

SECTION VIII: ADMINISTRATIVE

Appendix 5: Public Comments

PUBLIC COMMENTS: FY2010 Moving to Work Annual Plan - Plan for Transformation Year 11			
Row #	INDIVIDUAL OR ORGANIZATION	COMMENT	CHA RESPONSE
1	Robert Whitfield	The Draft CHA Plan is confusing as to how the estimated FY2010 expenditures match up to the public housing unit completion schedule. The unit completion summary chart on page two of the Plan indicates no completion of scattered site units in FY2010. However, the expenditure chart on page three indicates that \$24.7 million will be spent on CHA scattered site units in FY2010. If no units are to be completed in 2010, what will the \$24.7 million be spent on?	The \$24.7 million has been allocated to be used for ADA upgrades to meet HUD's VCA compliance to scattered site units. Additionally, although CHA previously met the Plan goals for the Scattered Site portfolio, CHA continues to engage in capital maintenance activity at these sites. Lastly, CHA anticipates adding units to this portfolio in FY2010 through the Property Investment Initiative. The budgeted funds will be used to meet the costs of each of these three activities.
2	Robert Whitfield	The chart on page three [of the public comment draft] indicates that \$4.7 million of the scattered site expenditures is for MTW Demolition Vouchers. What exactly are MTW Demolition Vouchers, and how will they be used in the expenditures for scattered site units?	As a Moving to Work (MTW) Authority, CHA is able to combine capital, operating, and MTW Demolition vouchers into a single fund in order to have more flexibility in the use of funds for various permitted purposes. MTW Demolition Vouchers traditionally assist PHAs with relocation or replacement housing needs that result from the demolition, disposition, or mandatory conversion of public housing units. However, using the single block grant fund, CHA will use the total funds assigned for scattered sites in FY2010 for the Property Investment Initiative, ADA retrofits, and capital maintenance activity.
3	Robert Whitfield	The Plan indicates that \$8.3 million is targeted for Cabrini Homes Extension in FY2010, and that \$1.1 million is for MTW Demolition Vouchers at the Extension. It is not clear from the Draft Plan what exactly is to be done at Cabrini Extensions in FY2010.	There are different development projects that fall under Frances Cabrini Homes Extensions. The \$7,234,000 budgeted for FY2010 is for construction activity at Parkside of Old Town Phase 2A - Rental. Based on the Unit Delivery Schedule, 39 units will be delivered in FY2011 at Parkside Phase 2A Rental.
4	Robert Whitfield	The CAC is requesting that the CHA Draft Plan be revised to be more specific as to how many public housing units are to be built and/or rehabilitated in FY2010 at each site, and requesting that the Draft Plan include language explaining how MTW Demolition Vouchers will be used at each site.	Please refer to the chart on pages 30-31 for a detailed description of planned unit delivery activity by year. HUD does not require PHAs to identify how MTW Demolition Vouchers will be used at each site. Rather MTW PHAs are required to describe with specificity any planned significant capital expenditures by development. CHA fulfilled this reporting requirement on page 5 by listing what type of funds will be used on a development by development basis.
5	Robert Whitfield	The Draft Plan indicates that a total of 890 units will be completed in FY2010. Page two indicates that 629 of the 890 units are to be rehabilitated. The chart on page 29 of the Plan also indicates a total of 890 units will be completed in FY2010; however, there is no indication on that page that states what activity, if any, will be done at the Extensions in FY2010.	At this time, CHA plans to rehabilitate 629 units in FY2010. The rehabilitation work will be spread across Altgeld Gardens (290), Dearborn Homes (180), Francis Cabrini Rowhouses (100), and Washington Park Low-Rises (59). CHA has no plans to deliver units at Francis Cabrini Extension in FY2010, but CHA will continue with construction work at this site which may lead to unit delivery in FY2011.
6	Robert Whitfield	The chart on page 29 indicates that 189 units are projected for rehabilitation in FY2010. Page three [of the public comment draft] indicates that \$41.1 million will be spent at Dearborn from capital and stimulus funds. Is this entire amount targeted for rehabilitation at Dearborn Homes in FY2010? The chart on page three [of the public comment draft] also indicates that \$40.1 million is targeted for MTW Demolition Vouchers at Dearborn Homes in FY2010. What exactly does this figure represent? Is it the amount of funds supporting Dearborn Homes residents who have used a Section 8 Voucher to temporarily relocate while they wait to return to a rehabilitated unit at Dearborn Homes?	As revised in the final draft, the \$81.8 Million in estimated capital expenditures for Dearborn Homes is targeted for rehabilitation work at the site. The \$38 Million in MTW Funds budgeted for Dearborn Homes is designated for rehabilitation activity at the site.

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7	Robert Whitfield	The CAC recommends that at the very least, the various charts should be grouped together or somehow coordinated so that a resident does not have to constantly flip from one page to another page to try and understand exactly what activity will or will not take place at a particular development or site in the upcoming fiscal year.	Thank you for your comment. We will continue to try to balance HUD's reporting requirements with readability for residents and the community at-large.
8	Robert Whitfield	Unit completion data is contained on pages 2, 6, and 29 of the Draft Plan. The data chart on page two [of the public comment draft] has a summary of the projected unit completions for mixed finance sites, and projected unit completions for rehabilitation activity in senior and family housing. The chart on page six gives more specific information on how many units will be completed at various sites and developments in FY2010. The total number of projected unit completions is 890. Specific information on unit completion at each site is also contained on pages 28 and 29 of the Draft Plan. None of these pages indicate any unit completions in FY2010 at Bridgeport Homes or Cabrini Homes Extension. However, the expenditure chart on page three of the Plan indicates that \$7.2 million will be spent at Cabrini Homes Extension in FY2010, and \$5.1 million will be spent at Bridgeport Homes in FY2010. It is unclear what the expenditures at these locations are for. Will any public housing units be completed at these developments in FY2010? The CAC is requesting that the Draft Plan include more details on spending at each of the sites listed on page three to avoid confusion as to whether units will or will not be done at that particular site for the upcoming fiscal year.	Neither Bridgeport nor Frances Cabrini Extension will have units delivered in FY2010. However, in FY2011 CHA anticipates delivering 39 units at Parkside of Old Town Phase 2A - Rental. The \$5.1 million budgeted for Bridgeport Homes is for ADA upgrades to the community center building as well as capital maintenance related work.
9	Robert Whitfield	The CAC is requesting that CHA staff continue to meet with the LeClaire Courts relocation committee and their representatives during the remainder of 2009. The CAC is repeating a recent verbal request that a similar "relocation committee" be formed from the Ickes Homes Local advisory Council (LAC), and that CHA convene and continue meetings with the relocation committee during 2009 prior to the formation of the Harold Ickes Homes working group in FY2010. The CAC is requesting that a meeting with the CAC, CHA and the LeClaire Courts and Ickes relocation committees be convened at CHA in September or early October to discuss how this initiative should proceed during 2009.	CHA intends to continue meeting with the LeClaire relocation committee as we prepare to start a working group in early 2010. CHA has also started a similar committee at Ickes. We remain committed to working with residents in each community.
10	Robert Whitfield	The Draft Plan indicates that 35,069 Section 8 MTW Vouchers will be used in FY2010. The Draft Plan further states that of that number, 1,313 will be project-based Section 8. The number of families in the CHA Section 8 Voucher program is now much greater than the number of families in CHA public housing. The CAC is requesting that CHA meet with the CAC Executive Committee to begin discussions about possible future Section 8 representation on the CAC Board of Directors.	Thank you for the comment. CHA will schedule a meeting with the CAC Executive Committee to discuss this issue and other topics.

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11	Robert Whitfield	The CAC is interested in obtaining information regarding the tenant selection plans or plans for Section 8 project-based units, and specific information as to how many, if any, 10/1/99 families with a right to return have been offered a Section 8 project-based unit. The CAC is also requesting information on how many 10/1/99 families have, as of this date, accepted housing in a project-based unit. This was not an issue when the CHA Relocation Rights Contract was finalized, and is therefore not specifically covered as to how this affects a family's rights under the contract. If a project-based unit is offered to a 10/1/99 family, does this count as an offer under the Relocation Rights Contract? The Annual Contributions Contract (ACC) period for new public housing units is generally forty years. The ACC period for rehabilitated public housing units is generally another twenty years from the completion of the rehabilitation. It is therefore important that the CAC obtain information on the length of the ACC for the project-based units listed in the Draft Plan. A meeting between CHA and the CAC on project-based programs should be convened as soon as possible to discuss the above issues and concerns regarding the CHA Section 8 project based program.	CHA will schedule a meeting with the CAC Executive Committee to discuss this issue and other topics.
12	Robert Whitfield	The Draft Plan indicates that CHA has formed a Fair Housing Unit for FY2010. The CAC is requesting information on what specific fair housing activity will be done in FY2010. Will this new unit have the authority to investigate fair housing complaints that are filed by CHA residents in public housing? Will the new CHA unit have the authority to investigate fair housing complaints filed by applicants for CHA public housing? Will the new unit have the authority to investigate fair housing complaints filed against the owners or property managers at CHA mixed finance developments and sites? How will this new unit interact with Federal and State fair housing agencies? Are there written rules and procedures governing the CHA Fair Housing Unit? Does CHA have, or will it have, a process for banning any Section 8 landlord who is found to have engaged in Federal or State discrimination in the rental of housing? Will that ban be imposed by CHA even if the discrimination did not involve housing rented by CHA Section 8 families? The CAC is requesting a meeting with CHA to discuss the above.	CHA will schedule a meeting with the CAC Executive Committee to discuss this issue and other topics.

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13	Robert Whitfield	The Draft Plan lists projected activity through 2015 when the Plan terminates. The CAC is aware that the future condition of the real estate market may alter redevelopment at one or more sites before the end of the Plan. It is therefore important that the CHA and the LACs and/or the CAC meet on a regular basis to ensure that all parties, especially CHA residents and relocates, are properly informed on the status of CHA redevelopment activities at all sites. CHA and the CAC should meet and discuss which developments are or will be affected or delayed over the last years of the Plan, and how information is to be conveyed to keep residents and relocatees informed about progress on the redevelopment or any changes in the initial plans for redevelopment. The CHA should also meet with the CAC and the Lathrop Homes LAC to discuss what the plans are for ensuring that housing at Lathrop Homes is maintained while the planning and redevelopment process continues.	Thank you for your comment.
14	Robert Whitfield	The CAC, from the beginning of the Plan up to the present, has had to address continuous concerns by public housing residents that public housing will be sold or given to private entities. The CAC is therefore requesting certain information to ensure that proposed activities in the FY2010 MTW Annual Plan comply with various Federal requirements, including the following: 1) requirements for the recording of Declaration of Trusts; and 2) requirements applicable to mixed-finance developments.	CHA will respond to a properly submitted FOIA request.
15	Robert Whitfield	<p>HUD recently issued HUD Notice PIH 2009-24 which extends HUD Notice PIH 2008-27 and PIH Notice 2007-15. These HUD Notices set forth certain requirements for PHAs that have mixed finance developments. HUD Notice PIH 200-15 requires, in part, that PHAs include in their annual audit statements, certain activities related to mixed finance transactions.</p> <p>The CAC is requesting a copy of the portion of CHA's last audit statement (submitted to HUD) that describes CHA's mixed finance transactions as required by the above HUD Notices. The CAC is also requesting a meeting with CHA to further discuss this request.</p> <p>The CAC is requesting a list of those CHA properties (including properties involved in mixed-finance developments) where CHA has not filed a Declaration of Trust as required by the Federal Housing Act, and more specifically, by HUD Notice PIH 2009-28, issued on August 14, 2009.</p>	CHA will respond to a properly submitted FOIA request and will schedule a meeting with the CAC Executive Committee to discuss this issue and other topics.

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16	Robert Whitfield	<p>HUD issued a Notice on September 15, 2009 (HUD Notice PIH 2009-36) that provides guidance to all PHAs regarding the requirement in Section 644 of the Housing and Community Development Act of 1992 to provide applicants for public housing with the option to include (as part of their application for public housing) information on an individual or an organization that can be contacted to assist "... with resolving any tenancy issue that arises during tenancy."</p> <p>The CAC has reviewed the current CHA Amended and Restated Moving to Work Agreement that was signed in June, 2008, and did not find any provision that exempts CHA from this new requirement resulting from the 1992 Act, or the January 22nd Notice published in the Federal Register. The Notice is quite clear that the contact information given by the applicant can be a family member, a friend, or a social or advocacy organization.</p> <p>The Notice also indicates that current tenants who were not advised of this option at the time of their application for tenancy should be advised of this option at the time of their annual recertification. The CAC is requesting a meeting with CHA as soon as possible to discuss and jointly agree on how this federally mandated requirement can be implemented by CHA going forward at all CHA properties, including mixed-finance developments.</p>	CHA will schedule a meeting with the CAC Executive Committee to discuss this issue and other topics.
17	Chicago Coalition for the Homeless (CCH), Coalition to Protect Public Housing (CPPH), Jewish Coalition on Urban Affairs (JCUA), Nathalie P. Voorhees Center for Neighborhood and Community Improvement at University of Illinois	Who has moved out and where have they gone?	Residents relocating under the Plan have the option of moving into mixed income unit, a revitalized public housing unit, or may choose to take a temporary or permanent housing choice voucher. Since the inception of the Plan nearly half of the residents living in CHA housing on 10/01/99 have had their Right of Return satisfied and moved into their permanent housing choice.
18	Chicago Coalition for the Homeless (CCH), Coalition to Protect Public Housing (CPPH), Jewish Coalition on Urban Affairs (JCUA), Nathalie P. Voorhees Center for Neighborhood and Community Improvement at University of Illinois	The CHA claimed that of the 2,543 rehabbed scattered site units it had achieved the goal of 100% renovated in FY2006. So, why [in the draft FY2010 Plan] is CHA planning to spend another \$20 million in stimulus money on these properties?	At the time the CHA draft FY2010 Plan was printed CHA had applied for a competitive stimulus grant to be used for scattered site ADA retrofitting, but was not awarded this grant. The reconciled FY2010 Capital Program Estimated Capital Expenditures Chart on page 5 of the final Plan reflects this change and does not assign stimulus funds to Category 3 - Scattered Site properties.
19	Chicago Coalition for the Homeless (CCH), Coalition to Protect Public Housing (CPPH), Jewish Coalition on Urban Affairs (JCUA), Nathalie P. Voorhees Center for Neighborhood and Community Improvement at University of Illinois	While the plan is to complete 3,041 family units in new mixed-income communities by the end of 2010, there remain nearly 3,700 more units to build in just five years if the plan is to be completed by 2015. Considering that it will take nearly 10 years to build less than that - and during a time that until recently had been favorable for development - how realistic is this? And, what about the families that moved out nearly 10 years ago thinking that it would be 5-7 years at most before they would move back to a new unit (see timeline in the FY2005 plan)?	CHA has been very fortunate to have received a combined amount of over \$180 Million in stimulus dollars during FY2009. These funds will greatly assist CHA in accelerating unit delivery and meeting FY2015 projections. Additionally, CHA continues to seek out external resources to meet the Plan objectives.
20	Chicago Coalition for the Homeless (CCH), Coalition to Protect Public Housing (CPPH), Jewish Coalition on Urban Affairs (JCUA), Nathalie P. Voorhees Center for Neighborhood and Community Improvement at University of Illinois	Who is benefiting from this plan?	The Plan has and will continue to benefit public housing residents, residents on the public housing wait list, voucher holders and their respective families.