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**DATE:** September 30, 2020

**SUBJECT:** RRHA Responses to Public Comments/Feedback about Annual Plan Submission

Richmond Redevelopment and Housing Authority welcomes and appreciates your feedback to the RRHA 2020-2021 Annual Plan. We are open to all suggestions and feedback that enables us to do a better job of serving our families. Per US Department of Housing and Urban Development (HUD) guidelines, we will take into consideration all suggestions and comments that we receive prior to RRHA’s submission of our final plan.

While not required, RRHA chooses to respond to the concerns raised in the letters and correspondence received regarding our Annual Plan submission. We have taken the time to address every point raised, in order to provide clarity and understanding and provide insight on any and all misconceptions and mischaracterizations of our Agency. RRHA exists to administer safe, clean, and decent affordable housing to the families that reside in RRHA’s communities. RRHA operates within the financial, regulatory, and programmatic constraints established by our governing agency, HUD. It is also worth noting that RRHA is open and receptive to meeting and/or partnering with organizations, agencies and individuals that have viable plans, ideas, and resources to improve the lives of RRHA families.

Please find RRHA’s response to each concern that you have raised below in “blue”. We sincerely hope this will help correct the various inaccuracies and untruths held by some.

**Dear Richmond Redevelopment & Housing Authority Board Members,**

**I am writing to express concerns about RRHA’s 2020-2021 Annual Plan. The plan proposes actions that would lead to widespread displacement of our city’s most vulnerable residents.**

- RRHA’s plan does none of what you allege. Contrary to what one might hear around the city, RRHA’s redevelopment plans will NOT displace RRHA families. A great example of RRHA’s commitment to public housing families is the Tenant Bill of Rights, a binding document between RRHA and the Creighton Court Tenant Council that will be used as an example for other public housing communities and redevelopment efforts. *(Tenant Bill of Rights attached)*



## **It proposes punitive fines and fees that go beyond charges deemed allowable by HUD.**

HUD regulations *permit* all public housing authorities to charge residents rent, late fees, fees for excess utilities, and maintenance charges beyond normal wear and tear. Although HUD does not determine or limit the amount of maintenance charges, RRHA's standard maintenance charges are clearly defined in the List of Standard Charges, which is posted in each management office and attached as Exhibit #4 to RRHA's proposed Admissions & Continued Occupancy Policy ("ACOP"), which is available on RRHA's website. <https://www.rrha.com/wp-content/uploads/2020/08/2020-08-07-ACOP-2020-2021-FINAL-clean.pdf> . We strongly encourage you to compare these standard charges against those of other housing authorities. In addition, RRHA has recently reduced the late fee of our low-income public housing program by nearly 60 percent - from \$15 all the way down to \$5.00. This makes RRHA's late fee one of the lowest among all housing authorities in Virginia.

## **This plan was generated with insufficient public input, and without appropriate advance posting of documents in an accessible manner.**

This statement is completely false. Below is a timeline of the platforms, means and methods that RRHA utilized to reach out to RRHA families, partners, stakeholders and others in the public domain to ensure awareness of the public comment period, and also provide options for participation in the process. RRHA began outreach on August 10, 2020 providing more than the required 45 days for the public to review and offer comments. The public comment period ends September 30, 2020.

### ***RRHA Timeline of Outreach/Engagement***

- **Thursday August 6, 2020** – RRHA met with the Resident Advisory Board (RAB) to provide an in-depth overview of RRHA's Annual Plan submission. As required by HUD, the RAB is made up of representatives from each of the tenant councils and the Housing Choice Voucher Program so that they have the information to communicate to the families they represent.
- **Sunday, August 9, 2020** – Richmond Times-Dispatch. Ran Public Notice announcing the public comment period and two public meeting sessions scheduled for September 23.
- **Tuesday, August 11, 2020** - RRHA posted the Annual Plan, Administrative Plan for RRHA's Housing Choice Voucher program, and the Admissions and Continued Occupancy Policy for low-income public housing on its website for public review. <https://www.rrha.com/about/reports-plans/> (*clickable link*)
- **Tuesday, August 11, 2020** - Media Release "Housing Authority Prepares to Submit Agency Plan to HUD" emailed to RRHA's media list, stakeholders, partners, Board of Commissioners, Richmond Advisory Board, Richmond Tenants Organization, City of Richmond officials, Legal Aid advocates, HUD Officials, Department of Social Services, and others.



- **Tuesday, August 11, 2020** – Emailed Media release “Housing Authority Prepares to Submit Agency Plan to HUD” to all RRHA families with email addresses that live in public housing communities - Creighton, Fairfield, Gilpin, Hillside, Mosby and Whitcomb and senior properties.
- **Week of August 10, 2020** – Distributed and posted flyers in all RRHA property management offices, and building common areas.
- **Tuesday, August 11, 2020** – Media Release – posted on RRHA website and social media platforms (Facebook and Twitter) (*FB 285 People Reached, 28 engagements*)
- **Thursday, August 13, 2020** – Richmond Free Press ran Public Notice announcing the public comment period and meeting scheduled for September 23.
- **Thursday, August 13, 2020** - Mailed Flyers in rental statements to all RRHA families
- **Friday, August 14, 2020** - Posted flyer on RRHA social media platforms. Facebook and Twitter (FB 294 people reached, 24 engagements)
- **Tuesday, August 18, 2020** – Virginia Public Media - Provided responses and documents to reporter Yasmine Jumaa for story to run about RRHA’s Annual Plan process (not sure if story ran. Could not find online and reporter did not send update)
- **Wednesday, September 9, 2020** – Posted Board of Commissioners Meeting on RRHA social media to present RRHA Annual Plan (Facebook and Twitter - *FB 232 People Reached , 10 engagements*)
- **Wednesday, September 16, 2020** – Presentation of Annual Plan to RRHA Board of Commissioners at a public meeting.
- **Friday, September 18, 2020** – Meeting with Legal Aid Advocacy groups to include members of Central Virginia Legal Aid, Legal Aid Justice Center and the Virginia Poverty Law Center (*Attendees included Omari Al-Qadaffi, Marty Wegbreit, Darryl Hayott, Louisa Rich and Victoria Horrock*)
  - Emailed flyer to Legal Aid advocates with instructions on how to access meeting (by phone and online).
- **Monday, September 21, 2020** – Posted on RRHA social media platforms encouraging public to attend meeting (by phone or online) (Facebook and Twitter - *FB 163 people reached on Facebook, 1 engagement*)
- **Tuesday, September 22, 2020** – Sent email to partners and stakeholders for final push to get the word out to public (*List included City of Richmond officials, Legal Aid advocates, Richmond Tenant Association, Richmond Advisory Board, Department of Social Services, Community Wealth Building*) - Retweeted over 30 times on Twitter and shared on Facebook platforms.

**The people of Richmond oppose the mass demolition of public housing, and forcible transfer of residents to a short term voucher system. For over a decade Richmonder’s have explicitly demanded**



**one-for-one, brick-and-mortar, centrally-located replacements for any public housing units that are lost in the process of redevelopment.**

- The Richmonders that live in public housing have a different view. Our Agency knows this because we are in contact with RRHA families on a daily basis. The explicit demands of those for a one-for-one, brick and mortar, centrally located replacements would continue decades of segregation and poverty in Richmond. RRHA cares deeply for our families and we recognize that each has an individual voice and the right to make their own decisions.
- What we hear from those families is not an opposition to demolishing the existing public housing, which is functionally obsolete and socially stigmatizing. In fact, RRHA residents are telling RRHA exactly the opposite. In a recent survey conducted by RRHA’s Resident Services team, Creighton Court families overwhelmingly want vouchers to leave public housing. A similar survey of RRHA families in 2016 produced the same results. We, at RRHA know that our families can flourish in a mixed use, mixed income community. We welcome responsive and responsible strategies, resources, and partnerships to fulfill demands to build as many brick and mortar units as the marketplace can bear.

**The people of Richmond oppose implementation of fines or fees beyond those authorized by HUD, which are limited to late fees, utilities payments, and maintenance fees.**

- RRHA does NOT charge any fees or costs outside of the permissible categories (specifically rent, late fees, fees for excess utilities, and maintenance charges beyond normal wear and tear) and RRHA provides each resident with a monthly statement showing the charges that RRHA assessed. Additionally, any RRHA resident who believes that a charge is inappropriate may make use of RRHA’s grievance procedure to dispute it.

**We also oppose the transition of the admissions waitlist to an all-virtual process and demand equitable access to communications with the housing authority for all residents, regardless of their access to technology or wireless internet.**

- Actually, RRHA has been accepting virtual waitlist applications, via the [APPLICANT PORTAL](#), since April 2015 with the opening of the Housing Choice Voucher Program waitlist. This alleged “transition” is, in fact, not changing the waitlist application process. However, RRHA is undertaking efforts to offer additional access and conveniences for our residents, participants, and applicants that work within their schedule and provide a mechanism for them to monitor where they are in the process. RRHA is also providing assistance with these processes through additional resources including, but not limited to, RRHA’s call center and kiosks, among others.

**We demand the housing authority engage in good-faith inclusion of all residents in the planning process.**

- Please refer to the timeline of community engagement listed above. RRHA will continue to make resident engagement a priority. We are currently planning ongoing and upcoming events to engage our families, keep them informed of RRHA programs and processes that impact them, and receive



*their* feedback, ideas and suggestions.

**The housing authority must honor residents' federally-protected right to self-governance.**

- RRHA fully supports its resident's right to self-governance. That is why RRHA actively supports the elected Resident Council in each of our communities and the jurisdiction-wide Richmond Tenant's Organization, which is made up of representatives from each Council. Consistent with HUD regulation, this jurisdiction-wide council, along with representatives from RRHA's Housing Choice Voucher Program, came together to form the Resident Advisory Board (the "RAB"). Rather than just giving the RAB a copy of the Annual Plan, RRHA actually consulted with the RAB as we developed the Annual Plan; we engaged all the RAB members and we received and incorporated their input into the draft plan. Additionally, as required by HUD and explained in detail above, RRHA made all the relevant documents available for review and conducted two virtual public meetings for anyone to attend, via telephone or computer, and offer comments about RRHA's Annual Plan. RRHA has also accepted written comments starting on August 10, 2020 and will continue accepting written public comments through September 30, 2020. All comments can be emailed to [info@rrha.com](mailto:info@rrha.com) or mailed to RRHA's main office at: ATTN: Office of the Interim CEO, 901 Chamberlayne Parkway, Richmond, VA 23220
- RRHA takes strong issue with the sentiment that we are haphazard in putting out our Annual Plan into the public domain. There are countless hours and a great deal that is involved. RRHA provides a detailed presentation for open discussion and dialogue with the residents and then again with the greater community. This presentation highlights changes to the plans. This action is NOT mandated or expected by HUD, nor is it a common practice by all Public Housing Authorities. This is a step that RRHA takes as a caring and communicative partner in the community and service provider to our families.

**In support of this, we demand the housing authority make documents available to the public in a timely and transparent manner.**

- RRHA is committed to regular and transparent communications. Regarding the Annual Plan, please see the timeline of engagement and public outreach above.

**We ask you to break with the Housing Authority's past practices of exclusion of tenants from the governance process and of the broader public from input on redevelopment plans.**

- RRHA exists to serve our families. RRHA has not and does not exclude them from the governance process. In fact, RRHA provides every available opportunity and avenue at our disposal to engage and entreat them concerning redevelopment as well as a myriad of other issues that we handle on a daily basis. RRHA remains committed, as we have been, to engaging our families and the broader community consistent with HUD regulations and RRHA's policies.

