted in the summary of changes, but these are fine.

Response: Thank you for your comment.

Comment: 5.6.1 (pp. 70-71) The language is revised so existing language is limited to the federal program, and EOHLC language is added for the different requirements for State programs and Live-In Aides/Personal Care Attendants (PCAs) as required by EOHLC revised regulations.

Response: Thank you for your comment.

Comment: 5.6.2 (pp. 71-72) This is revamped to strike certain language that previously conditioned approval of live-in aides or PCAs for all programs, and to then have a separate subsection where the federal program imposes additional requirements that are no longer applicable to the State program (given EOHLC revised regulations).

Response: Thank you for your comment.

Comment: 6.1.3 (pp. 74-76) This is a very important change and is worth discussion with the RAB and residents so that they fully understand it. Moreover, the use of the term “participants” may throw people since they may think it means HCVP, PBV, MRVP, or City Voucher participants, but as I understand it, this is a term that would also apply to existing federal public housing tenant households. It is also not clear, for the new language (where revised occupancy standards will be applied to new applicants and to those who don’t already have approved transfers), if it is just for the federal programs—that’s likely the intent, but BHA should clarify this. See also GBLS’ subsequent inquiry

about how the changed standards will affect size qualification determinations for those who already identified transfer needs but who do not yet have an active transfer. BHA has had different occupancy standards for its public housing and Section 8 programs for a long time. This typically has meant that public housing applicants would be assigned to a larger bedroom size than would be the case than if they were assigned, say, to a PBV unit. The purpose of this change would be that the Section 8 standards would be adopted across the Board—but this would only impact existing federal public housing households if they are being transferred (with an approved transfer date after a particular implementation date—not clear when that would be). Otherwise, the existing public housing occupancy standards would contain to be applied to them.

This issue has arisen, for example, in the discussion of modernization transfers at the Mildred C. Hailey Apartments. BHA has indicated that when modernization is completed, the revamped apartment will continue to be public housing for a while, and then after a period of time (18-24 months), will be converted to the Section 8 PBV program. However, if the public housing occupancy standard did not change, such households, if they were wrong-sized under Section 8, could potentially be required to relocate a second time. Use of the revised occupancy standard (as a public housing standard) at the time of the relocation transfer back to a revamped apartment would avoid doing two moves, and could make sure that the “right-sized” move is covered under BHA-covered relocation expenses. GBLS favors this approach to minimize moves as hardship, but we understand that this is a much bigger issue for residents and is worth a full airing and explanation by BHA staff.

Response: Thank you for your comment. We originally used “participant” but upon review, we agree that “resident” is the correct terminology in the ACOP. The ACOP now clearly defines “resident” in the context of federal and state public housing. The new occupancy standard will be implemented effective 4/1/25 and will apply to all Federal Public Housing applicants and residents at their lease effective dates. For transfers and new admissions approved prior to 4/1/2025, the old occupancy standard will remain in effect.

Comment: 8.1 (pp. 94-95) A new subsection (E) is added to the Residual Tenancy policy for the State program, following revised EOHLC regulations which permit, in certain circumstances, PCAs to be considered for residual tenancy even if their income had not been included in household income for rent determination purposes previously.

Response: Thank you for your comment.

Comment: 8.5 (pp. 95-96) Existing language on limitations on the Residual Tenancy policy is now prefaced by the qualification that this is for the federal program, and there is a separate paragraph about the state program, following revised EOHLC regs. BHA should remove the “(e)” before the paragraph describing the state program (that was likely an inadvertent carryover from Section 8.1).

Response: Thanks for flagging this. BHA removed the (e) as described above.

Comment: 9.1.1 (p. 97) This paragraph about the lease is now separated into separate subsections for the federal and state program. The paragraph on the federal program likely should eliminate the reference to EOHLC regulations, since those would not apply to the federal program, although BHA might decide, on its own, to include language from the state program in the federal lease which otherwise did not conflict with federal requirements. BHA has for a long time sought to have one consolidated lease and grievance procedure that it could use for both federal and state programs, and has previously obtained waivers from EOHLC and HUD to do this.

Response: Thank you for your comment. Removed the reference to EOHLC on the Federal side as flagged above.

Comment: 9.1.2 (p. 98) Regarding the length of the state lease, BHA has removed language that might qualify the continuous nature of the lease, and instead has substituted reference to EOHLC regulations and the lease as mandated or approved by EOHLC. (EOHLC does not have the requirement, mandated by HUD for the federal Community Service requirement, that leases have a one-year term and might not renew if tenants are out of compliance with Community Services obligations.)

Response: Thank you for your comment.

Comment: 9.1.3 (p. 99) This looks like it is missing a designation of a subsection (e)--it goes from (d) to (f). New language is added based on EOHLC regulations for additions to the household for State public housing (including that income is within continued participation limits and the unit is of the right size for the reconfigured household. There may be a question of what process should be followed if addition of household members would require transfer to a larger unit, particularly if these are additions to the household due to birth, adoption, or court-awarded custody of a minor, given federal fair housing familial status requirements. Subsection (f) makes clear that there will be screening of persons age 10 and older for State public housing, and of persons age 14 and older for Federal public housing. In addition, language is deleted that would limit the ability to change the head of household to ones where the head of household is elderly or disabled. This change is welcomed, since the prior language was too restrictive, and there may be a range of reasons why a family might ask to change the head of household (such as the former head being away from the apartment for prolonged periods for employment, military service, or the like).

Response: Thank you for your comment. Corrected the lettering. Agreed prior language on changing the head was previously too restrictive. Transfers to larger units based on family composition will be addressed by the transfer policy and depend on unit availability.

Comment: 9.1.4 (pp. 100-101) Subsection (a) is revised to make clear that existing language is for the federal program, and to add new language for the state program, including a limitation in the state program to temporary visitors for 21 days. Subsection

(b), on Unauthorized Occupants, is similarly revised to provide for different guest/visitor limitations for the federal and state programs. GBLS would suggest a few changes here-- Change the heading to subsection (a) to not only cover removal of household members, but also temporary visitors.

Revise the description of the state limitations in subsection (a) so that, similar to the "unauthorized occupant" provision in (b), a longer period of stay for a temporary visitor can be approved by BHA staff for good cause (for example, an out-of-state visitor becomes ill during a stay and cannot return home within 21 days).

In both sections, provide that if there is a request for someone who was a temporary visitor to become a household member, the person can remain in occupancy pending screening and approval (but subject to inclusion of the proposed addition's income in the rent). (This could be done as a cross-reference to the section about the process for adding household members and the conditional right to continued occupancy of the proposed addition.)

Response: Thank you for your comments, revisions adopted.

Comment: 9.2.1 (p. 101) BHA has not proposed any change to the language on annual recertification. However, HOTMA and other statutory changes authorize dispensing with annual recertification in certain circumstances, such as where a resident is on flat rent or has a fixed income. It may be that BHA will be addressing this when it implements HOTMA changes, but it likely would want to cover that in its HOTMA Appendix.

Response: Thank you for your comment. BHA will address this.

Comment: 9.2.5 (p. 102) Consistent with what is discussed above in Section 5.4.5 (p. 61), this provides for BHA discretion regarding additional information for zero income cases, instead of mandating it in all cases, and eliminates the requirement to automatically reverify zero income status every 90 days. However, consistent with other ACOP language, the household would be required to promptly notify BHA of any change from zero income status. As discussed above, while regular contributions toward household income or coverage of household expenses by third parties are countable (this is not new), it would be helpful for BHA to provide some guidance since gifts or sporadic assistance would not be countable. Perhaps EOHLIC's guidance on this can be used for both state and federal public housing for simplification

Response: Thank you for your comment. BHA will review HLC guidance on this subject and determine if it is appropriate to sync policies.

Comment: 9.2.7 (p. 102) Substitutes "When" for "Before" regarding giving of notice of rent change. This is helpful, as it clarifies that there is only one notice (as opposed to an advance notice), and the notice is effective as to the rent change.

Response: Thank you for your comment.

Comment: 9.2.8(b) (p. 103) There is very helpful language here for the federal program that says that if the tenant household hasn't clearly exercised an option between "flat rent" and income-based rent, as permitted in federal public housing, the lower of the two numbers will be the default option imposed, but the household can contact BHA promptly if this wouldn't have been its choice. This is a sensible approach and GBLS supports this.

Response: Thank you for your comment. We appreciate GBLS's support of this approach.

Comment: 9.3 (pp. 104-105) The interim recertification language is revised, for the State public housing program, to eliminate the special pandemic rules where rent could be adjusted downward to reflect the date of income loss, and to return to the prior rule where the effective date is the 1<sup>st</sup> month after information is provided justifying the adjustment (with some flexibility for circumstances where documentation is delayed). The state language also includes the provision for interim reporting of lump sum awards and one-time assessments based on such lump sums but adds language that interest could be charged on this amount if there is a delay in payment. This tracks EOHLC regulations.

Interim recertification is one of the areas that will change for the federal program due to HOTMA, and while BHA is not yet implementing HOTMA changes (because of HUD system delays), the HOTMA Appendix (below) discusses this. There should be further discussions about discretionary options on interim recertification and what BHA and its residents may favor.

Response: Thank you for your comment. The BHA is committed to a public process and discourse around changes that will affect how income and rent is determined.

Comment: 9.6 (pp. 112-113) BHA has not proposed a change here (to the Self-Sufficiency Income Exclusion). However, this is an area where HUD has made clear that BHA can no longer offer this for its federal public housing program (the state public housing self-sufficiency exclusion still exists but is far more limited). There may be households that qualified for the income exclusion prior to 2024 who would get the benefit of any months left to the disregard period that began before January 1, 2024. HUD has made clear that this change does NOT depend on its system changes for implementation. Therefore, it makes sense for BHA to make clear to its residents what the current rules are for the exclusion.

Response: Thank you for your comment. BHA will make clear the distinction between Self-sufficiency incentives are required under 24CFR 960.255 and the Earned Income Disallowance (EID) which HUD sun-setted on 1/1/24.

Comment: 9.7.4 (p. 117) The last paragraph is revised so that information about any exemption status for an adult family member under the federal Community Service requirement is contained in the notice of tenant rent share, rather than in a client worksheet. This reflects BHA's consolidation about how recertifications are handled

between Public Housing and Leased Housing operations, and the elimination of prior outmoded public housing terminology (such as “client worksheet” and “TSR”).

Response: Thank you for your comment.

Comment: 9.7.5 (pp. 117-118) Terms “BHA staff” and “recertification” are substituted for “Property Manager” and “tenant status review (TSR)” for Community Service Requirement compliance. The word “appointment” is also stricken (since recertification may not necessarily require an appointment, and the most important thing is getting in proper documents). “Annual” is used before recertification since Community Service compliance is reviewed on an annual basis. Note that in the strike-out, next to last paragraph, “us” was inadvertently deleted from the word “status” (and this use of “status” should be retained, since it’s not “tenant status review”).

Response: Thank you for your comment. Revised.

Comment: 9.7.6 (p. 118) As above, the reference to “Property Manager” is deleted and “BHA staff” substituted, since functions no longer limited to BHA property managers. It should be noted, however, that sometimes this function is carried on by private management companies under contract with BHA (and subject to BHA review and oversight).

Response: Thank you for your comment. Revised.

Comment: 9.7.7 (p. 119) As above, “BHA staff” and “recertifications” substituted for prior terms “Property Manager” and “Tenant Status Review (TSR)”. Here again, it may be helpful to clarify that the ACOP standards also apply to private management companies under contract to administer BHA public housing.

Response: Thank you for your comment. Revised.

Comment: Definitions (pp. 138-139) For both Residual Tenancy Applicant and Residual Tenant, the terms are redefined to make clear that for the State program, sometimes personal care attendants (PCAs) can qualify for residual tenancy as provided in EOHLC regulations. The term “TSR” is replaced with “recertification”, and any reference to “annual” review has been eliminated (since it may be that the review is more or less frequent than annually). As noted above, it may be helpful to have the existing definitions of “Participant”, “in good standing”, and “Veteran” available for reviewers, and the “Veteran” definition may need to be revised if required by recent EOHLC or state statutory changes.

Response: As stated above Participant and Participant in good standing are to be defined in the ACOP.

Comment: HOTMA Appendix (*This is not numbered, and not included in the Summary of Changes*) HUD has delayed the effective implementation date for HOTMA because

of some delays in setting up necessary reporting systems but has required PHAs to say what policies they intend to implement once there is an effective date. GBLS asked if residents/RAD needed to comment on BHA discretionary HOTMA policy changes at this time, or would have a separate opportunity to comment on these later (say as part of a mid-year PHA Plan Amendment). BHA is not sure what HUD will say. Note that BHA will retain its discretionary deduction of extraordinary medical expenses for all families (not limited to elderly/disabled families), but the change in the deduction threshold from expenses above 3% of annual income to those above 10% of annual income will be phased in for existing households, and will be implemented immediately for any new households (similar to how this is handled for elderly/disabled families). BHA hasn't addressed some other discretionary choices and GBLS/ is requesting a separate later opportunity for the RAB and residents to comment on the full set of HOTMA changes once an implementation date is set and BHA is in the process of making further revisions to its policies, leases, and procedures.

Response: Thank you for your comment.

### **Budget**

Comment: S. On p. 24, and at the beginning of the summary of Supplement changes (p. 1), no changes are listed for this, but it is likely that the numbers for available anticipated resources in 2025-2026 are not identical to those in the prior PHA Plan Supplement, and BHA should look at this and revise as needed.

Response: The financial resources table was updated.

Comment: AP. p. 3, Section B.5, this says there were no findings to address from the latest audit. Can BHA provide the latest audit (as this is a supporting document)?

Response: See BHA website, Fiscal, Financial Information with the latest available and historical information.

### **Capital**

Comment: S. B. 1.12 & B.1.13, Substantial Deviation and Significant Amendment (p. 65) BHA indicates on p. 1 that this has been revised, but the text does not show any updates (new language or strike-throughs), and that may be an error. BHA did have to revise this in past years to reflect RAD-related changes that HUD mandated.

Response: Please see referenced section text revision to non-emergency work items.

Comment: AP. p. 3, Section B.4, the approval date for the last rolling 5-year Capital Plan is revised from March 2023 to May 2024.

Response: Thank you for the comment.

### **Civil Rights**

Comment: AP. p. 4, Section D.1, this refers to the latest Assessment of Fair Housing (AFH), and correctly notes that HUD has not yet required this as an element of PHA Plan submissions. A BHA staff member did share with the RAB, by email, a latest update to work on AFH recommendations, but there was no formal presentation to the RAB on this. It would be helpful to provide greater detail on what has been done so far and what steps BHA and the City expect to take on this in the coming year somewhere in the PHA Plan or in response to comments. This is particularly true given that AFH involvement is part of the RAB's mission.

Response: The 2024 AFFH Summary Report was provided to the RAB in early January 2025. BHA staff meet throughout the year with the RAB and are available upon request to attend a Board meeting or arrange a presentation.

### **Economic Mobility / Family Self-Sufficiency**

Comment: Can you create an economic opportunity program initiative to help motivated lower income American citizens receive grants to serve those fellow BHA housing tenants who are marginalized? For example, with a financial grant budget of \$500,000 to \$1 million dollars, we can purchase a vacant land lot in the Commonwealth and pay general contractors to build a unique small business career development networking home center to help BHA housing tenants, lower income Americans and US veterans excel in entrepreneurship. All American housing tenants should be able to live in homes with heating access during anytime of season. Lower income Americans should be able to buy land, build desired homes and receive grants to equally participate in rural and urban community housing and mixed use land development.

Response: Thank you for the comment and proposal. While the BHA does not have discretionary funding for this purpose, BHA continues to partner with the City of Boston and other agencies on efforts to promote homeownership, entrepreneurship, and other advancement. The BHA seeks to pull levers that activate paths to self-sufficiency and economic mobility for BHA residents. Two examples of that are: (1) the First Home program where the BHA has leveraged City and federal resources to allow BHA more than 75 households to purchase homes in the past 2 years, and (2) the Family Self-



Sufficiency (FSS) program that builds assets for families as their earned income increases. The FSS program currently has more than 8 million dollars in shared escrow for the more than 1500 BHA households that participate.

BHA also strives to ensure that housing meets code requirements with respect to being heated and cooled appropriately.

### **Five-Year Plan**

Comment: (Administration) p. 1, Section B.1. I believe this is the first time BHA has set out these 4 key principles for the agency, i.e.,

Public support for housing works: Boston, like most major cities, is facing a housing crisis. The BHA's publicly supported housing programs are longstanding anchors of affordability that must continuously evolve to meet the needs of the present and future.

We are people, not buildings: The BHA is not about buildings or vouchers. It's about people: those residents we support through our services, and the employees who, day in and day out, dedicate their lives to our mission.

There is no home without community: Community is at the center of everything we do. We don't just provide access to affordable housing; we foster diverse, healthy communities and improve quality of life for everyone.

We are essential to Boston: Our staff, residents, and partners are all part of a system that fosters the kind of city we want to live in: diverse, equitable, and inclusive.

These are all excellent. It may be helpful to have a formal process to present the thinking that went into these principles and to solicit any further resident/public feedback. This is not realistic within the current PHA Plan submission framework (limited time for discussion at RAB meetings and need to get information out about planned capital expenditures, changes in the ACOP and Admin Plan, etc.) but there may be space for it during the upcoming monthly RAB meetings.

Response: Thank you for the comment.

Comment: Under Lead With Customer Service, a. (Administration) p. 2, Section B.2. Under Lead With Customer Service, BHA indicates an intent to establish Authority-wide resident surveys which will help evaluate performance and improvements, with metrics both as to how many surveys were completed and how many residents agree that BHA is responsive. No timelines have been set for implementation of the survey for Public Housing and Leased Housing programs, nor how this will be incorporated within Mixed Finance housing. When will report backs be provided, and will residents, RAB, LTOs, and BHA Monitoring Committee be among those who get these reports?

Response: The BHA plans to launch an updated resident wide survey in 2025. BHA staff presented a draft survey to the RAB in 2024 and plans to provide an update to the RAB in early 2025. BHA will review and share summary level survey findings on an annual basis.

Comment: Under Lead With Customer Service, b. (Communications) On website design and accessibility, in addition to being ADA compliant, the website should also be readable by most residents (in plain/simple English) and be clear regarding how limited English proficient households obtain translation and interpretation.

Response: BHA is currently engaged in reviewing the BHA website's accessibility components and will be implementing some improvements in this area. As part of that effort, we will also look at readability and translation information. The BHA website is connected to google translate, which is available for all text sections, as well.

Comment: Under Lead With Customer Service, c. (Customer Service) On customer service training (and related metrics on % of staff who've completed training and residents who respond to survey that they received quality customer service), what is the anticipated timeframe to start trainings and to have done a first round of training Authority-wide? Would it make sense to merge this and the next item (staff training to increase familiarity with policies and procedures & cultural competency), so that scheduling, etc., can be synchronized? Should those with expertise outside the BHA on issues of customer service & cultural competency be drawn into this?

Response: All things considered, Summer 2025 will be the best time to launch the first in a series of training sessions to improve and enhance resident and potential residents' experience whenever interfacing with BHA employees. This includes the experience BHA provides in person, over the phone, and all email correspondence. There will be several rounds of training (smaller groups perhaps with customized materials) and the goal is to have cycled through every department at least once by the end of 2025. BHA staff will seek to synchronize additional training sessions, such as cultural competencies, policy and procedure, etc. during the same time period. Customer Service staff believe we will need outside help for certain pieces of staff training, especially around specific and sensitive topics such as cultural competency.

Comment: Under Lead With Customer Service, d. (Admissions) On reducing applicant time in the screening process, what is the current average? Inclusion of the 30-day metric will be helpful to track improvements. If there are separate standards for screening of proposed additions to the household, these should be added.

Response: Thank you for your comment. Currently, the average time applicant screening is 60 days. We appreciate your suggestion about tracking improvements, and we will indeed focus on the 30-day metric moving forward. Additionally, we recognize the importance of having separate standard for screening proposed additions to households, including PCA and residuals. We are committed to reducing these screening times to no more than 30 days to enhance efficiency and responsiveness.

Comment: Under Lead With Customer Service, e. (Operations/Inspections) On the goal of closing 95% of resident-initiated non-emergency work orders within 60 days, GBLS would recommend that BHA be more ambitious to resolve these within 30 days. Such a goal would be closer to Sanitary Code and NSPIRE standards.

Response: BHA agrees that 30-days should be the standard. Ensuring that 95% are closed within the 60 days is an incremental goal BHA is seeking to ultimately achieve the 30 day mark excluding any repairs that are delayed for reasons outside of the BHA's control.

Comment: Invest in high quality maintenance, management, and inspection a. (Operations) On p. 3, under Invest in high quality maintenance, management, and inspection, regarding maintaining & tracking 97% occupancy rate, GBLS would ask that BHA report on this not only at the Authority-wide level, but also at each development, so if there are particular problems at particular sites, these can be readily identified and site-specific strategies adopted.

Response: Thank you for your comment. BHA wide occupancy rate tracking is available through HUD's website dashboard:  
[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/PH\\_Dashboard](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/PH_Dashboard)

Comment: Invest in high quality maintenance, management, and inspection b. (Leased Housing) Under Section 8 Management Assessment Program (SEMAP) High Performer status, BHA should justifiably be proud that it has maintained this status for quite a few years and should keep it up.

Response: Thank you for your comment.

Comment: Invest in high quality maintenance, management, and inspection c. (Operations / Inspections) Under Public Housing Inspections, in addition to arranging for 100% of units to be inspected annually, the turn-around time on non-emergency work orders should also be 30 days, rather than 60 days (see comment above on resident-initiated work orders, and n. 1).

Response: Thank you for your comment. The BHA's incremental goal is to ensure that all work orders are closed within 60 days, which it hopes to achieve by the end of 2025. Ultimately, the BHA seeks to have all work order closed within 30 days, with some exceptions for work that may take longer to complete due to delays in receiving supplies or other vendor delays.

Comment: Invest in high quality maintenance, management, and inspection d. (Administration) Under Implement Resident Service Plans for 8 BHA elderly/disabled sites, why over the 5-year period will only 5 sites get these plans? Should there be a more ambitious goal? If BHA resources will not permit Resident Service Plans for all developments, how will BHA decide which sites get these plans? What will be the schedule for implementing the plans over the course of the 5-year period?

Response: Thank you for this comment. The BHA is working to standardize resident services across BHA communities to ensure consistent service delivery and resident

support. Given current funding constraints and the depth of need, the BHA plans to gradually roll out more formal resident service plans that are tailored to the needs and priorities of BHA elderly/disabled communities as developments undergo conversion to project based section 8 that provide additional resources that can be used to strengthen resident services. The BHA will continue existing partnerships related to resident services and continue to pursue grant funded opportunities to provide enhanced resident services at our communities.

Comment: Invest in high quality maintenance, management, and inspection e. (Civil Rights / Administration / RED) Under Monitor and Enforce Fair Housing Obligations, what are the fair housing obligations that need to be carried over for the various programs? Since BHA and the City have not yet finalized the Assessment of Fair Housing (AFH), will there be some delay in determining this, and if so, what's the likely schedule for determining the protocols and monitoring and compliance mechanisms? How does BHA intend to monitor/enforce these within Mixed Finance sites—do existing contracts or performance measures need to be modified?

Response: BHA has formed a working group to address monitoring fair housing compliance at Mixed Finance sites and throughout various programs.

Comment: Create economic opportunity-job training, career ladders, wealth building—for BHA residents and staff a. (Administration/Procurement) On pp. 3-4, under Create economic opportunity-job training, career ladders, wealth building—for BHA residents and staff, the first item discusses improving Section 3 outcomes both for hiring and for pre-apprenticeship. It would be good to get a lot more detail on this, since it has been difficult to increase Section 3 participation, and this may require long-term engagement with unions and with individual residents over prolonged periods to identify and address barriers to resident participation in available workforce positions.

Response: The BHA is working on multiple strategies to increase resident opportunities including Section 3 hiring. Increased partnership with union pre-apprenticeship programs is one of the above. The BHA's tenant coordinator work, used in concert with construction and energy project, has been a reliable way of supporting public housing and Section 8 employment. The BHA sees additional opportunities in areas like internet access expansion and education for Section 3 employment.

Comment: Create economic opportunity-job training, career ladders, wealth building—for BHA residents and staff b. (Economic Mobility / First Home) Under Support 120 new BHA homebuyers, would this mean the creation of 120 new homebuyers over the next 5 years (i.e., roughly 24 per year), or would this be support to new homebuyers that have already been generated by BHA over the past 5 year period?

Response: Thank you for this comment. The BHA plans to support 120 new homebuyers during the 5 Year Plan period. The BHA is also exploring supports for new homebuyers who purchased during the past 5 year period.

Comment: Create economic opportunity-job training, career ladders, wealth building—for BHA residents and staff c. (Leased Housing / Economic Mobility / ECHO) Similarly, under Support 100 families who wish to relocate to Expanded Choice Communities, would this be a net increase of 100 households over those already doing this? Some explanation of what the Expanded Choice Communities are would be helpful. Tracking the metric of successful relocation is helpful, but it would be good to include statistics for families that tried to pursue these options but were not successful, and what the barriers were to success.

Response: ECHO+ (Expanding Choice in Housing Opportunities Plus), is a program designed to help improve the housing search process for program eligible Boston Housing Authority families in Boston and Greater Boston. As a program that also provides customized information on communities and affordable housing, ECHO+ helps overcome common barriers that Housing Choice Voucher families often face.

Commenter can find more info here: [https://www.bostonhousing.org/en/For-Section-8-Leased-Housing/Voucher-Programs/Expanding-Choice-in-Housing-Opportunities-\(ECHO\).aspx](https://www.bostonhousing.org/en/For-Section-8-Leased-Housing/Voucher-Programs/Expanding-Choice-in-Housing-Opportunities-(ECHO).aspx). In terms of supporting 100 families that wish to relocate to Expanded Choice Communities, BHA would only count the people who used ECHO services as opposed to naturally occurring participants moving.

Comment: Create economic opportunity-job training, career ladders, wealth building—for BHA residents and staff d. (Operations) Under FSS enrollment of 2,000 families, again, it would be important to know how much of this would be adding households versus maintaining households. From other material in the PHA Plan supplement, it appears that there are about 1,450 FSS households (with all but about 100 in the Leased Housing program), and so the goal would be to increase capacity by a bit over 500 participants and to maintain that as FSS families successfully graduate and are replaced by new families on the FSS waiting list. BHA should track progress here separately for Leased Housing and Public Housing, and it may be helpful to have site-specific tracking where particular FSS initiatives have been adopted (and particularly as new public housing developments are added to FSS, since so far this has been very limited). Should “FSS and participants” just be “FSS participants? In addition to the total amount in escrow, would having an escrow average report help? What is Boston Saves, and what is a realistic participation goal for this—is this separate from FSS participation (i.e., could people be in Boston Saves but not be in FSS, or is this a subclass of the FSS participant group)

Response: Thank you for your comments on FSS which staff will take under advisement. Regarding Boston Saves it is the City of Boston Children's Savings Account Program that gives each K2 student in Boston Public Schools an account with \$50. The money in this account can be used when your child graduates high school, for college or job training costs. For this special opportunity, BHA is partnering with Boston Saves to provide BPS students in BHA housing an additional \$500 for their Boston Saves accounts. Five hundred students will be selected by lottery to receive the stipend; all other eligible students will be placed on a waitlist and be entered into a lottery if more funding becomes available.

Comment: Create economic opportunity-job training, career ladders, wealth building—for BHA residents and staff e. (Administration) Under Increase resident participation in Workforce development/Self Sufficiency sessions by 50%, some likely collaborations (such as with Charlestown Adult Education and Northeastern), are flagged, but YouhBuild should also be included. Moreover, BHA should include a goal to get Northeastern to open up its program to Leased Housing as well as Public Housing participants. This is particularly important as the Northeastern program was originally targeted to Mission Main, and all residents there now have RAD/PBV assistance, rather than public housing, and subsidy conversion is the path for the future for many family public housing sites. BHA should also explore what other higher education programs may be good partnerships, including community colleges.

Response: BHA will take this comment under advisement.

Comment: Create economic opportunity-job training, career ladders, wealth building—for BHA residents and staff f. (Digital Literacy) For digital literacy (and the goal of hosting 100 classes where at least 95% of participants achieve at least one training goal), this is likely a longer discussion, since it is not clear what support will exist from what sources over the next 5 years for digital literacy and what collaborations (with BPS, BPL, adult ed and ESL programs, etc.) and delivery models may be best in light of this. In addition, it is not clear what common training goals would be, and whether BHA hosting the classes is the best way to ensure that a large number of BHA families are gaining digital literacy (or that such attainments are getting measured).

Response: BHA is exploring options to continue funding digital literacy programs over the next 5 years, including with support from external community partners and the City of Boston. Our delivery model includes two BHA Digital Equity Coordinators providing digital literacy instruction, recruiting and training BHA residents, local college students and other community members to serve as digital navigators. BHA digital equity staff measures and evaluates participants' goals and skill attainments through pre-and post-class surveys and regular community engagement. Our main intention is to help BHA residents become confident users of technology and the internet. The common training goals are: 1) residents can confidently use the internet on a phone, laptop/desktop, and or tablet; 2) residents use the internet safely and responsibly; and 3) residents are able to communicate online using email, social media and other platforms such as Zoom.

Comment: Create economic opportunity-job training, career ladders, wealth building—for BHA residents and staff g. (Administration) The last item in this subsection is the sole piece to focus on BHA employees (in terms of annual briefing on transportation and tuition benefits). BHA may want to include, here or elsewhere, a separate piece on enhancing employee retention and professional development, particularly for those who can become the next generation, and for ensuring that beneficial institutional memory is conveyed while preparing for the next 5 years.

Response: Thank you for this comment.

Comment: Partnering with Residents and Community Stakeholders to Promote Community Safety a. (Economic Mobility / Youth) On pp. 4-5, Partnering with Residents and Community Stakeholders to Promote Community Safety, there is discussion of growing after-school programs at 4 BHA communities, 3 of which are listed here (Hailey, Commonwealth, and Franklin Field) and measuring over time the number of sites with place-based after school and youth programs. Which is the 4<sup>th</sup> site? How did BHA choose these sites, and is there any potential to spread this program further to other sites over the 5-year plan?

Response: BHA is working to identify and invest new resources in youth programming at BHA communities. In 2023 the City of Boston committed new resources to support the development of an after school program at Franklin Field which was chosen due to the site's youth population, on-site youth center, absence of past investment, and history of violence. The BHA is seeking to expand youth programming to Mildred C. Hailey in Jamaica Plain for similar reasons. In 2024 the BHA received new funding to hire a dedicated youth services coordinator for BHA communities in Brighton. The BHA has not yet identified the fourth site for youth programming, the selection will depend on availability of funding, space to host a youth program, community interest, and a site's history with youth violence. To date, we have chosen sites based on the four criteria outlined above, with funding availability being a significant determinant. We are very open to expanding programming beyond four sites within the next five years and are actively seeking grant and funding opportunities to support this. The BHA anticipates that demonstrating the impact of the pilot program at Franklin Field will help us secure additional funding for new sites.

Comment: Partnering with Residents and Community Stakeholders to Promote Community Safety b. (Administration / Public Safety) The second item here identifies developing & implementing site-based community safety plans at 10 sites over 5 years. Does BHA have a schedule for likely roll out, and does it know which sites will be selected, or what process will be used to choose the sites?

Response: BHA staff from public housing and public safety will work closely to develop a schedule and selection framework for community safety plans including such factors as resident call volume and feedback from our safety and our police divisions. We will have the first two sites selected by the end of winter. BHA Public Safety would welcome the opportunity to meet with the RAB upon their request.

Comment: Partnering with Residents and Community Stakeholders to Promote Community Safety c. (Administration / Public Safety) The third item here discusses investing in technology that will enhance residents' "sense of safety" and discusses metrics both as to the number of sites with new intercom systems and the number of surveys reporting favorable on sense of safety. Two thoughts here - (a) wise technology investments should not only increase the sense of safety but actual safety (and can include things such as fob systems, cameras, and security lighting. (b) The use of surveys to track improvements should not be limited to technology

improvements, but include the other protocols listed in this section (such as site-based community safety plans and after-school and youth programming).

Response: Staff agree that technology investments can increase safety and each of the items mentioned have been and will continue to be part of BHA's safety investments. The surveys are a tool to gather information from residents and improve understanding of trends across several areas.

Comment: Create Green and Healthy Communities a. (Capital) On pp. 5-6. Create Green and Healthy Communities, it is not clear how the comprehensive capital plans will help to achieve this result, and BHA should say more.

Response: Comprehensive Capital Plan Projects combine resources to develop holistic site-wide plans and capital projects that improve the comfort and quality of living by introducing sustainable and fossil fuel free heating and hot water systems; improving fresh-air, ventilation and air-conditioning; providing a better thermal envelope (windows, roofs, insulation); and incorporating safe, climate resilient and user friendly exterior patios, courtyards, playgrounds and greenspaces.

Comment: Create Green and Healthy Communities b. (Administration / Capital) The second item here discusses the Mayor's plan to decarbonize BHA sites and to weatherize, insulate, and provide heat pumps for 1,500 units. More should be said here about a year-by-year and development by development plan to achieve these overall goals (including how it may relate to the City's BERDO implementation). At some sites, it may be that one approach is favored over another. It is also not clear if the 1,500 units are in both the BHA's federal and state public housing portfolios, and what the plans would be for BHA's federal portfolio, or for supporting decarbonization efforts in the Mixed Finance portfolio.

Response: BHA appreciates the need and desire for more clear project detail, timing, schedule and breakdown. The BHA plans to, at minimum, weatherize, insulate, and/or provide heat pumps for 1,500 units across BHA's federal and state public housing portfolio. These units may encompass federal and state properties and in certain cases not all measures may be useful or appropriate. To provide more specificity, the BHA is currently planning insulation measures at its Alice Taylor, General Warren and Pond Street properties. The BHA is also exploring insulation measures at its Heritage Apartments PBV property. The BHA is currently designing holistic system improvements at certain Mildred Hailey and Franklin Field buildings. The BHA is installing heat pumps at the Ashmont Apartments.

Since 2023 BHA has performed this work for over 500 public housing units and BHA currently has several projects underway that will increase this count. BHA identifies, develops, and prioritizes projects through the Capital Construction 5 Year Plan, which combines physical needs assessments from BHA communities, management and maintenance needs, and feedback from public housing residents. Over the 5 Year Plan



period the BHA will develop a mechanism for sharing completed and upcoming projects related to creating green and healthy communities.

Comment: Create Green and Healthy Communities c. (Administration / Capital) The third item lists Modernizing 2,700 BHA Apartments. BHA should break this out and indicate what work is anticipated at what sites over what schedule. Here, as with other items, it is important to not have items overlap and be double counted as that will create confusion and will not promote transparency.

Response: The BHA and our redevelopment partners are currently undergoing several comprehensive modernization and large scale redevelopment projects at BHA communities. These significant modernization and transformation projects will be counted as “modernizing 2,700 BHA apartments.” These projects include comprehensive modernization projects at BHA elderly/disabled communities as well as redevelopment activity underway at Mildred Hailey, Charlestown, and Faneuil Gardens.

Comment: Create Green and Healthy Communities d. (Administration/Capital) The fourth item lists Complete (10) accessibility and open space projects, and metrics refers to “green workforce supported projects”. Which sites and work is anticipated, and over what schedule? The accessibility and open space description doesn’t necessarily conjure up “green workforce”, so BHA should explain more regarding the connections.

Response: The BHA is considering multiple state and federally-assisted properties for open space investments and is seeking to enhance its regular program of accessibility improvements. Generally speaking, projects are in early conceptual stages and sites have not been selected. The BHA has included open space projects in its rehabilitation of the Mildred C. Hailey apartments and the Franklin Field apartments, ranging from rain gardens to recreational spaces and playgrounds to gardens for food production. The BHA has also worked on designs for open space improvements at the state-assisted Archdale Apartments.

With regard to open space and (green) workforce, the BHA is seeking to build on its longtime Section 3 hiring and more recent partnerships with PowerCorps Boston, among other partners, to train and employ or contract with projects that improve public amenities, climate resiliency, control of urban heat island effect, and stormwater retention.

Comment: Create Green and Healthy Communities e.(Administration/Capital) The fifth item identifies Completing solar development at 10 projects. Here again, it would be good to know which sites, what work is anticipated, and over what schedule (i.e., x site will be done in 2025-2027, but y site isn’t planned until 2028)

Response: The Capital Construction 5-Year Plan combines Physical Needs Assessments of the individual developments, management/ maintenance needs and feedback from the Residents to prioritize, plan and develop specific projects for specific

sites. Over the 5 Year Plan period the BHA will develop a mechanism for sharing completed and upcoming projects related to creating green and healthy communities.

Comment: Create Green and Healthy Communities f. (Administration/Capital) The sixth item lists Partnering with green workforce training programs for 20 site-based sustainability projects. BHA should identify which sites, what likely work, and the likely schedule over the 5-year period.

Response: The BHA is considering multiple state and federally-assisted properties for open space investments and is seeking to enhance its regular program of accessibility improvements. Generally speaking, projects are in early conceptual stages and sites have not been selected. The BHA has included open space projects in its rehabilitation of the Mildred C. Hailey apartments and the Franklin Field apartments, ranging from rain gardens to recreative spaces and playgrounds to gardens for food production. The BHA has also worked on designs for open space improvements at the state-assisted Archdale Apartments.

With regard to open space and (green) workforce, the BHA is seeking to build on its longtime Section 3 hiring and more recent partnerships with PowerCorps Boston, among other partners, to train and employ or contract with projects that improve public amenities, climate resiliency, control of urban heat island effect, and stormwater retention.

Comment: Long-Term Financial Sustainability at BHA a. (Administration / RED / Leased Housing) On p. 6, Plan for Long-Term Financial Sustainability at BHA, this discusses Converting at least 5 Public Housing properties to BHA owned project-based vouchers. To avoid overlap/double-counting/confusion, BHA should be clear about what fits within this item and what may fit within items in the Build New Public Housing item below. For example, Patricia White was just a straightforward conversion to PBV, but it is not clear how the renovation work at Hailey would be classified. In addition, rethinking about Section 18 conversions versus RAD/Section 18 blends (see notes/comments on the Supplement and RAD Addendum) may affect both timing and how much additional revenue may be expected to help support renovations and ongoing costs. Can BHA identify which sites it is putting under this item? There may be a similar question to items below as to whether this is ambitious enough over 5 years or, on the other hand, may be realistic given the need for public approvals, LIHTC funding, and any relocation required.

Response: The BHA has prioritized the ongoing modernization and reinvestment in its elderly/disabled properties and is working to reposition such sites while maintaining public control and ownership. Where appropriate and where resources are available, the BHA may also consider family sites for repositioning.

Comment: Long-Term Financial Sustainability at BHA b. (Operations) The second item here discusses Reducing Accounts Receivable by 25% Annually. How did BHA come up with this figure, and which accounts? Is this all rent-related, or are there other areas

(such as utility costs) where other efforts are likely to reduce costs? Rent collection and timely recertification has been a challenge for the BHA since the 2020 pandemic and it would be helpful to identify what strategies will be used (see also separate section below on Avoiding Resident Displacement and Helping Residents Weather Changes).

Response: The Accounts Receivable balances are related to rent. The BHA will avoid displacement wherever possible by entering into court ordered repayment agreements that allow residents to repay amounts owed to BHA over time. If a repayment agreement is active and current, the AR balance will remain low. However, displacement may occur in instances where residents fail to maintain their agreement. Collecting rents at a high percentage is critical for the long-term financial sustainability of BHA.

Comment: Build New Public Housing a. (Administration/RED) On p. 6, Build New Public Housing, the first item lists completing 4 Faircloth to RAD transactions during the 5-year period on publicly or privately owned land. It would be helpful for BHA to list what is already in the pipeline, such as it has elsewhere in the RAD Addendum (West End Library, Chinatown parcel, Amory Street, and Faneuil Gardens). Are these the 4 transactions that BHA is thinking of here? If so, is this an ambitious enough goal for the 5-year period? Moreover, the 4<sup>th</sup> item under this Priority Area (regarding the Mayor's/BHA's goal of building all available Faircloth units in the next decade) seems much more ambitious than this, and it may be helpful to have a map of how this is done over a decade and what realistically could be done in the next 5 years (acknowledging that some work is already underway in the current 5-year period).

Response: Thank you for the comment. Please see the revised RAD attachment. The final version of the 2025 RAD Attachment includes several prospective Faircloth-to-RAD projects. As additional projects are put forward from year to year, BHA will include them in future updates to the RAD Attachment, and BHA will track overall progress in 5-Year Plan updates. BHA expects to articulate more ambitious targets as we proceed over the next five years.

Comment: Build New Public Housing b. (Administration / Leased Housing) The second item lists Redeveloping 3 public housing sites to increase housing opportunities for persons with developmental disabilities, older adults, and families with children. It is not clear, without stating more, how this would be "new housing" (i.e., increased supply), as opposed to preservation and full utilization (which is of course very important). Which sites is BHA thinking of here? Since, as noted in the Supplement and RAD Addendum, BHA is ambitiously pursuing redevelopment at many more than 3 sites in both its Family and Elderly/Disabled portfolios, it is not clear if this is an ambitious enough goal for the next 5 years. BHA may want to say more about which 3 sites it has in mind and whether there are particular strategies at particular sites (beyond the Faircloth to RAD transactions earlier discussed) which would both improve opportunities and provide "net new" housing.

Response: Thank you for this comment. The BHA plans to conduct capacity studies over the next year to identify potential locations for new public housing and will work closely with residents during the planning and development process.

Comment: Build New Public Housing c. (Administration / Leased Housing) The third item here discusses redeveloping a BHA owned site to increase opportunities for veterans. Which site is planned here, and will such a site only be for veterans or will it also serve a range of other households with housing needs?

Response: The BHA is planning to leverage different resources and programs to support the goal of building new public housing in the City of Boston. In addition to HUD's Restore Rebuild program, the BHA will also explore the utilization of the HUD-Veterans Affairs Supportive Housing (VASH) program to create housing opportunities for veterans experiencing homelessness. BHA plans to conduct capacity studies over the next year to identify potential locations for new housing and will work closely with residents during the planning and development process.

Comment: Promote well-being and leadership for BHA residents and staff a. (Resident Capacity) On pp. 6-7, Promote well-being and leadership for BHA residents and staff, this includes a goal of completing 28 local tenant organization (LTO) or resident council elections during the course of the 5 years. BHA should indicate where it came up with this figure. Moreover, this goal is not properly stated. The goal must be to both complete all LTO elections that are overdue due to the pandemic or other reasons, and to then get back to the completion of regular elections on the regular cycle required by HUD (every 3 years). This depends both on how many recognized or conditionally recognized LTOs exist and are overdue on or will need new elections in the 5 years, as well as supporting efforts by residents at sites that don't have an LTO to form one (this would require both developing bylaws and doing elections).

Response: The figure used is based on internal capacity to complete elections and a realistic assessment of what it takes to conduct an election alongside the other departmental responsibilities. It includes task forces that may be overdue (Hailey and Charlestown for example – those sites are now in the election process) as well as encouraging elections at sites that do not have task forces currently (Fairmount for example – also starting the election process). Holding elections at sites that do not have a current LTO is very challenging as it takes multiple meetings to get residents adequately engaged to form an election committee and have sufficient declared candidates to hold elections. At some sites, we just do not get enough participation and have to revisit multiple times over a period of time despite efforts from staff. Staff also spend a considerable amount of time assisting boards to fill vacant seats, even shortly after an election. RSC staff will do their best to complete as many elections as possible each year.

Comment: Promote well-being and leadership for BHA residents and staff b. (Administration / Communications) The second item discusses coordinating with the Youth Council. There need to be more robust conversations to fold more sites into the

Youth Council and to include initiatives such as Youth Build and Design Corps which provide training and employment opportunities for youth related to expanding Section 3 as rehabilitation work is done on sites. Focus should not just be on arts and after-school programs but interactions with groups like Charlestown Adult Education and its success in helping youth with high school equivalency and job readiness, including obtaining drivers licenses, OSHA-10 training, and the like. The metrics here should not merely be on the number of youth who develop public speaking and policy expertise, but on fostering long-term economic opportunity for their families and modeling success for other young people in BHA communities.

Response: Staff are working on how to best incorporate the work of the Youth Council with more BHA sites, although there are related transportation and staffing level challenges (BHA does not get sufficient funding to fully support youth services generally). We are hoping to see some improvement in this area this coming year. The Youth Council is informed about career and other training opportunities both through Spoke and BHA and there is coordination between the Youth Council, other BHA youth programs, and the Charlestown Adult Education Center. In some cases youth from both the Youth Council and in other BHA youth programs have been referred to and attended the Charlestown Adult Education Center for additional services, especially for those that have graduated high school and are looking for assistance with next steps or for those that need to attend HiSet classes. This generally happens behind the scenes, and again, there are transportation challenges, so this activity may not be publicly apparent but staff are aware that the Charlestown Adult Ed Center can be used as a referral source for both youth and adult BHA residents. Lastly, while we agree the above items are important, we also believe that the arts, public speaking, policy expertise and after school programming are critical for youth opportunity and advancement.

Comment: Promote well-being and leadership for BHA residents and staff c. (Administration) The third item discusses increasing staff participation in leadership development training. It would be helpful to say more about what's intended here—would this be leadership development within the BHA organization, and what would that involve, or is it BHA staff reaching out to youth and families in BHA's Public Housing and Leased Housing programs? What staff could be most helpful? What skills will be developed? In addition, is there any intent to involve resident leaders in helping other residents develop leadership skills and how would that best be done?

Response: The BHA will continue to invest in leadership and professional development for BHA staff through the Management at its Best program, which is a voluntary program for new managers and staff interested in developing management and leadership skills. BHA plans to increase the number of staff participating in this program and will develop new programming options for staff that have previously participated in the management training program.

Comment: Promote well-being and leadership for BHA residents and staff d. (Administration/Operations) In addition to the Priority Areas, Goals, and Metrics already

included in Section B.2, pp. 2-7 of the 5-Year Plan, BHA may want to add Avoid Resident Displacement and Help Residents Weather Changes. This would be for both the Public Housing and Leased Housing programs. This could include VAWA relief, arrearages that develop for circumstances outside of families' control, private landlord decisions to increase rent beyond what's affordable to the resident or to pursue eviction for business or personal reasons, families unable to adjust quickly to subsidy standard adjustments due to household size changes, required relocations due to being wrong-sized or no longer needing accessibility features, and participants required to move because landlords do not make repairs and subsidy is withdrawn. BHA is also implementing HOTMA changes and some discretionary options may better help residents remain in BHA affordable housing (such as making withheld HAP payments available for relocation and retaining the discretionary medical expense deduction for all public housing families). Metrics could include evaluating success rates (how many families are able to successfully use their vouchers to move) and rent burden (how many HCVP households are paying more than 30% of income for rent), measuring the percentage of PBV participants who've requested to exercise mobility choice who've been issued and successfully leased up with tenant-based vouchers, and evaluating what percentage of families who had HAP contracts terminated for HQS violations were able to successfully lease up elsewhere (either through use of a tenant-based voucher or through transfer to a PBV or Public Housing unit).

Response: Staff will take the comment under advisement.

Comment: Promote well-being and leadership for BHA residents and staff e. (RED / Administration / Resident Capacity) BHA may also want to include as a Priority Area/Goal Reviving and Enhancing its Mixed Finance meetings. Prior to the pandemic, this became a good forum for resident leaders at the various BHA sites undergoing redevelopment (many with non-BHA partners) to share their experiences and for BHA and residents to discuss with Developer partners important issues like resident participation, LTO funding, grievance rights, and tenancy preservation and to help insure consistency between BHA and Mixed Finance protocols. BHA did Authority-wide resident conferences in 2019 and 2022 to share Principles of Redevelopment. Unfortunately due to the pandemic these meetings ended. While it is true that sometimes meetings with specific Developer partners may be beneficial rather than with the larger group, residents did find these forums to be helpful, and senior BHA staff were engaged in follow-through.

Response: Thank you for this comment. BHA is planning to organize a mixed finance meeting in 2025.

Comment: Promote well-being and leadership for BHA residents and staff f. (Administration) On p. 7, Section B.3, Progress Report. While BHA has not, in the past, provided a progress report on the final year of its last 5-year plan the same year that it generates a new plan, this is a matter on which HUD does not provide guidance, and in fact it would be beneficial, going into the new 5-year plan, to reflect back on what was

achieved and what remained to be accomplished in the prior 5-year plan. Comparison may also be instructive in development of the new plan.

Response: Staff will take the comment under advisement.

Comment: Promote well-being and leadership for BHA residents and staff g. (Legal) On p. 7, Section B.4, VAWA, see separate notes/comments in the PHA Plan supplement. While it is true that the VAWA policy is found there, rather than here, as noted in those comments, the 5-year benchmark is a good time to revisit whether the VAWA policy, notices, etc., need to be revised and to bring in outside reviewers to this process.

Response: Noted. The BHA reviews its VAWA policy from time to time.

Comment: Promote well-being and leadership for BHA residents and staff h. (Administration / Civil Rights) On pp. 7-8, Section D.1, Affirmatively Furthering Fair Housing (AFFH), as noted in separate notes/comments on the Annual Plan template, while BHA is not yet required by HUD to submit AFFH materials, BHA and the City of Boston have devoted substantial time to this, and in October, 2024, BHA staff shared an update on Assessment of Fair Housing (AFH) goals and indicated that a more substantial document would be available for the BHA's website in December, 2024 (as noted above, this is not yet available as of the deadline for PHA plan comments). GBLS has submitted separate comments on the October 2024 report. Given that the RAB's mission explicitly includes AFFH, it would be good to have a RAB session devoted to this topic, and the AFFH progress and planned implementation should be included somewhere in the PHA Plan submission (possibly as part of BHA's response to comments).

Response: The 2024 AFFH Summary Report was provided to the RAB in January 2025. BHA staff meet throughout the year with the RAB and are available upon request to attend a Board meeting or arrange a presentation.

### **Grievance Procedures**

Comment: S. (Grievance, Legal, Asset Management) B.1.6, Grievance Procedure (pp. 37-38) BHA has not proposed changes (see also p. 1), and GBLS is not suggesting any. However, it should be noted that as additional developments, or portions of development, either convert to Section 8 or undergo Mixed Finance modernization and redevelopment, this may require substitution of the Mixed Finance Grievance Procedure (finalized by BHA in 2019) for the regular BHA Grievance Procedure, and BHA should make sure that all such sites have done this so that residents and participants are getting the benefit of grievance protections accorded by law and/or BHA policy. BHA should also set up a system of response where it is identified that a Mixed Finance site does not appear to be providing the Mixed Finance Grievance protections. An issue

arose this year where it appears that the J.J. Carroll site (redeveloped as Section 8 PBV housing from its prior elderly/disabled public housing status) hadn't implemented this.

Response: BHA previously updated its RAD Attachment by appending sections of the HUD RAD Notice. With respect to the question about what to do if a developer is not complying: Residents and others should please report suspected noncompliance to BHA's Asset Management department. Raul Leon is BHA's Director for Asset Management.

### **Language Access including Four Factor Analysis**

Comment: p. 1 –This chart shows that, as in the past, there is fairly significant usage of Language Access resources to assist applicants and Public Housing and Leased Housing residents. Of the 1,064 requests for assistance during the past year, over half (566) are for Spanish, with Chinese coming next (192, or 18% of the requests), then Haitian Creole (140, or 13%), and then Cape Verdean and Vietnamese (both between 4-5%). One question here is whether BHA should add Haitian Creole as one of the languages into which it translates vital documents? Right now, this only happens for Spanish and Chinese. The chart also shows that the bulk of language needs are handled by the Language Access division of the BHA (60%), with contractors/vendors handling another 28%, BHA staff in regular departments who are bilingual handling 11%, and only 1% handled by clients' own interpreters. It also shows that the greatest demand is in Leased Housing, then Admissions, then Resident Engagement (which often involves translating materials for large tenant meetings with multiple languages), and then Grievances and Appeals.

Response: While Haitian Creole is at 13% of the language we assisted in the 2023-2024 FY (Out of the 1064 interpretation services recorded, 140 were for Haitian Creole), it is still less than 5% of the whole BHA population. Haitian Creole speaking population is only 2.3% of our public housing residents, 2.9% of our applicants on the waitlist, and 1.16% of our Leased Housing participants. However, we acknowledge that the need for Haitian Creole interpretation and translation services has increased since the inception of the BHA Language Access Division, and as such, we are working on translating and updating some of our most frequently used documents, such as the application and the public housing recertification form. We hope to have these documents available online before the end of the year.

Comment: On the second page, there is some discrepancy between the numbers shown in the chart and those in the text (for example, left hand chart shows 586 but text says 386, and right hand chart shows 5,322 cumulative new documents, but text says 4320). These should be reconciled. The bulk of the demand again is from Resident Engagement (33%), with Admissions and Real Estate Development also creating significant demand (14% each)



Response: Thank you for this comment. This has been updated. In the 2023-2024 FY, the Language Access Division translated 586 pages and updated 13 pages, a total of 599 pages. The total cumulative of pages translated and updated since 2010 is 6154. The resident Engagement Department groups our Wellness Connect, ROSS, and Resident Empowerment programs, thus the high number of translations.

Comment: The third page shows use of the BHA multilingual language line, and that there were over 17,000 calls involving its use over the past year. Here again, the heaviest demand was in Spanish (almost 90%), with Chinese between 5-6%, Haitian Creole about 2%, and other languages below 1% each. Admissions and Leased Housing again had the highest demand, with work orders and Development-related communications then following.

Response: Thank you for the comment.

Comment: The fourth page discusses the Volunteer Interpreter program, which has been a vital aspect of the BHA program for many years, particularly given the limited budget that BHA has to meet language access needs. This reflects both maintaining a robust pool and training and taking on new volunteers, as well as the volunteers' involvement at a number of sites for multilingual resident engagement. It may be useful to track 2023-2024 accomplishments with those in prior years so that if there are any needs for tweaks or any barriers that should be addressed (for example, recruitment is insufficient to address turnover), appropriate strategies can be added.

Response: The Language Access Division is working on a system to be able to track areas of need and strategies to improve recruitment, which enormously declined after the pandemic.

### **Leased Housing**

Comment: I now live in Randolph, MA. I want to know why a leasing officer can increase a residents rent without an inspection of the apartment. This new wing of apartments are for seniors. There are about 43 units and I have had a problem every month I have lived here. I received a change in contract rent on October 8, 2024 hand delivered by a maintenance person from BHA at 7:40 pm. I moved in October 2023 a year ago. I received annual inspections every year in Boston and now live in Randolph. What is the reason Randolph, MA does not follow the same rules? I called staff Oct 3<sup>rd</sup> and Oct 9 and my daughter send an email and we did not get a phone call or an answer to the email and no answer to this date. Mass Housing Finance / HUD was here and a letter was posted in the elevator if you want your apartment inspected call the office and I did. I got no answer from them. I would think apartments that have problems would be addressed.

Response: BHA now conducts Housing Quality Inspections on a biennial basis (every other year). However, if there are issues at an apartment that detract from health and safety of the residents, the BHA will conduct an inspection upon request. The BHA Inspection Department can be reached at 617-522-0048 or contacted by other means available here: <https://www.bostonhousing.org/en/For-Section-8-Leased-Housing/Inspections.aspx>

Comment: S. On p. 33, the number of public housing and leased housing families served, as well as expected turnover, increased slightly. The NAACP litigation vouchers, previously listed at 276, have dropped to zero. One speculates that this may reflect the final closeout of the litigation and that no further voucher assistance can be expected from this source—can BHA confirm?

Response: Thank you for your comment. Yes, that is correct this reflects the final closeout of the litigation vouchers. The BHA has completed its obligation to continue monitoring these vouchers and reporting to HUD. The funding for these vouchers has been rolled into the larger housing choice voucher program.

Comment: S. B.1.7., Homeownership Programs (pp. 39-43) On pp. 41-42, language about the Section 8 Homeownership Program is revised to make clear (similar to Admin Plan proposed changes discussed in other notes) that homeownership counseling agencies are HUD certified and not BHA approved. In the paragraph on the bottom of p. 41, appears there is a typo, and the language “or working for” before “agency” should either be deleted or placed elsewhere.

Response: Thank you for your comment.

Comment: S. (also RED) B.2.23, Project-Based Vouchers (pp. 87-89)  
There are revised statistics here on the number of units in BHA’s portfolio, as well as how the project-based cap has increased somewhat. Increases in the number of RAD units (both new ones added this year, and ones anticipated to be added soon) are also relevant, since such RAD units are not factored into the project-based cap. All of this is good news, since robust use of the PBV program is key to the BHA’s future and preservation of affordable housing. It’s not clear from this draft if BHA is anticipating development of new project-based housing outside of what it may do within repositioning of its public housing portfolio. As noted in separate comments on proposed revisions to the Admin Plan BHA should provide the analysis regarding any impact additional project-basing may have on community needs for tenant-based assistance or for PBV participants to utilize the Choice Mobility option through available tenant-based vouchers.

Response: Thank you for your comment. BHA will prepare an analysis when the BHA is project-basing 50% or more of its authorized voucher units. We have not yet met this threshold.

Comment: S. (also RED) There is also a question of reconciling the number of existing RAD units (and anticipated RAD units by the end of 2024) with the RAD Addendum and other information. This says that there are 469 RAD units currently and that a further 100 RAD units will be added by end of 2024. However, this does not match with the RAD Addendum, which appears to yield a higher number of current RAD units and other Supplement material calls into question how there will be additional RAD units by the end of 2024.

Response: Staff have reconciled the Supplement and RAD Addendum.

### **Leased Housing Administrative Plan**

Comment: 3.3.5(b), (e)(8) (pp. 21-24, 30) Similar changes to ACOP to include Participants as well as Applicants within the Super Priority category, as long as they are in good standing. As noted in ACOP notes, it would be good to have the Participant and Good Standing definitions to be clear which programs this may apply to (i.e., is this just PBV, or does it include HCVP, MRVP, and City Voucher program)? Would “good standing” include participants that are honoring agreements with BHA (such as repayment agreements)? This makes clear that Public Housing tenants are considered Applicants (rather than Participants) if a transfer to the PBV or other Leased Housing program is being considered, but there should be clear language elsewhere that different income limits apply to them as opposed to other new Applicants. Language is also added so that Super Priority can be provided if (i) a City voucher was issued for a limited time period, (ii) a special purpose voucher was issued but funding is no longer available for that special purpose (such as stability vouchers, emergency housing vouchers, or VASH, and the household is otherwise Section 8 eligible, or (iii) a Foster Youth Initiative (FYI) participant has successfully completed the Family Self-Sufficiency (FSS) program and the FYI term has expired. Is the FSS reference correct, or should this be FYI?

On the Inaccessibility Priority, language is revised (deleting “For Disabled Persons only”) so this matches what is in the ACOP, but there is no change in meaning (i.e., the person would still need to show that a household member had a mobility or other impairment that made the person unable to use a critical element of existing housing.

Response: Thank you for your comment. Yes, the being in good standing includes active repayment agreements. The definitions of “participant” and “participant in good standing” can be found in the Admin Plan on page 276. Income eligibility is outlined in Chapter 5, Section 5.5.1, which details income eligible families. Yes, the reference to FSS is correct. According to FYI regulations, an eligible youth participating in the FSS program is entitled to receive assistance for up to 24 months, BHA decided to prioritize the youth who enter the FSS program.

Comment: 3.3.7 (pp. 33-34) In the opening paragraphs, language is added so that it is clear that the granting or denial of various preferences for elderly/disabled, veteran status, and displaced Boston resident applies across the board for all BHA waiting lists. In subsection (a), subheadings are added to distinguish between the single elderly/disabled preference (over other single applicants) and the elder preference category (which may only apply to certain PBV sites as such designation is listed in the HAP contract. In subsection (b), the word “veteran” is added so it is clear that the veteran can have this status, as well as the various family members of a veteran as listed. Note questions on the ACOP about whether changes in state law on the definition of a veteran and veterans preference may require any changes to the Admin Plan, either to the definition of “Veteran” or otherwise.

Response: Thank you for your comment. BHA has reviewed, no additional edits are necessary at this time.

Comment: 3.3.9 (p. 38) Language about “Preference For” prior to “Former Moderate Rehabilitation” deleted as necessary (since all of the items here are preference categories).

Response: Thank you for your comment.

Comment: 5.5.1 (p. 60) This establishes exceptions to the extremely low-income eligibility that generally applies to Section 8, particularly with exceptions where people are being transferred/converted from the federal or state public housing programs or other Leased Housing programs. The language here doesn’t look like it changed, but it may be that BHA deleted some of what was listed (since originally it went to subsection (k) and would now end at subsection (j)), and there is reference to VASH eligibility of up to 80% of area median income (AMI). Can BHA clarify what was removed? Is any additional language needed here for City Voucher tenants who may have time-limited assistance or whose assistance ended (or where transfer to Section 8 may otherwise be advisable, such as may be needed for reasonable accommodation)?

Response: Thank you for your comment. This section was incorrectly labeled, and nothing was deleted. We apologize for the oversight in the summary of changes. Agreed, BHA has made those edits.

Comment: 5.5.3 (pp 62, 64-66) A number of items under Determining and Verifying Family Income are revised. In (f)(7), while information on assets will be collected annually, it will only be verified every three years. As mentioned elsewhere, BHA may need to revise asset verification once HOTMA changes are fully implemented, and there may be some households that do not have annual recertifications due to largely having a fixed income. In (i), language is added to clarify what are deductible health and medical care costs (including insurance premiums) for elderly and disabled families. Here again, as HOTMA is implemented there will be major changes in how such deductions are applied for existing participants (phase in of changed deduction threshold) and new participants (use of the new threshold). In (l), the earned income

disregard for family members with disabilities is eliminated, as required by HOTMA (this provision is already in effect and is not affected by HUD's delayed HOTMA implementation on other items).

Response: Thank you for your comment.

Comment: 5.9.2 (pp. 72-75) Language on Conducting Briefing Sessions is revised to (i) add information on unit selection that HUD provides, (ii) for persons with disabilities, add reference to effective communication requirements of ADA regulations and briefing information on the reasonable accommodation process, (iii) add information on the right to seek exception payment standards as a reasonable accommodation for persons with disabilities, (iv) add information about BHA's duty to provide information on accessible units to persons with disabilities and where needed to provide assistance in locating a unit, (v) providing information on family obligations in the briefing packet, and (vi) including information on the advantages of looking for units in areas of higher opportunity. Language is also added about BHA's obligation to provide assistance to families with Limited English Proficiency (LEP). GBLS would like an opportunity to review the briefing packet materials in case we may have any suggestions for improvement.

Response: Thank you for your comment. BHA will share with GBLS once the briefing package been has updated.

Comment: 9.3.2 (p. 110) BHA has revised its protocols on Inspections, so that there will be a First, Second, and a Final (Third) inspection in those instances where either the Family was not home or denies access, and these get scheduled automatically without the need for the family to follow up or provide an excuse. Inability to obtain access by the Final Inspection will lead to issuance of a notice of proposed termination. GBLS supports these improvements. BHA should continue best practices of texting/calling tenants when they are on the way and when they have arrived (not relying solely on doorbells that may not work or a knock that may not be heard) as well as using alternative means of communication with family members and interpreters where this may be necessary for effective communication. Moreover, if the reason for lack of access for all three inspections is understandable and can be cured (for example, the participant was hospitalized during the entire period, and just arrived home), termination should be withdrawn.

Response: Thank you for your comment.

Comment: 9.5.1 (p. 111) BHA deleted language that referred to also complying with the time standards in the State Sanitary Code. It would be helpful if BHA explains why this was deleted—i.e., if it was because of conflicts with HUD timelines, revised NSPIRE language, or the difficulty in its staff keeping up to date with both NSPIRE and Sanitary Code standards on time periods for repairs. (Note that the Sanitary Code was revised in 2023 and there may be different provisions now in some areas than was the case in the

past, and presumably there would have been staff training to get up to speed on any revisions, if needed.)

Response: Yes, that is correct BHA has deleted these references because it conflicts with HUD timelines, and revised NSPIRE language.

Comment: 9.5.3 (p. 112) Language here is revised about what occurs on reinspection if the inspector finds that not all items are completed. Previously this would just result in a recommendation of suspension of subsidy. This is revised so that the inspector could recommend either extension or suspension. Language is also added that if owner is working in good faith to address repairs but seeks an extension, this too will be considered. A supervisor will then review the inspector's recommendation or owner request and decide what notice will be given (i.e., for suspension or for extension). These revisions make sense.

Response: Thank you for your comment.

Comment: 12.2.1 (p. 136) This adds the requirement that a family is in "good standing" if it is to be received into the BHA Leased Housing program from another jurisdiction. It would be helpful to spell out what "good standing" means (for example, it should include those who are on repayment plans but are otherwise in compliance with such plans) and how BHA determines this for families being received from other jurisdictions. Since HUD has made clear that receiving PHAs cannot rescreen for eligibility (see 24 C.F.R. 982.355(c)(9)), BHA should explain how this additional language does not run afoul of the portability regulation.

Response: Thank you for your comment. The definition of "participant" is outlined in the Admin Plan on page 275. We are not rescreening portability participants; we are following our own Admin Plan, which stipulates that our participants cannot relocate due to adverse action resulting from disclosure by the initial Housing Authority. If the participant is not in good standing as determined by the initial housing authority, the voucher will not be issued by the BHA and the portability will be returned.

Comment: 14.2.1 (pp. 162-163) Language here is added on the Mainstream Voucher Term, Expiration, and Extension. It is not clear why this is needed as a separate section, but likely is based on some new HUD requirements. It appears that the initial period and extension period are consistent with those that BHA uses for the overall Section 8 Housing Choice Voucher Program (the portions of the Admin Plan that discuss this generally are in a different chapter).

Response: Thank you for your comment. This is in response to PIH notice 2024-30.

Comment: 14.7.5 (p. 173) For the VASH program, this adds language to clarify that VA-connected service benefits are excluded in the calculation for program eligibility but are counted for the purpose of determining the tenant share and subsidy payments.

Response: Thank you for your comment.

Comment: 14.7.6 (p. 174) There is additional language added to this subsection, but the subjects of the new language don't readily mesh with the section's title (which has to do with the VASH voucher period), and so readers may miss that these topics are addressed in this section. It may make sense to have a new overall section heading, or to have subheadings. The content is fine—it adds flexibility for a pool of VASH inspected units, as well as for lease-up in advance of inspection if there was a recent enough inspection that found no violations, as well as for the use of a higher payment standard as a reasonable accommodation for a person with a disability.

Response: Thank you for your comment. Agreed, BHA has made those edits.

Comment: 14.7.9 (pp. 174-175) New language is added here regarding portability of VASH vouchers, including that there is no rescreening by receiving PHAs. The new language in the last two sections should be reviewed-- (i) while this creates some VAWA exceptions to VA approval of a port, the VAWA list is not complete (it does not include dating violence), and (ii) the last paragraph (on veterans seeking to port outside the VA catchment area) is incomplete.

Response: Thank you for your comment. Agreed, BHA has made those edits.

Comment: 14.7.10 (pp. 175-176) This revises language on VA Medical Center (VAMC) case management responsibilities for VASH applicants and participants. The language seems fine, but there is an unnumbered subsection on housing search which probably needs to get into the numbered bullets, and there is a last numbered bullet which has no content after the number.

Response: Thank you for your comment. Agreed, BHA has made those edits.

Comment: 14.7.12 (pp. 176-179) The language here in (a) on VASH Project-Based Assistance adds a new category entitled “Zero HAP option” where VASH units could be provided within a VA facility or there are VASH supportive services provided on-site. This is described as a “waiver” in the body of the description, but nowhere else is this described as a waiver, and it may be that additional language is needed here or elsewhere to make a waiver effective. The units are “zero HAP” because families “will not be removed from the HAP contract as there is no last housing assistance payment that would trigger removal after 180 days”. It would be helpful if BHA could explain this further. This sounds like it could be an innovative housing model where there may be appropriate facilities. However, there may also be questions of what happens for these Zero-HAP VASH families if they no longer choose to subsequently move (see subsection (c)). Consistent with HUD regulations, the revision also states that VASH project-based assistance is not counted in the overall project-basing income mix cap. It would be helpful to discuss subsection (c)(3) further. While subsection (c) is entitled “Right to Move”, subpart (c) concerns those who have to move from a VASH PBV unit because it is wrong-sized or the unit has accessibility features the participant no longer

needs. (As we've discussed in other contexts, BHA may have some flexibility with waivers for those who might elect to be underhoused and do not wish to move.) While the initial language here about 30-day and 60-day notices makes sense, what does NOT make sense and/or is not clear is what happens if there is not available VASH assistance within the 60-day period, and the potential adverse consequences to the participant and to economic feasibility of the project. Since the particular PBV regulation doesn't apply (as noted here), what does compel this, and is this open for further discussion? It does not appear that subsection (d) answers what happens here, for the participant, since it is couched in language regarding a participant choosing to move, and not where a move is required for wrong-sizing or accessibility adjustments. Some of this may also relate to ACOP options (where a participant could get super-priority for a public housing unit).

Discussion would also be beneficial regarding subsection (e), which provides for termination of VASH PBV if a family is not participating in case management services without good cause. It is acknowledged here that there may be participants no longer in need of such services, and there would NOT be termination of assistance in those cases. Termination of payments, however, may adversely affect the provider, and it may make more sense for the provider to proceed with diligent efforts to enforce related lease provisions regarding noncompliance, with money continuing to flow for the unit, while court resources are available to seek out appropriate alternatives. In addition, as BHA has done with its "Graduate" Priority 1 category, it would make sense to have a path for VASH PBV participants who no longer need case management services, but who do need affordable housing, to access alternative programs (such as the Housing Choice Voucher Program) and free up units where case management services would be beneficial to new VASH admittees.

Response: Thank you for your comments.

- The term "waiver" has been changed to "provision"
- Section a(2) outlines that units under this provision will not be removed from the contract, and participants will not be required to relocate.
- Section c(3) has been relabeled for clarify to indicate it is not under "Right to Move."
- Section d (ii) clarifies what happens if there are no available VASH vouchers.
- Section 3.3.5 (a)(9) still includes graduates of PBV units who have fulfilled supportive services as a Priority One category.
- For the full VASH provisions, please refer to the Federal Register Volume 89, No. 156, published on 8/13/24.

Comment: 15.1 (p. 190) The Section 8 Homeownership language is revised to reflect that homeownership counseling may be by a HUD-certified program (not necessarily BHA approved) and that the FSS counseling may be by BHA or a third party agency (such as Compass).

Response: Thank you for your comment.



Comment: 15.2.1 (p. 192) Under Qualifying for Homeownership Assistance, subsection (b)(1), this provides that the additional income that BHA requires may either be above 50% of area median income (AMI) or “the minimum wage time 2000 hours”, whichever is greater. There’s likely a typo here, and it should be “times” rather than “time”. (That same typo appears in existing Admin Plan text at 15.2.3.)

Response: Thank you for your comment. Agreed, BHA has made those edits.

Comment: 15.2.5 (pp. 195-196) It appears that something was deleted in the text here (old subsection (c)), but the deleted text has not been provided for comparison.

Response: Thank you for your comment. This section was incorrectly labeled, and nothing was deleted. We apologize for the oversight in the summary of changes.

Comment: 15.4 (p. 196) Language here is simplified to simply refer to a HUD certified homeownership counseling program, and to eliminate any reference to BHA having a role with this.

Response: Thank you for your comment.

Comment: 15.12 (pp. 200, 202) The section is retitled to add “Payment Standards” after “Homeownership”. A subsection B. is added to reflect that the payment standard is the lower of that based on the family size or the home size, that it is adjusted if the unit is in an exception rent area, and that the payment standard may not be lower than that which was in effect at the start of homeownership assistance. The language here on “exception area rent” should be clarified—how would this relate to Small Area FMRs that might otherwise be applicable?

Response: Agree that this paragraph could be updated for accuracy. The BHA’s Payment Standard chart reflects payment standards that are based off the Metropolitan Area FMRs or the Small Area FMRs (zip code based). The Metropolitan Area FMRs are non-exception area payment standards while the Small Area FMR based Payment Standards are exception payment standards as permitted by HUD’s policy allowing use of up to 110% of the SAFMR where the SAFMR exceed the FMR.

Comment: 15.14 (p. 204) Language is added to the Statement of Family Obligations (for the Homeownership program) to say that the home will be maintained to comply with HUD HQS standards (although BHA will not inspect the unit annually for HQS compliance). Question here and throughout the Admin Plan—should NSPIRE be used in place of HQS references?

Response: The BHA will replace HQS with NSPIRE.

Comment: 16.1.4 (p. 209) Under Maximum Amount of PBV Assistance, a new subsection B on PHA Determination prior to Unit Selection is added. BHA is required to determine how many units it is permitted to project-based and whether it has budget

authority prior to issuing a request for proposals, making a selection based on a previous competition, amending an existing HAP contract to add units, or noncompetitively selecting a project. In addition, the BHA must prepare an analysis of what the impact would be of project-basing 50% or more of its authorized voucher units, particularly with regard to community needs for tenant-based vouchers and PBV participants' desires to exercise Choice Mobility options. Has BHA prepared such an analysis, and can it be shared with GBLS and the RAB?

Response: Thank you for your comment. BHA will prepare an analysis when the BHA is project-basing 50% or more of its authorized voucher units. We have not yet met this threshold.

Comment: 16.2.1 (pp. 209-210) The word "two" was deleted from the beginning of this section (since there are more than two ways for BHA to select owner proposals). A new subsection (d) is added for noncompetitive selection of VASH PBV proposals on VA facilities, similar to the Zero HAP waiver option discussed above in Section 14.7.12.

Response: Thank you for your comment.

Comment: 16.5.9 (p. 240-243) This section about what happens if a family occupies a wrong-sized PBV unit, or does not require accessibility features that the unit may have, requires more discussion. The general language about identifying the problem within 30 days and offering assistance within 60 days makes sense. (As noted above under VASH PBV comments at 14.7.12, it should also be recognized that some underhoused families may elect a permissible waiver to remain in place.) However, the options available to households, and the consequences that occur to the families and to PBV owners and when they occur require more talk. In some instances, it may be that the public housing program could offer appropriate referrals. In addition, it may be that all units in a PBV development are accessible (or have certain desirable accessibility features, such as elevators), and so requiring a family to move because it does not need those accessibility features doesn't make sense since it would be virtually impossible to determine who should be required to move.

Response: Thank you for your comment, BHA is open to discussing further.

Comment: BHA's HOTMA Admin Appendix (unnumbered pages) This is not in the BHA's summary of changes. However, as BHA staff explained in an email exchange on 10/31/24, this is required by HUD's HOTMA implementation notice, which has delayed HUD's HOTMA implementation until various systems changes are made. HUD requires housing agencies to describe how they will implement the provisions of Sections 102 and 104 of HOTMA once HUD has established a date.

As noted in the ACOP notes/comments from GBLS, BHA is not clear what opportunity HUD may later provide for resident/public review and comment on how BHA finally implements HOTMA, and therefore GBLS would intend to get in comments on this now to the extent that it can, without foreclosing the opportunity for later review and comment if this is feasible. However, these are not yet prepared.

Response: Thank you for your comment.

## **Legal**

Comment: Why each resident not have a BHA Real ID? To understand my question, it is complaint about my opinion. If BHA had Real ID it would be good or excellent for residents of BHA to see who is living there under the law of BHA paying rents and some many things else. Because some residents have someone living free and they are not report it to the local offices. You know how much money BHA is losing? Some people are rich and they are living in BHA. They are living free. Also they have properties in their countries out of USA. Rich people and owner of properties outside of USA. This is not good. But it is for only poor people whom can't afford it, only poor whom have nothing else. Think about it. If you want to visit each neighborhood, do it soon and can you bring the police or FBI too to check it out?

Response: The BHA requires all residents of public housing to meet the applicable federal or state eligibility requirements at the time of admission and every year thereafter at the annual recertification. If you are aware of any fraud, please contact the BHA through its zendesk portal: <https://bostonhousinghelp.zendesk.com/hc/en-us> .

Comment: S. B.1.9, Safety and Crime Prevention (Including VAWA) (pp. 49-61) BHA has made very minor changes to its VAWA policy (referring to non-binary individuals on p. 51 and referring to the public housing lease as having some relevant language on p. 52). It would be worthwhile for advocates who are knowledgeable on how HUD has revamped VAWA guidance over the past decade to review and comment on the existing VAWA policy with appropriate BHA staff, as well as to review standard forms to make sure they are in plain language, understandable, and internally consistent.

Response: Thank you.

Comment: S. B.1.10, Pet Policy (pp. 62-63) Two small and non-controversial changes have been made to the pet policy. First, there is a reference to pet policies being incorporated into the BHA public housing lease. Second, in addition to tenants needing to supply information on vaccinations, etc., they are required to provide information about municipal registration (where that is required). Can BHA provide more information about the municipal registration piece, and if this is just general HUD language, or if this is something new intended to complement City of Boston requirements, and what those requirements would be? Many residents who have pets registered with BHA may not be aware of municipal registration requirements if they are new (and this may not apply to all pets).

While BHA is not proposing a change, it should be noted that there is some very old language in the original pet policy adopted in the early 2000's which talks about a pet registration fee. It may not make sense to keep that, and most residents and managers don't have any sense of whether a fee was required or paid.

One thing that should be noted is that as public housing developments are redeveloped or repositioned, it is important to insure that tenants' rights to have common household pets are protected in their new housing (both as to existing pets and as to new pets that might be added to the household in the future). Unfortunately this is not an area that HUD has addressed in its RAD guidance. It is also important that distinctions between pets and support/assistance animals for persons with disabilities be made, and that new owners be as familiar with reasonable accommodation requirements for support/assistance animals for disabled persons as BHA has been.

Response: Per state law, all dogs must be registered in the city or town in which they reside. For further information on how to license a dog in the City of Boston, please visit, [www.boston.gov/departments/animal-care-and-control/how-license-your-dog](http://www.boston.gov/departments/animal-care-and-control/how-license-your-dog). The City charges a license fee for all dogs (except for dog owners 70 and older). The BHA charges a one-time pet ownership fee in federal family developments.

Service animals and emotional support animals are not pets. They are assistance animals needed by a person with a disability. All dogs, whether they are pets, emotional support, or service animals, need to be registered with their town/city, but there is no separate official registry of assistance animals. For more information on assistance animals in housing, including situations where a housing provider may deny or revoke a request for a reasonable accommodation to have an assistance animal, please see [www.mass.gov/info-details/assistance-animals-in-housing](http://www.mass.gov/info-details/assistance-animals-in-housing).

## **Operations**

Comment: Can you please restore the basic human rights for lower income housing tenants to choose the desired home heating temperature rate in each public and subsidized housing unit? And can you please use your prominent position to help create economic opportunities for motivated lower income housing tenants to have resident empowerment through community economic urban development?

The state mandate standard temperature requirement laws are cruel and inhumane. Every law abiding American citizen should have the freedom rights to control, and choose the desired the home heating temperature rate in every home or public/subsidized housing unit.

How can we live in a democracy where high minded progressive policymakers dictate and determine when lower income housing tenants can have the heat turned on in their housing units? This cruel and inhumane home heating standard temperature requirement law is a prime example of an authoritarian rule of governance.

We the American people should always be able to exercise our basic human rights to control and choose when we want to turn on the heat inside our homes or housing (apt) units regardless of the temperature outside.

Creating more vital economic opportunities for motivated lower income American citizens (who live in public housing for more than 10 years) to be able to exercise their constitutional rights to freely purchase small vacant idle land parcels from the Department of Neighborhood Development. This proposed economic empowerment inclusive initiative, should be a top priority to promote resident empowerment and provide self-sufficiency for the less fortunate.

America was originally established upon the righteous biblical ideals of inclusive capitalism, with the intent to protect and preserve individual citizens' constitutional rights. Taking away the basic human rights for lower income housing tenants to control and choose the desired home heating temperature rate in residential housing units is oppressive and destructive to the American Democracy.

Thank you again for your time and consideration. May Almighty God bless all your future endeavors, as you faithfully seek Godly biblical insight-wisdom and righteously serve humankind.

Response: BHA strives to ensure that housing meets code requirements with respect to being heated and cooled appropriately. Regarding economic mobility opportunities, BHA continues to partner with the City of Boston and other agencies on efforts to promote homeownership, entrepreneurship, and other advancement. The BHA seeks to pull levers that activate paths to self-sufficiency and economic mobility for BHA residents. Two examples of that are: (1) the First Home program where the BHA has leveraged City and federal resources to allow BHA more than 75 households to purchase homes in the past 2 years, and (2) the Family Self-Sufficiency (FSS) program that builds assets for families as their earned income increases. The FSS program currently has more than 8 million dollars in shared escrow for the more than 1500 BHA households that participate.

Comment: S. B.1.4, Rent Determination (pp. 25-30) On p. 1, it is stated that this section is revised. However, in reviewing the section, I did not see any revisions (new language added, or strike-throughs of prior language). Could BHA clarify? HOTMA implementation will mandate significant changes in Public Housing and Leased Housing rent determination, and this is discussed slightly in the HOTMA Appendices to the ACOP and Admin Plan (see separate notes on that), but as noted, GBLS is hoping that BHA will have a robust engagement process with residents on any changes and BHA discretionary policies, to the extent permitted by HUD, and that topic isn't covered in comments here.

Response: The Flat Rent section was revised in the referenced section.

Comment: S. B.1.5, Operation and Management (pp. 31-36)

The list of developments that are BHA managed versus those that are privately managed (on pp. 31-32) appears unchanged, and does not include sites that have converted to Mixed Finance operations (such as Franklin Hill, etc.)

Response: Franklin Hill is included in the table referenced.

Comment: S. BHA revamped its note on p. 34 about FSS expected graduation and replacement with new FSS participants. As noted under Section B.1.8 below, if FSS goals previously set have not been achieved, it would be good to have information about why and what new goals BHA thinks are feasible. Moreover, as noted in other comments, much of the BHA's FSS program has been for Leased Housing participants, and relatively few Public Housing residents and sites have been able to participate. A long-term goal should be to add more public housing residents and sites to the FSS program. The 5-year plan could lay out the plan for which additional sites and expected numbers of public housing residents can take advantage of this program over each of the next five years.

Response: See Five-Year Plan goal on creating economic opportunity.

Comment: S. B.1.8, Community Services and Self-Sufficiency (pp. 44-48) On pp. 45-46, there is an updated statement of various programs that BHA Public Housing tenants and Leased Housing participants utilize. Some (like the HomeBase set aside and the JRI program in public housing) have been eliminated, and others (like the Elders Living at Home Program) have been merged under new headings. Should the Justice 4 Housing initiative with BHA, which includes the SHARPP program (to improve housing access for criminal justice-involved individuals returning to the community), be added here, or is that just related to the City Voucher program? On p. 47, there are updated figures on current Family Self-Sufficiency (FSS) enrollment –88 public housing families and 1366 Leased Housing families. While this is impressive, it would be helpful to compare these with FSS utilization goals that BHA included in its last 5-Year Plan Progress Report, and see if the goals were achieved and if not why.

Response: Thank you for the comment. The details of the SHARPP program is not necessary for addition as it is subject to ongoing changes. Changes to lookback periods and the emphasis on review of mitigating circumstances have been updated in recent Admin Plan versions and those policies are the lynchpins of the commitment to housing participants with a criminal history.

Comment: S. B.1.11, Asset Management (p. 64)

There is nothing new here (see also p. 1), and more of the focus in recent years has been on Mixed Finance and Demolition/Disposition Strategies, which are discussed further below, as well as in the RAD Addendum (for which separate notes/comments have been submitted).

Response: Thank you.

Comment: S. B.2.17, Designated Housing for Elderly and/or Disabled Families (pp. 80-82) While p. 1 indicates that this portion of the Supplement was revised, no revisions appear in the text, other than stating "Oct. 2024" after the chart with units at various

BHA federal elderly/disabled public housing sites. It would be helpful for BHA to provide a highlighted/strike-through version of any changes made from the prior version of this section/chart, or if it turns out that there were no changes, revise p. 1 accordingly. Note that while the Designated Housing Plan does not need to be extended or newly submitted in the coming PHA Plan year, it will expire in February 2027, and BHA would need to take appropriate action with HUD prior to that date.

Response: The referenced section table was updated in October 2024.

Comment: S. B.2.18, Conversion of Public Housing to Tenant-Based Assistance (p. 83) While p. 1 indicates that this portion of the Supplement was revised, no revisions appear in the text, and it still contains Per Unit Month figures from the fall of 2023, as opposed to the fall of 2024. (The page does say "Oct. 2024 at the bottom", and it may be that the number of occupied units for the various federal family developments is updated, although there are no strike-throughs or highlights to indicate revision.) BHA should review and update this.

Response: The referenced section table was updated in October 2024.

Comment: S. (also RED/Asset Management) B.2.24, Units with Approved Vacancy for Modernization (p. 90) This is an updated list and includes vacancies at Eva White in the South End (slated for demo/dispo Mixed Finance activity, as listed above), 91-95 Washington Street in Brighton, and General Warren in Charlestown (a proposed demo/dispo and Mixed Finance site). It would be helpful to get more information on the strategy to eliminate these vacancies, which may differ based on future plans for each site.

Response: Staff welcome opportunities to address the RAB on topics of importance such as this.

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

1. Re-Open for use all the Family Units Trash Chutes at 29 Jette Ct and 31 Jette Ct and the other Family Buildings Trash Chutes at Commonwealth Development in Brighton.
2. Daily Clean the high-rise buildings. Examples for cleaning are the elevator floors and walls and wash the front and back hallway floors each day.
3. Heating for all Residents, new Honeywell thermostats that can be-regulated by the Residents.
4. Remove the present Bathroom Toilets and put-back again the toilets that had water in the tanks so the Resident can see the water rising in the tanks for use and flushing. Note: The toilets that are presently in the resident's units are consistently not working and Residents have told me that he/she is having to remove the poop(unsanitary) with plastic spoons because there is not enough water in the toilet for flushing.

5. Safety concern. New apartment doors needed. Resident's apartment entry doorknobs are-covered by a piece of silver-tin. Also, the doors are too high-up off the floor and cold-air and pest can get inside of Resident's unit.
  6. New Windows with better ventilation that do not sweat in the hot and freezing temperatures (? mold).
  7. New Elevators for all high rises. The elevators breakdown weekly and sometimes daily, and the elevator ceiling fan has not worked for 10 years or more and elevator has poor air circulation.
  8. More Street lighting throughout the property for the residents' Safety.
  9. More Cameras on the property for Residents' Safety.
  10. Repair Roofing for all high-rises
  11. When a Resident request repairs, we are asking for the repairs to be-done under the original work order requested number. Instead, Residents are-being-told to call back three & four times to get additional work order numbers because the repairs are-not-being-done at the technician first visit to the unit. Residents should not have to be-told that the original work order number was simply to assess the repair work to be-done.
  12. Safety Concern: Residents must have camera access to see who is ringing the doorbell or door-buzzer to get entry into their building.
- Note: Residents' doorbells and door buzzers are ringing throughout the nighttime.

Response: Thank you for the comment and list of priorities, some of which can be found in the BHA's Capital Plan. BHA welcomes and incorporates resident input as part of the annual capital planning process. BHA staff will take all comments under advisement. Specifically Items 1, 2, 3, 4 & 8 may be reviewed with Operations staff if this has not been addressed; Item 5, had a Unit doors replaced in CFP 18 and 19 (recently completed), if new weatherstripping or a door sweep is required it can be reviewed with Operations staff; Item 6 is being reviewed with current Envelope/Masonry Repairs noted in CFP 21, 22 & 23; Item 7 have the elevators at Commonwealth Elderly out to Bid funded currently in CFP 22 and CFP 21 have planning review of the Commonwealth Family Elevators in Design with budgeting of added City Funds; Item 9 had significant cameras added through CFP 18, project was completed in Nov. of 2021; Item 10 Roofing at Commonwealth was last completed in 2002 with replacement scheduled for 2027 (will be added in CFP Budgets for 2027 & 2028). Item 11 Staff agree that a work order is not just for assessment only but should cover the repair, in most instances; Item 12 it should be noted that upgraded intercoms are in the Five Year Capital Plan for all of our developments. We are focusing on the Elderly Buildings first (the Butterfly System) then the Family Sites.

### **Public Hearing**

Comment: Hello. I came to BHA a few years ago into section 8 moderate rehab with my daughter into a two bedroom and later I had a son and now I need another room for my son and tried to send in paperwork and on waiting list for three bedrooms. Now apartment is too small. Contact my caseworker but told I can't do anything about it.



Landlord said can't do anything for me but I thought I was approved for a three bedroom. My son is four now, so I need a room for him. I don't know what I can do now.

Response: BHA staff took down her name and contact information and will follow up about her specific situation.

Comment: Hello, I applied back in 2021 and am now living in a shelter. I am an applicant and provided some paperwork, a lot of paperwork and I sent it to them. I am wondering what is the next step. I sent everything they asked for.

Response: BHA staff took down her name and contact information and will follow up about her specific situation.

Comment: I will do something brief and also sent in pieces in writing. Two quick things Victor Williams presented to monitoring committee with updated information that made it appear there were positive developments and would be good to merge into annual plan and update the final version of the PHA plan submission. So that's one thought. Another that was discussed briefly at the RAB meeting with Katie McGonagle and Taylor Cain regarding the five-year plan that was drafted before the election of Nov 5th and some things may change a bit. BHA staff made a good response saying a lot of the five-year plan is aspirational, it's what our best hopes and intentions for what BHA hopes to get done in the next five years and what needs to happen in Boston. Though there may be some challenges in terms of federal resources so just a thought that the Authority may want to blend into the final version any thoughts along those lines to still the plan to proceed forward and accomplish as much as possible, but there may be some challenges and that all of us will need to be thoughtful in figuring out how to, to respond to challenges that may lie ahead. That's all I had.

Response: BHA staff thank you for the comment and participation as always and staff will consider making updates to the Annual or Five Year plan.

Comment: Could you give a high level overview on how heavily the opinion of the RAB board weighs on this five-year plan, for example, if residents are in disagreement with parts of the plan? Could you go over to what the process would be? Is it just an opinion? Is there a process in which we come to an understanding where we all on the same page?

Response: That's a tough question to directly answer. I think we do everything here at the BHA with the residents and leased housing participants in mind. We know are trying to move certain things in a particular direction. For example, we are redeveloping some of our public housing sites because we believe that it is critical for the financial viability of the housing authority and necessary to provide low-income housing for the long-term future. So that's something we at the BHA strongly believe in. So while that's the ultimate goal, how we get there is to be determined, how does that work? How are the leases going to be under the new management, what rights are residents going to have? Those are all things that we're looking for resident participation and opinion on,

so we can come to a common understanding or really understand what residents are valuing. And so, this is hard to answer generally without diving into the specific issues. I don't know how to answer it, except that I do know from working at the BHA a very long time, that, we take the RAB's opinion very seriously. And while we don't always agree, we certainly try to figure out how can we come to a place where all parties are okay with moving forward or a compromise that could help both parties or all of us move forward and be okay with that direction.

So again the RAB is critically important for the BHA. I think we're extremely lucky. I've actually had a chance to do consulting at other housing authorities where there's not such a strong resident advisory board. And I think we're very lucky to have that kind of have a good group of public housing residents and Section eight participants that come together and really advise us on issues, and, somewhat attributed to I think to Mac and John and the great job that they do around keeping everything together. But again, it's just something we are going to do and it's part of the BHA's core mission is to really take that resident feedback and do the best we can to advise our policies with that. So, happy to talk on specific issues at some other point in time as well, if you'd like.

Comment: I appreciate your response. And this is my first year with the RAB. And so from my perspective, it seems like a logical and proactive approach versus a reactive approach. So it seems like there's this grassroots platform, which is the RAB, right? Where you're having bottom up conversation so that you can provide that top down solution piece and making sure that you're meeting the needs for the residents. So I kind of knew the answer, but I just wanted to put it out there so that you could say it for the people.

Response: Thank you. Appreciate that.

Comment: Can I add maybe a little bit on that one, uh, Heather, if that's okay? So, an example a few years back was Bill McGonagle had come to the RAB to propose basically scrapping having the tenant grievance panel. And there was a strong resident reaction both at developments and at the RAB about that. And so, Bill said, wait a minute, I'm going to slow this process down. And he came up with a modified proposal, which was basically, sure, I'll have a hearing officer system, which might be faster, but if residents really want to have it go to the panel as well that's an option that people can do. So he basically tried to keep the best of both worlds. The other example is that BHA has from time to time, spent additional time talking through with RAB members ideas that it has. So I know David was part of a conversation, I think it was last year or maybe the year before where we were doing stuff. There was stuff about criminal history revisions and the screening times being done for criminal history. And that was a really good conversation because then residents understood from a BHA standpoint, I think there were also some residents there from Justice for Housing that explained what their concerns were about giving people second chances. And so being able to do that kind of diving in to understand the whole range of issues was, was incredibly helpful.

Response: Thank you, appreciate that.

Comment: So I'm a resident at Heritage over in East Boston. And so I find it interesting that you're speaking about a five-year plan, but in late January there's going to be a four year plan beginning. So I'd like to address that issue. I hope it fits within this discussion, but it is been reported in various media outlets that the president elect has directed federal officials to find ways to cut funding to cities controlled by Democrats. So Boston certainly fits that case and he's also threatened by executive order to take federal funds away from sanctuary cities who don't implement his policies regarding illegal immigrants so Boston also falls within that category. So my question is if these measures really take hold and are presented to the nation, does Boston Housing have measures which could legally oppose such funding or cuts in funding from the federal government? And if they do, I would hope that they would make them public to all of us. So that's my question. That's my comment. I appreciate you.

Response: Thank you for your comment. Really appreciate you coming out tonight and giving a comment. I don't think I have a really substantive answer for you because a lot of what we're facing is somewhat speculative, right? We are certainly concerned about what's on the horizon in terms of federal funding and what may happen or what may not happen. So we are certainly alert but not taking any steps at this point to do anything in advance that might be harmful to us. We are waiting. The majority of our funding comes through HUD and they already have formulas to distribute that funding across the nation. I think it would be somewhat difficult to remove HUD funding from so-called sanctuary cities. There's probably other areas where that might be a little bit easier to do, but again, I'm just speculating and so we're all anxiously awaiting what may happen and keeping our fingers crossed that the need for housing will cut across the aisle in Washington. I understand your anxiety around the issue and I think we all at the housing authority have the same concerns.

Comment: So I said a lot of everything up here, but to highlight just how important it is for people to get involved. We are having purposeful conversations with BHA. So I heard you sir, mention how you have concerns. One of the great things about the RAB is that we're able to get an insight on what's coming down the pipeline. There's no questions that are off limits. So if there are any concerns that you have, you bring them to these conversations that we have on a monthly basis. And if they don't have the answer, the great thing about BHA and I don't work for BHA and if I had an issue, I would really say it is that if they don't have the answer, they'll get it to you and they'll get it to you in record time. And so I just can't say it enough. I'm just so pleased with how they've been handling the communication piece. And the other piece too is we don't always agree. A lot of times we don't agree with what's happening, but it's okay to agree to disagree because we also have to take into consideration that we live in a space where housing isn't really stable for anybody. So to have these protections and BHA really standing on the front line and really fighting for us, you really feel that when you're having these meetings with them. So again, I just wanted to highlight, be part of the conversation so that you can understand where we're going and then you can share your comments and then be part of the plan and that's really how you walk away feeling. So that's it.

Response: Thank you for your comment and see above response about RAB / resident involvement.

Comment: Good evening. Good evening. I'd like to discuss a few things. I am very interested in becoming a member of the resident advisory board. The second thing is customer service. When we call housing authority, no one answered the phone. When they do, they sound like they just woke up, like we bother them. You can hardly hear 'em. You hear your voice right after you speak coming back and then they get very combative, very disrespectful customer service. I used to work in offices. One of the person they taught us, you learn how to speak to people and you learn how to dress. Not like a model but decent and pleasant, not anything hanging out. Sean just woke up and jumped out his bed and came to work. And the third thing is advocacy. Why in the world can't our, I don't know what you call 'em today, the people who are supposed to represent us, why can't they advocate for us? They don't do anything. When we have a problem with the manager or the housing where we live, they're absent. They nowhere to be found. That's ridiculous. Thank you.

Response: Thank you. Just a brief response but I will say that the BHA recently hired a director of customer service and the main goal of that role of that person is to improve the level of service that you receive when you call the work order center and so that those folks can be much more responsive to your needs. We're also working very hard to reduce the timeframes around work orders and how quickly they are resolved. And so one of our goals for 2025 is to ensure that 95% or more of the work orders are resolved within 60 days. Of course the emergency work orders will be resolved within 24 hours, but I acknowledge that we have can improve significantly with respect to customer service. Once we get the work order center staff at a level that we believe is appropriate, we're going to continue going outward from there and making sure that not only management staff but everybody at the BHA is more responsive and more customer service oriented. So that is something that is at the forefront of the work that I'm doing. I appreciate your comments and just wanted to let you know that we are certainly working on that and I know that we haven't been the best in the past, so thank you for your comment. Staff also followed up with a phone call and sent the commenter information about the RAB in the mail.

Comment: Thank you. This is my first time here. I live at 140 Clarendon street side. I've been there for a year and a half and recently I'm on disability and my SSI check they were supposed to start giving me retroactive money and I used that money to pay my rent and instead of giving me the money, they sent me a bill that said that I owed up \$1,500 because while I'm in school trying to earn my degree and improve my life, I was homeless in Boston and took three years to get that apartment. They took my SSI check because I made a thousand dollars, \$1,408 a month and their own documents say that I can earn \$1,650. So I filed an appeal and the mail, so the mail in my bill, I know the mail lady, she does a real good job of getting us the mail. The mail basically they never got the mail. I tried to bring it to hand deliver the appeal to the office. They said I had to send it to Washington State and I sent it. I said I took pictures of it but I couldn't pay my rent and I didn't know what to do. I had a hip replaced. I couldn't work the whole month

of June so I had no money coming in and they still haven't given me my check back. I'm on disability. I have several issues. I have a part-time job so I can pay my rent right now, but I was behind. I just don't know what to do.

Response: BHA staff gathered contact information and followed up to work on these issues.

Comment: Hi, I have been at the Charlestown development for 10 years and I would like to mention two problems. I have two problems which basically interfere with my life mode of living. I'm student at the Bunker Hill Community College and for the past year and a half, the site has had a very annoying high pitch construction site noise. It can be very, very annoying, believe me, it's not on a scale that it would deafen you, but it is extremely annoying and it is present in the apartment constantly. I have spoken with the head of the BHA a month ago and it lessened somewhat the noise, but it's still very, very considerable and it has turned my life into a living hell because I'm a student. And what it sounds like, it sounds like beep, it's a backup signal, it's a reverse signal noise which is present all the time.

It's like beep, beep, beep, beep beep and it's the whole day from 6:00 AM to 4:00 PM and I don't know how to solve it because I do not have much power in that question. I did complain. I left a note, I written note at the meetings. It seems that it has lessened a bit but it's still there and it has interfered with my grades at the college because it's quite challenging to be a community or college student. I can assure you.

A second problem is doors entrance, doors prop open any time of the year for the whole day. Some unlawful resident, someone who is anonymous opens the doors and I haven't been able to solve it. Management installed a sign to the wall today, not to leave the doors open, but as I was leaving for this meeting, I found the door wide open again. Someone puts a broom into the door. So I don't know how to solve it because it's a security concerned, aware anyone can walk in. Actually Massachusetts is bear country. I don't know if you are aware Massachusetts is a bear country. There's not a lot of bears in Charlestown though. Well then I read that in Charlestown, Rhode Island, that bears were spotted in the navy yard, which scared me but it turns out to be Rhode Island. But the bears, they are present. When I lived in the Berkshires, I actually had pictures of them. They are present in Massachusetts. They are. That's true. They're small black bears but they are there. So that is my concern. Thank you for your time. But the main concerns, the two things is construction noise and the door being propped open.

Response: Staff gathered commenter contact info to refer to management to follow-up about these issues.

Comment: Okay. Hello everyone again. So I have a couple of concerns. One of the concerns that I have is the porch pirates, when you get your packages stolen by random people when they're delivered and the lack of security that we have at our site, especially as an elderly disabled division building. We believe that we have to have security and if it's not 24 /7, at least some hours of the night, where a lot of the mischievous activities have been happening. We do not have security at all at the Ausonia apartments and a lot of things have happened, like strange activity has

happened and it's never deescalated. There's a huge complaint about packages getting stolen. I've had to have my medicine delivered to another location just to not have it stolen. I've had over a hundred dollars worth of medicine stolen and stuff that I need forever and it's extremely frustrating, especially when you are fixed income that money is not something you could just pull off of trees. So the fact that we do not have any secure place for our packages to go or even a security guard looking out for the residents is crazy. I would like to know what BHA can do about giving this that building security or at least in having an Amazon locker put into the building lobby of some sort or some kind of something because people are having a lot of important things stolen and it's not fun having to go through the whole process of having medication sent again because now they have to investigate and you're going days without what it is you need and your routine is messed up. That's one of the things that's been really bothersome to a lot of the people at the Ausonia is lack of security and stolen things. I see other sites have security and we don't.

Response: Thank you. That's definitely an issue we can follow up on, especially with respect to the packages and I think your idea about an Amazon locker or something similar to that could be a viable solution. So I'm going to speak with Raul Leon who's in charge of the asset management division and oversees Ausonia. And we'll discuss some feasibility there and then get back to you on that specific issue on the packages with respect to security.

Comment: Hello. Good evening everybody. I live at Barkley Apartments known as Cathedral several years ago. I have lived there for approximately 25 years. I really didn't know that it's going to be a bunch of people and really this is my first time that I participate in this event and I'm glad that you are here to listen to our voice. Thank you for that. I really appreciate this opportunity. But tonight I have a bunch of comments that I would like to address. I told you I live there for 25 years. One of the problems that personally my family is facing and I know that my neighbors are facing is this smoking problem in the building. Even we know that there are signs on the main door of each building from BHA that smoking is prohibited and it's not allowed. But some residents, they don't consider that there is a policy that they cannot smoke even inside the halls or inside their apartments. And this has been an issue, a big issue and I can say from my perspective because my family have suffered asthma for several years. We have complaining this problem with the smoking department and also we have address with our manager, but we haven't seen a response from them. Instead, we have some issues now with our neighbor who is the one who smokes and his family smoke and also his guests coming to smoke, even drugs and marijuana to detect from my apartment. This is something that really make me to make a lot of police reports. If I wouldn't know, I wouldn't bring just evidence I was going on. Even though one of these days last year we have an argument with this family and his wife came into my apartment trying to attack me and also making comments and trying to attack my husband who is a BHA employee besides. So these problems have been increasing and this is something that I'm telling you that I am not the only one who has been complaining about these people. There are some families that, or people who wouldn't want to talk because they are afraid of any retaliation from these tenants. It's sad

because these apartments have been very, very quiet, very nice people. I told you I believe for 25 years, but recently these people move in no more than one year ago. And this is something desperate that I really need your consideration and to address this problem.

Some other thing that besides that is the other tenant say some of the packages have been in stealing from our doors. Also vandalism and sometimes we just found our tires flat. Someone take the air from our tires. So we really are concerned about this.

Regarding the other thing that is that also the music, love music. Many tenants don't consider people who really need to get up early to go to work and they play the radio music so loud even until 1:00 AM or the parties begin at 12:00 PM and ending until 1:00 AM the next day even. So we understand that holiday sometimes they can enjoy or we have parties, but people still, especially those who work for the public service and BHA , they need to get up early, doesn't matter that is next another day or holiday, they have to be working and something that need to be addressed.

Another thing I'm really happy that BHA is trying to give the opportunity to tenants to have our first home. Something that I really would like to do. I am enrolled in that program, but I want to just suggest something regarding that. I know that many of us would like to fix our credit grade or sometimes we have our jobs so we have very good records of our credit. This is not enough to us in order to get our home. I will suggest if for example, all the history of the payments or the credit that we have paid, many of us 25 years paying rent on time and with our efforts working, sometimes we have been single mother, single parents or both parents, we have worked hard in order to pay our rent. So we just do approach this suggestion if you can consider that our payment history, rent payment history will be taken in account in order to have our approval ready for this. Other problems that I've seen not only in other families is that sometimes some of them are self-employed and when they go to the bank to request for the credit. They are denied because the minimum of working should be two years for a business support. And I think that if someone is self-employed is because we can see that people really is interpreter and they really work hard in order to pay the rent. So I think that if BHA really wants to help tenants, they should do it in appropriate way. I know that you are doing the best but also consider that the BHA serve people who really is not rich people. It's people who have been struggling. We have our children in college. Thanks God and thanks BHA. My, I have two, one daughter and one son in college. I am proud to say that my son have a scholarship for school and my daughter have a scholarship for UMass. So BHA should be proud of these people like my children and other people who really, I know you have daughters, sons and grand sons, granddaughters who have been working hard for this. So thank you so much. I really appreciate this opportunity.

Response: Thank you for your comments. Thank you. Staff gathered commenter contact info to pass on to manager for follow-up. Regarding credit scores suggestion, the credit score requirement to BHA's First Home Program mirrors a mortgage lender's requirement in order for a client to obtain a mortgage loan, and they are subject to other rules/regulations around credit score. So, even if BHA waived our program credit score requirement it would not assist families with achieving homeownership as they will still need to obtain pre-approval from a mortgage lender (and have a credit score high

enough to do so). Congratulations on sharing the information about the children in college.

Comment: Okay, greetings everybody. I don't even think I need a mic with this big mouth. I put my email over there and my phone number just in case anybody here wants to give me call soon as I'm done with not grievances or worse complaints, but maybe a little bit of hope. So I heard a lot everybody, everything that you've said, I know that there is a, people are think what four or five year plan supposed to be good things and promise you it'll be less than half of that, okay, that you'll start to see things in about six months. It's going to be good. Now, one of those people that you were talking to recently actually attempted to take my life. I've been doing a lot of weird stuff here and I don't know that some of you might've heard or know me, but if you don't, that's fine. What's most important is though is that it's very hard to stop something that's good, what's going on. So there are people who are trying to make very good people suffer and it won't happen. Back in it was 1947, I don't remember when John F. Kennedy passed away, what he did. He said, we have nothing that's a fear but fear itself. So there are some people trying to put that on you. You have sustained this long four years and it's going to get better. Okay? Now what I can tell you to do is honestly just pay attention to, it's going to sound crazy, but the weather now if you contact me, my cell phone is off for right now to the end of the month, but I do have an email. I'm using public wifi wherever I might go to. But I did hear some good things. I also was able to see pretty well. So thank you very much for letting me speak and I'm going to actually head out now. Okay, bless you all. Thank you, thank you.

Response: Thank you very much for that.

Comment: Hi, I'm a volunteer at Greater Boston Legal Services, used to be on staff at Greater Boston Legal Services. My colleague is in the audience. Just wanted to talk about six things, which I'm going to try to get through in three minutes. So one, I wanted to thank the BHA for including in the five-year plan, a mission statement, which is a brand new mission statement. And I don't think very many people mentioned that at all, but it's actually a very interesting mission statement and I think people should take a look at it because it sort of lays out some new things about where the BHA is with regard to the city and with regard to its residents and its vision of itself. And I just think it's a very interesting vision. So take a look.

Second, I wanted to mention a couple of things about the five-year plan that I think maybe could get tweaked a little bit. So in one area there's discussion about performance included in the performance has to do with turnaround time on basically tenant generated work orders and turnaround time on vacancy work orders. And I think David had mentioned this earlier, setting a goal of 60 days on that. Well, the state sanitary code sets a goal of 24 hours for emergency work orders and 30 days for all other work orders to get done. And those are the same standards that BHA holds landlords to for the section eight program. And so there is a question about whether or not a 60 day standard for yourself is what you really want to have for that work order goal. And so that's something to take a look at. The other one is vacancy reduction is really important. Sometimes it's a question of what's necessary to get a unit turned over



through the screening process, people who are going through the process, getting screened, getting approved, but then there's also the work when someone moves out of the unit to make sure it's ready for the next tenant to move in. The vacancy work order part is that second part, which is making sure the work gets done so that somebody can move in. And BHA, it's important for the BHA to be able to turn around work orders and get them leased up so it doesn't end up with negative scores for the PHAS program as well as possibly negative consequences for the NSPIRE standards. And so it's another thing to possibly look at. I understand that for both the work order production and vacancies, sometimes there are problems. Sometimes there are things, for example, I know that Administrator Bok spoke very eloquently at the city council recently about all the problems with the elevators at Cathedral/ Ruth Barkley and necessary in order to get that work done. And those are very real, but at the same time, whatever the BHA can do to try to get things done within those time periods would be good.

An additional goal the BHA may want to include, and I think it's actually included in what it has, but could add a little bit, has to do with restarting the mixed finance residents group. That group basically met prior to the pandemic. It was a way in which residents and the developers and managers of different mixed finance sites could get together in a room and say, what are we all doing here and where are there gaps? And oh, you did something good here at Washington Beach, can we do that same thing over here at Franklin Hill? Oh, what are your eviction records look like? What could we be doing? Granted with the pandemic, all that ground to a halt. And I know that there is also discussions about whether or not sometimes having cluster groups that just focus on particular developers is helpful. And I do think that that could be the case like with a Trinity meeting or a Beacon meeting. But I do think that we've lost a little bit of something without getting all the residents together from the mixed finance sites. And this is particularly true when there are a lot of developments that are going through that route and that is projected to be the route going forward for the future. BHA may also want to look at the issues that were brought up through the ISHI process and the conference that we had with Mayor Wu in 2021 about trying to get mixed finance management protocols standardized similar to what was already done on the mixed finance grievance procedure and the mixed finance tenant participation. Granted, not everything works, not everything's the same size, got to have flexibility, understood, because pursuing lots of different sources of money and oftentimes they contradict each other. But whatever can be done to sort of simplify the process and say, we've figured this out here, here and here is what's good. And then when we need to change it, we can. It's just I think a good goal for the authority to have system-wide.

I know that what was mentioned before about an additional goal you may want to include is about avoiding displacement and helping people weather changes that are outside of their control. So certainly that's something that came up loud and clear during the pandemic, but it's not something that's unique to the pandemic. People have circumstances in which they lose income and aren't able to pay rent. There's a family debt, they have to borrow money to do a funeral. There are domestic violence situations and reasonable accommodation situations or people needing to get services of one sort or another, whether or not that's for a hoarding issue or a mental health problem or what have you. But just including that as one of the goals that the BHA has of both helping

avoid displacement and helping ensure that people have systems that they can go to help weather storms.

At the same time, I hear completely what Administrator Bok at the monitoring committee recently that we need to get expectations back about rent, getting rent paid, people recertifying on time, et cetera. I hear all that, but it just would be good to incorporate that as a goal. An earlier commenter mentioned a very important point, which is, gee, what's going to happen in the next four years? And I know when the draft plan was done, it was done before November the fifth. The one thing I would add to what was said earlier is there's a whole community and there's a whole group of residents that are out there. And if the Authority needs help, please contact the residents, please contact the community and let us know how we can be of help you. I know that in 2013 had to go through a major dilemma around sequestration. There were about to be 500 families tossed off the section eight program. There were more residents that turned out for those public hearings than for any public hearings that BHA ever had. And so if there's the need for that, again, please feel free to call on the community.

And so finally, I would just say that it would be good on HOTMA stuff and other things that I know are paused a little bit that if you're going to get into greater detail on any of that and there's an opportunity to have more discussions with residents, please do that. We know that sort of all that's a little up in the air because you keep waiting for HUD to tell you what they're doing and you've had to sort of just do rough sketches in the meantime because HUD says, get us a rough sketch of this. But to the extent that we can talk through any of that stuff with residents, that's really important because it's people's rent. People need to understand how they're rent is being set and understand what the choices are and have a good dialogue with you. And on that note, thank you very much for the opportunity to speak with you.

Response: Thank you. I appreciate those comments and I know you probably submitted those in writing as well. The mission statement has been around the past couple years but appreciate the sentiments. But I will say on the 60 day work order turnaround, I think that is an incremental goal for the BHA. I think we're going to continue to get those numbers down, but I think that's the initial goal is that 60 day number. BHA staff agree that the mixed finance resident group has been helpful in the past and will look at reconvening this group. Regarding circumstances where a resident loses income and aren't able to pay the rent that BHA encourages residents in this situation to report the loss of income and go through the recertification process. Regarding assistance from BHA residents advocating for vital affordable housing programs and policies, as BHA has done in the past so it will continue in the future. Regarding HOTMA, staff will actively engage with residents as HUD moves closer to implementation. Again I want to just thank everybody for coming out tonight. Very much appreciate your attendance again and the terrible rainy weather out there. But thanks again for participating and hope to see you all again soon. Thank you everybody.

## **Real Estate Development**

Comment: S. B.2.14, HOPE VI or Choice Neighborhoods (p. 66) There are no revisions to this section indicated (see also p. 1), and this is no surprise since BHA's last HOPE VI project was the first phase of Old Colony redevelopment and the Whittier Street Choice Neighborhoods grant was obtained a number of years ago. One question may be whether the Whittier Street project is close to close-out, and if that should be listed here (in lieu of "activities pursuant to an approved Transformation Plan underway"). But it may be that that would be for the following year.

Response: Thank you. While the redevelopment of the original Whittier site is expected to be completed in 2025, there are other grant activities that will not conclude until later. As suggested, we do not expect grant closeout until a future year.

Comment: B. 2.15, Mixed Finance Modernization of Development (pp. 67-68) There are a number of useful updates here, including:  
Revised expected completion dates for Old Colony Phases V and VI (p. 67)  
A revised construction start date for 127 Amory St. (p. 67)  
Confirmation that J. J. Carroll was completed in January 2024 (see separate note under Section B.1.6 on the Mixed Finance Grievance Procedure there) (p. 67)  
Removal of Torre Unidad from the projected Mixed Finance list, and substitution of General Warren with expected RAD/Section 8 blend with renovations (p. 67). A similar substitution is found on p. 68.  
Faircloth to RAD language was revised to add 2024 solicitation of proposals, to remove reference to the Mayor's Office of Housing, and to indicate that this would be part of private affordable housing developments (p. 68).

Response: Thank you.

Comment: S. B.2.16, Demolition and/or Disposition (pp. 69-79)  
Here again, there are a number of updates  
For Charlestown (p. 70), it's noted that the first building will be open for occupancy in December 2024 (this should be revised to January 2025).

Response: Yes, thank you, the first building is indeed ready for occupancy as of January 2025.

Comment: S. For Hailey (pp. 72-73), Buildings 1A and 1B in the Centre Street Partners (CSP) Phase I portion of the site are to be completed by summer 2025. There is some revised language to discuss how BHA will conduct the renovation of the balance of the site, but since the approaches will be different, it may be best to list this under a separate heading. As noted in separate notes on the RAD Addendum, it appears that BHA is reconsidering whether the BHA renovation portion of the site should be done as a RAD/Section 18 blend. (This is similar to BHA's reconsideration for the Ausonia, St. Botolph, and Bunte dispositions.) As noted there, this should be discussed thoroughly with residents so they understand how this may affect timing and expectations. In addition, BHA staff have explained, in an email exchange, how the numbers shifted

from 526 to 516, but it may be helpful to also include this explanation in the responses to comments in the PHA Plan process.

Response: In order to clearly separate the two components of Hailey (demolition with new construction versus renovation) we have further revised the entries to remove mention of the renovation component from the demolition/new construction component.

As of this time, BHA does not expect to need to resort to a RAD/Section 18 blend at Hailey. In the event that we do end up needing to use RAD in any way, BHA will absolutely discuss with residents what that would mean.

Regarding the shift from 526 to 516, this was simply to correct a prior error. The correct figure should have always been 516. (The error was the result of counting 10 non-residential units that should not have been included.)

Comment: S. For McCormack (p. 73), it's updated to reflect that necessary approvals for Phase 1 (of two phases) were obtained in 2024, and it is anticipated that demolition and construction will begin in the first quarter of 2025.

Response: Thank you.

Comment: S. On Eva White (pp. 73-74), the description is revised to make clear that this is a RAD/Section 8 blend, and BHA is awaiting the RAD Conversion Commitment with conversion anticipated January 2025 and construction start in the first quarter of 2025.

Response: As an update, BHA received the RAD Conversion Commitment in December 2024, and the conversion was effective 01/01/2025. We have updated the Annual Plan Supplement accordingly.

Comment: S. On Lenox Street (p. 74), language was added to make clear that construction completed in 2023.

Response: Thank you.

Comment: S. For J.J. Carroll (pp. 74-75), this now reflects that work is completed (not just projected).

Response: Thank you.

Comment: S. For Patricia White (p. 75), while this properly reflects the disposition and subsidy conversion, there was to be later renovation work. Could this be updated (here or elsewhere) to reflect current status?

Response: BHA and resident representatives have been working with a design team of architects and engineers to assess physical needs, project costs, and plan for upcoming

construction work. Resident task force representatives have participated as well. We aim to share and advance the latest concepts in 2025.

Comment: S. For St. Botolph (pp. 75-76), while a Section 18 demo/dispo application was approved in 2020, new language has been added that due to changes in HUD Section 8 requirements, BHA is now considering this as a RAD/Section 18 blend, with a planned start date in 2025 and completion date in 2027. Can BHA provide more information on this (including what's changed)? This development has had this work long-deferred. There may have been some cost challenges here, but it is important to make sure residents and the RAB are up to speed.

Response: The planned work was indeed been delayed due to cost challenges, but BHA is very confident that construction will begin in 2025. The reason we may need to pursue a RAD/Section 18 blend has to do with changes to HUD regulations that were partially implemented in 2024—essentially, without a RAD component, housing authorities cannot undertake construction work immediately upon a Section 8 conversion. BHA is seeking a waiver from HUD that would allow us to proceed as long planned. But, if needed, BHA would pivot to a RAD/Section 18 blend to ensure that construction may start as planned.

Comment: S. For Doris Bunte Apartments (p. 76), here too there was a Section 18 application approved in 2020 but BHA indicates that changes in HUD Section 8 requirements mean that it may need to pursue a RAD/Section 18 blend, with planned disposition dates in 2026 and completion in 2028. It would be helpful to explain to residents and the RAB what's happening. Here and elsewhere, is competition for scarce LIHTC funding across sites pushing the calendar back?

Response: Yes, the key constraint has been projects costs and the constraint on resources, including competitive resources such as Low Income Housing Tax Credits.

Comment: S. For Ausonia (pp. 76-77), as with St. Botolph and Doris Bunte Apartments, BHA had an approved Section 18 application (from 2022) but indicates that changed HUD Section 8 regulations may mean it is best to pursue a RAD/Section 18 blend instead, with projected start dates in 2026 and completion in 2028. As stated for those sites, information about explanation of changes and what's affecting the calendar should be brought to Ausonia residents and the RAB.

Response: Staff welcome the opportunity to update Ausonia residents and the RAB.

Comment: S. Torre Unidad (p. 77) is removed from the list. See also discussion at Section B.2.15, above.

Response: Yes, that's correct. BHA is not planning to pursue a disposition application for Torre Unidad for two reasons: (1) the energy performance contract at Torre Unidad would complicate a disposition and (2) we are confident that we can provide for ongoing capital needs at the site through traditional ongoing capital planning

Comment: S. For Mission Main (pp. 77-78), prior information is revised to make clear that this was a RAD/Section 18 blend and that the conversion closing happened at the end of 2022.

Response: Thank you.

Comment: S. For the Adams Orchard Parcel 2D item (p. 78), this is updated to reflect the 2024 closing of the sale of the vacant unusable land.

Response: Thank you.

Comment: S. For Orchard Gardens (pp. 78-79), the description is updated to reflect that a CHAP was issued in the summer of 2023. Similar to what happened with the HOPE VI site at Mission Main, this would be a RAD/Section 18 blend with an anticipated conversion by 2026. It would be good for the RAB to receive information on this, since it's been a while since the RAB has gotten information about Orchard Gardens.

Response: Staff welcome the opportunity to update the RAB.

Comment: S. For General Warren (p. 79), this was already on this list, but it is updated to reflect that it would be a RAD/Section 18 blend, and the anticipated completion date would be 2027 (see also Section B. 2.15, above).

Response: Thank you.

Comment: S. B.2.19, Conversion of Public Housing to Project-Based Assistance under RAD (p. 84) There are no changes proposed here (p.1), and the text cross-references the RAD Addendum regarding BHA RAD-related activity. (GBLS has provided a separate set of notes/comments/questions on the RAD Addendum.)

Response: Thank you.

Comment: S. B.2.22, Non-Smoking Policies (pp. 85-86)  
BHA has not proposed any changes here (see p. 1) and GBLS does not think any changes are needed. It should be noted that BHA's Non-Smoking Policies predated HUD's adoption of national non-smoking policies in 2016 (announced with BHA and resident leadership at the BHA's Washington Beech site). Moreover, neither HUD's rule nor BHA policy dictate what occurs in Mixed Finance housing, but on the other hand HUD has permitted owners of HUD subsidized multifamily and Mixed Finance housing to establish non-smoking policies if they wish, and many Mixed Finance sites have such restrictions. It is important, in any conversions, that if there are changes made from BHA's policies, residents should have an opportunity to review and comment on such changes, consistent with the BHA's Resident Participation Policy (RPP), which extends to Mixed Finance sites.

Response: Thank you.

### **Real Estate Development RAD Attachment**

Comment: p.1 - New language about requests for proposals for Faircloth units, both for publicly and privately owned property.

Response: Yes, that's right. Thank you.

Comment: p.2 - Some revised language, including that Replacement Housing Factor (RHF) funds (which now are called Demolition and Disposition and Transitional Funding (DDTF)) can be applied toward RAD conversions, but no change in meaning/content.

Response: Yes, the reference to RHF funds has always been in the RAD attachment. We merely moved the reference as a stylistic change because RHF funds are themselves a type of capital funding. (The previous sequencing made it seem that RHF funds are separate from HUD capital funds, which they are not.) BHA in fact utilized RHF funds to create RAD units as part of phase 3A at the Old Colony redevelopment.

Comment: p.3 - West Newton Street RAD conversion (110 RAD, 36 PBV in RAD blend) likely can be left as is.

Response: Thank you.

Comment: p. 4 – Ausonia description should be changed in light of Supplement (Section B.2.16) material indicating that although BHA obtained a Section 18 approval in 2022, it may need to pursue a RAD/Section 18 blend and closing date would change. Notes here from old draft which discussed possibility of pursuing various options, as well as 2025 closing date, should be revised. Capital Fund Allocation in conjunction with use of RAD instead of Public Housing Capital Fund updated to reflect current Capital Fund budget.

Response: Thank you. We have updated the notes to confirm that BHA has received Section 18 approval, but to also clarify that we are keeping Ausonia in the RAD Attachment in case we need to pursue a RAD/Section 18 blend. We have also updated the target closing date to 2026, because—as the comment suggests—we are unlikely to reach a closing in 2025.

Comment: p.5 - Description of the 28 RAD PBV units as part of Old Colony Phase 3A (completed by 2022) likely requires no change.

Response: Thank you.

Comment: p. 6 – Description of Orchard Offsite Phase II (Long-Glen Apts.) for the 34 Public Housing Units converted to RAD PBRA only requires revision to say that the conversion has taken place (as opposed to the notes, which indicate that it will take place in 2021).

Response: Yes, thank you. We have made that update now.

Comment: p. 7 – Heritage description likely can be left as is. This was a Mixed Finance conversion from elderly/disabled public housing a number of years ago, in which most units were converted to PBV, but some had to be retained as public housing. The 28 public housing units that remained (and were not the 3 for employee or agency use) were converted to PBV RAD.

Response: Thank you.

Comment: p. 8 – Lower Mills description likely can be left as is. As with Heritage, there was a Mixed Finance conversion from elderly/disabled public housing a number of years ago, in which most units were converted to PBV, but a few had to be retained as public housing. The 17 public housing units that remained (and were not the 2 for employee or agency use) were converted to PBV RAD.

Response: Thank you.

Comment: p. 9 – Mission Main (Phases I, II, and III) was originally redeveloped through the HOPE VI process in the 1990's, and BHA and the Developer realized it would be advantageous to refinance, do appropriate upgrades, and switch to the RAD/Section 18 blend as LIHTC HOPE VI units came to the end of their compliance period. The initial Capital Fund Program allocation in prior drafts has been significantly reduced, since the BHA could use Demolition and Disposition Transitional Funding (DDTF)--what used to be the Replacement Housing Factor (RHF) funds—and apply this toward costs.

Response: BHA did not in fact apply DDTF funding toward Mission Main costs. The reference here to DDTF acknowledges that BHA continues to receive some capital funding from HUD in the form of DDTF funding. DDTF funding lasts for five years after a public housing unit is removed from the public housing portfolio through a Section 18 disposition approval. (Housing authorities do not receive any capital funding for units that convert to RAD.)

Comment: p. 10 – Eva White has previously been listed, but the notes should be updated, to reflect that this is being done solely as a RAD/Section 18 blend, and not on the dual track of possible RAD blend and pure Section 18 disposition. In addition, as reflected in Section B.2.16 of the Supplement, the date for the closing should be revised (it was not closed by early 2024, and the Supplement indicates a likely conversion in January 2025). See also separate note below as to how the closing date for Eva White might affect the overall count of excluded RAD units for Project-Based Voucher determinations under Section B.2.23 of the Supplement.



Response: We have made those updates. The closing happened at the very end of December 2024 with the RAD subsidy effective as of 01/01/2025.

Comment: p. 11 – Orchard Gardens (Phases I, 2, and 3) is a proposal similar to Mission Main (it was also redeveloped through the HOPE VI process at roughly the same time). There would be a RAD/Section 18 blend. The notes should be updated, since elsewhere in Section B.2.16 of the Supplement it is clear that there will not be a closing in 2024. In addition, it would help to clarify whether there is also outstanding any separate Orchard Commons units that would ultimately need to go through a similar process.

Response: Thank you. We have now updated the closing target to 2026. Orchard Commons will likely undertake a RAD conversion at some point in the future, but to date there have been no concrete discussions among residents, BHA, and the developer at Orchard Commons.

Comment: p. 12 – Mildred C. Hailey Apartments is a bit confusing and requires some more discussion. There have been two Section 18 demo/dispo proposals for different portions of the Hailey site--(a) the Centre Street (CSP) redevelopment, which comprises roughly 1/3 of the site and involves demolition and new construction, as well as providing both full replacement units and additional affordable units targeted to a different range of incomes, and (b) the BHA renovation/ modernization, which comprises 2/3 of the site in which there will be temporary relocation and significant rehabilitation, but no demolition or new construction. Neither of these proposals involved use of RAD. The description here appears to be just for the 516 federal public housing units in the BHA renovation. The draft indicates that BHA is rethinking how the BHA renovation portion would be done (as it is also doing for Ausonia, Bunte, and St. Botolph) through a RAD/Section 18 blend. This possible change and its ramifications has not been discussed with the resident organization that represents tenants in existing and replacement units in both the CSP and BHA portions of the site. The City has also invested significant resources (\$50 million) to bring all units at Hailey up to current standards. GBLS is very involved with assistance to the resident organization here on complex redevelopment and relocation issues.

Response: Yes, thank you. The reference in the RAD Attachment is indeed to the 516 units that BHA is planning to renovate. BHA did in fact receive Section 18 disposition approval for these 516 units in October 2023. But BHA want to keep the 516 units listed here in the RAD Attachment solely to preserve flexibility if for any reason a partial RAD conversion becomes helpful.

Comment: p. 13 – General Warren would be a RAD/Section 18 blend, as discussed further in Section B.2.16 of the Supplement. The note should be updated to reflect what has occurred since 2023 (i.e., if a developer was selected), and this should be reviewed to be consistent with the material in the Supplement (re anticipated closing date).

Response: BHA has made a decision to pursue a RAD conversion and renovation on its own—without a private developer partner, in other words. We've updated the details in the RAD Attachment accordingly, and we've updated the target closing date to 2026.

Comment: p. 14 – West End Library is not BHA public housing property but is a good example of leveraging publicly owned property to increase affordable housing opportunities.

Response: Thank you.

Comment: p. 15 – Faneuil Gardens is new, and it is not an existing BHA federal public housing property. Rather, it is state public housing, and through the redevelopment process, BHA anticipates using the Faircloth-to-RAD process to federalize many but not all replacement units. BPDA recently approved the proposed Master Plan and Phase I for this site, and BHA will now proceed to secure necessary state and federal financial commitments necessary for feasibility. Information should be shared with the RAB about what's going on at the site, and eventually BHA will need to also go through the BHA Monitoring Committee process for disposition.

Response: Yes, thank you. BHA welcomes an opportunity to update the RAB.

Comment: p. 16 – Parcel P-12-C (Chinatown) is also not BHA public housing property but is a new proposal of a joint venture of two non-profits to generate new deeply affordable housing through the Faircloth-to-RAD process. The RAB has not yet heard any details on this.

Response: Yes, thank you. BHA welcomes an opportunity to update the RAB.

Comment: Resident Rights p. 17 – This includes the Resident Rights regarding relocation, tenant participation, waiting list, and screening that are contained in HUD RAD notices, and are referenced earlier (on p. 1 of the RAD Addendum, 4<sup>th</sup> paragraph). These should be made available to the RAB and residents who may wish them (they are not included in the PDF on the BHA's PHA Plan website).

Response: Yes, thank you, BHA will make these available on its website and through other means.

Comment: Bunte Apartments and St. Botolph should likely appear on the RAD chart, even if BHA had earlier only proposed Section 18 demo/dispos (which were approved by HUD), since BHA indicates it may revise its strategies here to pursue RAD/Section 18 blends.

Response: Yes, thank you. We have now updated the RAD Attachment to include those two sites.

Comment: As noted in separate notes on Section B.2.23 of the Supplement, about Project-Based Vouchers, the number of RAD units listed in the RAD Addendum (or which can be arrived at between the RAD Addendum and various pages in Section B.2.16 of the Supplement) and those listed in Section B.2.23 don't match—the RAD Addendum (and other materials) yield a figure of 484 currently, while Section B.2.23 of the Supplement says that it is 469. Moreover, it is not clear, from current plans, how an additional 100 RAD units would be added by the end of 2024, since even an Eva White closing by the end of 2024 (as opposed to early 2025) would only add 21 more RAD units. BHA should review and respond on this.

Response: Thank you, our figures seem to have been out-of-date. We have updated Section B.2.23 of the Supplement to reflect that, as of 01/01/2025, there are 471 RAD PBV units under contract. The breakdown is as follow: 267 at Mission Main, 28 at Old Colony, 28 at Heritage, 17 at Lower Mills, 110 at West Newton-Rutland, and 21 at Eva White.