

Proposed FY2019 MTW Annual Plan

Public Comment Period: July 26 - August 24, 2018

Public Comment Hearings: Aug 3, 11:00a, CHA Headquarters, 60 E Van Buren; Aug 9, 2:00p, Jane Addams Center, 1254 S Loomis; Aug 16, 6:00p FIC; 4859 S Wabash

#	Individual/ Organization	Comment	CHA Response/Transcript
1	JULIE ELENA BROWN Senior Staff Counsel Director, Public Housing BPI	CHA is proposing (p. 47) a new lease to own program that is generally described in the Plan. The description is not clear as to whether CHA is planning to sell existing public housing units or which units CHA is intending to make available for the program. Please provide more information on this topic. If CHA plans to use units currently in its portfolio, will CHA replace any units that are lost to the portfolio through sales to successful participants?	CHA currently owns 19 townhomes located near Jackson and Western that would be the only units that would qualify under the proposed lease-to-own program should we receive approval. There will be specific criteria around income, credit and other eligibility to take part in the program.
2	JULIE ELENA BROWN Senior Staff Counsel Director, Public Housing BPI	In its proposed dispositions CHA lists a number of planned sales or long term leases on land that is within the purview of existing CHA Working Groups. In some cases, these proposed dispositions have not been discussed in those Working Groups. For example, proposed dispositions of land adjacent to Park Boulevard and LeClaire Courts have not been discussed in those respective Working Groups prior to publication of the draft Plan. CHA's handling of such matters is inconsistent across its Working Groups, with full information being provided and discussed in some groups, and little to none in others. In fact, some of CHA's established groups do not even meet on a regular basis. BPI is concerned that important land use issues are being proposed in this draft Plan that have not been presented in established Working Groups. Please provide more information about CHA's intentions regarding the Park Boulevard land swap and the land sales in the LeClaire Courts neighborhood.	Working Groups meet when planning is underway to inform the planning process. Work at some sites is more active than at others. Park Boulevard: CHA is working with the City of Chicago with any eye toward swapping equal property along State Street if that will stimulate commercial development that complements residential housing. There will not be a net loss of land available for housing. LeClaire land: CHA issued a request for proposals for the LeClaire site that calls for a variety of uses while returning residential units to the property.
3	JULIE ELENA BROWN Senior Staff Counsel Director, Public Housing BPI	CHA is seeking HUD approval to count Choose to Own units toward its 25,000 unit commitment to HUD. Because these units are not in the CHA portfolio – they are private units being purchased by CTO participants – and they will not be in the portfolio after purchase, BPI does not believe they should be counted toward CHA's 25,000 unit commitment.	Thank you for your comment.
4	JULIE ELENA BROWN Senior Staff Counsel Director, Public Housing BPI	On p. 11 CHA lists 17 units in the Lawrence & Broadway Apartments as planned PRA units. The CHA board has approved 17 units at 1825 W. Lawrence. Which is the correct site, or sites, for these units?	This is the same project. CHA has revised the annual plan to reference "1825 W. Lawrence." PRA is planned for 17 units at 1825 W. Lawrence Avenue, which represents 10% of the total units in the building.

5	JULIE ELENA BROWN Senior Staff Counsel Director, Public Housing BPI	CHA proposes to sell or lease land on the 3000 and 3100 blocks of West Washington, in the East Garfield Park neighborhood, for “development of residential, mixed-use, commercial or other land uses.” What is CHA’s intention with respect to these parcels? This land is in a Limited Area under the Gautreaux court orders and its use for public housing may be prohibited under those orders.	CHA specifically used a broad description to encompass a variety of development options. CHA understands the Gautreaux limitations and was not planning to develop public housing.
6	JULIE ELENA BROWN Senior Staff Counsel Director, Public Housing BPI	BPI supports CHA’s stated intention to use the results of fair housing testing to shape its fair housing goals and to address, in part, its duty to affirmatively further fair housing, including with respect to source of income discrimination. Racial and economic discrimination continue to be serious barriers to mobility for HCV participants.	Thank you for your comment.
7	KIMBERLY BAGGET	My mom, she lives in public housing. But how do you get the lease-to-own, and then say like if you're a nonresident, will you be able to apply to lease-to-own in the public housing.	CHA currently owns 19 townhomes located near Jackson and Western that would be the only units that would qualify under the proposed lease-to-own program should we receive approval. There will be specific criteria around income, credit and other eligibility to take part in the program. As CHA has indicated in the plan, the priority would be for anyone living in public housing or our HCV population, or anyone on our wait lists. And finally, then we will open it up to eligible persons from the community. It would be a five-year program that would lease with the rent payments, a portion of those getting escrowed to serve as the down payment for the townhome
8	KIMBERLY BAGGET	Okay. So right now is it like -- can people go apply at the Jackson and Western to be on the wait list?	At this time, CHA is seeking approval from HUD for this activity. If CHA receives permission from HUD, we will inform people how to apply.
9	KIMBERLY BAGGET	Okay. I got one more question. Because I was reading -- I was just skimming through it, actually. Is it possible that you guys can explain more into the EPS, the exception payment standards.	Katie Ludwig: In the Housing Choice Voucher program, the limit that we place on how much rent we can pay in a given month is called a payment standard. Through our MTW authority, CHA offers exception payment standards, which means we can pay a slightly higher rent under certain circumstances. We have two different kinds of exception payment standards. One is for mobility areas (areas with lower poverty and lower crime rates). We can go up to 150 percent of the HUD fair market rent as a payment standard. And, we can go up to 250 percent of the HUD fair market rent

in cases of a reasonable accommodation. So if for instance a person is in a wheelchair, something like that, and they need a unit that has wider doorways, and we could pay a slightly higher rent, up to 250 percent of the fair market rent, for that unit. What we're requesting in this from HUD is to make that reasonable accommodation exception payment standard, the circumstances under which we can offer that, a little bit broader. And not just for the accessibility features of the unit, but also for the location of the unit. So for instance, we get requests a lot of the time that folks would like to live in a certain unit because it's close to their doctor's office, or it's close to where they go for therapy, or their kids are enrolled in a certain school because their kids have a -- oh, my gosh, why can't I think of the acronym for -- IEP. Thank you. Their kids have an IEP, and this -- this school that their kids go to supports all their social, emotional learning needs and whatnot. And they need to be attending that school; and they would like to live close to that school. We can approve -- you know, if we have documentation from the doctor or medical professional that supports that, we can approve a reasonable accommodation. And if this gets approved, we'd be able to use that higher rent level, if it's needed. It's not -- I should say in all of these cases this is only if it's needed. It doesn't mean that automatically the landlord gets that higher rent. But it means that if the market in that area supports that higher rent, then we would offer that. I should have said that off the bat. None of this is automatic. It's not that landlords go, oh, now I can get this higher rent. It is -- if that's what the going rate is in that area, then we could pay up to that higher amount. Does that help?

10	BARBARA BURNS	<p>As a someone who grew up at Lathrop Homes in the 50's and 60's, I have actively advocated for the current residents and public housing units at Lathrop during this redevelopment. While disappointed that only 400 of the 925 Lathrop units will remain on site in the redevelopment, I am pleased that many stakeholders were able to influence the CHA to replace those lost units off site on the North side of Chicago. To reinforce this replacement promise, Business and Professional People for the Public Interest (BPI) and the CHA entered into an agreement in the Gautreaux case in federal court to replace the 525 family units. CHA was also permitted to develop 105 senior units as part of this agreement. To be honest, I don't understand why the senior units are included in this agreement except to use Lathrop money for these senior units. I hope we do not see toward the end of the replacement process the complaint from CHA that there is no money left for the remaining family units.</p>	<p>Thank you for your comment. CHA is committed to providing housing for families as well as seniors.</p>
11	BARBARA BURNS	<p>To date, CHA has classified 134 senior units as "proposed transfer from Lathrop Homes" according to the proposed 2019 MTW Annual Plan, page 107. They are Ravenswood Senior Living, 4501 N. Winchester - 74 units, Independence Apartments, 4022 N. Elston - 30 units; and, Northtown Apartments, 6800 N. Western - 30 units. This is 29 units over the 105 agreed upon in the Gautreaux court.</p>	<p>CHA has long wait lists for senior housing across the city which demonstrates the need for such housing. Not all of the senior units will be counted as Lathrop RAD transfer of assistance units.</p>
12	BARBARA BURNS	<p>The proposed 2019 MTW Annual Plan has very little information on the number of bedrooms in the family units. Whereas Lathrop always had a significant number of 3 and 4-bedroom units, the information I can find shows a predominance of 1 and 2-bedroom replacement units. For example, on page 107 Concord at Sheridan, 6438 N. Sheridan has 65 family units consisting of 47 1-bedroom units, 18 2-bedroom units, and no 3 or 4-bedroom units. Another example on page 107, John Pennycuff, 2031-37 N. Milwaukee has 47 family units consisting of 35 1-bedroom units, 12 2-bedroom units, and no 3 or 4-bedroom units. Neither of these developments have 3 or 4-bedroom units.</p>	<p>The units that will return to the Lathrop site include a number of three- and four-bedroom units that may surpass the number of three- and four-bedroom units that were historically on the site.</p>
13	BARBARA BURNS	<p>The lack of 3 and 4-bedroom family units is a problem for many low-income families in the city of Chicago. I also thought that the replacement units as well as the units on site were required to reflect the number of bedrooms that existed at Lathrop as of 10/1/1999 based on an Act of Congress authorizing the Moving to Work (MTW) program. CHA does not appear to be taking</p>	<p>See the response above.</p>

		this requirement into consideration with regard to the Lathrop replacement units	
14	BARBARA BURNS	As to the Lathrop on site CHA units, the various reports that have information regarding the number of public housing units in Phase 1A do not all agree with each other. For example, while both this proposed 2019 MTW Annual Plan, p 25 and the document from the Lathrop Community Partners' Working Group agree on 151 CHA units on site, the City of Chicago Department of Planning and Development, Third Quarter 2017 Project Summary Appendices 18 and 19, show something else. Appendix 18 of the third quarter 2017 report has a unit breakdown of 161 CHA replacement units (which appears to include 18 units at 80%AMI - 3 of which are 0-bedrooms) while the very next page Appendix 19 has 143 CHA units and the 18 units at 80%AMI are not listed as CHA units. Perhaps these 18 units are Affordable Requirement Ordinance (ARO) units.	Thank you for pointing out the discrepancy between the City's Third Quarter report and CHA's plan. The actual number of units under construction for CHA families on-site is 151.
15	BARBARA BURNS	In conclusion, it is my hope that the CHA and the City of Chicago will be conscientious in moving forward with Lathrop replacement units on the North side 1) by not counting 0-bedroom units as family units; 2) by not counting units that are at 80%AMI or ARO as CHA units; 3) by looking beyond the wait list to determine the need for additional 3 and 4-bedroom units by low-income families citywide searching for a roof over their heads at a rent they can afford; 4) by actively seeking out, beyond sending out letters to their last known addresses, the former residents who have the right of return or who are eligible to reinstate their right of return; and, 5) by actually replacing all 525 Lathrop family units as required by court order in a timely and efficient manner.	Thank you for these suggestions.

16	CLAUDICE WARE	I heard you say that there's nothing in the works for demolition at this point, for 2019. Well, my question is 420 and 430 West North Avenue, those residents are being told they have to leave because of that reason.	JENNIFER HOYLE: Right. Just to be clear, there are demolitions that were submitted as part of previous plans that may be carried out in 2019, but the 2019 plan doesn't list any new demolitions that we're asking for approval for. So there may have been demolition that got approved in 2017 that we're now just getting around to demolishing, but there's nothing that is new for 2019 that we would be demolishing in the future as of yet.
17	FRANCINE WASHINGTON	Yes. I know we asked before, and you're talking about the hardship. We were talking about the FamilyWorks program. I never did see any black and white for mandatory folks to participate.	MARY HOWARD: So that -- this is in the plan. We are waiting for the property office to roll out that with the property management.
18	CLAUDICE WARE	Make it mandatory --	MARY HOWARD: So it is in the plan, it's in the new -- or version of the ACOP. That safe harbor was extended -- right? So last year's plan, safe harbor was extended from 90 days to 180 days, and that services were mandatory for anyone in safe harbor or not compliant; but that hasn't been implemented yet.
19	FRANCINE WASHINGTON	They need to be completed.	MARY HOWARD: I agree.
20	CLAUDICE WARE	I'm hearing you say safe harbor. Our residents -- and again, my name is Claudice Ware. I'm hearing you say safe harbor, but residents, if we want to become self-sufficient, remain lease compliant, whatever, we have to make the program across the board their way. Not just for State Parkway.	MARY HOWARD: Okay. So noted. And let's talk about that. Because that part is not in the plan. Okay? Let's talk about that and --
21	FRANCINE WASHINGTON	I want to talk about the disposition of land swap. I don't care about nobody else, I'm talking about -- Park Boulevard, because I have a right to return, and I'm mortified. We worked, we sweated, and got cursed out, spit on, and stepped on to redevelop the State Parkway. Now the -- it was about bringing a big box. We live in a community. We got all the names across the street, of 39 -- they can build on. We got the -- by the CHA with 3919 South Federal. That's CHA land. That's for CHA high rise. With the Robert Taylor buildings.	Thank you for your comment. CHA is committed to bringing housing back to the site as well as complementary retail development.

22	FRANCINE WASHINGTON	<p>They can build over there. Big box, 33 and -- we live in the community. We're -- all the mixed-income properties, we're close to the community than anyone. We all get along. We laugh and cry together. We fellowship and break bread together. Homeowners, and residents. And market. We bring all the-the community. Not supposed to-- they can--they knock you over the head. They talking trash all of this community. And all the big boxes bring all kind of rules to this community. We don't ask for one, and we don't want one.</p>	<p>Thank you for your comment. CHA is committed to bringing housing back to the site as well as complementary retail development.</p>
23	FRANCINE WASHINGTON	<p>All through -- no one else say, or CHA staff -- we try to redevelop the land. Yet still bring big boxes. CHA complain and -- to get the tax credit and Tax Increment Financing? Why can't you get the developer to just build one building, one project? We don't like it. It ain't happening. And we're bringing petitions. I have several, but I was write -- and I did stop to pick up -- I'm going to come to each page. But we -- not what you all talk about, we can't -- talking about when going to press. We can't talk about this stuff that's wrong. And I don't like it. It needs to really change. You come here and comment on that. They change. It's been over a year and a half I been talking about it. Especially that big box. No way.</p>	<p>Thank you for your comment. CHA is committed to bringing housing back to the site as well as complementary retail development.</p>
24	TAMIKO HOLT	<p>Hi, I'm trying to understand the -- so I have a question about the asset elimination, so -- asset elimination proposal. So I see it says 50,000 or less is totally eliminated. So I thought it was 100k. So what -- what changed? What's the new language? I don't understand. Because if it was already 100k - - so are you asking for it to be 50k?</p>	<p>STEVE FIELD: What we -- the previous activity just eliminated all assets after par-- a participant came onto the program. And this program, this amendment essentially modifying the activity, will eliminate anything under 50,000. Before we couldn't -- we did take those into account. So it was never 100,000, it was never part of the policy.</p>
25	TAMIKO HOLT	<p>I recall some paperwork that said \$100k. But I will look back on it and double-check.</p> <p>So you don't know when that will be?</p> <p>But you will put out a notice concerning that.</p>	<p>STEVE FIELD: I believe you might be referring to some of the language in the past, because it was not issued as specific guidance. It was something along the lines of that. But that -- we're waiting for HUD to take a look at that.</p> <p>That's correct.</p> <p>Yes.</p>

26	TAMIKO HOLT	<p>So concerning the payment standards versus -- so the CHA saying that they're going to not just take the -- take into account to areas that is only identified as mobility areas, so they're going to go on a block-by-block basis on, I guess, the family needs?</p> <p>So like say if my grandmother is near her medical, you know, the medical institution that she goes to frequently -- because I see the language says that it's taking account other things besides mobility areas. So is that what the language is saying?</p>	<p>STEVE FIELD: So the additional language essentially is -- let me take a step back. Beforehand we can go up to 200 percent -- 250 percent mark for the standard, if there's a need for specific accessibility feature in the unit. What the modification does is gives us a little bit more flexibility to also take into account location of the unit.</p> <p>So for example, if that participant needed to be in a certain location, near the doctor's office, and the market required to go up to 200 for -- 50 percent of the fair market rent, this modification will allow us to do that.</p>
27	TAMIKO HOLT	<p>Okay. That's good, then. So let me put on the record, it's nice to see that -- things that we previously advocated for being implemented. The-the exceptional -- what do you call it -- the hardship for fathers -- maybe fathers and mothers that may be paying child support that pretty much takes away from -- the child support are so high that it takes away from them being able to pay rent or just pay utilities. So I see you guys made changes to accommodate that. So that's good. I commend CHA. So what I want to know, is there a time frame for that, or as long as the child support payments are inactive? How does that go?</p>	<p>STEVE FIELD: As long as the household member is providing the documentation that they're paying child support, that is indefinite.</p>
28	TAMIKO HOLT	<p>That's good. Okay. That's great. So that was about it. Oh, the exceptions. 90 days prior to -- so CHA does not have to inspect the unit 90 days prior to another inspection that has already taken place. From my understanding, this is from the rent control - - so you moved out. The section that says CHA is authorized to approve tenancy for a unit that pass inspections within the previous 90 calendar days without conducting a new inspection for each request. Or each RTA --</p>	<p>STEVE FIELD: Yeah. Just for the record, this is an existing activity that, however, we have not implemented it. So the proposal -- or I'm sorry, what the activity does in cases where participants submits an RTA, they do the inspection, for whatever reason -- or they don't move into the unit. And then another participant within 90 days of the inspection submits an RTA for the exact same unit, would allow us to use that previous inspection. But again, just want to make clear that we have -- that is not implemented as of this moment.</p>
29	TAMIKO HOLT	<p>Okay. That's a gray area. I think that would come in -- that keeps it offline. This is what I'm saying, one respect -- so two of you guys come for the uniform inspection policy where there is no room for -- what do you call it, for -- for inspectors to pretty much use their own judgment and -- and -- so it's a lot of language to your inspection policies that calls -- causes for them to use their own judgment. Until you move away from that, then I can see this</p>	<p>STEVE FIELD: Yeah. I mean, unfortunately, try and eliminate as much subjectivity to that. And the -- but unfortunately, just the nature of the inspection, some want -- one inspector interprets something one way, and another can -- will interpret the other way. We try and get -- eliminate the inconsistencies as much as possible. But again,</p>

		happening. Because what one inspector – I seen when one inspector passes, and the other one won't.	there's no way to completely eliminate. So we understand that that is something that we need to work on and that is – happens with our inspections.
30	FRANCINE WASHINGTON	We done the rent conversion or vouchers out on the street. RAD has been in existence for almost three years now, and it – rents totaled after the first year that you're not for Section 8 vouchers but traditional housing. We are several – in the whole city – RAD one or two years ago is now asking for a Section 8 voucher to move out, and they're not getting the opportunity. I mean, they call, and walking in – talking about RAD for vouchers. What if we got – the RAD, and now wants to move? What is being done?	After living in a RAD unit for one year, tenants have the opportunity to request to be placed on a transfer list to receive a tenant-based Housing Choice Voucher (HCV). Households on this list receive a tenant-based HCV before households on the general tenant-based HCV wait list. CHA is not currently pulling from either wait list–RAD transfer or HCV–as additional tenant-based vouchers are not available at this time. CHA will issue vouchers in the appropriate order when they become available.
31	HAROLD LUCAS	I'm a native Chicagoan. Born in public housing project, and have been working on - my name is Harold Lucas. I'm president/CEO of Black Metropolis Convention and Tourism Council. We are destination marketing organization, not for profit, for the historic Bronzeville community. We seek to empower public housing and low income residents to be able to stay in Bronzeville as emerging internationally significant African-American heritage tourism destination, and to be empowered by entrepreneurial enterprise and wealth creation of visitors, hopefully under the banner of Section 2, which we know about over the years, but it has not been implemented.	Thank you for this information.
32	HAROLD LUCAS	I would like to draw your attention – I have given everybody a copy of this document, the centerfold of the document is a – a statement about the potential of the South Side of Chicago, State of Illinois, based on our relationship with two presidents: Abraham Lincoln and Mr. Obama; to really turn this unit of the city into a major tourism trail. What I'm proposing is development projects for the west side of State Street between 18th Street and 67th Street, and from 43rd Street on the lakefront to Stewart Avenue. And both of those boundaries are boundaries that are in the actual Black Metropolis Heritage Area designation. So we are – we have a municipal boundary, we have people who have been displaced from public housing, we have had buildings built on public housing properties that had the owners of those ventures, specifically mayor – have cashed out on their post. Some people got some jobs; but we're not talking	Thank you for your comment and the handouts that you submitted.

		<p>about equity ownership for low income people and breaking the cycle of poverty, which is what the Plan for Transformation should be also about. So we're inquiring that we're ready, willing, and able to provide that technical assistance to deserving low income people who want to create the economic empowerment to move away from profits, welfare, social service programs.</p>	
33	<p>LEAH LEVINGER leah@chicagohousinginitiative.org;</p> <p>SARAH DELGADO sdelgado@cafha.net</p>	<p>I'm writing on behalf of the Chicago Housing Initiative to express concerns about the CHA's plans to significantly reduce the number of family-sized and family-designated public housing units in the Lathrop Homes redevelopment, looking at both on-site and off-site replacement housing options provided in the redevelopment.</p> <p>I'm writing on behalf of the Chicago Area Fair Housing Alliance to express concerns about the CHA's plans to significantly reduce the number of family-sized and family-designated public housing units in the Lathrop Homes redevelopment, looking at both on-site and off-site replacement housing options provided in the redevelopment.</p>	<p>Thank you for your comment. Please note that the units that will return to the Lathrop site include a number of three- and four-bedroom units that may surpass the number of three- and four-bedroom units that were historically on-site.</p>
34	<p>LEAH LEVINGER leah@chicagohousinginitiative.org;</p> <p>SARAH DELGADO sdelgado@cafha.net</p>	<p>CHA's significant reduction of family-sized housing conflicts with the CHA's statutory obligation under the Moving to Work Demonstration Program to "maintain a comparable mix of families (by family size) as would have been provided" and "continue to assist substantially the same total number of eligible low-income families as would have been served"[1] as if the CHA had not been deregulated under the MTW demonstration program.</p>	<p>Thank you for your comment.</p>
35	<p>LEAH LEVINGER leah@chicagohousinginitiative.org;</p> <p>SARAH DELGADO sdelgado@cafha.net</p>	<p>Lathrop Homes has been a public housing development that, since its origin, has offered a significant number of larger family-sized apartments, including meaningful numbers of 3-bedroom and 4-bedroom apartments. Unfortunately, from information available in the draft 2019 MTW Plan and other city documents and reports, it appears that the CHA will be replacing these large family-sized units off-site with what are mostly 1-bedroom apartments: In total, at least 127 of the 157 apartments that can be accounted for by bedroom sizes are reported to be one-bedroom units. That is 81% of the replacement units we can account for being one-bedrooms compared with the original Lathrop Homes development, which was 46% 3-bedroom and 42% 4-bedroom apartments.</p>	<p>Please provide the source of your information regarding the historic bedroom mix at Lathrop Homes so that it can be corrected. Our records show Lathrop Homes was 49% 1-BRs; 44% 2-BRs; 7% 3-BRs with no 4 BRs.</p>

36	<p>LEAH LEVINGER leah@chicagohousinginitiative.org;</p> <p>SARAH DELGADO sdelgado@cafha.net</p>	<p>We are also concerned that the replacement housing units we can account for seem to include 135 soon-to-be-designated senior housing units when the Consent Decree only allows for the designation of up to 105 units as senior housing.</p>	<p>CHA is committed to providing housing for seniors as well as families. CHA has long wait lists for senior housing across the city which demonstrates a need for such housing.</p>
37	<p>LEAH LEVINGER leah@chicagohousinginitiative.org;</p> <p>SARAH DELGADO sdelgado@cafha.net</p>	<p>All told, this loss of family-sized housing will have a disparate impact, obviously, on protected classes the CHA has a special duty to house, including larger Latino and black families, and larger families in general.</p>	<p>Thank you for your comment. Please note that the units that will return to the Lathrop site include a number of three- and four-bedroom units that may surpass the number of three- and four-bedroom units that were historically on-site.</p>
38	<p>LEAH LEVINGER leah@chicagohousinginitiative.org;</p> <p>SARAH DELGADO sdelgado@cafha.net</p>	<p>Larger families are most likely to experience severe rent burden and the CHA is profoundly under-serving families across its physical public housing stock. According to ACS data, there are at least 97,291 families with children with incomes below \$35,000. Given Chicago's intensifying rental market, it is likely that an overwhelming majority of these 97,000 families are rent-burdened. Housing instability has devastating effects on children's educational outcomes as well as mental and emotional well-being.</p>	<p>See the response above.</p>
39	<p>LEAH LEVINGER leah@chicagohousinginitiative.org;</p> <p>SARAH DELGADO sdelgado@cafha.net</p>	<p>We urge the CHA and HUD to ensure that CHA takes action to meet the CHA's obligation to "maintain a comparable mix of families" by bedroom size as it served pre-deregulation and prior to the Plan for Transformation.</p>	<p>Thank you for your comment.</p>
40	<p>LEAH LEVINGER leah@chicagohousinginitiative.org;</p> <p>SARAH DELGADO sdelgado@cafha.net</p>	<p>The connection between the lack of affordable family sized, family-designated housing, displacement and rampant school closings in developing areas where low-income and working families are being pushed out is deeply troubling. The CHA can be part of the solution by producing affordable, large family-sized, family-designated housing in the Lathrop Homes redevelopment and across its portfolio.</p> <p>It's time for a paradigm shift back to the production of family-sized units on the CHA's part.</p>	<p>CHA continues to work with development partners, aldermen and community stakeholders to identify housing opportunities for the replacement units across the North Side of the city as we collaborate on meeting the goal for this commitment.</p>