

Comments and Responses to the BHA FY 2025 State Annual Plan covering April 2024 through end of March 2025.

The following document contains the comments and responses received on the BHA's FY 2025 State Annual Plan covering April 1, 2024 to March 31, 2025. BHA staff met with the Resident Advisory Board from September through December discussing the Plan process and documents and sent copies of the Plan to the RAB and Local Tenant Organizations. The Plan was put out for public comment on November 1, 2023 and the comment period closed on December 15, 2023 with an in-person public hearing held Dec 11, 2023 at 1 PM and a virtual public hearing held December 12, 2023 at 6 pm.

The BHA took several steps to notify the public of the FY 2025 State Annual Plan and the opportunity to comment. The BHA placed an advertisement in the Boston Globe, included a notice with the rent statement of public housing residents, 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 and the proposed Plan. 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.

Overview and Certification

Comment: (Ops) p.1--Here (and elsewhere—see for example p. 5), there is reference to the Department of Housing and Community Development (DHCD), and all such references should be changed to the Executive Office of Housing and Livable Communities (EOHLC). It may be that these are still in the forms provided by EOHLC. Three links in the last paragraph to sections of 760 CMR don't work.

Response: BHA staff will pass the comment along to EOHLC. The commenter is referring to text provided by EOHLC in the template.

Comment: (Ops) p.3--This refers to 1930 as the date for building Bowdoin Street. That was prior to the existence of any state public housing program, and so there may be a question whether that date should be used.

Response: BHA staff will pass the comment along to EOHLC. The commenter is referring to text provided by EOHLC in the template.

Comment: (Lsd Hsg) p.3--Can BHA say how many of the Massachusetts Rental Voucher Program (MRVP) vouchers are tenant-based and how many are project-based? Does BHA administer

any Alternative Housing Voucher Program (AHVP) units? The number of households served by federal vouchers seems inconsistent with what's in the Federal Annual Plan and should be checked.

Response: There are 12 AHVP, 285 Mobile, and 676 Project Based.

Comment: (Res Capacity) p.3--Note that only two of the listed recognized local tenant organizations (LTOs), Faneuil and West Broadway, are within the last five years, and EOHLRC regulations require revisiting of recognition every 5 years. If there is a plan to update the recognition for Franklin Field Elderly, Gallivan, and Orient Heights, this should be described somewhere. Moreover, it would appear that Archdale, Fairmount, Monsignor Powers, and South Street don't have recognized LTOs, and BHA may want to discuss any plans to engage with residents at those sites.

Response: South Street just elected their task force on November 17th 2023. We are in the process of completing their recognition. The LTO at Gallivan is now inactive as its two remaining members passed away in 2023. Plans are being made to hold a new election at West Broadway. RCP staff began meeting with residents in fall 2023 at Fairmount to start conversations about forming a new LTO. The RCP staff will be working with the other state sites on outreach efforts to form LTOs. Since Orient Heights is now a Trinity managed site, BHA staff will connect with Trinity management staff about holding an election at that site.

Comment: (Legal/Admin) p.4--While this correctly points out that for BHA, there is no Board of Commissioners or Board vote because of BHA's unique governance legislation (St. 1989, c. 88, as amended), there is a role for the BHA Monitoring Committee, and BHA may want to describe somewhere what that role may be for this Plan, budget, etc. Moreover, since a new City Council was elected in fall 2023, normally there would be a review of current Monitoring Committee appointments by the Mayor in early 2024 (and since at least one Leased Housing representative has resigned from the Committee this fall, meaning there is a vacancy to fill), BHA may want, both here and in its related Federal Plan, to discuss how this will be done.

Response: BHA will work with the Mayor's Office to review the current Monitoring Committee appointments as well as to appoint an additional member to the Committee so that the Committee is fully staffed.

Capital Improvement Plan

Comment: Section 2.1, Capital Improvement Plan, CIP Overview & Funding, Note that while the online version of the plan did have Attachments (A) and (B), referenced in this section, the "hard copies" that the RAB received did not.

Response: BHA staff provided copies of plan documents to RAB.

Comment: p.3--Under Net Formula Funding (FF) for the first 3 years of the CIP, there is planned spending of \$11.3 million (online version), although there is only an allocation of \$9.3 million. Where is the additional money from? Similarly, under Unrestricted FF, the allocation is \$8.8 million, but the planned spending is \$10.9 million (online version)—similar question. Is one of these a subset of the other? That may similarly explain why the totals differ by \$2 million.

Response: BHA's receives an annual Formula Funding award, which is proportional to its needs-based share of EOHLC's capital funding as determined by the state-wide Capital Planning System (CPS)

However, independent of this process the BHA creates a list of capital needs projects, based on the Priority 1 Facility Assessment Rating, where the component is in either a Poor or Critically Condition and is often past useful life, which projects are added to its Planned Spending on a rolling basis throughout any given year

Although, it is BHA's intent is to keep its Planned Spending in line with the Allocation Award. Historically, the estimate for the planned spending created in CPS often exceeds the Allocation amount.

Therefore, BHA employ's one or all of the following a strategies to reconcile its planned spending with its annual FF award. The strategies include: defer either all or part of the project in the annual plan to another year, reduced the scope work into a smaller projects, which can be phased over one or more years, and/or offset project costs with other funding sources, when available, i.e. grants, special funding, ear marks, or other awards.

There is no "additional money", it is only a process of how and when the funds are spent over a rolling three year period.

Planned Spending and Unrestricted Formula Funding are not a subset of one another

Comment: CIP Projects: Is any of this what was intended by Attachments (A) and (B) to Section 2.1 (see notes above), or are those separate? It appears that pp. 1-8 discuss regular FF, and pp. 9-11 discuss special awards, and this perhaps matches Attachments (A) and (B), respectively, but we are not sure. This may be the explanation for the \$2 million difference between allocation and spending (see above) because of the inclusion of special awards.

Response: Attachment B [GRANTS and/or AWARDS] is located at the end of the Annual Plan - after Sec 8.1 of the Glossary under the Section titled Attachments.

Comment: p.1--Are the funds allocated here for "stair/hall improvements" at South Street related to vacancy reduction, as discussed in Section 2.3, Item 14, below? Or is the Authority-wide Roof Replacement item (p.2) meant to cover vacancy reduction at South Street (where vacancies stem from roof leaks)? See also p. 5, which discusses roof repair at South Street.

Response: Authority-Wide: Stair Hall project at South Street addresses the critically stair hall improvements required at South Street, and does not affect the vacancy reduction.

Urgent Roofing Repairs at South Street addresses the critically required roofing repairs to remedy the multiple leaks at penthouses and chimneys to prevent interior infrastructure damage from water, which directly affects the vacancy rate by rendering the units inhabitable due to this condition.

Comment: p.5--Can BHA describe more what ARPA related work is being done at Fairmount, Archdale, and South Street, and how this relates to BHA and City of Boston ARPA spending strategy?

Response: Here is some additional description.

- **Fairmount**
 - Electrical: Load Center Upgrades | Federal Pacific
 - Electrical: Replacement of Fire Alarm Panel and Devices
 - Site Drainage
- **Archdale**
 - Electrical: Electronic Control Module
 - Electrical: Load Center Upgrades | Federal Pacific
 - Electrical: Replacement of Fire Alarm Panel and Devices
- **South Street**
 - Electrical: Electronic Control Module
 - Electrical: Replacement of Fire Alarm Panel and Devices
 - Utilities: - Transformers
- 234 Million Of ARPA Funding has been budgeted by the City of Boston for Housing. Two of the core activities listed under the city budget is for safety and health. Both of these activities are directly being addressed by each of the project referenced above at each development.
 - Safety
 - Electrical Load Center Upgrades | Federal Pacific
 - Electrical: Replacement of Fire Alarm Panel and Devices
 - Utilities: - Transformers

- Health
 - Electronic Control Module
 - Site Drainage

Comment: p.6--Can BHA describe more what the “wire access points” piece is for 4 state sites (but listed under Gallivan) at the end of this page? It’s also unclear why the same item is listed on p. 11 without any associated development or special comment.

Response: Installation of Wireless Access Points at Various BHA Development Locations to Facilitate BHA's Networking System that will Provide Access to the Internet over the air, which will enable the Residents, Task Force and BHA's Management Offices to have “WIFI”. The duplicated listing [Item 10] inserted by error and will be removed.

Comment: p.9--Could BHA say what the acronym “HILLAP” means (for Orient Heights Phase III) and is it all completed?

Response: High Leverage Asset Preservation Program “HILLAP”; Project is completed.

Comment: CIP Narrative: p.1--while BHA said in its initial draft that it was submitting an Alternate CIP, revised comments at the November 2023 RAB meeting indicated this was not the case. Item 3 seems to be missing some words in the first two lines (describing BHA goals).

Response: Boston Housing Authority did not submit an Alternate CIP. Here is the full text. The main vision guiding the BHA’s CIP FY 2024 – FY 2028 is to pursue housing and community development goals that create strong and vibrant communities through a range of affordable housing options and opportunities for all residents. Further, the strategies across all goal areas will help promote equity, with a special emphasis on helping households at the lowest income levels, underserved protected classes, and persons with special needs, and provide housing and related support in BHA’s diverse and inclusive communities. Given the severe cost burden of housing and risk of homelessness experienced by those at the lowest income levels with limited funding resources, the BHA prioritizes the stabilization and expansion of affordable housing. The objective is to increase the supply of affordable units across its State Portfolio to enable low to moderate income households from the public, and nonprofit sectors to live and be productive citizens within Suffolk County. To the extent possible, priority will be given to projects and programs that allow the BHA to meet this goal and provide a high quality of life to their residents. As in previous years, increasing affordable housing options through various methods continues to be a priority.

Comment: p.2-- On Item 6, can the report submitted 10/27/2023 be shared with the RAB and affected LTOs?

Response: BHA's most recent quarterly capital report (form 80 and 90) was submitted on 10/27/2023. The information contained in these reports is available through the CAPHub platform. Therefore, the consolidated state mod reports would need to be created and distributed through another department, since CAPHub does not create consolidated state mod reports. Our CPS facility data has been updated with current condition information, including changes.

Comment: p. 3—In Item 9, there seems to be a contradiction in the statements here, which initially say “we have not been able to include all of our high priority (CPS priority 1 and 2) projects in our CIP”, but then later says “The BHA has included all high priority 1 and 2 projects in the CIP.” Could BHA either correct or clarify this?

Response: The BHA has included all high priority 1 and 2 projects in the CIP.

Comment: p.3--In Item 11, regarding special needs developments (Chapter 167 or 689 housing), BHA indicated that it completed a service provider input process in accordance with its lease and held an annual meeting with the provider staff at all special needs developments in June 2023. Could BHA share a summary of the results of that process and meeting with the RAB and public?

Response: The Special Occupancy Units “SOU” consists of 10 sites, serving fifty-two residents, which sites are located in, Charlestown, Dorchester, Roslindale, Roxbury, and South Boston.

BHA's Capital Construction Department, and Operations, convened a meeting with Metro Residential Department of Social Services to review i) active projects, ii) planned projects, and iii) component deficiency's, [components which may require immediate repairs or modernization, based on their assessment priority.] A summary of some of these items reviewed and discussed at this meeting included but are not limited to the following: Current Projects: accessibility, building envelope modification, stairs, decks porches, and electrical, mechanical, and plumbing systems upgrades. Planned Projects: explore the viability of the modernization and/or renovation goals of the property and to investigate the possibility of increasing the density of the existing structures. Component Deficiencies: kitchens, and bathrooms upgrades, backup generators, wider entries at egress and room openings, increase food cabinet storage capacity and storage areas

Comment: p. 3--On Item 12, BHA has provided per unit monthly expenses for various utilities, but the data is VERY old (2004-2005), and BHA says it is awaiting additional information from utility company to update the data. Does BHA have any projection when this data will be available and when it can be shared with the RAB, public, and EOHLIC?

Response: BHA most recent monthly energy reports are from September 30, 2022 to August 31, 2023

The following table lists the EOHL's thresholds for Per Unit Monthly (PUM) expense for electricity, natural gas, oil, and water use and the developments at the Housing Authority that have expenses more than the thresholds, if any]:

Development	Annual Cost	# Units	PUM	Threshold	Exceeds Threshold	
					Yes	No
501 WEST BROADWAY						
Electric (kWh)	614,044	486	105.72	\$100	●	
Gas (Therms)	916,525	486	157.80	\$80	●	
Water (HCF)	1,222,625	486	210.51	\$60	●	
504 FANEUIL						
Electric (kWh)	291,403	258	94.12	\$100	●	
Gas (Therms)	15,830	258	5.11	\$80		●
Oil (Gallons)		258		\$50		
Water (HCF)	575,328	258	185.83	\$60	●	
505 FAIRMOUNT						
Electric (kWh)	416,949	202	172.01	\$100	●	
Gas (Therms)	355,464	202	146.64	\$80	●	
Water (HCF)	396,753	202	163.68	\$60	●	
507 ARCHDALE						
Electric (kWh)	417,046	283	121.94	\$100	●	
Gas (Therms)	408,089	283	119.32	\$80	●	
Water (HCF)	594,690	283	173.89	\$60	●	
508 ORIENT HEIGHTS						
Electric (kWh)	61,754	239	33.20	\$100		●
Gas (Therms)	29,470	239	15.84	\$80		●
Water (HCF)	5,491	239	2.95	\$60		●
510 GALLIVAN						
Electric (kWh)	450,899	249	149.70	\$100	●	
Gas (Therms)	590,556	249	196.07	\$80	●	
Water (HCF)	446,534	249	148.25	\$60	●	
512 SOUTH STREET						
Electric (kWh)	103,917	132	65.60	\$100		●
Gas (Therms)	169,400	132	106.94	\$80	●	
Water (HCF)	192,530	132	121.55	\$60	●	
601 FRANKLIN FIELD FAMILY						
Electric (kWh)	68,533	40	142.78	\$100	●	
Gas (Therms)	153,505	40	319.80	\$80	●	
Water (HCF)	75,413	40	157.11	\$60	●	
602 FRANKLIN FIELD SENIOR						
Electric (kWh)	94,009	32	122.41	\$100	●	
Gas (Therms)	24,730	32	32.20	\$80		●
Water (HCF)	92,989	32	121.08	\$60	●	
603 MONSIGNOR POWERS						
Electric (kWh)	97,087	68	118.98	\$100	●	
Gas (Therms)	14,068	68	17.24	\$80		●
Water (HCF)	69,083	68	84.66	\$60	●	
653 CLIFTON/BALCHOLDER-SPEC.						
Electric (kWh)	8,335.13	6	347.30	\$100	●	
Water (HCF)	11,247.58	6	468.65	\$80	●	
756 705-6 CONDOMINIUMS						
Water (HCF)	394,787	6	236.68	\$80	●	
Gas (Therms)	137,322	141	82.33	\$80	●	
Water (HCF)	257,890	141	154.61	\$60	●	

Comment: Pp. 3-4—Item 13, Energy or Water Savings Initiatives appears to be missing some context at the end of the section.

Response: Boston Housing Authority is currently pursuing energy or water-saving audits or grants as noted below:

Utility data management system:

- To meet immediate needs, BHA has improved internal data reporting capabilities to comply with local building performance ordinances.
- BHA continues to explore energy management systems since it discontinues uses of Mass Energy

Comment: (also Ops) 4--On Item 14, BHA indicates that its vacancy rates are significantly above what EOHLC has set as goals. EOHLC has a 2% vacancy rate goal for all programs. BHA's rate ranges from 3% in its Family Chapter 200 program, to 9% for its Family Chapter 705 program and 14% for the Chapter 667 program. BHA's sole strategies here are to deal with water infiltration problems at Archdale and South Street, which are two Chapter 200 sites. However, there is nothing to address the vacancy issues which are worse for the BHA's Chapter 705 and Chapter 667 portfolio. It may be that the Chapter 705 strategy relates to overall BHA plans for disposition and rehab of that portfolio, but if this is so, BHA should say that, and there should be a specific Chapter 667 strategy.

Response: BHA seeks to efficiently complete the vacancy turnover process, given the available resources and the volume and condition of vacated units. Renewed focus on the quality of unit turnovers has yielded positive results in the form of fewer unit refusals. The averages have also improved over the course of the current fiscal year. Current make ready time is 41 days, with overall turnover time at 92 days.

The 705 Portfolio will be repositioning into BHA's first-time low-income home ownership program. The BHA is presently conducting a review of these existing properties, with respect to their condition, period of vacancy, and if these units are occupied or unoccupied. After this assessment is completed the BHA will determine, which properties should be disposed of as-is or modernized as part of this program. The 667 Portfolio Elderly FRANKLIN FIELD 667-01, Family FRANKLIN FIELD 667-02, and MONSIGNOR POWERS 667-03, vacancies at these developments are not due to required capital improvements.

Maintenance and Repair

Comment: Having an index here of plan subsections labeled (a) through (h) is unnecessary/confusing when those letters are not used again in subsequent pages to orient the reader. In the first 7 pages is the Maintenance Overview (referring to the state agency as “DHCD”), and then the bulk of what follows is the BHA Preventive Maintenance guidance (15 chapters), followed by a Preventive Maintenance Schedule & Report Form (18 pages), and then 2 pages titled “BHA Deferred Maintenance”. It would be helpful if BHA could provide any notation about changed pages here, since comments have been provided on prior years’ versions of this, and it is not known in what respects BHA has changed this from what was provided in prior years (see n. 6). While pp. 4 and 6 of Section 3.1 do discuss enhancements that BHA has instituted in the past year (Zendesk, Maintenance Mechanic III flexibility, One Call Now, and new inspection protocols) which are also highlighted in the 5-Year Progress Report on the federal side, these could be missed without highlighting them more. Moreover, the average amount of time for vacant units to be made maintenance ready (87 days) and to lease up vacant units (193 days), as described on p.6 of Section 3-1, is unacceptable. Given the large number of homeless and at-risk individuals and families on BHA’s waiting list, as well as EOHLC’s recent efforts to address vacancies in state housing Commonwealth-wide and continued press coverage on this issue, units must be restored to full utilization as quickly as possible.

Response: Thank you for your comment and suggestions. BHA is not able to alter the format of the referenced sections of the Plan, but will try to add the appropriate letter at the beginning of each section to assist in orienting readers. BHA seeks to efficiently complete the vacancy turnover process, given the available resources and the volume and condition of vacated units. Renewed focus on the quality of unit turnovers has yielded positive results in the form of fewer unit refusals. The averages have also improved over the course of the current fiscal year. Current make ready time is 41 days, with overall turnover time at 92 days.

Comment: In addition, EOHLC seems to expect that most LHAs will have a deferred maintenance schedule, and that certain repair requests may identify deferred maintenance work that must be delayed until sufficient capital or other funding is available (see p. 7 of Section 3.1). As noted in the BHA Deferred Maintenance section, BHA does not currently have a Deferred Maintenance Plan, as “all required work for code compliance purposes is captured in the work order system or through the capital planning process”. At the same time, BHA indicates that after it implemented its new work order system in 2021, Operations would be incorporating additional enhancements and “BHA may begin classifying certain work items as deferred maintenance” with staff doing long-range planning and work scheduling and tracking deferred items separately from day-to-day maintenance requirements. Five examples are given where items might be deferred until there is a vacancy or until a particular season is over, where there is insufficient funding, or where grouping of items by location, task or trade would make sense, as well as revised priorities that may occur from time to time (for example, assigning staff to tackle vacancy reduction). BHA also identifies where it would not be appropriate to postpone an item, and what information will be captured regarding a deferred

item. Has BHA decided to track items as deferred maintenance, and has it revised its Standard Operating Procedure? If this hasn't happened yet, but BHA anticipates this happening over the next fiscal year, can BHA provide such projections as to when this may occur?

Response: BHA is currently working on a number of initiatives aimed at improving maintenance delivery, property conditions and customer service, as described in the Plan. Many of these are in the pilot stage of the implementation process. With the current slate of priorities, deferred maintenance planning and tracking will likely be addressed in the first quarter of next fiscal year (late spring/early summer of 2024).

Operating Budget

Comment: p.1--As noted, this is not the projected budget for the coming fiscal year, which normally is prepared one month in advance of the start of the fiscal year but is the actual budget for the prior year. At the bottom, it's noted that BHA's operating reserve at the end of state fiscal year 2023 was \$45 million, which was 321.9% of the full reserve amount. Can BHA (or EOHLC) identify what reserve is recommended for the BHA, and if BHA has too high a reserve, or too low a reserve, what actions are recommended?

Response: Thanks for the comment. This reserve figure is under review as BHA has transitioned state units (Camden and Orient Heights) from Public Housing to PBV, resulting in a loss or transfer of units and a need to re-calculate subsidy and reserves. Additionally in FY23, BHA reported an operating reserve balance (a/c #2806 – Unrestricted Net Asset) of \$42,108,471. This Unrestricted Net Assets has unrestricted net assets roll-forward from FY22. In FY22, we reported unrestricted net assets of 44,058,583. It included 34,989,096 of Other Revenue – Retained. This retained other revenue represented notes receivable transferred (Orient Heights and Camden), other equity transferred from closed state modernization grants, prior year adjustment, and other incomes. This additional amount should have been reported in BHA's restricted account – a/c #2805 instead of a/c #2806 and should have been excluded from the operating reserve calculation for the budget.

Comment: p.2--Actual receipts are better than anticipated for tenant rents (\$9.8 million as opposed to \$9.0 million) and for interest on investments (\$378,000 as opposed to \$42,000), and EOHLC operating subsidy was also higher. On the other hand, retained revenue was much lower (\$1.5 million as opposed to \$6.0 million); the last item seems to explain most of the loss in total revenue. Can BHA explain this to the RAB and the public, and articulate any strategy to avoid long-term consequences? On the expense side, while some items are significantly above what was budgeted, the overall expenses are \$1.3 million less than what was anticipated. Here again, it would be helpful to explain trends and what may be expected long-term. Fortunately,

overall revenues exceeded expenses, although not by the amount originally expected (\$2.1 million as opposed to \$5.4 million).

Response: FY23 Budget was prepared based on FY22's financials, which explains why there are variances in the budgeted amount versus the actual amount. In FY23, BHA charged \$9.8m for tenant rents in FY23. At the end of FY23, BHA has an outstanding AR balance of \$1.7m. Regarding unrestricted interest income, BHA saw a significant jump in FY23 due to an increase in interest rate from the Fed.

Performance Management Review

Comment: p.1--Performance Management Reviews (PMRs) are done biennially, and BHA explains that this is not the year for a PMR. RAB will need to review this next year.

Response: Thanks for the comment.

Comment: Explanation of PMR Criteria Rankings, This whole section was not included in the "hard copies" provided to the RAB and GBLS. The "occupancy rate" formula doesn't make sense as written, and there appears to be a parenthesis missing somewhere. We'd also flag the new CHAMP criteria on p. 2—these are interesting, and it will be curious to see next year's PMR.

Response: This text is provided by the state and BHA staff are not aware of any changes.

Policies

Comment: p.1--Here again, DHCD references should be changed to EOHLC. It's stated here that there was an ACOP change on rent collection policy as updated 8/10/23--can BHA provide this to RAB/GBLS? We're not aware of any such change on the state side. (The ACOP was revised as part of the Annual Plan process in fall/winter 2022-2023, and there are proposed ACOP changes in this Annual Plan, but we do not believe any related to rent collection. The mid-year ACOP change in June 2023 was solely a federal public housing over-income policy change required by HOTMA, and would not affect state sites.) It would be good to have copies of the relevant correspondence regarding EOHLC's approval of ACOP changes to clear up any confusion and to share with the RAB.

Response: BHA staff will pass the comment along to EOHLC. The commenter is referring to text provided by EOHLC in the template. BHA does not have a separate Rent Collection Policy. Protocols for rent collection are part of the ACOP. The ACOP date is referring to the last date it went through a review and comment period and the policy was approved. BHA has provided the ACOP to the RAB and GBLS as it went through the review and comment period.

Comment: (Legal) p.2--This correctly refers to an August 10, 2023, effective change date for the Tenant Participation Policy. BHA may want to refer to this here by its new name, Resident Participation Policy (RPP). Changes to that policy were started in conjunction with the Annual Plan process in fall-winter 2022-2023, but required some further discussions with resident leaders before a final policy was adopted. As noted above, we would suggest that the RPP, like the ACOP, Grievance Procedure, and BHA Lease, be treated as a waiver in that it is a slight departure from EOHLC requirements intended to promote as much uniformity as possible in how tenant participation issues are handled BHA-wide (with appropriate distinctions where different state and federal schemes require it, such as the level of tenant participation funding).

Response: BHA staff will update the name of the policy to Resident Participation Policy. BHA staff appreciate the suggestion and will consider whether we will need to request a waiver from EOHLC.

Waivers

Comment: (Legal) p.1--As has long been the case, BHA has waivers for its Admissions and Continued Occupancy Policy (ACOP) and its Tenant Grievance Procedures so that federal and state procedures can be aligned as much as possible. GBLS and the RAB have long supported this approach. We would recommend that the BHA Lease and the BHA Resident Participation Policy (RPP) also be treated as waivers where there are small departures from EOHLC regulations to promote uniformity of treatment and consolidated administration for state and federal public housing programs.

Response: Thank you for the comment. BHA staff will take the comment under advisement.

Comment: I know you only requested waivers from DHCD, excuse me, E-O-H-L-C on two things, which was your lease and your grievance procedure. But it may very well be, you need to do it on the RPP, the resident participation policy. I think there are a few things there that depart from the state's requirements, but in fact, the BHA, doing it one way for all the sites, I think makes a lot of sense. So just worth taking a look about whether or not you need to formalize that as a waiver request. I know that the state agency already approved it, so that part's not the issue. Question is whether or not it should be listed as a waiver.

Response: Thank you for the comment. BHA staff will take the comment under advisement.

Other Elements (Tenant Satisfaction Surveys, PMR)

Comment: This includes tenant satisfaction surveys, as well as certain attachments to the Capital Plan Goals & Objectives and Grants and Awards (what is referenced above at Secs. 2.1 and 2.2).

The tenant satisfaction survey data doesn't appear to be different than from prior years (it refers to 2020, and a possible statewide update in 2022). If there is anything different or new here, please let RAB/GBLS know. We did submit comments on this last year which would be the same if there is no new data.

Response: BHA staff are not aware of any changes to the data.

Comment: (CCD) Capital Plan Goals and Objectives—a few typos on p. 1 (“attachement”, “20241-2028”). As BHA has in the federal annual plan, on p. 1, it may want to discuss how BHA's state revisions align with City of Boston revised 2023 goals on decarbonization, as well as any new EOHLC directives or initiatives on broadband inclusivity and sustainability. It would be helpful to have some introductory/lead-in text before the table on the First Home Program, since otherwise the reader may think this is another sustainability initiative, as opposed to a completely different initiative. Throughout the document, BHA should also indicate how any of this may be different from what was presented last year—what has been added, what has been deleted, where priorities have shifted, etc.

Response: **Reference Note 1:** Section 2.1 Goals and Objectives, [Attachment A] is a subsection of this section, and is responding the annual plan's statement request for Additional Remarks by Boston Housing Authority, which note can be found at the end of the CIP's Overview and Funding of the Annual Plan section.

Reference Note 2: Section 2.2 Grants and Awards, [Attachment B] is a subsection of this section, and is responding the annual plan's statement request for information on the Funds in Additional to Annual Formula Funding Award, which note can be found at the end of the CIP Project of Annual Plan section.

Staff will correct the typos to reflect the changes for both the word attachment and the numeric value of 2024-2028.

BHA' current energy portfolio is more than 95% reliant on fossil fuels, resulting in greenhouse gas emissions of 53,730 metric tons per year at an estimated annual cost of \$38,292,876 [determined as a 3-year average from 2018-2020]. As the resident population continues to reside and grow within BHA's

community, and despite recent green energy initiatives, the environmental impact of energy consumption will increase significantly.

BHA often utilizes opportunities created by redevelopment and major renovation projects to upgrade buildings' ventilation, reduce energy consumption, and introduce higher efficiency systems. BHA Goals and Objectives to create Sustainable Buildings, include, but are not limited to:

- Eliminate the use of fossil fuels in public housing developments by 2030
- Upgrade buildings to support BHA's decarbonization
- Utilize BHA's purchasing power to advance energy efficiency and clean energy goals
- Implement renewable energy technology where possible
- Ensure new buildings and renovations follow certain energy and sustainability standards
- Utilize green infrastructure techniques at BHA developments
- Support the adoptions of renewable and energy efficient technology in buildings in greater Boston through BHA's voucher program