The information collection requirements contained in this document have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and assigned OMB control number 2577-0075. There is no personal information contained in this application. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when disclosure is not required. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

This general information is required to request HUD approval to remove public housing property (residential or non-residential) from public housing requirements, including use restrictions imposed under the Annual Contributions Contract (ACC) and the Declaration of Trust (DOT)/Declaration of Restrictive Covenants (DoRC). PHAs may request such HUD approval under the following laws: demolition and disposition (Section 18 of the 1937 Act and 24 CFR part 970); voluntary conversion (Section 22 of the 1937 Act and 24 CFR part 972); required conversion (Section 33 of the 1937 Act and 24 CFR part 972); homeownership (Section 33 of the 1937 Act and 24 CFR part 906); retentions under 2 CFR 200.311 (PIH Notice 2016-20 or subsequent notice); and eminent domain (PIH Notice 2012-8, or subsequent notice).

Note: This form requests general information only and PHAs are required to submit an additional addendum for the specific type of proposed removal. This form in addition to the applicable addendum are collectively known as the SAC application since these applications are processed by HUD's Special Applications Center (SAC). HUD will use this information to review PHA requests, as well as to track removals for other record keeping requirements. Responses to this collection of information are statutory and regulatory to obtain a benefit. The information requested does not lend itself to confidentiality. PHAs are required to submit this information electronically to HUD through the Inventory Removals Submodule of the Inventory Management System/PIH Information Center (IMS/PIC) system (or a later electronic system prescribed by HUD). IMS/PIC will assign each SAC application a "DDA" number.

This form does not apply to proposed removals (conversions) under HUD's Rental Assistance Demonstration (RAD) program; and the instructions for RAD application submissions via IMS/PIC is provided and governed by a separate OMB-approved HUD form.

Section 1: General Information	
1. Date of Application:	March 1, 2021
2. Name of Public Housing Agency (PHA):	Brockton Housing Authority
3. PHA Identification Number:	MA-024
4. PHA Address:	45 Goddard Road, Brockton, MA 02301
5. Contact Person Name at PHA:	Thomas G, Thibeault
6. Contact Person Phone No.:	508.588.6880
7. Contact Person Email:	TomT@brocktonhousingauthority.com
8. Is the PHA operating under any remedial order, compliance agreement, final judgment, consent decree, settlement agreement or other court order or agreement, including but not limited to those related to a fair housing or other civil rights finding of noncompliance? *If yes, attach a narrative description of explaining how the proposed removal is consistent with such order, agreement or other document*	☐ Yes ☒ No
9. Name of Local HUD Field Office	Boston Regional Office
10. Name of Expeditor at Local HUD Field Office who assisted PHA with application	N/A

Section 2: N/A

Section 3: PHA Plan, Board Resolution, Environmental Review and Local Government Consultation	
1. PHA Plan: Year of PHA Plan that includes the removal action and approval date:	Year: 2021 Approval Date: 09/24/2020
Attach evidence that the removal action is included in the approved PHA Plan and approval date	
2. Board Resolution that approves the removal action; and PHA's submission of removal application to HUD: Board Resolution Number: 20-03 Board Resolution Date: September 24, 2020	
Attach a copy of signed PHA Board Resolution	

3. Environmental Review: Check the box for the entity that conducted the Environmental Review (ER):	☒ HUD under 24 CFR part 50 ☐ Responsible Entity (RE) under 24 CFR part 58 Name of RE: **DRAFT ATTACHED** Date ER was conducted:
Attach a copy of HUD's approval of the Environmental Review (i.e. HUD-7015.16). See instructions.	
4. Local Government Consultation: The PHA covers the following jurisdiction(s):	Brockton, Massachusetts
5. Date(s) of letter(s) of support from (local) government officials:	See attached
Attach copies of all letters of support from local government officials, along with a narrative description of the PHA's consultation (if applicable)	

Section 4: Description of Existing Development				
1. Name of Development:			Campello High Rise	
2. Development Number:			MA-024	
3. Date of Full Availability (DOFA):			04/29/1979 [EIOP 03/03/1973]	
4. Number of Residential Buildings:			2	
5. Number of Non-Residential Buildings:			1	
6. Date Constructed:			1972 (first occupied)	
7. Is the Development Scattered Site?			☐ Yes ☒ No	
8. Number of Buildings (single family, duplexes, 3-plexes, 4-plexes, other):			2	
9. Number of Types of Structures (row houses, walk-up units, high-rise unit):			2 High-rise residential structures; 1 non-res structure (maintenance shop)	
10. Total Acres in Development:			5.26 Acres	
11. Existing Unit Distribution	General Occupancy	Elderly/Disabled Designated Units	Total Units Being Used for Non-Dwelling Purposes	Total Units in Development
0 – Bedroom				
1 – Bedroom		396		396
2 – Bedrooms		2		2
3 – Bedrooms				
4 - + Bedrooms				
Total				
Attach a description of the distribution of UFAS accessible units (bedroom size; unit type, e.g., mobility or sensory)				

Section 5: Description of Proposed Removal

1. Type of Removal Action(s)
(e.g., Demolition, Disposition, Disposition to allow for Public Housing Mixed-Finance Modernization, Demolition and Disposition, DeMinimis Exception under Demolition, Voluntary Conversion, Required Conversion, Homeownership, Eminent Domain, Retention under 2 CFR part 200)

Disposition (obsolescence)

2. Proposed Action by Unit Type (e.g. bedroom size)

Existing Unit Distribution	General Occupancy	Elderly/Disabled Designated Units	UFAS Mobility Units	UFAS Sensory Units	Total Units Being Used for Non-Dwelling Purposes	Total Units in Development
0 – Bedroom						
1 – Bedroom		375	19	0	2	396
2 – Bedrooms			2	0		2
3 – Bedrooms						
4 - + Bedrooms						
Total						

3. Proposed Action by Building Type	Buildings to be Demolished Only	Buildings to be Disposed of Only
Residential Buildings		2
Non-Residential Buildings		1
Total Buildings		3

If the removal action is for only a portion of property at a contiguous site, attach a site map

4. Total Acreage Proposed for Removal (if applicable) 5.26 acres

(a) Attach a description of the land (e.g. survey, copy of the legal description)
(b) Attach a copy of the recorded Declaration of Trust (DOT)/Deed of Restrictive Covenant (DoRC)
(c) If the removal action is for only a portion of property at a contiguous site, attach a site map.

5. Estimated Value of the Proposed Property $23,183,800

(a) Was an independent appraisal conducted to determine the estimated Fair Market Value?	☐ Yes ☒ No
(b) If yes, date of appraisal and name of appraiser:	Date: Name:
(c) If not, describe other form of valuation used:	Tax Assessor, City of Brockton

Attach an executive summary of the appraisal or other form of valuation

6. Timetable

Activity		Estimated Number of Days After HUD Approval:
(a)Begin Relocation of Residents:	N/A ☐ -if vacant or for non-dwelling building	120 days
(b)Complete Relocation of Residents:	N/A ☐ -if vacant or for non-dwelling building	360 days
(c) Execute Contract for Removal		360 days
(d) Removal of the property		450 days

Section 6: Relocation

1. Number of Units Proposed for Removal that are Occupied as of the Submission Date of this SAC application: (Note: These numbers are not editable and automatically populated when application is submitted)	398
2. Number of individual residents that the PHA estimates will be displaced by this removal action:	502

Attach a summary of the number of individual residents estimated to be displaced by race and national origin and a summary of households estimated by be displaced by who have a member who is a person with a disability

3. Who will provide relocation counseling and advisory services to residents?	☒ PHA staff ☐ Another Entity contracted by the PHA Describe:
Attach a description of the relocation counseling and advisory services that the will be provided to residents who will be displaced by this action	
4. What is the estimated costs of relocation and moving expenses (including advisory services)?	$625,050
5. What is the anticipated source of funds for relocation and moving expenses (including advisory services)?	☒ Capital Funds ☒ Operating Funds ☐ Funding Source Year: ☐ Non-1937 Act Funds (describe:)
6. What comparable housing resources does the PHA expect to offer to displaced residents?	☒ Public Housing. If checked, number: 60 ☒ Section 8 HCV (existing resources. If checked, number: 3 ☐ Section 8 HCV (new award of TPVs) (see question #7). If checked, number: ☒ PBV Unit. If checked, number: 398 ☐ Other (attach description). If checked, number:
Attach a summary of the comparable housing resources that the PHA expects to offer to be displaced residents.	
7. Tenant Protection Vouchers (TPVs): If the PHA is eligible to receive TPVs in connection with the proposed removal action, how many TPVs is the PHA requesting?	☒ Yes - Replacement TPVs. If checked, number: **398** ☐ Yes - Relocation TPVs. If checked, number: ☐ No TPVs will be requested
Attach a brief explanation supporting the TPV request. See PIH Notice 2017-10 and PIH Notice 2018-04 (or any successor notices). If the PHA is a public housing only-PHA, the PHA must partner with a PHA that administers an HCV program.	

Section 7: Resident Consultation	
1. Will any residents be displaced or otherwise affected by the proposed removal action? If yes, date(s) PHA consulted with residents?	☒ Yes ☐ No Date(s): see attachment
Attach a narrative description of consultation process, along with supporting documentation (e.g., agenda, meeting notices; sign-in sheets; meeting minutes, print-out of written or email consultation)	
2. Is there a Resident Council (at affected development)? If yes, name of Resident Council and dates PHA consulted it:	☒ Yes ☐ No Name: Bldg. A & Bldg B. Date(s): 01/08/21 ☐ N/A to removal action
Attach a narrative description of consultation process, along with supporting documentation e.g. meeting notices; sign-in sheets; meeting minutes, print-out of written or email consultation)	
3. Is there a Resident Council (PHA-wide jurisdiction)? If yes, name of Resident Council and dates PHA consulted it:	☐ Yes ☒ No Name: Date(s): ☐ N/A to removal action
Attach a narrative description of consultation process, along with supporting documentation e.g. meeting notices; sign-in sheets; meeting minutes, print-out of written or email consultation)	
4. Date(s) PHA consulted with the Resident Advisory Board (RAB) (as defined in 24 CFR 903.13)	Name of RAB: Resident Advisory Board Date(s): August 19, 2020 ☐ N/A to removal action
Attach a narrative description of consultation process, along with supporting documentation e.g. meeting notices; sign-in sheets; meeting minutes, print-out of written or email consultation)	
5. Did the PHA receive any written comments from residents or resident groups/organizations during the consultation process?	☒ Yes ☐ No
If yes, attach comments received, along with an evaluation by the PHA	

Section 8: N/A

Section 9: PHA Certification of Compliance

Acting on behalf of the Board of Commissioners of the PHA, as its Chairman, Executive Director, or other authorized PHA official, I approve the submission of this SAC Application known as DDA # for removing public housing property from public housing use restriction, of which this document is a part, and make the following certifications, agreements with, and assurances to the Department of Housing and Urban Development (HUD) in connection with the submission of this SAC application and the implementation thereof:

1. All information contained in this SAC application (including all supporting documentation, attachments and required form HUD-52860 addendums) is true and correct as of today's date.
2. Resident demographic data in the IMS/PIC system is updated and current as of the date of the submission of this SAC application.
3. The PHA will comply with all applicable fair housing and other civil rights requirements, including but not limited to HUD's general non-discrimination and equal opportunity requirements listed at 24 CFR 5.105(a), as well as the duty to affirmatively further fair housing (AFFH) related to this SAC application. AFFH includes ensuring that the proposed inventory removal development is not in conflict with fair housing goals and strategies in my agency's PHA or MTW Plan, and is consistent with my agency's obligation to AFFH, certification and supporting activities. The PHA conducted the submission requirements of this SAC application (including removal justification; resident consultation, etc.) in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act of 1990, state or local accessibility requirements, and other applicable civil rights laws. If HUD approves this SAC application, the PHA will carry out and implement this removal action (including relocation, if applicable), in conformity with all applicable civil rights requirements. The requirements for AFFH can be found at 24 CFR §§ 5.150-5.152, 5.154, 5.156, 5.158, 5.160, 5.162, 5.164, 5.166, 5.168, and 5.169-5.180.
4. The removal action proposed in this SAC application does not violate any remedial civil rights order or agreements, conciliation agreements, voluntary compliance agreements, final judgments, consent decrees, settlement agreements or other court orders or agreements to which the PHA is a party. If the PHA is operating under such a document, it must indicate this by uploading a document to the SAC application that provides a citation to the document and explains how the proposed demolition or disposition is consistent with such document.
5. If the PHA is a non-qualified PHA under the Housing and Economic Recovery Act of 2008 (HERA), it has complied with the PHA Plan requirements regarding the proposed removal action at 24 CFR part 903 and the applicable statutory removal authority. For instance, if the removal action is a demolition or disposition, the PHA must describe the demolition or disposition in its PHA Plan or in a Significant Amendment to that PHA Plan and that description must be substantially identical to the description in the SAC application. If the PHA is a qualified PHA, the PHA certifies that it has discussed the removal action at a public hearing.
6. The PHA has conducted all applicable resident consultation and will conduct all relocation activities associated with this SAC application in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act of 1973 (24 CFR 8.6) and with 49 CFR 24.5, and as applicable, the Americans with Disabilities Act of 1990. The PHA will take reasonable steps to ensure meaningful access to their programs and activities for persons who have limited ability to read, speak, or understand English – i.e., individuals who have limited English proficiency (LEP).
7. The PHA will comply with all applicable Federal statutory and regulatory requirements and other HUD requirements, including applicable PIH Notices, in carrying out the implementation this SAC application, as approved by HUD. The PHA specifically certifies that the property proposed for removal in this SAC application is in compliance with Declaration of Trust (DOT) or Declaration of Restrictive Covenants (DoRC) requirements.
8. The PHA will comply with the terms and conditions of any HUD approval that HUD may issue for this SAC application, including requirements applicable to future use, record-keeping and reporting; and will specifically retain records of the SAC application and its implementing actions of HUD's approval of this SAC application for a period of not less than 3 years following the last required action of HUD's approval. The PHA further certifies that it will make such records available for inspection by HUD, the General Accountability Office and the HUD Office of Inspector General. If the PHA wants to make any material changes from what it described in its SAC application and/or HUD's approval of the SAC application, it will request HUD approval for such changes, in accordance with applicable HUD guidance.
9. The PHA will not take any action to remove or otherwise operate the property proposed for removal outside of public housing requirements until it receives written approval of this SAC application from HUD.
10. If any units proposed for removal by this SAC application are subject to an Energy Performance Contracting (EPC), the PHA agrees to comply with additional instructions provided by HUD regarding the EPC and will not take any steps to implement this SAC application (if approved by HUD), without receiving confirmation from HUD that all applicable EPC requirements are satisfied.
11. If any units proposed for removal by this SAC application are subject to a Capital Fund Financing Plan (CFFP) or other Section 30 debt, the PHA agrees to comply with additional instructions provided by HUD regarding the CFFP or other Section 30 and will not take any steps to implement this application (if approved by HUD), without receiving confirmation from HUD that all applicable CFFP or other Section 30 requirements are satisfied.

12. If the PHA is in the process of removing all of its public housing units from its ACC low-rent inventory through this or other SAC applications and/or other pending removal actions, including the Rental Assistance Demonstration (RAD) program, the PHA agrees to comply with additional instructions provided by HUD regarding the close-out of its public housing portfolio.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Thomas G. Thibeault
Official Title:	Executive Director
Signature:	
Date:	

Form HUD-52860 Instructions
Refer to SAC website at www.hud.gov/sac for more information

This form request general information from PHAs about proposed removal actions under the following laws: demolition and disposition (Section 18 of the 1937 Act and 24 CFR part 970); voluntary conversion (Section 22 of the 1937 Act and 24 CFR part 972); required conversion (Section 33 of the 1937 Act and 24 CFR part 972); homeownership (Section 32 of the 1937 Act and 24 CFR part 906); retentions (PIH Notice 2016-20 and 2 CFR 200.311); and eminent domain (PIH Notice 2012-8, or replacement notice). This form is the first part of a SAC application that must be submitted via the fields in the Inventory Removal Submodule of IMS/PIC (or replacement system).

PHAs must complete the sections of this form where there is no field in the IMS/PIC SAC application for the requested information. PHAs must then upload this form and other supporting documentation requested by this form to the IMS/PIC SAC application. PHAs must label that supporting documentation by section number of this form and/or by name (e.g. Resident Consultation). PHAs must complete and submit applicable addendums as indicated below as part of a SAC application. PHAs must refer to the applicable regulations, PIH notices and other program guidance noted above for detailed requirements on the submissions required for the specific removal action proposed in the SAC application at SAC web site.

Proposed Removal Action	Additional HUD Form Required
Section 18 Disposition and/or Demolition	HUD-52860-A
Section 18 Demolition Rehab Needs and Cost-Test	HUD-52860-B
Section 32 Homeownership	HUD-52860-C
Section 33 Required Conversion	HUD-52860-D
Section 22 Voluntary Conversion	HUD-52860-E
Eminent Domain	HUD-52860-F
Part 200 Retention	HUD-52860-G

NOTE: The removal of public housing units from the PHA's inventory through these actions will impact (decrease) the PHA's Operating and Capital Fund subsidy from HUD. See 24 CFR 990.190 and PIH Notice 2017-22 (or successor notice) for impacts on Operating Fund. Capital Funds for units will terminate at the time the units are removed from ACC via IMS/PIC. However, PHAs may be eligible for Demolition Disposition Transition Funding (DDTF) pursuant to 24 CFR 905.400(j).

Section 1: General Information

Some fields will automatically populate from IMS/PIC. If not, complete all fields.

Section 2: N/A

Section 3: PHA Plan, PHA Board Resolution, Environmental Review and Local Government Consultation

Refer to the regulation, PIH Notice or other HUD guidance document for guidance on these requirements for the specific removal action proposed, but generally the following apply:

PHA Plan: PHAs must include the removal action in their approved PHA plan for all SAC applications.

Board Resolution: PHAs must obtain a board resolution approving the removal action for all SAC applications. For demolitions and dispositions proposed under 24 CFR part 970, the board resolution must be dated after the date of resident and local government consultation.

Environmental Clearance: HUD will not process or approve a SAC application without evidence that the proposed removal action has received Environmental Clearance. This evidence will generally be a copy of a HUD signed Authority to Use Grant Funds (HUD-7015.16 form or subsequent form) for the proposed removal action (including future use, if known) to evidence an environmental review acceptable to HUD was completed under 24 CFR part 58. In some instances, evidence of Environmental Clearance may be a letter from the Responsibly Entity stating the activity was exempt or categorically excluded under 24 CFR part 58. The only exception to obtaining Environmental Clearance under 24 CFR part 58 is if HUD, in its sole discretion, decides to complete the environmental review itself under 24 CFR part 50. In this case, the applicable local HUD Office of Public Housing must have actually completed the environmental review and determined the action has Environmental Clearance before HUD will process or approve a SAC application.

Local Government Consultation: PHAs must consult with their local government officials and obtain a letter of support for all SAC applications (except for eminent domain and homeownership). For demolitions and dispositions proposed under 24 CFR part 970, PHAs must include a narrative description of its consultation with local government officials.

Sections 4-9 must be completed and submitted separately for each Development covered by this Application

Section 4: Description of Existing Development(s)

Most information should automatically populate from IMS/PIC information, except for Section 4, Line item 10 (Total Acres of the Development) which the PHA must complete. If line 10 is not completed or less than proposed for disposition under Section 5, PHA will not be able to fill in Section 5, line 4. The development number should be the HUD development number. All development numbers are at least 8 characters long (and may be up to 11 characters for AMP developments).

Section 5: Description of Proposed Removal

Unlike section 4, this information will not automatically populate. PHAs must complete the fields of this form where there is no field in the IMS/PIC SAC application for the requested information (i.e. UFAS information).

Removal Action Type: PHAs must select removal action type as the first step to creating the electronic SAC application in IMS/PIC.
Property description (Unit, Building, Acreage): PHAs identify the property by development number(s) and buildings by their IMS/PIC building PHAs provide the total acreage (refer to instructions for Section 4, line 10) and physical address of the property proposed for removal. If the removal action includes land (i.e., not just buildings), PHAs should attach a description of the land (e.g. survey, copy of the legal description), along with a copy of the DOT/DoRC that is recorded against the property, if available. If the proposed removal action (including demolition) is for only a portion of the property at a contiguous site, PHAs must attach a site map.
Estimated Value of Property: Attach an independent appraiser's appraisal summary or other valuation method.
Timetable: PHAs indicates the number of days after HUD approval of a SAC application that they estimate they will complete these activities.

Section 6: Relocation

PHAs complete this section for all proposed removal action where relocation will be required. PHAs may be required to complete additional relocation information in the applicable addendums (e.g. right of first refusal for homeownership applications; evidence of compliance with all applicable federal, state, and local laws for eminent domain actions).

For question #3, the summary of the type of counseling and advisory services should include a description of how the services will promote fair housing, including but not limited to how they will assist residents in obtaining housing in opportunity areas.

For question #6, the relocation summary should provide sufficient detail about the comparable housing that the PHA will offer to the displaced residents (i.e. based on available resources and resident preferences) Indicate how the PHA will identify and offer comparable housing to (a) displaced residents who have a family member who is a person with a disability; and (b) displaced residents who are not eligible for Section 8 HCV assistance (e.g. because they are over-income).

Note that a PHA's eligibility to receive TPVs is based on statutory Appropriations laws, and other HUD guidance, including but not limited to PIH Notice 2017-10and PIH Notice 2018-04 (or any successor or replacement notices).

If the PHA is a public housing only-PHA and will partnering with a PHA that administers an HCV program for the TPVs, the partnering PHA must have jurisdictional authority and administrative capacity to administer the TPVs. PHAs should contact their local HUD Office of Public Housing for more information.

Section 7: Resident Consultation

Refer to the regulation, PIH Notice or other HUD guidance document for guidance on resident consultation for the specific removal action proposed.

Section 8: N/A

Section 9: PHA Certification of Compliance

The Executive Director, Board Chairperson, or other authorized agent of the PHA, should complete, sign and date the Certification and submit it (as a scanned PDF file) as part of its submission of the SAC application.

De Minimis Demolition

PHAs do not need HUD approval to demolish units under Section 18 de minimis authority. PHAs do need to submit information to HUD described at 970.7(a)(1), (2), (12), (13), and (15), which includes PHA plan, description of the property, board resolution, and environmental requirements. Thus, for purposes of de minims demolitions, PHAs are submitting information and not a SAC application through this form.

HUD 52860: Inventory Removals Application

Attachment: Section 3, Line 1 PHA Plan

Attach evidence that the removal action is included in the approved PHA Plan and approval date.

Annual PHA Plan *(Standard PHAs and Troubled PHAs)*	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

(1) ***High-Performer PHA*** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.

(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.

(3) ***Housing Choice Voucher (HCV) Only PHA*** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.

(4) ***Standard PHA*** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.

(5) ***Troubled PHA*** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.

(6) ***Qualified PHA*** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A. PHA Information.

A.1

PHA Name: Brockton Housing Authority **PHA Code:** MA024
PHA Type: ☒ Standard PHA ☐ Troubled PHA
PHA Plan for Fiscal Year Beginning: (MM/YYYY): 01/2021
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)
Number of Public Housing (PH) Units 1626 **Number of Housing Choice Vouchers (HCVs)** 1933 **Total Combined Units/Vouchers** 3559
PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission

Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

The Brockton Housing Authority 2021 Annual Plan will be available on the agencies website http://www.brocktonhousingauthority.com/, at our main office located at 45 Goddard Rd, Brockton MA 02301, at each Asset Managers offices and at our Admissions and Rental Assistance office located at 1090 Main Street Brockton MA 02301

☐ **PHA Consortia:** (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

Y	N	
☐	☒	Statement of Housing Needs and Strategy for Addressing Housing Needs
☐	☒	Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
☒	☐	Financial Resources. See Attachment **(MA024b01)**
☐	☒	Rent Determination.
☐	☒	Operation and Management.
☐	☒	Grievance Procedures.
☐	☒	Homeownership Programs.
☐	☒	Community Service and Self-Sufficiency Programs.
☐	☒	Safety and Crime Prevention.
☐	☒	Pet Policy.
☐	☒	Asset Management.
☐	☒	Substantial Deviation.
☐	☒	Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

The Financial resources have been updated using the most recent known financial information.

Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

In June of 2010 The Brockton Housing Authority, along with the City of Brockton and Building a Better Brockton published an Analysis of Impediments to Fair Housing Choice. The Analysis confirmed the most significant barrier to fair housing continues to be the limited supply of affordable housing. The City, along with the Brockton Housing Authority had created and submitted an Affirmatively Furthering Fair Housing Plan in October of 2017. As part of this draft plan the Authority has identified certain goals which are included in attachment **MA024c01.** Since the time that the plan was submitted we have been informed that the template used and the data available was not entirely accurate, therefore, HUD has suspended the updated AFFH requirements. We have now re-engaged with the City to update the Analysis of Impediments. We will proceed with our annual plan using the local information that was collected during the AFFH process and any new information gathered though further analysis..

Furthermore, in Brockton, non-whites are more likely than white residents to be low-income, so the housing problems of low-income people are most prevalent in minority households. The limited funding for the development of new affordable housing serves to restrict fair housing choice for lower income, minority households as well as people with disabilities. The Authority continues to explore options for low income families in the Low Income Tax Credit area, the award of additional Housing Choice Vouchers and other section voucher programs along with using our existing portfolio as leverage for capital improvements and the development of additional units. The Authority has applied and been awarded additional mainstream vouchers.

The greatest barriers to increased availability of high-quality, affordable housing continues to be limited public funding and more limited private sector interest in developing affordable housing in Brockton or the surrounding area. The real estate market continues to remain tight, and rents and sale prices are still out of reach for many low- and moderate-income households due to rapid escalation in recent past years, combined with uncertainty in the market on the parts of buyers, sellers, financers and investors. The Authority continues to see an increase in the number of voucher holders experiencing difficulty finding units that meet the parameters of the various rental assistance programs managed by the Authority. Increased outreach efforts are being made to recruit quality landlords with affordable units and the Authority has increased our payment standards to 110% of HUD's fair market rent for our area. The Authority has included a new outreach position in our 2020 budget to assist voucher holders find and lease units.

The Authority has no complaints of discrimination based on race, creed color, national origin or sexual preference in the past twelve months. We have not been informed or noted any problems in our rental assistance programs that could be tied to discrimination. We continue to do outreach to minority populations to ensure equal access to housing resources. Limited public funding and private investment interest are remaining barriers to increasing the supply of affordable housing.

The inventory of available and acceptable apartments has become very tight. Many voucher holders, especially one bedroom voucher holders have had difficulty finding appropriate units, although now, with a greater degree of difficulty. The primary issue facing residents of all low income

demographics is affordability and the availability of subsidized or affordable housing. These issues have been pivotal in the determination of the Authority's five year plan

(c) The PHA must submit its Deconcentration Policy for Field Office review.

Attached as file **MA024a01**

B.2 **New Activities.**

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y	N	
☐	☒	Hope VI or Choice Neighborhoods.
☒	☐	Mixed Finance Modernization or Development.
☒	☐	Demolition and/or Disposition.
☒	☐	Designated Housing for Elderly and/or Disabled Families.
☐	☒	Conversion of Public Housing to Tenant-Based Assistance.
☒	☐	Conversion of Public Housing to Project-Based Assistance under RAD.
☐	☒	Occupancy by Over-Income Families.
☒	☐	Occupancy by Police Officers.
☐	☒	Non-Smoking Policies.
☒	☐	Project-Based Vouchers.
☒	☐	Units with Approved Vacancies for Modernization.
☒	☐	Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.

- **Mixed Finance Modernization or Development;** The Authority will use financing when available to supplement our modernization activities. The Authority continues to explore Energy Saving program that may crease utility savings that can be leveraged to supplement out capital plan.
- **Demolition and/or Disposition:** It is the intent of the Brockton Housing Authority to explore the Section 18 Disposition program with regard to the obsolesce of several of our federal public housing units. It is the intent of the Authority to retain control of the units and seek Tenant Preservation Vouchers for any units that qualify for the Disposition program. The Authority will review its entire public housing portfolio including, 24-1 Hillside Village, 24-2 Belair heights, 24-3 Manning Tower, 24-4 Crescent Court, 24-6 Campello High-rise, 24-7 Caffrey Towers, 24-8 Sullivan Tower, 24-9 Roosevelt Heights, 24-10 Belair High-rise. An application for Demolition/disposition will only be made if it will support financial opportunities to address the large backlog of capital needs within our current federal public housing program. This is consistent with the PHA's annual and five-year plan.
- **Designated Housing for Elderly and/or Disabled Families**. The Authority is required to resubmit an application for approval of its designated housing plan every two years. The Authority plans on resubmitting the plan this year for approval for the 2021 and 2022 plan years
- **Conversion of Public Housing to Project-Based Assistance under RAD:** The Brockton Housing Authority will explore the feasibility of used the RAD program to determine if the program will address the backlog of capital needs of its developments. If it is found that this program will provide the additional funds needed to address this backlog the Authority will submit an application to HUD's Special Application Center. The Authority will review its entire public housing portfolio including, 24-1 Hillside Village, 24-2 Belair heights, 24-3 Manning Tower, 24-4 Crescent Court, 24-6 Campello High-rise, 24-7 Caffrey Towers, 24-8 Sullivan Tower, 24-9 Roosevelt Heights, 24-10 Belair High-rise. An application for the Rental Demonstration Program will only be made if it will support financial opportunities to address the large backlog of capital needs within our current federal public housing program. This is consistent with the PHA's annual and five-year planm3

- **The Authority does have one unit occupied by a Brockton Police Officer at Roosevelt Heights.** There are no plans to extend this program at this time
- **Project-Based Vouchers**; The Authority is regularly reviewing and considering the issuance of project based vouchers to address deconcentration of poverty and lack of suitable housing available to voucher holders. We have not committed to any specific development. The underlying motivation is to provide better quality housing stock and/or more diverse locations for our participants
- **Units with Approved Vacancies for Modernization;** The Authority will use hotel units when they are necessary to complete comprehensive modernization.
- **Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants)**; The Authority will consider applying for any and all grants available to supplement the security activities at the agency.

B.3 **Civil Rights Certification.**

Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations,* must be submitted by the PHA as an electronic attachment to the PHA Plan.

B.4 **Most Recent Fiscal Year Audit.**

(a) Were there any findings in the most recent FY Audit?

Y N
☐ ☒

(b) If yes, please describe:

B.5 **Progress Report.**

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

The Authority has continued its training regimen for all employees to ensure that our staff is prepared to meet the challenges of shrinking resources, increased regulatory demand and an ever increasing population with multiple service needs. We have also partnered with several service agencies to ensure that our residents continue to receive the services that they need and are entitled to.

1. The Authority has received an additional 100 vouchers for families who head of household are disabled in support of our designated housing plan. We have also received 19 VASH vouchers and 521 Rental Demonstration Vouchers.
2. The Authority continues its work in buying foreclosed properties, renovating them and making them available for rent to low income families or for sale to qualified first time homebuyers
3. The Authority will engage an organizational consultant in the summer of 2020 to review the BHA's current organizational capacities and make recommendations of changes necessary to successfully transition from our current financial infrastructure to new models available to address our future needs.
4. We have refinanced our capital fund debt to fund the replacement of two aging elevators in Manning towers and to address envelope issues at Hillside village. We have completed a self-implementing energy performance contract to reduce our use of water, electricity and gas. This has allowed us to replace the aging elevators at the Campello high-rise, Caffrey Towers and Sullivan tower. A 5.6-Million-dollar Energy Service Agreement has been completed providing energy improvements throughout our federal portfolio. The Authority has entered into a net metering agreement with Sun Edison that is projected to save the Authority of $14,000,000 over the next twenty years.
5. It is anticipated that five Family Self Sufficiency families will purchase a new homes in 2021.
6. The Authority meets with the Resident Advisory Board on a monthly to discuss the needs and issues facing the residents. Through these meetings we have addressed issues around security, infestation, modernization, training and policy development. Our regular in person meetings have been curtailed due to the COVID 19 pandemic.
7. The Authority has joined the Statewide Section 8 waiting list to ensure resources are available to all applicants. The Authority is now participating in the State wide waiting list program for state aided housing assistance. We have also continued with outreach to local churches and service agencies to ensure that the public is aware of resources available to them through the Authority. We have trained our maintenance and management staff on issues regarding Section 504 reasonable accommodation, limited English proficiency policies and many more.
8. It is the intent of the Brockton Housing Authority to explore the Section 18 Disposition and/or HUD's RAD program with regard to the obsolesce of several of our federal public housing units. It is the intent of the Authority to retain control of the units and seek Tenant Preservation Vouchers for any units that qualify for the Disposition program and RAD Vouchers for units that qualify for that program. The Authority will review its entire public housing portfolio including, 24-1 Hillside Village, 24-2 Belair heights, 24-3 Manning Tower, 24-4 Crescent Court, 24-6 Campello High-rise, 24-7 Caffrey Towers, 24-8 Sullivan Tower, 24-9 Roosevelt Heights, 24-10 Belair High-rise. An application for Demolition/disposition and or RAD will only be made if it will support financial opportunities to address the large backlog of capital needs within our current federal public housing program. This is consistent with the PHA's annual and five-year plan.
9. We have hired over 50 residents to perform various jobs at the Authority. We have also worked with local agencies to bring educational opportunities to the Authority to address issue that prevent our residents from becoming self-sufficient.

B.6 **Resident Advisory Board (RAB) Comments.**

(a) Did the RAB(s) provide comments to the PHA Plan?

Y N
☐ ☒ The Annual plan was compiled with the assistance of the RAB. The Authority meets monthly with the RAB to discuss operations and polices of the Authority. There were no comments provided during the comment period.

(c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.

B.7	**Certification by State or Local Officials.** Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.
B.8	**Troubled PHA.** (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A ☐ ☒ ☐ (b) If yes, please describe:
C.	**Statement of Capital Improvements.** Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).
C.1	**Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD. See HUD form 50075.2 2018 Capital Plan approved 5/29/2018, 2019 Capital plan approved by HUD on 4/16/2019, 2020 Capital plan approved by HUD on 3/26/2020.

Instructions for Preparation of Form HUD-50075-ST
Annual PHA Plan for Standard and Troubled PHAs

A. PHA Information. All PHAs must complete this section.

A.1 Include the full **PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Annual Plan. All PHAs must complete this section.

B.1 Revision of PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no." (24 CFR §903.7)

☒ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(1)) Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (24 CFR §903.7(a)(2)(ii))

☐ **Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

☒ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing

or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

☐ **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

☐ **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

☐ **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

☐ **Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

☐ **Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(l)) A description of: **1)** Any programs relating to services and amenities provided or offered to assisted families; and **2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS. (24 CFR §903.7(l))

☐ **Safety and Crime Prevention.** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

☐ **Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

☐ **Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

☐ **Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

☐ **Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. Should the PHA fail to define 'significant amendment/modification', HUD will consider the following to be 'significant amendments or modifications': a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund; or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: Notice PIH 1999-51. (24 CFR §903.7(r)(2)(ii))

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

B.2 **New Activities.** If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

☐ **Hope VI or Choice Neighborhoods. 1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30)

☒ **Mixed Finance Modernization or Development. 1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30)

☐ **Demolition and/or Disposition.** Describe any public housing projects owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

☐ **Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: **1)** development name and number; **2)** designation type; **3)** application status; **4)** date the

designation was approved, submitted, or planned for submission, and; **5)** the number of units affected. **Note**: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

☐ **Conversion of Public Housing.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/conversion.cfm. (24 CFR §903.7(j))

☐ **Conversion of Public Housing.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to project-based assistance under RAD. See additional guidance on HUD's website at: Notice PIH 2012-32

☐ **Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days' notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.503) (24 CFR 903.7(b))

☐ **Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.505) (24 CFR 903.7(b))

☒ **Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: Notice PIH 2009-21. (24 CFR §903.7(e))

☒ **Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan. (24 CFR §903.7(b))

☒ **Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).

☒ **Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 Civil Rights Certification. Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))

B.4 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

B.5 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.6 Resident Advisory Board (RAB) comments. If the RAB provided comments to the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

B.7 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

B.8 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

C. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))

C.1 Capital Improvements. In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan.

PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form- 50075.2 approved by HUD on XX/XX/XXXX."

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 9.2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

HUD 52860: Inventory Removals Application
Attachment: Section 3, Line 2 Board Resolution

Attach a copy of the signed PHA Board Resolution

Brockton Housing Authority
45 Goddard Road
P.O. Box 7070
Brockton, MA 02303-7070

(508) 588-6880 / Fax (508) 588-8271

#2020-06
Regular Meeting of September 24, 2020
Extract

Chairman Timothy Sullivan called the meeting to order at 2:03 PM. Upon a roll call, those present and absent were as follows:

PRESENT	ABSENT
David Teixeira	Ernest Pettiford
Janet Trask	
Carol Roberts	
Timothy Sullivan	

Mr. Thibeault explained the Acceptance of Comment on Brockton Housing Authority Annual Plan and Approval of Resolution #20-03; Resolution Approving the Submission of the Brockton Housing Authority Annual Plan for Fiscal Year 2021. The Quality and Work Responsibility Act requires that the Authority submit a Plan to the US Department of Housing and Urban Development (HUD) on an annual basis. Before this Plan can be submitted it must be advertised and public comments received. This Plan has been worked on throughout the year with the Resident Advisory Board. Copies were also made available to anyone in the community who requested one. The most significant change to this year's Plan is the statement that the Authority intends to explore HUD's Section 18 Disposition Program and HUD's Rental Assistance Demonstration Plan. This item was discussed at length with the Resident Advisory Board. The RAB was very supportive as long as the Authority retains management of the properties. This initiative has also been included on Mr. Thibeault's Executive Director's Reports over the past seven months. The comment period concludes on September 24, 2020. Commissioner Teixeira made a motion, seconded by Commissioner Roberts to approve Resolution #20-03; Resolution approving the Submission of the Brockton Housing Authority Annual Plan for Fiscal Year 2021. Upon a roll call vote, the Ayes and Nays were as follows:

AYES	NAYS
Carol Roberts	None
David Teixeira	
Janet Trask	
Timothy Sullivan	

The Chairman thereupon declared the motion carried.

I do hereby attest that the above is a true and correct extract for the minutes of the Regular Meeting of September 24, 2020.

Thomas G. Thibeault, Secretary

10/1/2020.
Date

HUD 52860: Inventory Removals Application

Attachment: Section 3, Line 3 Environmental Review

Attach a copy of HUD's approval of the Environmental Review.

DRAFT ENCLOSED

DRAFT

MEMORANDUM

TO: Robert F. Sullivan, Mayor
City of Brockton

FROM: Matthew Alger, Project Manager
Amanda Makela, Environmental Scientist

RE: HUD Environmental Review
Campello High-Rise
1380 Main Street
Brockton, Massachusetts
Job No. 20.07437.00

DATE: December 31, 2020

Attached please find the HUD Environmental Review for the property identified as Campello High-Rise located at 1380 Main Street in Brockton, Massachusetts.

In addition to the HUD Environmental Review Checklist document, a series of maps and websites have been supplied as supporting documentation for the Review.

According to the results of the HUD Environmental Review, the project proposed at Campello High-Rise by the Brockton Housing Authority cannot convert to exempt status because one or more statutes or authorities listed in Section 58.1 requires formal consultation or mitigation.

Please feel free to contact our office with any further questions.

Sincerely,

BETA Group, Inc.

Amanda Makela
Environmental Scientist

Matthew Alger
Project Manager

Job No. 20.07437.00

BETA Group, Inc.
89 Shrewsbury Street, Suite 300, Worcester, MA 01604
P: 508.866.8383 | W: www.BETA-Inc.com

DRAFT

U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5

Pursuant to 24 CFR 58.35(a)

Project Information

Project Name: Campello High-Rise (Parcel ID: 117-034)

Responsible Entity: City of Brockton
Brockton City Hall
45 School Street
Brockton, MA 02301

Project Location: 1380 Main Street, Brockton, MA (Parcel ID: 117-034)

Project Description:

Scope of Work:

Site Improvements: The buildings are located adjacent to the Salisbury Plain River, with the entire footprint of Building B and about half of Building A within the 100-year flood plain (Zone AE) per the 2012 FEMA published flood maps. Given this, the proposed scope of work will include flood mitigation measures including active or passive flood barriers and stormwater management system. Additional site improvements will include replacement of domestic water and fire service mains and sanitary laterals, improvements to parking surfaces and walkways, and new shrubs and plantings along with new outdoor furniture.

Building Structure and Envelope Improvements: Significant improvements will be needed to address identified deficiencies in the building structure and envelope. Work to the building structure will include reinforcement of the primary structural frames to meet code requirements, repairing or replacing other structural deficiencies as needed, repairing or replacing the exterior balconies, and stabilizing slab movement. Work to the building envelope will include cladding the building and improving the waterproofing detail at the balconies, installing balcony guards, replacing the EPDM roofing with PVC, replacing as needed exterior hollow metal doors and frames, and possibly installing new apartment windows and balcony doors.

Life and Safety Deficiencies: The buildings life and safety components do not meet current codes and/or are beyond their useful life. The proposed rehabilitation would include installing two fire pumps, providing check back flow preventers, installing at least two fire department connections at the exterior of each building, replacing all existing sprinkler heads (given age) and expanding sprinkler system to all closets and at each floor landing, and adding enclosed smoke vestibules at the end fire stairs. Further, not all doors and walls are properly fire-rated and will need to be upgraded. Firestopping and fireproofing also needs to be completed.

Handicapped Accessibility: There are currently 18 units that are identified as accessible units; however, not all the units are fully compliant. Non-compliant units will need to be brought into compliance. In addition, eight units will need to be adapted into accessible units for sensory-impaired residents. Other accessibility improvements including adjusting the slope at the main entrance to Building B, eliminating trip hazards in walkways and pavement and removing steps at egress doors, relocating the intercom systems so it is accessible, and making the community room kitchen accessible. Handrails in the egress stairs will also need to be upgraded among other improvements to bring the building into full compliance with state and federal accessibility regulations.

Plumbing, Mechanical and Electrical System Upgrades: Many of these components are original to the building and require full replacement. For the plumbing components, the scope work is anticipated to be replacing sanitary and storm lines in the building include roof drains, replacing entire domestic water piping system, adding a gas booster and pressure regulation, and installing new plumbing fixtures in all kitchens and bathrooms. For the mechanical system, full replacement of the heating and ventilation systems is planned. The existing systems are antiquated or not functioning. For the electrical system, comprehensive upgrades are needed including replacing and relocating main electrical switchboards, relocating transformers vaults from roof penthouses, replacing all aging panel boards and circuit wiring, upgrading the emergency generators and emergency power, and installing new light fixtures.

Unit Interiors: Unit interior are worn from wear and tear. Flooring in the units is vinyl asbestos tile and will need to be abated and replaced. Kitchens and bathrooms are original to when the buildings were built and need to be replaced. All kitchens will need new cabinets, countertops, sink, and appliances. All bathrooms should have their tubs replaced with walk-in showers with new sinks and toilets installed along with a new tile floor. Lighting throughout the units needs to be upgraded, and bi-fold doors need to be replaced.

Common Areas: Similar to unit interiors, common finishes and fixtures in common areas need to be upgraded. Additionally, code requires wall mounted handrails in the fire stairs and infill panels and handrails at stair guards. Lighting throughout the common areas need to be replaced. Improvements to the trash handling system including replacing the existing chutes and compactors is planned.

Energy Improvements: Because of the level of work required at Campello, the entire building envelope and mechanical/electrical systems will need to meet current energy performance standards for renovated buildings.

Hazardous Materials Abatement: The building has identified asbestos containing materials in the flooring, mastic, ceiling finish, wall joint compound as well as the transite panels on the building's exterior. Whenever possible and feasible, the asbestos containing materials will be removed, properly disposed of, and replaced.

Level of Environmental Review Determination:

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:
58.35(a)(4)(i)

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	Yes ☐ No ☑	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. Refer to "Airport Hazards" Map.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes ☐ No ☑	This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act. Refer to "Coastal Zone Management & Coastal Barrier Resources" Map.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes ☑ No ☐	The structure or insurable property is located in a FEMA-designated Special Flood Hazard Area. The 8 Step Process was completed, and no mitigating factors were required. See attached "FEMA" Map and 8 Step Process Documentation.
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes ☐ No ☑	Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes ☐ No ☑	This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act. Refer to "Coastal Zone Management & Coastal Barrier Resources" Map.

Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes ☐ No ☑	On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.6		
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes ☐ No ☑	There are no federally listed species or designated critical habitats in the action area. The project will have No Effect and is in compliance with the Endangered Species Act. Please refer to attached "Wetlands and Endangered Species Act Map".
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes ☐ No ☑	Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements. Please refer to attached "Explosives & Flammable Operations Map" and "Land Use Map".
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes ☐ No ☑	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act. Please refer to attached "Land Use" Map.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes ☑ No ☐	This project does occur in a floodplain. The 8 Step Process was completed to ensure compliance with Executive Order 11988 and no mitigating factors were required. See attached "FEMA" Map and 8 Step Process Documentation.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes ☐ No ☑	Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106. See MACRIS Database: http://mhc-macris.net/options.aspx
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes ☐ No ☑	The Preliminary Screening using the Day/Night Noise Calculator (DNL) indicated that the combined DNL for road and rail traffic within 1,100 feet of site does not exceed 65 decibels. See attached DNL Calculator worksheet and please refer to MassDOT Traffic Ticker link : http://mhd.ms2soft.com/tcds/tsearch.asp?loc=Mhd& mod=

Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes ☐ No ☑	The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements. Refer to "MassDEP MCP 21E – Priority Resources" Map.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.6		
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes ☐ No ☑	Based on the project description, this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990. Refer to attached "Wetlands and Endangered Species" Map.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes ☐ No ☑	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. Refer to attached "Wetlands and Endangered Species" Map.
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes ☐ No ☑	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	8 Step Process (See attached documentation).
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	8 Step Process (See attached documentation).

DRAFT

Campello High-Rise
1380 Main Street

Brockton, MA

Determination:

☐ This categorically excluded activity/project converts to **EXEMPT** per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; **Funds may be committed and drawn down after certification of this part** for this (now) EXEMPT project; OR

☑ This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain "Authority to Use Grant Funds"** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR

☐ This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Preparer Signature: **Date:** December 31, 2020

Name/Title/Organization:

Matthew Alger, Project Manager
BETA Group, Inc.

Responsible Entity Agency Official Signature:

Robert F. Sullivan, Mayor

_____**Date**:_____

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

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Legend

Airports Labels

Airports

Tax Parcels for Query

Airport Hazards Map

USGS Topographic Map
Campello High-Rise
1380 Main Street
Brockton, Massachusetts
Project No. 20.07437.00

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Coastal Zone Management & Coastal Barrier Resource Map

MassGIS Oliver

Campello High-Rise
1380 Main Street
Brockton, Massachusetts
Project No. 20.07437.00

BETA

Legend

BioMap2 Critical Natural Landscape Coastal Adaptation Analysis

Coastal Natural Community Systems

- BARRIER BEACH SWAMP DECIDUOUS
- BRACKISH TIDAL WETLAND
- FRESHWATER TIDAL MARSH
- COASTAL BANK, BEACH, DUNE
- COASTAL SALT POND SYSTEM
- COASTAL FOREST
- MARITIME FOREST
- MARITIME SHRUBLAND
- SALT MARSH
- TIDAL FLAT
- ROCKY SHORE

Coastal Zone Arcs

Coastal Zone

Coastal Barrier Resource Units

Tax Parcels for Query

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National Flood Hazards Layer FIRMette

ation pin by selecting a different location on the locator map below or by entering a
e a minute or more during peak hours to generate a dynamic FIRMette.

Go To NFHL Viewer »

PIN
- Approximate location based on user input and does not represent an authoritative property location

MAP PANELS
- Selected FloodMap Boundary
- Digital Data Available
- No Digital Data Available
- Unmapped

OTHER AREAS
- NO SCREEN — Area of Minimal Flood Hazard Zone X
- Effective LOMRs
- Area of Undetermined Flood Hazard Zone D
- Otherwise Protected Area
- Coastal Barrier Resource System Area

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) Zone A, V, A99
- With BFE or Depth
- Regulatory Floodway Zone AE, AO, AH, VE, AR

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
- Future Conditions 1% Annual Chance Flood Hazard Zone X
- Area with Reduced Flood Risk due to Levee. See Notes. Zone X
- Area with Flood Risk due to Levee Zone D

OTHER FEATURES
- 20.2 / 17.5 — Cross Sections with 1% Annual Chance Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

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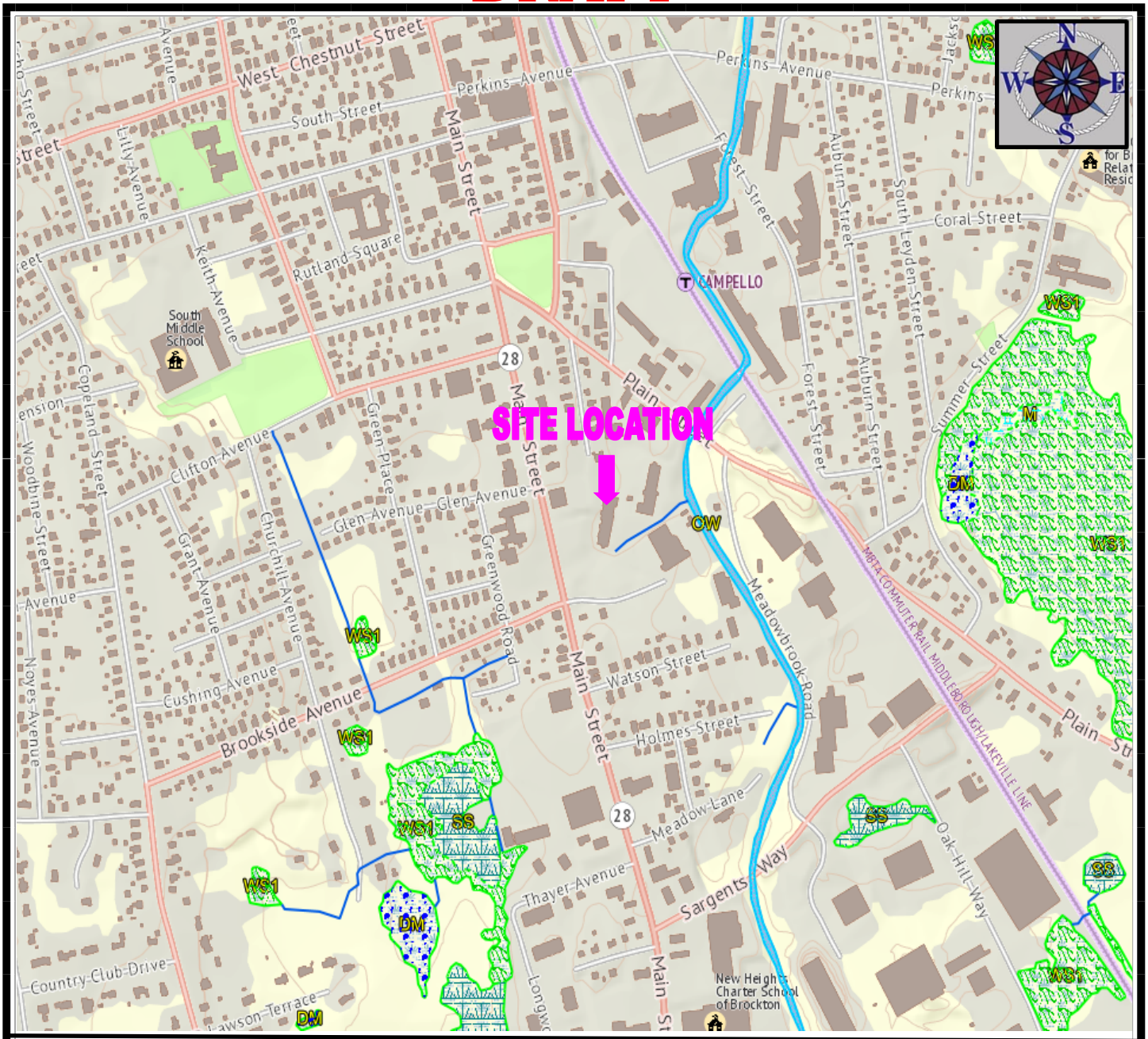

Wetlands & Endangered Species Map

MassGIS Oliver

Campello High-Rise

1380 Main Street

Brockton, Massachusetts

Project No. 20.07437.00

BETA

- Shoreline
- Hydrologic Connection
- Mean Low Water Line
- Apparent Wetland Limit
- Closure Line
- Edge of Interpreted Area
- Wetland Change Area (2001 & 2003)
- Wetland Change Area (2005)
- Wetland Change Area (2008 & 2009)
- Wetland Change Area (2011 & 2012)

Label	Description
BA	COASTAL BANK BLUFF OR SEA CLIFF
BB	BARRIER BEACH SYSTEM
BE	COASTAL BEACH
BG	BOG
CB	CRANBERRY BOG
D	COASTAL DUNE
DM	DEEP MARSH
M	SHALLOW MARSH, MEADOW, OR FEN
OW	OPEN WATER
RS	ROCKY INTERTIDAL SHORE
SM	SALT MARSH
SS	SHRUB SWAMP
TF	TIDAL FLAT
WS1	WOODED SWAMP DECIDUOUS
WS2	WOODED SWAMP CONIFEROUS
WS3	WOODED SWAMP MIXED TREES
BB-BE	BARRIER BEACH-COASTAL BEACH
BB-BG	BARRIER BEACH-BOG
BB-D	BARRIER BEACH-COASTAL DUNE
BB-DM	BARRIER BEACH-DEEP MARSH
BB-M	BARRIER BEACH-MARSH
B-OW	BARRIER BEACH-OPEN WATER
BB-SS	BARRIER BEACH-SHRUB SWAMP
BB-WS1	BARRIER BEACH-WOODED SWAMP DECIDUOUS
BB-WS2	BARRIER BEACH-WOODED SWAMP CONIFEROUS
BB-WS3	BARRIER BEACH-WOODED SWAMP MIXED TREES

- 15 meter Elevation Contour
- 5 meter Elevation Contour
- MassGIS Level 3 Assessors' Parcel Boundary
- NHESP Estimated Habitats of Rare Wildlife
- NHESP Certified Vernal Pool
- Notice of Intent (NOI)

FEMA National Flood Hazard Layer (NFHL) Flood Zones

- A: 1% Annual Chance of Flooding, no BFE
- AE: 1% Annual Chance of Flooding, with BFE
- AE: Regulatory Floodway
- AH: 1% Annual Chance of 1-3ft Ponding, with BFE
- AO: 1% Annual Chance of 1-3ft Sheet Flow Flooding, with Depth
- VE: High Risk Coastal Area
- D: Possible But Undetermined Hazard
- X: 0.2% Annual Chance of Flooding
- X: Reduced Flood Risk due to Levee
- Area Not Included
- Area with no DFIRM - Paper FIRMs in Effect

FEMA Q3 Flood Zones (from Paper FIRMs, where NFHL Unavailable)

- A
- AE
- AE Floodway
- AH
- AO
- D
- VE
- Area Not Included
- X500

DNL Calculator

DRAFT

Site ID	1380 Main Street
Record Date	12/30/2020
User's Name	Amanda

DRAFT

Road # 1 Name:	Main Street North of Main Street 28 N of Brookside Avenue

Road #1

Vehicle Type	Cars ☑	Medium Trucks ☑	Heavy Trucks ☑
Effective Distance	249	249	249
Distance to Stop Sign	0	0	0
Average Speed	35	30	50
Average Daily Trips (ADT)	29000	1000	282
Night Fraction of ADT	15	15	15
Road Gradient (%)			2
Vehicle DNL	48	42	58
Calculate Road #1 DNL	59	Reset	

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Road # 2 Name:	Plain Street East of Meadowbrook Road

Road #2

Vehicle Type	Cars ☑	Medium Trucks ☑	Heavy Trucks ☐
Effective Distance	531	531	
Distance to Stop Sign	0	0	
Average Speed	35	30	
Average Daily Trips (ADT)	6000	778	
Night Fraction of ADT	15	15	
Road Gradient (%)			
Vehicle DNL	36	36	0
Calculate Road #2 DNL	39	Reset	

Railroad #1 Track Identifier:	Commuter Rail - Middleborough/Lakeville Line

DRAFT

Rail # 1

Train Type	**Electric** ☐	**Diesel** ☑
Effective Distance		775
Average Train Speed		60
Engines per Train		2
Railway cars per Train		50
Average Train Operations (ATO)		12
Night Fraction of ATO		10
Railway whistles or horns?	Yes: ☐ No: ☐	Yes: ☐ No: ☑
Bolted Tracks?	Yes: ☐ No: ☐	Yes: ☑ No: ☐
Train DNL	0	52
Calculate Rail #1 DNL	52	Reset

Add Road Source | Add Rail Source

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Airport Noise Level	
Loud Impulse Sounds?	◯Yes ◯No
Combined DNL for all Road and Rail sources	60
Combined DNL including Airport	N/A
Site DNL with Loud Impulse Sound	

Calculate | Reset

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Explosives & Flammable Operations Map

MassGIS Oliver

Campello High-Rise

1380 Main Street

Brockton, Massachusetts

Project No. 20.07437.00

BETA

Legend

DEP Tier Classified 21E Sites
- TIER I
- TIER II
- TIER 1D

Active Landfills
- Active Landfills

Inactive Landfills
- Inactive Landfills

Closed Landfills
- Inactive Landfills

Registered Compost Sites
- Registered Compost Sites

Activate Windows
PC settings to activate Windows.

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Explosives & Flammable Operations Map

MassGIS Oliver

Campello High-Rise

1380 Main Street

Brockton, Massachusetts

Project No. 20.07437.00

BETA

Legend

DEP Tier Classified 21E Sites
- TIER I
- TIER II
- TIER 1D

Active Landfills
- Active Landfills

Inactive Landfills
- Inactive Landfills

Closed Landfills
- Inactive Landfills

Registered Compost Sites
- Registered Compost Sites

Activate Windows
PC settings to activate Windows.

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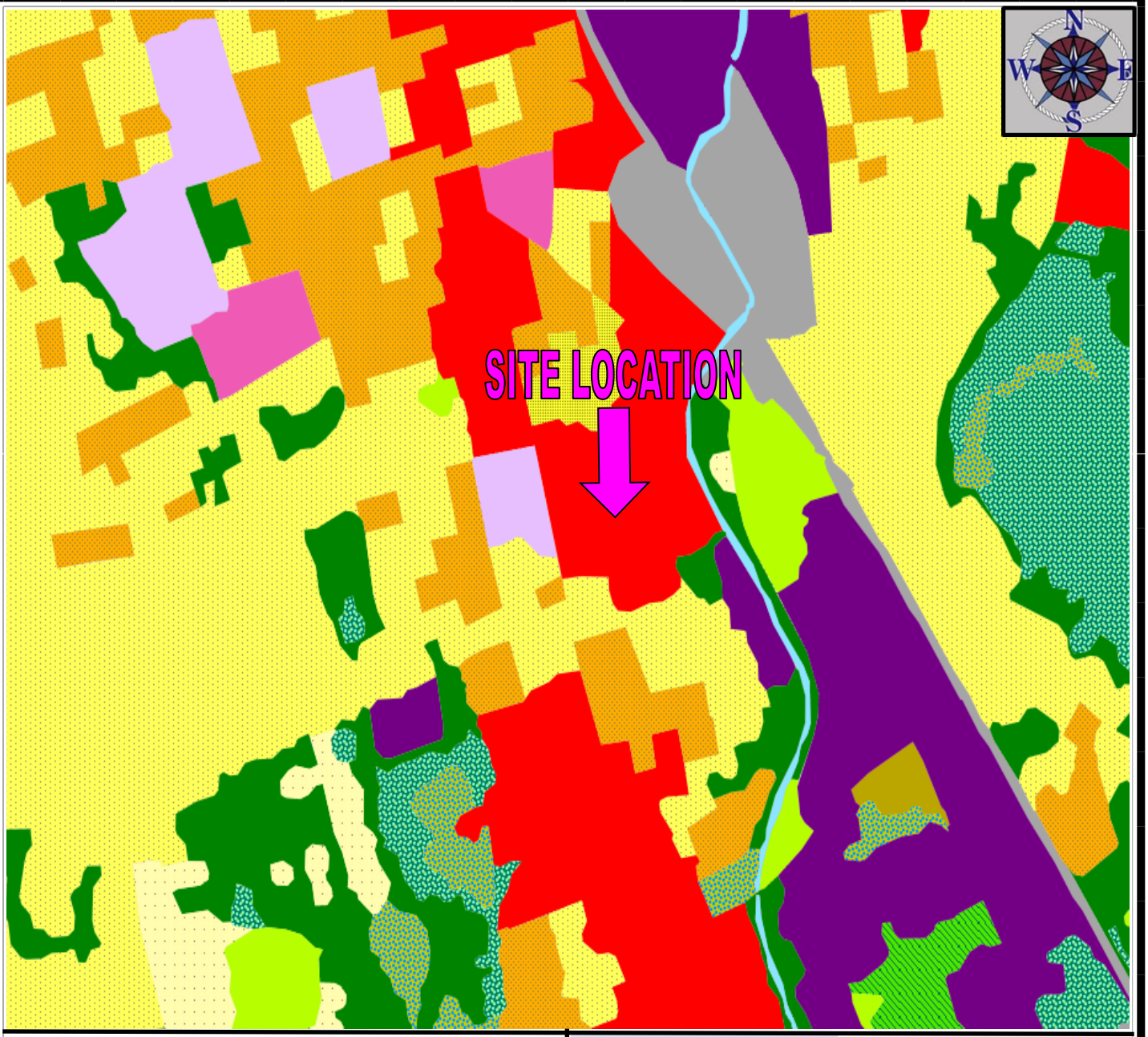


Land Use Map

MassGIS Oliver

Campello High-Rise

1380 Main Street

Brockton, Massachusetts

Project No. 20.07437.00

BETA

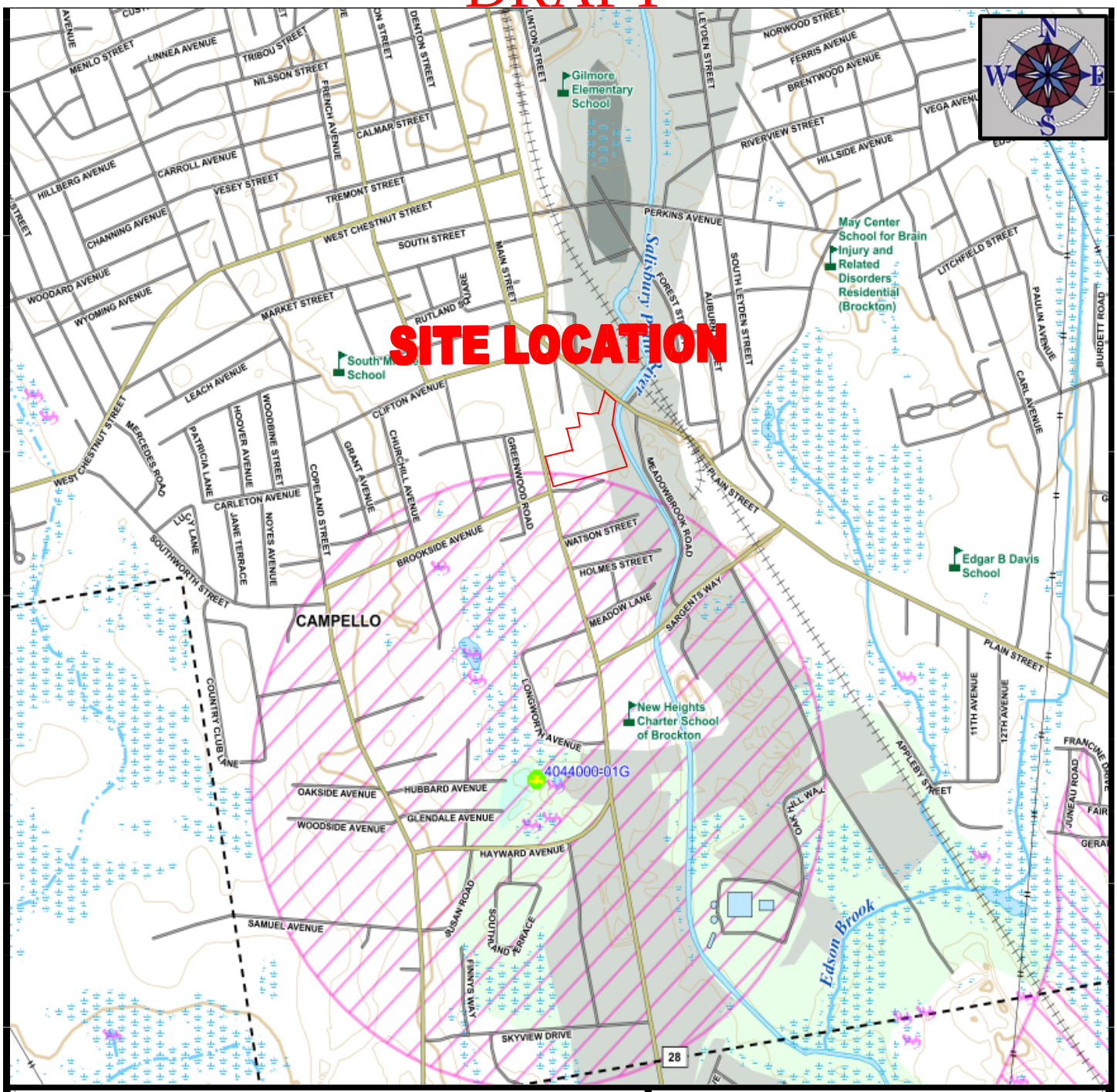
Legend

Land Use 2005

- FOREST
- BRUSHLAND/SUCCESSIONAL
- OPEN LAND
- WATER
- FORESTED WETLAND
- NON-FORESTED WETLAND
- SALT WATER WETLAND
- SALTWATER SANDY BEACH
- CRANBERRY BOG
- ORCHARD
- NURSERY
- CROP LAND
- PASTURE
- CEMETERY
- GOLF COURSE
- PARTICIPATION REC.
- SPECTATOR REC.
- WATER-BASED REC.
- MARINA
- MULTI FAMILY RES.
- HIGH DENSITY RES.
- MEDIUM DENSITY RES.
- LOW DENSITY RES.
- VERY LOW DENSITY RES.
- TRANSITIONAL
- URBAN PUBLIC/INSTITUTIONAL
- COMMERICAL>
- INDUSTRIAL
- TRANSPORTATION
- POWERLINE/UTILITY
- MINING
- WASTE DISPOSAL
- JUNKYARD

Activate Windows
Go to PC Settings to activate Windows.

DRAFT



LEGEND

- Community Groundwater Well
- Community Surface Water Intake
- Emergency Surface Water Intake
- Non-Community Groundwater Well
- NHESP Certified Vernal Pool
- NHESP Potential Vernal Pool
- School
- Hospital
- Long Term Care Residence
- Prison
- Pipeline
- Powerline
- MBTA Blue Line
- MBTA Green Line
- MBTA Orange Line
- MBTA Red Line
- Active Rail Lines
- Major Highway - Limited Access
- Major Road - Not Limited Access
- Local Street or Road
- Town and State Boundary
- DEP Region Boundary
- 15 Meter Contour Interval
- 3 Meter Contour Interval
- Perennial Stream or Shoreline
- Intermittent Stream
- Intermittent Shoreline
- Manmade Shoreline
- Ditch or Canal
- Aqueduct
- Dam
- Channel in Water
- Open Water
- Public Water Supply Reservoir
- Tidal Flat
- Inundated Area
- Fresh Water Wetland
- Cranberry Bog
- Salt Water Wetland
- NHESP Estimated Habitat of Rare Wildlife
- Surface Water Supply Watershed Boundary
- Public Water Supply Protection Area (Zone A)
- Interim Wellhead Protection Area (IWPA)
- Approved Wellhead Protection Area (Zone II)
- Solid Waste Landfill
- Areas of Critical Environmental Concern
- EPA Designated Sole Source Aquifer
- Protected Open Space
- Non-Potential Drinking Water Source Area: High Yield
- Non-Potential Drinking Water Source Area: Medium Yield
- Potentially Productive High Yield Aquifer

MASS GIS

MassDEP Priority Resources Map

Canpello High-Rise

1380 Main Street

Brockton, Massachusetts

Project No. 20.07437.00

BETA

DRAFT

8 Step Process
Campello High Rise
1380 Main Street
Brockton, MA 02301
Brockton Housing Authority

Step 1: Determine if the proposal is in a 100-year or 500-year floodplain, floodway, or coastal high hazard area and the level of assessment.

The proposed residential improvements are located within a 100-year floodplain area.

Step 2: Public notification for input in the decision making process with a 15 day comment period.

The public was notified for comment for the required 15-day period. See attached documentation.

Step 3: Identify and evaluate practicable alternatives.

Alternative No. 1: No Action Alternative
The No Action Alternative would eliminate the proposed improvements and upgrades to the existing residential buildings. Beneficial impacts of No Action are considered minor or non-existent. Adverse impacts of No Action include the housing project not being able to meet building and fire code requirements or comply with federal accessibility requirements for to those who require special assistance. The existing infrastructure conditions would also continue to deteriorate and current energy performance standards would not be met.

Alternative No. 2: Non-floodplain Alternative
The Non-floodplain Alternative would include construction of one or more new structures at an alternative location to replace the existing structures. The cost of purchasing property and constructing new units off site would be financially prohibitive and would limit access to services currently provided at the Campello High-Rise project. There would also be significant costs associated with demolition of the existing structures that would no longer be viable for occupancy. Renovating existing buildings on site makes economic sense and enables greater levels of efficiency in addressing administrative and social service issues which already service the project.

Alternative No. 3: Floodplain Proposal
This is the only viable alternative since the proposed work consists of improvements to an already existing residential facility. Not going through with the improvements would fail to address the necessary utility upgrades and accessibility (ADA) requirements that the Brockton Housing Authority is hoping to address in this facility. The proposed scope of work includes flood mitigation measures including active or passive flood barriers and a stormwater management system.

Step 4: Identify potential direct and indirect impacts associated with the occupancy or modification of the floodplain.

Because the proposed improvements are utility replacements and other exterior / interior upgrades to an already existing residential facility, the floodplain impacts associated with this project are not beyond the scope of the everyday impacts of the facility. The site consists primarily of paved impervious area and the immediate site vicinity is a highly developed urban area. There are no foreseen adverse effects on the 100-year floodplain.

Step 5: Design and modify (as practicable) the preferred alternative to minimize and mitigate for the potential adverse impacts within the floodplain.

There are no potential adverse impacts as a result of the original proposed project because the redevelopment actions will occur indoors or within existing impervious paved areas as necessary to conduct improvements and upgrades to exterior portions of the property. As a conservative measure, the proposed scope of work includes flood mitigation measures including active or passive flood barriers and a stormwater management system.

Step 6: Reevaluate the preferred alternative to determine if it is still practicable with regard to information obtained in steps 4 and 5. Other alternatives rejected in step 3 should also be reevaluated to assess practicability relative to the preferred alternative.

The original proposed project is still practicable based on the alternative given in Step 3, and because the scope of the redevelopment project will not have adverse effects on the floodplain.

Step 7: Publish final notice with 7 day comment period.

The public was notified of the final decision for the required 7-day period. See attached documentation.

Step 8: Implement the proposed action with mitigation measures identified in step 7.

The proposed action will be implemented upon approval. No mitigation efforts are required because the redevelopment project is to take place inside of already existing residential buildings or within existing impervious paved areas as necessary to conduct work on the exterior portions of the property. However, as a conservative measure, the proposed scope of work includes flood mitigation measures including active or passive flood barriers and a stormwater management system. There will be no adverse effects on the 100-year floodplain in which the buildings are located.

HUD 52860: Inventory Removals Application
Attachment: Section 3, Line 5 Government Consultation

Attach copies of all letters of support from local government officials, along with a narrative description of the PHA's consultation (if applicable)

Thomas Thibeault, the Executive Director of the Brockton Housing Authority has consulted directly with the Mayor, Ward Councilor, State Representative, and Senator, representing the City and this District. Mr. Thibeault discussed the obsolescent condition at Campello, the need for significant funding to repair and correct deficiencies and code non-compliance, and the inadequacy of current capital funding allotments. As evidenced in the attached letters, the representative elected officials strongly support the efforts of the BHA to apply for the disposition of Campello as a means for achieving the preservation of this important affordable housing resource.

Please see attached letters of support.

The Commonwealth of Massachusetts

MASSACHUSETTS SENATE

SENATOR MICHAEL D. BRADY
2nd Plymouth & Bristol District

STATE HOUSE ROOM 416A
BOSTON, MA 02133-1053
TEL: (617) 722-1200
FAX: (617) 722-1116
MICHAEL.BRADY@MASENATE.GOV

Vice Chair
JOINT COMMITTEE ON TOURISM
ARTS AND CULTURAL DEVELOPMENT

SENATE COMMITTEE ON WAYS & MEANS
JOINT COMMITTEE ON REVENUE
JOINT COMMITTEE ON VETERANS AND FEDERAL AFFAIRS
SENATE COMMITTEE ON BILLS IN THIRD READING
JOINT COMMITTEE ON WAYS & MEANS

Mr. Thomas G. Thibeault
Executive Director
Brockton Housing Authority
45 Goddard Road
Brockton, MA 02301

Re: Brockton Housing Authority's Section 18
Application for the Disposition of Federal Public Housing
Campello Hi-Rise, 1380 Main Street, Brockton

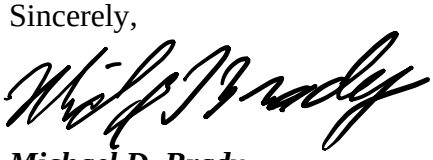
Dear Mr. Thibeault,

As the State Senator who represents the residents of the Campello Hi-rise (Campello), I strongly support the Brockton Housing Authority's (BHA) Section 18 Disposition Application, also known as the Inventory Removal Application, to the U.S. Department of Housing and Urban Development for the disposition of three-hundred-ninety-eight (398) apartment units of housing at Campello. The Brockton Housing Authority ha66s informed me of the plan for the disposition application. Furthermore, I endorse and support the efforts of the BHA to plan for important and essential capital improvements to this important housing resource especially when it is clear that current programs and funding sources are inadequate to address the physical needs at Campello.

I have represented the residents of Campello for many years, first as a State Representative and now as State Senator. During my monthly office hours at Campello, the Capital needs of the buildings have been apparent, and the residents have discussed their wishes for improvements. I concur with the plan to convert the existing federally-assisted facility at Campello to a project-based voucher program which will allow the BHA to access adequate funding and resources to make necessary repairs to a distressed property while maintaining its status as a vital affordable housing resource. I am very glad that that even with a comprehensive modernization of the buildings, the elderly and disabled residents will be able to continue to live at Campello at rent level that are comparable to their current rents and remain under the BHA's current policies. As I see it, this is really the only viable alternative to access the funds necessary to make sure that these apartments meet current habitability standards, are code complaint and provide dwellings that are safe, healthy, and sanitary for the coming years and generations.

Please accept my thanks for the way in which you accomplish your mission to provide for Brockton's most vulnerable residents. I sincerely hope for your success in this effort and soundly support this application.

Sincerely,



Michael D. Brady
State Senator
2nd Plymouth and Bristol District

ROBERT F. SULLIVAN
Mayor

City of Brockton

Office of the Mayor

KERRY RICHARDS
Chief of Staff
krichards@cobma.us
508.580.7123

January 6, 2021

Mr. Thomas G. Thibeault
Executive Director
Brockton Housing Authority
45 Goddard Road
Brockton, MA 02301

Re: Brockton Housing Authority's Section 18 Application for the Disposition of Federal Public Housing Campello High Rise at 1380 Main Street, Brockton, MA 02301

Dear Mr. Thibeault,

The City of Brockton strongly supports the Brockton Housing Authority's Section 18 Disposition Application, also known as the Inventory Removal Application, to the U.S. Department of Housing and Urban Development for the disposition of three hundred ninety-eight (398) apartment units of housing at the Campello High Rise. The Brockton Housing Authority has informed the City of Brockton of the plan for the disposition application. Furthermore, the City of Brockton endorses and supports the efforts of the Brockton Housing Authority to plan for comprehensive and essential capital improvements to this important housing resource, especially when it is clear that current programs and funding sources are inadequate to address the physical needs at the Campello High Rise.

I concur with the plan to convert the existing federally-assisted facility at the Campello High Rise to a project-based voucher program, which will allow the Brockton Housing Authority to access adequate funding and resources to make necessary repairs to a distressed property while maintaining its status as a vital affordable housing resource. I am also heartened to know that even with a comprehensive modernization of the building, elderly and disabled residents can continue living at the Campello High Rise at rent levels that are comparable to today's rents and remain under the Brockton Housing Authority's current policy. I understand this is the only viable alternative to access the funds needed to ensure that these apartments meet current habitability standards, are code compliant, and provide buildings that are safe, healthy, and sanitary.

The City and its citizens recognize the Brockton Housing Authority's mission to provide for its most vulnerable residents. I wish you all the success in this effort and soundly support this application.

Respectfully,

Robert F. Sullivan
Mayor
City of Brockton

The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

GERRY CASSIDY
STATE REPRESENTATIVE
NINTH PLYMOUTH DISTRICT

STATE HOUSE, ROOM 136
TEL. (617) 722-2396
Gerard.Cassidy@MAhouse.gov

VICE CHAIR
Public Service

COMMITTEES:
Ways and Means
Labor and Workforce Development
Revenue

Mr. Thomas G. Thibeault
Executive Director
Brockton Housing Authority
45 Goddard Road
Brockton, MA 02301

Re: Brockton Housing Authority's Section 18
Application for the Disposition of Federal Public Housing
Campello Apartments, 1380 Main Street, Brockton

Dear Mr. Thibeault,

I am writing in strong support of the Brockton Housing Authority's (BHA) Section 18 Disposition Application, also known as the Inventory Removal Application, to the U.S. Department of Housing and Urban Development for the disposition of three-hundred-ninety-eight (398) apartment units of housing at Campello Hi-Rise. I support the efforts of the BHA to plan for important and essential capital improvements to this housing resource, especially as it is clear that current programs and funding sources are inadequate to address the physical needs at Campello.

Prior to the COVID-19 pandemic, I held monthly office hours at Campello and personally saw the capital needs; it was a topic of discussion with many residents. I concur with the plan to convert the existing federally-assisted facility at Campello to a project-based voucher program, which will allow the BHA to access adequate funding and resources to make necessary repairs to a distressed property, while maintaining its status as a vital affordable housing resource. I am very glad that that even with a comprehensive modernization of the buildings, the elderly and disabled residents will be able to continue to live at Campello at rent levels that are comparable to their current rents and remain under the BHA's current policies. I understand this is the only viable option to access the funds necessary to ensure that these apartments meet current habitability standards, are code complaint and provide dwellings that are safe, healthy, and sanitary for the coming years and generations.

Thank you for your commitment to provide for Brockton's most vulnerable residents. I sincerely hope for success in this effort and soundly support this application.

Sincerely,

Gerry Cassidy

Gerry Cassidy
State Representative
Ninth Plymouth District
Vice Chair, Joint Committee on Public Service

SEIU

HUD 52680: Inventory Removals Application

Attachment: Section 4, Line 11 UFAS Accessible Units

Attach a description of the distribution of UFAS accessible units (bedroom size; unit type, e.g., mobility or sensory)

Campello High-Rise is part of AMP 2, which includes five(5) other federally assisted elderly/disable properties: Belair Heights, Manning Tower, Caffrey Towers, Sullivan Towers, and Belair Tower. There are 22 total buildings and 1303 total units in AMP 2. The unit distribution in AMP 2 is as follows: 1290-1BRs, 11 -2BRs, 0-3BRs, and 0-4BRs; two (2) apartments at Campello are currently offline.
Of these units please see the table below indicating the total number of UFAS accessible units in AMP 2.

Number of Accessible Units	Bedroom Size	Unit Type (Mobility or Sensory)
61	1-BR	Mobility
5	2-BR	Mobility

Below is a table describing the 21 existing UFAS accessible units at Campello.

Accessible Units	Bedroom Size	Unit Type (Mobility or Sensory)
112B	1-BR	Mobility
114B	1-BR	Mobility
116B	1-BR	Mobility
118B	1-BR	Mobility
120B	1-BR	Mobility
116A	1-BR	Mobility
117A	1-BR	Mobility
118A	1-BR	Mobility
119A	1-BR	Mobility
307A	1-BR	Mobility
316B	1-BR	Mobility
517B	1-BR	Mobility
614B	1-BR	Mobility
710B	1-BR	Mobility
711A	1-BR	Mobility
809A	1-BR	Mobility
912A	1-BR	Mobility
1002B	1-BR	Mobility
1017A	1-BR	Mobility
410	2-BR	Mobility
810	2-BR	Mobility

With 21 handicap accessible units, Campello meet the UFAS requirement that 5% of the building's 398 units be accessible. The distribution of handicap accessible units generally reflects the overall unit distribution. In addition, 2% of the units must be available for households with sensory impairments; as part of the renovations, eight units will need to be retrofitted into sensory-adapted units (seven 1BR and one 2BR unit).

Existing and Required Accessible Units at Campello

	Mobility Units		**Sensory Units**	
	1-BR	**2-BR**	**1-BR**	**2-BR**
Existing	19	2	0	0
Change	+0	+0	+7	+1

HUD 52860: Section 5, Line 4
Total Acreage Proposed for Removal

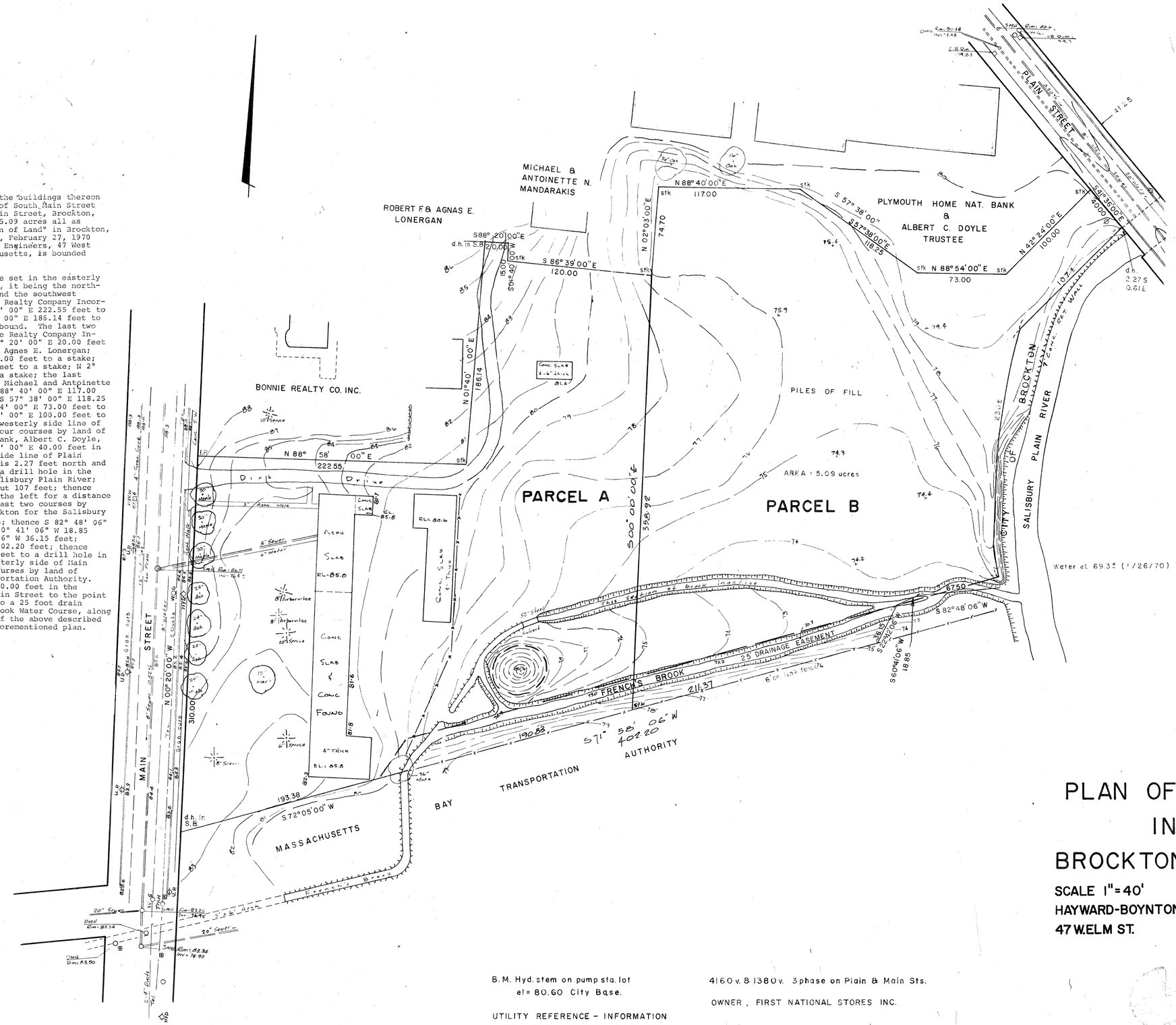
Attach a description of the land (e.g. survey, copy of legal description)

See survey and legal description.

Boundry Description

A certain tract of land with the buildings thereon located on the easterly side of South Main Street and the southwest side of Plain Street, Brockton, Massachusetts and containing 5.09 acres all as shown on a plan entitled "Plan of Land" in Brockton, Massachusetts, scale 1"= 40', February 27, 1970 Haywood-Boynton Incorporated, Engineers, 47 West Elm Street, Brockton, Massachusetts, is bounded and described as follows:

Beginning at an iron pipe set in the easterly side line of Main Street, it being the northwest corner of the lot and the southwest corner of land of Bonnie Realty Company Incorporated; thence N 88° 58' 00" E 222.55 feet to a stake; thence N 1° 40' 00" E 185.14 feet to a drill hole in a stone bound. The last two courses of land of Bonnie Realty Company Incorporated. Thence S 88° 20' 00" E 20.00 feet by land of Robert F. and Agnes E. Lonergan; thence S 1° 40' 00" W 15.00 feet to a stake; S 86° 39' 00" E 120.00 feet to a stake; N 2° 03' 00" E 74.70 feet to a stake; the last three courses by land of Michael and Antoinette N. Mandarakis; thence N 88° 40' 00" E 117.00 feet to a stake; thence S 57° 38' 00" E 118.25 feet to a stake; N 88° 54' 00" E 73.00 feet to a stake; thence N 42° 24' 00" E 100.00 feet to a stake set in the southwesterly side line of Plain Street; the last four courses by land of Plymouth Home National Bank, Albert C. Doyle, Trustee; thence S 41° 36' 00" E 40.00 feet in the said southwesterly side line of Plain Street to a point which is 2.27 feet north and 0.61 feet westerly from a drill hole in the retaining wall of the Salisbury Plain River; thence southwesterly about 107 feet; thence southerly by a curve to the left for a distance of about 230 feet; the last two courses by land of the City of Brockton for the Salisbury Plain River Water Course; thence S 82° 48' 06" W 67.50 feet; thence S 60° 41' 06" W 18.85 feet; thence S 22° 42' 06" W 36.15 feet; thence S 71° 58' 06" W 402.20 feet; thence S 72° 05' 00" W 193.38 feet to a drill hole in a stone bound in the easterly side of Main Street; the last five courses by land of Massachusetts Bay Transportation Authority. Thence N 0° 20' 00" W 310.00 feet in the easterly side line of Main Street to the point of beginning. Subject to a 25 foot drain easement for French's Brook Water Course, along the southerly property of the above described premises shown on the aforementioned plan.



B.M. Hyd. stem on pump sta. lot el= 80.60 City Base.

4160 v. & 1380 v. 3 phase on Plain & Main Sts.

OWNER, FIRST NATIONAL STORES INC.

UTILITY REFERENCE - INFORMATION TAKEN FROM DEPARTMENT RECORDS AND ON THE GROUND SURVEYS, AND ARE NOT NECCESSARILY ACCURATE

A certain tract of land with the buildings thereon located on the easterly side of South Main Street and the southwest side of Plain Street, Brockton, Massachusetts, and containing 5.09 acres subdivided into Parcel "A" and Parcel "B" all as shown on a plan entitled "Plan Of Land" in Brockton, Massachusetts, scale 1"=40', February 27, 1970, Haywood-Boynton Incorporated, Engineers, 47 West Elm Street, Brockton, Massachusetts, is bounded and described as follows:

PARCEL "A"

Beginning at a iron pipe set in the easterly side line of Main Street, it being the northwest corner of the lot and the southwest corner of land of Bonnie Realty Company Incorporated; thence N 88°58'00" E 222.55 feet to a stake; thence N 1° 40'00" E 186.14 feet to a drill hole in a stone bound. The last two courses by land of Bonnie Realty Company Incorporated. Thence S 88° 20'00" E 20.00 feet by land of Robert F. and Agnes E. Lonergan; thence S 1° 40'00" W 15.00 feet to a stake; thence S 86°39'00" E 120.00 feet to a stake. The last two courses by land of Michael and Antoinette N. Mandarakis. Thence S 0°00'00" E 358.92 feet; thence S 71° 58'06" W 190.83 feet; thence S 72° 05'00" W 193.38 feet to a drill hole in a stone bound in the easterly side of Main Street; the last two courses by land of Massachusetts Bay Transportation Authority. Thence N 0°20'00" W 310.00 feet in the easterly side line of Main Street to the point of beginning subject to a 25 foot drain easement for French's Brook Water Course along the southeasterly portion of the property of the above described premises.

Beginning at a iron pipe set in the easterly side line of Main Street, it being the northwest corner of the lot and the southwest corner of land of Bonnie Realty Company Incorporated; thence N 88°58'00" E 222.55 feet to a stake; thence N 1° 40'00" E 186.14 feet to a drill hole in a stone bound. The last two courses by land of Bonnie Realty Company Incorporated. Thence S 88°20'00" E 20.00 feet by land of Robert F. and Agnes E. Lonergan; thence S 1°40'00" W 15.00 feet to a stake. Thence S 86°39'00" E 120.00 feet to a stake. The last two courses by land of Michael and Antoinette N. Mandarakis to the point of beginning of the following described parcel.

Water el. 69.3± (1/26/70) PARCEL "B"

Point of beginning from a stake N 02°03'00" E 74.70 feet to a stake this course by land of Michael and Antoinette N. Mandarakis thence N 88°40'00" E 117.00 feet to a stake; thence S 57°38'00" E 118.25 feet to a stake; thence N 88°54'00" E 73.00 feet to a stake; thence N 42°24'00" E 100.00 feet to a stake set in the southwesterly side line of Plain Street; the last four courses by land of Plymouth Home National Bank, Albert C. Doyle, Trustee; thence S 41°36'00" E 40.00 feet in the said southwesterly side line of Plain Street to a point which is 2.27 feet north and .61 feet westerly from a drill hole in the retaining wall of the Salisbury Plain River; thence southwesterly about 107.00 feet; thence southerly by a curve to the left for a distance of about 230.00 feet; the last two courses by land of the City of Brockton for the Salisbury Plain River Water Course; thence S 82°48'06" W 67.50 feet; thence S 60°41'06" W 18.85 feet; thence S 22°42'06" W 36.15 feet; thence S 71°58'06" W 211.37 feet; the last four courses by land of Massachusetts Bay Transportation Authority. Thence N 0°00'00" and 358.92 feet to a stake to the point of beginning. Subject to a 25.00 foot drain easement for French's Brook Water Course along the southerly property of the above described premises.

PLAN OF LAND IN BROCKTON, MASS.

SCALE 1"=40' FEB 27,1970

HAYWARD-BOYNTON INC. ENG.

47 W.ELM ST. BROCKTON

Schedule "A"

A certain parcel of land situated in Brockton, Plymouth County, Massachusetts being shown as Lot No. 2 on a plan entitled "Plan of Land in Brockton, owned by Brockton Perforating Machine Company, Inc., Scale 1" = 40' August 11, 1964, Hayward, Hayward & Boynton, Civil Engineers, Surveyors, 68 Main Street, Brockton" being duly recorded with Plymouth County Registry of Deeds and containing 5.26 acres according to said plan. Said Lot 2 is more particularly bounded and described as follows:

Beginning at a chisel cut in the back of the cement sidewalk at the Northwest corner of the lot, it being distant one hundred fifty-one and 67/100 (151.67) feet from the Southerly sideline of Montello Street Extension; thence North 88° 58' 00" East, two hundred twenty-two and 55/100 (222.55) feet to a stake; thence North 1° 40' 00" East, one hundred eighty-six and 14/100 (186.14) feet to a stone bound; the last two courses by land of Bonnie Realty Company, Inc.; thence South 86° 39' 00" East, twenty (20) feet to a pipe bound; thence South 1° 40' 00" West, fifteen (15) feet to a stake; thence South 86° 39' 00" East, one hundred twenty (120) feet to a stake; the last three courses by land of Robert C. Williams; thence North 2° 03' 00" East, seventy-four and 70/100 (74.70) feet to a stake, partly by land of said Williams; thence North 88° 40' East, one hundred seventeen (117) feet to a stake; thence South 57° 38' East, one hundred eighteen and 25/100 (118.25) feet to a stake; thence North 88° 54' East, seventy-three (73) feet to a stake; thence North 42° 24' East, one hundred (100) feet to a stake in the southwesterly sideline of Plain Street; the last four courses by Lot 1 on said plan; thence South 41° 36' 00" East, forty (40) feet in the said sideline of said Plain Street to a drill hole; thence Southwesterly about one hundred seven (107) feet; thence Southerly about two hundred thirty (230) feet; the last two courses by Salisbury Plain River; thence South 84° 34' 00" West, sixty-seven and 50/100 (67.50) feet; thence South 62° 27' 00" West, eighteen and 85/100 (18.85) feet; thence South 24° 28' 00" West, thirty-six and 15/100 (36.15) feet to a stake; thence South 73° 44' 00" West, four hundred two and 20/100 (402.20) feet; thence South 72° 06' 00" West one hundred eighty-nine and 11/100 (189.11) feet to a stone bound set in the Easterly sideline of said Main Street; the last five courses by land of Eastern Mass. Street Railway Company; thence North 0° 20' 00" West, three hundred ten and no/100 (310) feet in the said sideline of said Main Street to the point of beginning.

The within conveyance is made subject to a stwenty (20) foot right of way, the westerly sideline being along the course South 1° 40' 00" West, one hundred eighty-six and 14/100 (186.14) feet, then continuing on range with the said course to its intersection with the property line of Eastern Mass. Street Railway Co. The Easterly sideline is twenty (20) feet Easterly from and parallel to the above described line, all as shown on said plan.

The within conveyance is made subject also to an easement taken for the relocation of Salisbury Brook; said easement being Northerly of the north line of land of Eastern Mass. Street Railway Company and running from the Salisbury Plain River to a point about 73° 44' West, four hundred (400) feet from the Southeast corner of the herein described property; the southerly line being the northerly line of the said Eastern Mass. Street Railway Company land. The North line being Northerly twenty-five (25) feet from and parallel with the above described line, excepting where the said brook turns to the South and passes off the property herein described.

HUD 52860: Inventory Removals Application
Attachment: Section 5, Line 5
Estimated Value of the Property

Attach an executive summary of the appraisal or other form of valuation

The estimated 2020 value of Campello High-Rise is $23,183,800 ($22,012,000 for improvements and $1,171,800 for the land), based on the findings of the City of Brockton's tax assessor's office. Under Massachusetts law, tax assessors are required to assess properties at 100% of fair market value. Tax assessors use three different means – cost, income, and market value – to determine the final value of a property. Attached is the tax assessor's valuation of the property from 2020.

tyler clt division

COMMERCIAL PROPERTY RECORD CARD 2021

BROCKTON

Situs : 1380 MAIN ST	PARCEL ID: 117-034	Class: 970	Card: 1 of 1	Printed: July 18, 2020

CURRENT OWNER

BROCKTON HOUSING AUTHORITY
45 SCHOOL ST
BROCKTON MA 02301
03850/00261

GENERAL INFORMATION

Living Units	400
Neighborhood	491
Alternate ID	458
Vol / Pg	03850/00261
District	
Zoning	C2
Class	EXEMPT

Property Notes

Land Information

Type		Size	Influence Factors	Influence %	Value
Primary	SF	229,126			1,171,800

Total Acres: 5.26
Spot: Location:

Assessment Information

	Appraised	Cost	Income	Prior
Land	1,171,800	1,171,800	1,171,800	1,171,800
Building	22,012,000	22,696,800	22,012,000	22,012,000
Total	23,183,800	23,868,600	23,183,800	23,183,800

Manual Override Reason
Base Date of Value 1/1/2019
Value Flag INCOME APPROACH Effective Date of Value 1/1/2019
Gross Building:

Entrance Information

Date	ID	Entry Code	Source
05/02/18	CP	Field Review	Other
12/03/14	JOD	Unimproved	Other

Permit Information

Date Issued	Number	Price	Purpose		% Complete
11/14/19	2150	23,400	REMODEL		
08/12/19	1443	15,000	REMODEL		
11/29/18	BPA-18-59(	18,000	ADDITION		
09/05/17	67497	18,000	OTHER	Repair Trash Chute	100
10/14/15	B63266	20,000	BLDG	3 Antennas	0

Sales/Ownership History

Transfer Date	Price	Type	Validity	Deed Reference	Deed Type	Grantee
				3850/261		

Inspection Witnessed By _____

tyler
clt division

COMMERCIAL PROPERTY RECORD CARD 2021

BROCKTON

Situs : 1380 MAIN ST	Parcel Id: 117-034	Class: 970	Card: 1 of 1	Printed: July 18, 2020

Building Information

Year Built/Eff Year	1972 /
Building #	1
Structure Type	Apartments High Ris
Identical Units	2
Total Units	191
Grade	B
# Covered Parking	
# Uncovered Parking	
DBA	PUBLIC HOUSING

Building Other Features

Line	Type	+/-	Meas1	Meas2	# Stops	Ident Units	Line	Type	+/-	Meas1	Meas2	# Stops	Ident Units
1	Porch Covered		1	260		1							
3	Porch, Open Upper		5	10		3							
3	Porch Cov-Upper		5	20		80							
3	Porch, Open Upper		5	10		3							
3	Porch Cov-Upper		5	20		10							
1	Elevator Hydraulic Pasngr		2,000	100	10	2							

Interior/Exterior Information

Line	Level From	To	Int Fin	Area	Perim	Use Type	Wall Height	Ext Walls	Construction	Partitions	Heating	Cooling	Plumbing	Physical	Functional
1	01	01	100	4,456	239	Support Area	10	Concrete Lc	Fire Proof	Normal	Electric	None	Normal	2	2
2	01	01	100	7,424	389	Apartment	10	Concrete Lc	Fire Proof	Normal	Electric	Unit	Normal	4	4
3	02	10	100	11,080	596	Apartment	9	Concrete Lc	Fire Proof	Normal	Electric	Unit	Normal	4	4

Interior/Exterior Valuation Detail

Line	Area	Use Type	% Good	% Complete	Use Value/RCNLD
1	4,456	Support Area	32		306,280
2	7,424	Apartment	61		817,660
3	11,080	Apartment	61		10,176,980

Outbuilding Data

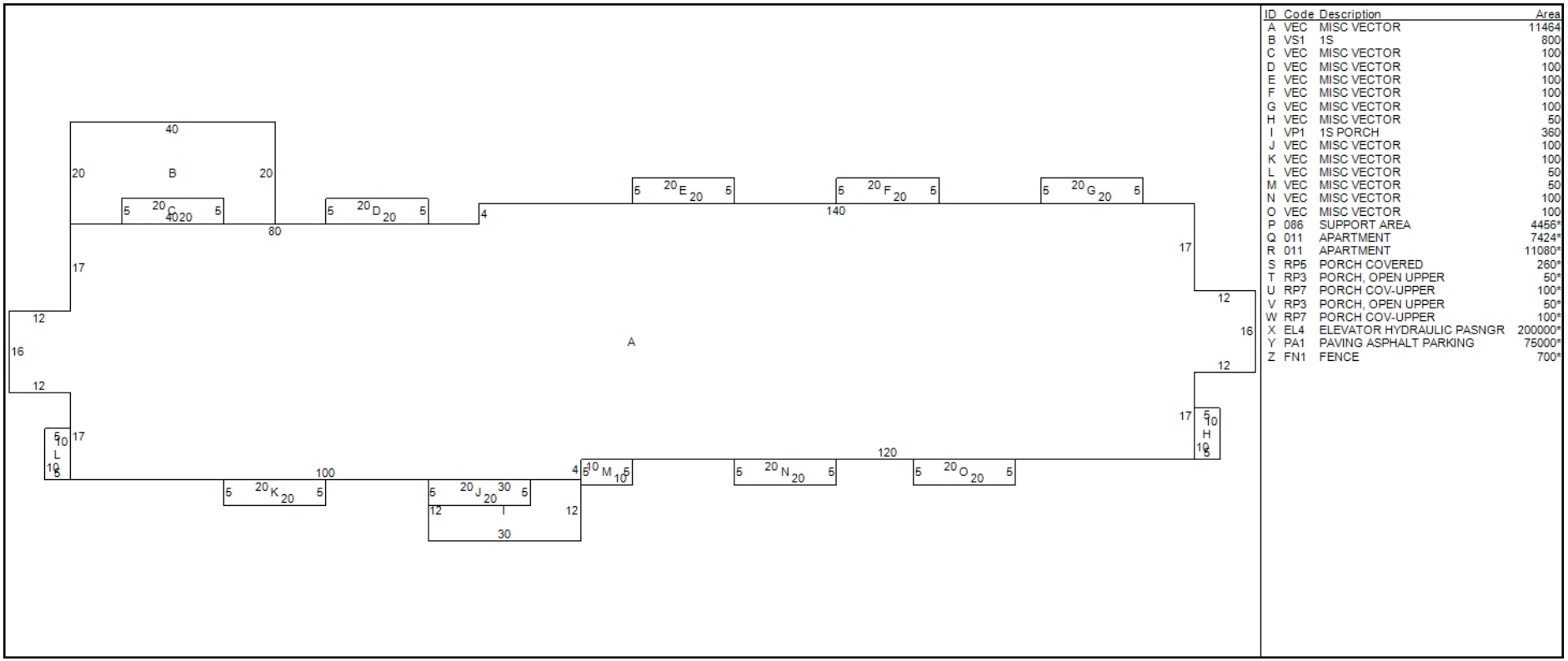
Line	Type	Yr Blt	Meas1	Meas2	Qty	Area	Grade	Phy	Fun	Value
1	Asph Pav	1972			1	75,000		3	3	93,750
2	Fence	1972	1	700	1	700		3	3	1,230

tyler
clt division

COMMERCIAL PROPERTY RECORD CARD 2021

BROCKTON

Situs : 1380 MAIN ST	Parcel Id: 117-034	Class: 970	Card: 1 of 1	Printed: July 18, 2020



ID	Code	Description	Area
A	VEC	MISC VECTOR	11464
B	VS1	1S	800
C	VEC	MISC VECTOR	100
D	VEC	MISC VECTOR	100
E	VEC	MISC VECTOR	100
F	VEC	MISC VECTOR	100
G	VEC	MISC VECTOR	100
H	VEC	MISC VECTOR	50
I	VP1	1S PORCH	360
J	VEC	MISC VECTOR	100
K	VEC	MISC VECTOR	100
L	VEC	MISC VECTOR	50
M	VEC	MISC VECTOR	50
N	VEC	MISC VECTOR	100
O	VEC	MISC VECTOR	100
P	086	SUPPORT AREA	4456*
Q	011	APARTMENT	7424*
R	011	APARTMENT	11080*
S	RP5	PORCH COVERED	260*
T	RP3	PORCH, OPEN UPPER	50*
U	RP7	PORCH COV-UPPER	100*
V	RP3	PORCH, OPEN UPPER	50*
W	RP7	PORCH COV-UPPER	100*
X	EL4	ELEVATOR HYDRAULIC PASNGR	200000*
Y	PA1	PAVING ASPHALT PARKING	75000*
Z	FN1	FENCE	700*

Addtional Property Photos

tyler
clt division

COMMERCIAL PROPERTY RECORD CARD 2021

BROCKTON

Situs : 1380 MAIN ST	Parcel Id: 117-034	Class: 970	Card: 1 of 1	Printed: July 18, 2020

Income Detail (Includes all Buildings on Parcel)

Use Grp	Mod Type	Inc Mod	Model Description	Units	Net Area	Income Rate	Econ Adjust	Potential Gross Income	Vac Model	Vac Adj	Additional Income	Effective Gross Income	Expense Model %	Expense Adj %	Expense Adj	Other Expenses	Total Expenses	Net Operating Income
00	S		Shell Income Use Group	0			85				0							
01	A	002	Apartments/Per Unit	382	214,288		85	3,152,188	5		0	2,994,579	40			1,197,832	1,197,832	1,796,747

Apartment Detail - Building 1 of 1

Line	Use Type		Per Bldg	Beds	Baths	Units	Rent	Income
1	011	Apartment	191	0	\0	382	9,708	3,708,456

Building Cost Detail - Building 1 of 1

Total Gross Building Area	223,200
Replace, Cost New Less Depr	11,300,920
Percent Complete	100
Number of Identical Units	2
Economic Condition Factor	
Final Building Value	22,601,840
Value per SF	101.26

Notes - Building 1 of 1

Income Summary (Includes all Building on Parcel)

Total Net Income	1,796,747
Capitalization Rate	0.077500
Sub total	23,183,832
Residual Land Value	
Final Income Value	23,183,832
Total Gross Rent Area	223,200
Total Gross Building Area	223,200

HUD 52860: Inventory Removals Application

Attachment: Section 6, Line 2 Summary of Displaced Residents

Attach a summary of the number of individual residents estimated to be displaced by race and national origin and a summary of households estimated by be displaced by who have a member who is a person with a disability.

Below is a breakdown of Campello residents by race, national origin, and households who have a member with a disability, based on February 2021 data. Although temporary relocation may be required as a consequence of construction activities, no residents will be permanently displaced as part of the Campello disposition.

Race	**Number of Residents/Percent of Total**
White	180(43.27%)
Black/African American	235(56.49%)
American Indian/Alaska Native	0 (0%)
Hispanic, non-white	0 (0%)
Asian	1 (0.24%)
Declined	77 (18.51%)
Other	9 (2.16%)
Total:	**502**
Citizenship	
Citizen	345 (82.93%)
Eligible Noncitizen	68 (16.35%)
Total	**413** (+3 Ineligible Non-Citizens 0.72%)
Disability	
Disabled	182 (43.75%)
Non-Disabled	234 (56.25%)
Total	**416**

HUD 52860: Section 6, Line 3

Description of Relocation Counseling and Advisory Services

Attach a description of the relocation counseling and advisory services that will be provided to residents who will be displaced by this action.

BHA has budgeted $625,050 to cover staff time to counsel and advise Campello residents about the disposition and conversion the conversion of the building's units from public housing to Project-Based Voucher (PBV) units and to provide relocation assistance in the instance that a resident does not want to remain in a PBV unit and would prefer to relocate to another public housing unit in the BHA portfolio. The relocation assistance includes staff time identifying an appropriate unit and any moving costs associated with the relocation.

The relocation counseling and advisory services will be overseen by the BHA, and may be performed either by qualified BHA staff and an outside party. The relocation counseling and advisory services to be provided will include timely notices in accordance with Section 104(d) of the Housing and Community Development Act of 1974; individual one-on-one meetings to review relocation requirements, options and needs; assistance in preparing for the move including the determination of packing assistance will be needed; coordination of the moving activity from scheduling the movers to assisting with notifying the post office and others of address changes; ensuring timely receipt of relocation payments to residents if any are made; and in general, serving as the "helping hands" and "friendly face" to residents during the relocation period.

HUD 52860: inventory Removals Application
Attachment: Section 6, Line 6
Summary of the Comparable Housing Resources

Attach a summary of the comparable housing resources that the PHA expects to offer to be displaced residents.

The permanent resource for existing residents at Campello will be Project-Based Vouchers that are connected to their apartment units. We expect no residents to relocate as part of the disposition, but have budgeted for a small number of relocation moves in the unlikely instance that there are residents who do not want to resident in a Project-Based Voucher unit and would like to relocate to another public housing unit in the BHA portfolio.

If the disposition application is approved and the BHA receives an award of TPVs, MHA will begin a resident process to finalize the construction plan and phasing and identify if the construction will require temporary resident relocation for it to be safely completed. If the construction does require relocation, the BHA will work with Campello residents to develop a Tenant Relocation Plan that will outline relocation options, resources, and policies. The resource for temporary relocation during construction is expected to be vacant on-site units at Campello and other BHA-owned public housing units.

HUD 52860: Inventory Removals Application

Attachment: Section 6, Line 7 Tenant Protection Voucher Request

Attach a brief explanation supporting the TPV request. See PIH Notice 2017-10 and PIH Notice 2018-04 (or any successor notices).

If the disposition application is successful, the BHA will apply for replacement Tenant Protection Vouchers (TPVs). The BHA will only proceed with the disposition if it receives an allocation of TPVs, as they are necessary to support the 398 eligible units at Campello as they transfer from the public housing program to project-based operating assistance. TPVs are critical to the BHA's ability to fund the comprehensive renovations that are needed at Campello. Given the higher funding levels of TPVs than public housing operating and capital subsidies, the TPVs would allow Campello to raise private financing, while also ensuring a stable subsidy for the future.

HUD 52860: Inventory Removals Application
Attachment: Section 7, Line 1
Resident Consultation

Attach a narrative description of consultation process, along with supporting documentation (e.g., agenda, meeting notices; sign-in sheets; meeting minutes, print-out of written or email consultation)

It is always the first priority of the BHA to keep residents informed of plans for and changes to their living environment, and prefer to inform resident "in person". However, COVID 19 has made it impossible and unwise to meet with residents in large group settings to advise them of the BHA's intentions for Campello with regard to the Section 18 Disposition Application. Compounding this issue is the relative technical inexperience of the Campello residents which made virtual webinars or virtual meetings unfeasible.

However as evidenced in following attachments, the BHA has met with the resident councils of each building as well as the Resident Advisory Board to provide them with information about the application.

Furthermore, the BHA created and developed information posters and newsletters (see below) in English, Spanish, and Portuguese to help distribute key information to all residents and provide updates relative to the intentions of the application, the schedule, and help to answer some frequent and pressing questions the residents may have around relocation, rent, and management should the building be renovated. Because some residents are functionally illiterate, the management staff will record updates for releases over the phone.

Nothing can replace face to face presentations. However, especially for seniors and disabled residents, this is not an option at the current time. As a vaccine becomes more widely administered the BHA looks forward to engaging the resident in person on the future of Campello Hi-Rise. In the meantime the BHA plans to issue multi-lingual newsletters and recordings to keep people informed.

Campello Apartments Section 18 Disposition

BROCKTON HOUSING AUTHORITY

Thomas Thibeault

Executive Director

What are the Brockton Housing Authority's plans for Campello?

- The Brockton Housing Authority is applying to get more money from HUD to operate and renovate Campello. Due to the significant physical needs at Campello, this is the best way for the BHA to protect and preserve Campello as affordable housing for many years to come.
- If the application is successful, it would mean that Campello would switch from public housing funding to project-based operating subsidy.

Benefits of Converting from Public Housing to Project Based Vouchers (Section 8s)

- It moves apartment units from HUD's public housing side to its project-based operating subsidy side which has historically received funding increase while public housing has at best received no increase, or worse, has suffered from years of budget decreases.
- It would generate additional annual income for the Brockton Housing Authority to operate and maintain Campello. Also, the additional income could help pay for a comprehensive modernization of Campello in the near future which could include central air conditioning, bathroom and kitchen upgrades, and improvements to the façade.
- More budget certainty and stability – even if the budget for project-based operating subsidy program was reduced, the additional income received under that program would put the BHA in a better position to weather any reductions in the HUD budget!

How would this affect Campello residents?

- There would be NO impact to Campello residents from the conversion itself.
- Your rent would be calculated the same as it is now and Brockton Housing Authority would still provide all of the same utilities (heat, hot water, electricity)
- The Brockton Housing Authority would still operate and maintain the building

If the application is successful, the Brockton Housing Authority will work with residents to plan for the improvements.

Keep in Touch!

Look: for periodic newsletters with latest information

Listen: to Creole recordings of latest information

Speak up: give us your thoughts!

Suggestions? Concerns?

Please offer your ideas, concerns, and questions and deposit them in the box

BROCKTON HOUSING AUTHORITY

Campello Times

Resident Newsletter for Modernization Needs vol. 1

November 30, 2020

What is going on at Campello?

Letter from the Executive Director

The Brockton Housing Authority is always looking for new ways to improve the resident experience at all of its developments from making sure our corridors and yards are clean to fixing leaking pipes and broken hardware. We also care about making common areas available to you as important spaces to gather and socialize. I know this has been much harder for everyone during this COVID pandemic, and we appreciate the measures you have taken and the commitment you have made to keep Campello as COVID-free as possible.

Although we have been fortunate to receive annual allotments of federal funds to maintain our buildings and programs, many of our buildings are older and require more substantial repairs than the annual allotment can fund. As you may know Campello is about 50 years old and is experiencing the types of problems that buildings of this age encounter: worn out infrastructure like plumbing and water supply, damaged finishes and fixtures like kitchen cabinets and bathtubs. The building has served its residents well but we have not been able to invest the dollars needed to adequately keep pace with the wear and tear of an old building. The BHA has been considering various methods and funding sources available from HUD that would allow us the possibility of making more lasting and comprehensive renovations so that Campello can be successful for the next 50 years!

In the past few months you may have noticed a few new faces being escorted through the buildings and grounds by BHA staff. In order to determine which program makes the most sense, we have to perform an assessment of the development's physical conditions. These new faces are architects and engineers who have been analyzing the conditions at Campello. They have drafted a report that will be available for review in about six weeks. It is important to refer you to the schedule (see p. 2): we are a long way from doing any design or major construction on the building so there is no imminent requirements for relocation of any kind. We intend to keep Campello residents fully informed as we progress through this application process.

I would like to draw your attention to several things: the FAQ section of this newsletter which answers some of the questions you might have, the schedule which demonstrates that we are in a feasibility phase with no current design or construction plans, and our intentions to provide methods by which you may express your opinion while working within this COVID era.

Thank you for your interest in this important endeavor. We look forward to working with you as partners to assure that the plans going forward are clearly understood and receive the benefit of your invited participation.

Sincerely

Thomas Thibeault, Executive Director

Brockton Housing Authority

RESIDENT OUTREACH

The BHA is committed to keeping residents informed during this application process. Ordinarily, we would enjoy meeting you all in person at community events. Because of COVID, we are having to modify our efforts. We value your input, and welcome you to offer your thoughts and opinions using one or more of the following methods.

Coming Up:

- Please visit the elevator lobby at each building to learn more about the Section 18 application process. Fill out a suggestion or question and drop it in the box: answers will be featured in this newsletter or in the lobby.

- We will also send out updates by audio recordings so that all residents have access to the information.

Quiz Question:

When was Campello built?

1962 1972 1982

(see page 2 for answer)

Frequently Asked Questions

Question and Answers:

Q. If the building is renovated can I continue to live at Campello after the work is complete?

A. Yes. No Campello residents will lose their housing as a result of any renovations.

Q: Will I have to move for the renovation?

We do not know yet and will not know for some time. Any construction will not likely start for three years. And that depends on the success of this application. Once we know about the application we can move forward and inform Campello residents of the renovation plan. It is possible that the level of required renovation work may require residents to leave their apartments due to dust and noise.

Q. Who will manage the building after it is renovated?

A: The BHA will manage the building after the renovation.

Q: What program is the BHA considering for funding?

At this time, the program that is most advantageous for making lasting improvement at Campello is known as a Section 18 disposition. We are not able to make the necessary repairs with any other current HUD program. The Section 18 disposition would change the way HUD funds BHA to operate Campello as affordable housing, and would allow BHA to make the needed improvements and upgrades to protect and preserve the development.

Q. How will HUD consider the application to be successful?

A: The BHA has to demonstrate that current deficiencies requiring repair at Campello will cost at least $47M or about $117,000 per unit in items that need be repaired within the next three years.

Q: ***How can I stay updated on the progress of the design?***

A: Look for a general information board in the Lobby, listen to recordings of the information, read these periodic newsletters.

Q: Who is our contact person at the BHA?

A. You may contact Melissa O'Malley to provide feedback if you feel your questions are not being answered.

Preliminary Schedule

At this time, we anticipate the following schedule and milestones
(subject to changes and updates):

Summer– Fall 2020
Physical Assessment of the Building

Fall 2020
Resident Process and Information Sharing
Begin preparing the Section 18 Application

December 2020—January 2021
Public review period of application

February 2021
BHA Board of Directors votes to submit application

March 2021
Section 18 Application Submitted

July 2021
Section 18 Application Approved

If successful:
Fall 2021—Fall 2022
Design Procurement and Design Process

Winter– Spring 2023
Begin Construction at the very earliest!

Quiz Answer:

The construction of the Campello buildings was completed in 1972.

HUD 52860: Inventory Removals Application
Attachment: Section 7, Line 2
Resident Consultation: Resident Council

Attach a narrative description of consultation process, along with supporting documentation (e.g., agenda, meeting notices; sign-in sheets; meeting minutes, print-out of written or email consultation)

On Friday, January 8, 2021, the Authority met by conference call with members of the Resident Councils (Tenant Associations) of Building A and Building B. Attending the meeting were:

Irene Doucette	Vice-President, A Building Tenant Association
Dorothy Tosetti	President, B Building Tenant Association
Mary Princiotta	Vice-President, B Building Tenant Association
Melissa O'Malley	Site Management Director
Fred Aloisi	BHA Resident Services Coordinator
Jeffrey Olivier	Supportive Housing Consultant to the BHA
Thomas G. Thibeault	Executive Director

Several aspects of the Campello application were presented an discussed as follow:

- The existing condition and deficiencies of Campello and the magnitude of the need.
- What the various funding options were for obtaining renovation funds?
- Why the BHA was pursuing the Section 18 Disposition?
- How approval of the application would make it possible to undertake comprehensive renovations to TPVs
- What are the impacts to the residents in terms of relocation, rent, and building management.
- What residents might expect with regard to schedule.

Discussion including the following questions and answers:

Q. *Will the renovations repair all of the apartments or just the worst ones?*
A. It is true that some apartments are in worse condition than others depending on when the BHA could make repairs on turnover. However, the needed repairs extend to each apartment in terms of plumbing, electrical, heating, and finishes. This is the one chance the BHA has to make comprehensive renovations to sustain Campello for the next 30 years.

Q. *Is HUD going to approve the application?*
A. The BHA believes Campello is a strong candidate for a successful application given the condition of the building and the extensive need for repairs that cannot be paid for with current funding sources. But there are no guarantees that the applications will be approved.

Q. *Will I have to move when the application is submitted.?*
A. Absolutely not; No relocations is required as a condition for the application.

Q. *If the application is approved, will I have to move and when?*
A. Since the building requires a significant renovation, residents and their belongings will be relocated to another apartment while work in their unit is accomplished. See the schedule in this newsletter for "when" this relocation may be required.

Q. *If the building is going to be completely renovated, what is the BHA going to do about bedbugs that residents may have in their apartments to make sure the pests are not back in the restored building?*
A. The BHA has a lot of experience working with residents during relocation to eradicate pests like bedbugs. Relocation is usually a good time to take care of this.

Q. *Will residents be able to keep their air conditioners when they move?*
A. Yes, the BHA will relocate all resident belongings when the resident moves.

Q. *I am worried about construction and would like to move permanent to another BHA development. Can I do this?*
A. Yes, if the application is successful, the BHA will consult with each residents about their preferences and work to accommodate residents to the greatest extent possible.

Q. *Some people in the building are unable to read. How are they being informed?*
A. The site management staff is taking measures to record this information and communicate verbally with those who are not able to read.

Q. *Can I move temporarily off site for the construction and then move back to Campello after construction?*
A. This is a relocation option the BHA uses for other developments would likely use it for Campello.

Q. *Can I live in the building during construction?*
A. Yes, It is planned the renovations would not require the buildings to be complete vacant but be done several vacant floors at one time. This is called "phased" construction in a building that is partially occupied.

Q. *Can I stay in my apartment during the renovation?*
A. No. Due to the magnitude of the needs and deficiencies at Campello, everyone will have to vacate their apartment at some point.

Q. How will we know about what is going to happen?
A. Read the newsletters and the BHA will reach out in any way we can to keep residents informed but taking precautions due to the pandemic.

HUD 52860: Inventory Removals Application

Attachment: Section 7, Line 4

Resident Consultation: Advisory Board

Attach a narrative description of consultation process, along with supporting documentation (e.g., agenda, meeting notices; sign-in sheets; meeting minutes, print-out of written or email consultation)

On Wednesday, August 19, 2020, the Authority met with the Resident Advisory Board (RAB) to discuss the Authority's 2021 Annual Plan and to specifically discuss the intent of the Authority to submit an application to HUD for its Section 18 Disposition program and HUD's other Rental Assistance Demonstration programs. Due to COVID, this meeting was held in the yard behind the community room at Hillside Village (24-1).

The Executive Director, Thomas Thibeault, represented the Authority. The meeting was attended by the Tenant Councils of Hillside Village (24-1) Belair Heights (24-2) Manning Tower (24-3), Campello High-rise (24-6) Caffrey Tower's (24-7), Sullivan Towers (24-8), Belair High-rise (24-10), Kennedy Drive (667-2), and Crosby Gardens (667-4). All tenant councils were provided copies of the draft plan prior to the meeting via the US post office.

Mr. Thibeault had previously discussed that the Authority was considering applying for these programs in RAB meetings held earlier in the year and in late 2019. As a standard procedure, the Authority has met with the RAB on a monthly basis since 1999. Mr. Thibeault initiated these meetings at that time and has attended them on a regular basis.

Mr. Thibeault reviewed the Annual plan and Capital plan with the RAB in detail and then spoke of the Section 18 Disposition program and the Authority's intent to apply for the program for the Campello high-rise if the development was eligible. The RAB members asked if any resident would be displaced. Mr. Thibeault stated that it was not the intent of the Authority to displace any of its current residents. The RAB stated that they would like the Brockton Housing Authority continue to manage the complex under the new program. Mr. Thibeault stated that it was the intent to have the Authority continue as the management agent for the properties.

The meeting ended with the RAB endorsing the concept by voice vote and Mr. Thibeault stating that they would be working our engineers on a physical needs analysis of the Campello high-rise and would share this information with them once the report was completed.

The BHA will continue the resident engagement and consultation process through the disposition process.

RAB Meeting 8-19-2020

	Name	Development	Phone #	Email Address
1	Johnnie Shannon	Belair Tower	508-580-4569	
2	John Frois	Belair Tower	586-1811	
3	Margaret Simon	Belair Heights	508-583-8184	
4	Cheryl Duren	Sullivan	508 5[illegible]	974-5251 durencheryl09@gmail
5	Kevin Donovan	Crosby Garden	5085620072	—
6	Shawn Fehin	Manning Tower	774-297 0942	
7	Mike Cox	Manning Tower		
8	Larry Moses	Manning Tower		
9	Carol Robert	Caffrey Tower	774-826-6825	chowrunner2@msn.com
10	Keither Lennards	Caffrey Towers	774-223-5780	Lennards@hotmail.com
11	Kevin Cowner	Kennedy	774-849-6542	PRESKEVKEN@gmail.com
12	Pauline Ghidoni	KENNEDY DR	508-583-2115	
13	Mike Minnock	Eagle St	774-2840924	meminnock69@gmail.com
14	Gail Smiths	RAB		
15	Sheila Morrison	Sullivan Tower		
16	Mary Princiotta	Campello	(508)369-1652	
17	Dorothy Tosetti	Campello	(508)468-4927	dottosetti@yahoo.com

HUD 52860: Inventory Removal Application

Attachment: Section 7, Line 5 Comments from Residents

Despite the challenges of working in a pandemic, The BHA has been successful in keeping residents up to date as described in previous attachments. Through phone conferences, holding outdoor small group meetings, issuing posters and newsletters, the BHA has extended itself especially as the pandemic has forced closures and made large resident meetings impossible. That said, as part of the resident consultation process described in Section 7 of HUD 52860, the BHA has received the following questions and comments orally and in writing from residents (many of these questions appear in a FAQ section in the newsletters).

Q. Are there other means of funding the work that is needed at Campello?

BHA response: We have analyzed other HUD funding sources available to reposition and repair public housing. None are able to provide adequate amounts of funding to perform the type of comprehensive modernization that is needed at Campello. Only the disposition process and subsequent award of TPVs can fund Campello's capital needs.

Q. What changes to Campello if the application is approved?

BHA Response: The main change is that the funding for Campello moves from a public housing subsidy to a Section 8 subsidy. This results in more subsidy for the BHA to make necessary and overdue repairs to the building. Other than relaocation for construction, there is no impact on residents: your rent will be calculated the same way and the BHA will still provide all the same utilities (heat, hot water, electricity). Your lease terms will be the same but it will need to be renewed with a new LLC owner (see next question). The BHA will continue to maintain and operate the building.

Q. Does the ownership of the building change when the subsidy changes?

BHA response: The building will continue to be controlled by the BHA. As part of the disposition, the property will be conveyed to an LLC. The BHA will continue to maintain and operate the building and you will continue to interface with the same BHA staff.

Q. Will residents have to be relocated during the application?

BHA response: No residents will have to be relocated as part of the disposition application and process.

Q. ***Is HUD going to approve the application?***

BHA response: The BHA believes Campello is a strong candidate for a successful application given the condition of the building and the extensive need for repairs that cannot be paid for with current funding sources. But there are no guarantees that the applications will be approved.

Q. When construction starts, what will happen to the residents? Where will they go?

BHA response: No residents will be displaced as part of the disposition application and process and resultant modernization. If the disposition application is approved and Campello receives an award of TPVs, we will begin a resident process to finalize the

construction plan and phasing and identify if the construction will require temporary resident relocation for it to be safely completed. If the construction does require relocation, the BHA will work with Campello residents to development a Tenant Relocation Plan that will outline relocation options, resources and policies.

Q. ***Can I go back to my original apartment once construction is over or will I be permanently relocated?***

BHA response: No residents will have to be relocated as part of the disposition application and process. Right to return policies will be discussed with residents and formalized as part of the Tenant Relocation Plan should construction require any relocation.

Q. What is the overall timeframe for the application?

BHA response: The disposition application will be brought to the Brockton Housing Authority Board of Commissions for their approval on February 25, after a 30-day period of public review and comment. Once we receive the board's approval on the disposition application, we will submit the application to the HUD SAC office in March. We hope to hear by May if the application will be reviewed by the SAC office.

Q. If I have to move, either temporarily or permanently, who will pay for it?

BHA response: No residents will have to be relocated as part of the disposition application and process. If the application is approved and TPVs are awarded, we will begin a resident process to discuss relocation procedures and policies. If any relocation is required or warranted, BHA will pay for relocation expenses including movers, packing materials and any utility reconnection fees.

Q. ***Will the renovations repair all of the apartments or just the worst ones?***

BHA response: It is true that some apartments are in worse condition than others depending on when the BHA could make repairs on turnover. However, the needed repairs extend to each apartment in terms of plumbing, electrical, heating, and finishes. This is the one chance the BHA has to make comprehensive renovations to sustain Campello for the next 30 years.

Q. ***Will I have to move when the application is submitted.?***

BHA response: Absolutely not; No relocations are required as a condition for the application.

Q. ***If the application is approved, will I have to move and when?***

BHA response: Since the building requires a significant renovation, residents and their belongings will be relocated to another apartment while work in their unit is accomplished. See the schedule in this newsletter for "when" this relocation may be required.

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BHA response: The BHA has a lot of experience working with residents during relocation to eradicate pests like bedbugs. Relocation is usually a good time to take care of this.

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BHA response: The site management staff is taking measures to record this information and communicate verbally with those who are not able to read.

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BHA response: This is a relocation option the BHA uses for other developments would likely use it for Campello.

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BHA response: Yes, It is planned the renovations would not require the buildings to be complete vacant but be done several vacant floors at one time. This is called "phased" construction in a building that is partially occupied.

Q. ***Can I stay in my apartment during the renovation?***
BHA response: No. Due to the magnitude of the needs and deficiencies at Campello, everyone will have to vacate their apartment at some point.

Q. How will we know about what is going to happen?
BHA response: Read the newsletters and the BHA will reach out in any way we can to keep residents informed but taking precautions due to the pandemic.

Q. The building is for elderly and disabled households. Will that change?
BHA response: No, the building will remain designated for elderly and disabled households.

Q. Do the Section 8 Tenant Protection Vouchers(TPVs) that would be received for this project allow me to move anywhere with the voucher?
BHA response: The BHA intends to make vouchers mobile or project-based. The only way that we can pay for the needed renovations at Campello High-Rise is to make the TPVs project-based. These would not be mobile vouchers.