

Aloha Members of the NYCHA Board, NYCHA Leadership, HUD Representatives, Elected Officials, Community Partners, and Stakeholders,

Please accept this email, the attached report, and the attached testimony as Save Section 9's official public comments on NYCHA's FY 2027 Draft Annual Plan.

My name is Guatuke Ini Inaru (colonial name: Ramona Ferreyra), and I am the Founder of [Save Section 9](#), a tenant-led volunteer organization dedicated to rehabilitating and expanding public housing through education, organizing, and policy advocacy.

Attached is **Beyond Compliance: A Resident Oversight Report on NYCHA's FY 2027 Draft Public Housing Agency Annual Plan (Save Section 9 Policy Report No. 1)** for inclusion in the official public record of NYCHA's FY 2027 Annual Plan.

This report represents the most comprehensive resident review of a NYCHA Annual Plan that Save Section 9 has undertaken. We reviewed every section and attachment of the Draft Annual Plan using a standardized oversight framework focused on transparency, accountability, meaningful resident participation, evidence-based decision-making, and the preservation of Section 9 public housing.

This report reflects hundreds of hours of resident-led research, analysis, and policy development and is submitted in the spirit of strengthening—not merely criticizing—the governance of the nation's largest public housing authority.

This report is being shared with HUD, elected officials, community organizations, and coalition partners because the issues it raises extend beyond NYCHA's FY 2027 Draft Annual Plan and concern broader questions of public housing governance, resident participation, preservation policy, and federal oversight.

PRINCIPAL FINDING

Our principal finding is straightforward:

The FY 2027 Draft Annual Plan demonstrates compliance with many HUD reporting requirements, but it does not consistently demonstrate accountability or articulate a clear vision for the future of public housing in New York City.

Throughout the Plan, NYCHA explains what it intends to do, but often does not explain:

- why major policy decisions were made;
- what alternatives were evaluated;
- how resident recommendations influenced final decisions; or

- how success will ultimately be measured.

The Plan also advances privatization-based strategies without demonstrating that publicly accountable alternatives—including **Comprehensive Modernization of Section 9 public housing** and other preservation-first financing proposals—were meaningfully evaluated before irreversible decisions were advanced.

While this report examines NYCHA's Annual Plan as a citywide governance document, I also submit these comments as a resident of Mitchel Houses, a development slated for conversion through the Permanent Affordability Commitment Together (PACT) program. The recommendations contained in this report are not abstract policy proposals to me—they concern my home, my neighbors, and the future of my community. **I do not support the proposed conversion of Mitchel Houses to PACT.** Before any irreversible transfer of public housing to private management proceeds, NYCHA should demonstrate, through transparent and independent evidence, that publicly accountable alternatives—including Comprehensive Modernization of Section 9 public housing—have been meaningfully evaluated and found inadequate. That showing has not been made in the FY 2027 Draft Annual Plan.

PUBLIC PARTICIPATION

Unfortunately, the public hearing held on July 29, 2026, reinforced one of the central findings contained throughout our report.

The FY 2027 Draft Annual Plan affects more than 298,000 NYCHA residents, yet the public hearing concluded before the majority of registered speakers were afforded the opportunity to testify.

HEARING ADMINISTRATION

According to the hearing record:

- More than **60 residents registered to testify in person**, yet only **26 residents were called to speak** before the hearing concluded.
- As a result, the **majority of registered speakers were denied the opportunity to testify** despite complying with NYCHA's registration process.
- Although the hearing began after its scheduled start time (approximately **5:36 p.m.**), the final speaker began testifying at approximately **7:56 p.m.**, and the hearing concluded at **8:00 p.m.**
- The publicly available recording appears to show Chair Jamie Rubin departing before the hearing concluded (approximately **2:10** into the recording).

ACCESSIBILITY AND TECHNOLOGY CONCERNS

Residents also reported several barriers that limited meaningful participation:

- The webinar restricted written communication, making it difficult for participants to communicate or request assistance.
- Residents experienced difficulties joining through Zoom and, in some cases, were only able to participate by telephone.
- Telephone participants reported being unable to adequately hear the proceedings.
- Residents with hearing impairments reported difficulties following the hearing while using headphones or hearing devices.

These events raise important questions regarding the integrity of NYCHA's public participation process.

If residents comply with the established procedures for registration but are nevertheless denied the opportunity to testify because an arbitrary end time has been reached, meaningful public participation is undermined.

As stated throughout our report:

Public participation is meaningful only when residents can see how their ideas were considered—not merely that they were invited to speak.

SAVE SECTION 9'S RECOMMENDATIONS

Accordingly, Save Section 9 respectfully requests that:

1. **HUD reject the FY 2027 Draft Annual Plan until it has been substantially revised.**
2. **HUD institute a nationwide moratorium on new RAD conversions, PACT transactions, and Section 18 demolitions pending completion of an independent Government Accountability Office (GAO) evaluation.**
3. **NYCHA adopt Comprehensive Modernization as its preservation-first strategy for Section 9 public housing.**
4. **NYCHA strengthen democratic participation by ensuring every resident who registers to testify is provided an opportunity to be heard.**
5. **NYCHA voluntarily publish the complete public comment matrix and its responses before submitting the Final Annual Plan to HUD, clearly identifying how resident comments influenced revisions to the Final Plan.**

6. **This report be entered into the official public record and carefully considered before the FY 2027 Annual Plan is finalized.**
7. **The City undertake a comprehensive review of NYCHA's executive leadership and governance structure and appoint leadership committed to preservation, transparency, accountability, and meaningful resident participation.**

REQUEST FOR CLARIFICATION

We respectfully request clarification regarding NYCHA's Annual Plan hearing procedures:

- Is there a written policy requiring NYCHA Board members to remain present for the duration of the Annual Plan public hearing?
- If not, what are the expectations regarding Board attendance during resident testimony?
- Is there a written policy establishing an 8:00 p.m. conclusion to the Annual Plan hearing regardless of how many registered speakers remain?
- If such policies exist, please provide copies or identify where they are publicly available.

Additional Request for Clarification Regarding Resident Advisory Board Documentation

The FY 2027 Draft Annual Plan states that NYCHA met with the Resident Advisory Board (RAB) during six meetings between March and June 2026. Attachment N includes meeting agendas, each of which lists "Roll Call" as the first agenda item.

However, the Draft Annual Plan does not include the corresponding attendance records, meeting minutes, recommendations, or voting records.

Additionally, on page 218 of the Draft Annual Plan, under "**Resident Advisory Board Recommendations**," the required question asking whether the RAB submitted comments contains unchecked "**Yes**" and "**No**" boxes, and the sections identifying the RAB's comments and NYCHA's responses are left blank.

Accordingly, Save Section 9 respectfully requests clarification regarding the following:

- Did the Resident Advisory Board submit formal comments on the FY 2027 Draft Annual Plan?
- If so, where can those comments be reviewed?

- If no comments were submitted, why are the required certification fields left incomplete?
- Will NYCHA correct these omissions in the Final Annual Plan?
- Will NYCHA publish the roll call, attendance records, meeting minutes, recommendations, and responses associated with the six RAB meetings referenced in the Draft Annual Plan?

HUD GUIDANCE

We appreciate HUD's written response to questions submitted separately regarding the Annual Plan public participation process. HUD confirmed, among other things, that:

- Annual Plans must include public comments and a narrative describing the PHA's analysis of those comments (24 CFR § 903.13).
- Prior Annual Plans and supporting documents, including comment packages, are public records available for public inspection.
- HUD does **not** require PHAs to publish the completed public comment matrix before submitting the Final Annual Plan. However, Save Section 9 recommends that NYCHA voluntarily do so to strengthen transparency and public confidence.
- If the Resident Advisory Board challenges elements of the Annual Plan, NYCHA must document those challenges and its responses as part of its submission.
- Approved Annual Plans and supporting documentation must be made available for public inspection following HUD approval.

HUD's response reinforces our recommendation that NYCHA adopt transparency practices that exceed the minimum federal requirements and establish a national standard for meaningful resident participation.

CLOSING

The events of the July 29 hearing underscore the importance of the recommendations contained in this report. Public participation cannot be considered meaningful when residents who comply with the registration process are denied the opportunity to testify because of an arbitrary time limit.

Save Section 9 believes that public housing decisions should be transparent, evidence-based, and shaped by meaningful resident participation before irreversible actions are taken.

Our report is offered in that spirit. We respectfully request that it receive full consideration as NYCHA and HUD evaluate the FY 2027 Annual Plan.

Because the hearing concluded before I was called to testify, I have attached the testimony I intended to deliver and respectfully request that it also be included in the official public record.

We also respectfully request written confirmation that this report and the attached testimony have been received and will be included in the official public record for NYCHA's FY 2027 Annual Plan.

In solidarity,

Guatuke Ini Inaru (Ramona Ferreyra)
Founder, Save Section 9
Resident, Mitchel Houses