

Mr. Mayor,

First, let me acknowledge and congratulate the progress your GHA Board has made in adhering to the requirements in CFR 941.202, HUD's Site & Neighborhood Standards,

http://edocket.access.gpo.gov/cfr_2009/aprqtr/pdf/24cfr941.202.pdf! This regulation says that "c), public housing units constructed after demolition of public housing units may be built on the original public housing site, **or in the same neighborhood**, if" ... "The number of public housing units being constructed is **no more than 50 percent of the number of units in the original project**" ...

GHA's October 2009 rebuilding plan violated this regulation by proposing the building 77% of the previous number at Oleander Homes, 74% of the previous number at Cedar Terrace, and 75% of the previous number at Magnolia Homes.

GHA's rebuilding plan as published 04 October 2010 in the GCDN violated this regulation by proposing the building 61% of the previous number at Oleander Homes, 53% of the previous number at Cedar Terrace, and 90% of the previous number at Magnolia Homes.

GHA's rebuilding plan as voted on 25 October 2010 conformed to this regulation by proposing the building 49% of the previous number at Oleander Homes, 49% of the previous number at Cedar Terrace, but **still violated this regulation by proposing the building 90% of the previous number at Magnolia Homes.**

http://www.ghatx.org/news_overview.aspx?ArticleID=133

We can see the progress at the Oleander and Cedar Terrace sites, but why does Magnolia continue to violate this regulation?

In addition, CFR 941.202 says that the 50% rebuilding limit applies to “the original public housing site, **or in the same neighborhood**”. Neighborhoods are normally defined as Census Tracts. This would mean that the 50% rebuilding limit would also apply to all of Census Tract 7240 (location of Oleander Homes), Census Tract 7246 (location of Cedar Terrace) and Census Tract 7243 (location of Magnolia Homes).

Questions for Harrish at the joint meeting:

Why does the Magnolia rebuilding plan still violate the 50% limit?

Do the scatter site building plans conform to CFR 941.202 by locating them in census tracts other than 7240, 7246 and 7243?