

CASE NAME:

Assistant Secretary for Fair Housing and Equal Opportunity v. the City of Boston et al.

CASE NUMBER:

1. Complainant:

Craig W. Trainor
Assistant Secretary for Fair Housing and Equal Opportunity

U.S. Department of Housing and Urban Development
2415 Eisenhower Avenue
Alexandria, Virginia 22314

2. Other Aggrieved Parties:

Yet to be determined

3. The following is alleged to have occurred or is about to occur:

Discriminatory acts under Fair Housing Act Section 804 (a)

Discriminatory acts under Fair Housing Act Section 804 (b)

Discriminatory acts under Fair Housing Act Section 804 (c)

Discriminatory acts under Fair Housing Act Section 805

Discrimination in federally funded programs under Title VI of the Civil Rights Act of 1964

4. The alleged violation occurred because of:

Race, Color, National Origin

5. Address and location of the city and state where the discrimination occurred:

Boston, Massachusetts

6. Respondents:

Michelle Wu
Mayor
City of Boston
1 City Hall Square, Suite 500
Boston, Massachusetts 02201

Sheila A. Dillon
Chief of Housing
Mayor's Office of Housing
26 Court Street
Boston, Massachusetts 02108

Mayor's Office of Economic Opportunity and Inclusion
1 City Hall Square, 8th Floor
Boston, Massachusetts 02201

Kairos Shen
Chief of Planning
City of Boston Planning Department
1 City Hall Square, 9th Floor
Boston, Massachusetts 02201

Opportunity Communities
c/o The Neighborhood Developers
4 Gerrish Avenue
Chelsea, Massachusetts 02150

7. Respondents' Representative:

Joshua A. Levy
Partner
Levy | Firestone | Muse
900 17th Street NW, Suite 605
Washington, DC 20006

The representative of The Neighborhood Developers is yet to be determined.

8. The following is a brief and concise statement of the alleged violation. All allegations of fact are based upon information and belief, publicly available documents and articles, and materials supplied by Respondents.

The Assistant Secretary for Fair Housing and Equal Opportunity, on behalf of the Secretary of Housing and Urban Development, files this Secretary-initiated complaint of housing discrimination, as authorized by Section 810 (a)(1)(A)(i) of the Fair Housing Act, 42 U.S.C. § 3610(a)(1)(A)(i).

The complaint alleges the City of Boston (the City) has developed and has implemented, or intends to implement, various discriminatory housing policies. Upon information and belief, the City has endorsed a city-wide system for allocating scarce housing resources based on race, color and/or national origin.

The City's public officials have explicitly demonstrated both racial animus and favoritism. In December 2023, the Mayor's office segregated a city council function by race, uninviting white City Council members. (Exhibit A). The former City Council President and current City Councilor, Ruthzee Louijeune, has praised the ongoing "Welcome Home, Boston" housing initiative for providing "intentional investment" in communities based on race. (Exhibit B).

A review of official, public-facing documents shows that Respondents' housing programs are intended and designed to discriminate on the basis of race in violation of Sections 804(a)-(c) and 805 of the Fair Housing Act, as well as Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d. The effort is apparently led by the Mayor's Office of Housing (MOH), Mayor's Office of Economic Opportunity and Inclusion, and the City of Boston Planning Department.

The City targets homebuyer outreach and education efforts in black and "Latinx" neighborhoods. Through the Boston Home Center, the City intends to induce banks and mortgage lenders to increase their lending in communities based on the racial demographics of the area. (Exhibit C).

The City offers financial housing assistance to meet explicit racial targets. In 2023, the City stated that "at least 65%" of "opportunities to buy homes through City of Boston initiatives" go to "BIPOC" [black, indigenous, or person of color] households. According to the City, financial housing assistance is not just for all low-income persons but instead "particularly BIPOC residents." As outlined in the Boston Housing Strategy 2025 document, "City resources will be used to help low-to-moderate-income and/or BIPOC residents put together a down payment and access financing." (Exhibit D). Last summer, the City's "progress report" for Welcome Home Boston announced that it achieved its racial quota, and "more than 65% of homebuyers assisted through City of Boston initiatives are BIPOC." (Exhibits B and E).

The City's Anti-Displacement Action Plan utilizes a faulty race-based risk assessment tool to inform public investments. The City intends to direct public resources to areas based, in part, on the percentage of residents who are non-white. Whiter areas with higher percentages of "native English speaking residents" will be deprioritized as the City allocates housing resources. (Exhibit F).

The City is considering implementing a "Diversity Preservation Preference" that would make new income-restricted housing available based on race. (Exhibit G).

Upon information and belief, the City intends to implement discriminatory housing plans in conjunction with the nonprofit Opportunity Communities (OppCo). On a now-deleted webpage, OppCo listed "Homes for Equity" as one of its key initiatives. The program "will work with individual cities and town, starting with the City of Boston" to implement "explicit race-

conscious marketing and buyer selection.” (Exhibit H). OppCo’s outlined plan aligns with the City’s stated goals of race-based marketing and financial assistance.

The City has imposed racial contract terms on developers working with the City. As stated in their Welcome Home Boston Request for Proposals, the City offers 20 vacant city-owned parcels for development, but applicants “must submit a Diversity and Inclusion Plan which reflects the extent to which the proponent plans to include ... participation, employment, and management roles by people of color.” The Diversity and Inclusion Plan “should address all phases of development, including ... ongoing operations,” such as “building tenants.” The Boston Planning and Development agency intends “to bring the same criteria”—racial composition—“into private development.” (Exhibit I).

9. The most recent date on which the alleged discrimination occurred

March 5, 2026, and is continuing.

10. Types of Federal Funds identified: Community Development Block Grants, HOME Investment Partnerships Program, Emergency Solutions Grant Program

11. The acts alleged in this complaint, if proven, may constitute a violation of the following:

42 U.S.C. § 3604(a)-(c)

42 U.S.C. § 3605

Fair Housing Act Section 804 (a)

Fair Housing Act Section 804 (b)

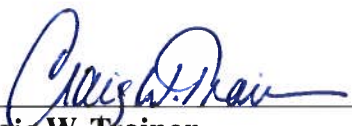
Fair Housing Act Section 804 (c)

Fair Housing Act Section 805

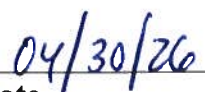
42 U.S.C. § 2000d

Title VI of the Civil Rights Act of 1964

I declare under penalty of perjury that I have read this complaint and, upon information and belief, that it is true and correct.



Craig W. Trainor
Assistant Secretary
Fair Housing and Equal Opportunity



Date

Exhibit A



Search the web

The Telegraph

US mayor defends restricting invitations to official Christmas party to non-whites

Michael Murphy

Thu, December 14, 2023 at 1:01 p.m. EST · 2 min read

Add Yahoo on Google



Mayor Michelle Wu addresses the controversy surrounding Boston's segregated Christmas party blunder invitation on US TV - CHP

The Democrat mayor of Boston has defended her decision to hold a non-whites only Christmas party.

[Michelle Wu](#) has come under fire for hosting the "electeds of colour" event.

The [segregated](#) celebration has been held for years at an official reception hall in [Boston](#), but this year invitations were accidentally sent to all 13 members of the city council, including white members.

The mayor's office rescinded the invitations to seven white councillors 15 minutes after they were sent out, leading to a backlash from the city's representatives over the "divisive" event.

ADVERTISEMENT

Speaking outside the venue on Wednesday night, Ms Wu said: "I can understand someone might be confused or worried if certain people weren't being invited at all or were being left out of any type of celebration.

"But, I assure you, everyone on the Boston City Council has got an invitation to multiple types of events and holiday parties."

Invitations mistakenly sent to all councillors by mayor's aide

The party went ahead on Wednesday after the mayor's office apologised for the blanket invitations, which were sent to all councillors in error by Denise DosSantos, Ms Wu's aide.

Ms DosSantos sent a follow-up email clarifying the event was restricted to non-white councillors.

ADVERTISEMENT

"I wanted to apologise for my previous email regarding a Holiday Party for tomorrow," Ms DosSantos wrote.

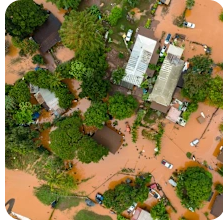
"I did send that to everyone by accident, and I apologise if my email may have offended or came across as so. Sorry for any confusion this may have caused."

More in News



Ocean Alexander 30P and 40P Superyachts in Photos

Robb Report



Hawaii digs out from another round of flooding after a surprise downpour, in photos

The Canadian Press



Air Canada, LaGuardia tragedy: Multiple video angles of jet collision online show timeline and final moments

Yahoo News Canada

Finally, A Place Where Women May Write First

Ti Laughloves basis of race.

One councillor, Frank Baker, said it was “divisive” that he was not invited because he was white. “I do find it divisive, but what are you going to do about it? You don’t want me at a party, I’m not going to come to a party,” he told WHDH, an independent TV station in Boston.

ADVERTISEMENT

Ms Wu, whose parents came to the US from Taiwan, became Boston’s first female mayor and the UDS’S first Asian American mayor in Nov 2021.

Broaden your horizons with award-winning British journalism. Try The Telegraph free for 1 month, then enjoy 1 year for just \$9 with our US-exclusive offer.

[Terms and Privacy Policy](#) [Privacy Dashboard](#) [About Our Ads](#)

Exhibit B



MAYOR MICHELLE WU ANNOUNCES WELCOME HOME BOSTON, PHASE 3, PROVIDES PROGRESS REPORT ON HOMEOWNERSHIP PROGRAMS

Last updated: July 23, 2025



PUBLISHED BY:

[Mayor's Office \(/departments/mayors-office\)](/departments/mayors-office)



PUBLISHED BY:

[Housing \(/departments/housing\)](/departments/housing)



PUBLISHED BY:

[Planning \(/government/cabinets/planning\)](/government/cabinets/planning)



Homes Built by BIPOC Developers Support Racial Equity

Yesterday, Mayor Michelle Wu joined new homeowners, BIPOC-owned development teams, community members, and local leaders in Dorchester to celebrate first-time homebuyers and the launch of phase three of [Welcome Home, Boston \(https://5twmznuab.cc.rs6.net/tn.jsp?f=001t1dht5vsMcknRLTEb518Aie2QE9biSqsyclhPsCrpWIDRfERTTWC7f-9Fzcj89brn3T6inlZtcz9MJq4D4FWkK38b8H1I27hQOZXm63mNMBYUMRX0B5WjS-2wjcUfZTL6ckLRbENuirg62WgFNU0bbM4nsCRew7yjamrGmRqdotAnBP9Gx5aS501PZjBnuX6wt5BwxeTn4Aslib7fyzapRSFA4XRzcyjBov4dJGcV4g7wNkwBOsVWzBPUHHAehLvfg==&ch=Efd7rU-amfF3L7BO9ul8CKby1QhW5N9hdgVuTTBoUzb2BJ3yAdJttg==\)](https://5twmznuab.cc.rs6.net/tn.jsp?f=001t1dht5vsMcknRLTEb518Aie2QE9biSqsyclhPsCrpWIDRfERTTWC7f-9Fzcj89brn3T6inlZtcz9MJq4D4FWkK38b8H1I27hQOZXm63mNMBYUMRX0B5WjS-2wjcUfZTL6ckLRbENuirg62WgFNU0bbM4nsCRew7yjamrGmRqdotAnBP9Gx5aS501PZjBnuX6wt5BwxeTn4Aslib7fyzapRSFA4XRzcyjBov4dJGcV4g7wNkwBOsVWzBPUHHAehLvfg==&ch=Efd7rU-amfF3L7BO9ul8CKby1QhW5N9hdgVuTTBoUzb2BJ3yAdJttg==). The homes visited were built on City-owned land by development teams led by people of color and supported by City programs, including the Boston Home Center. The event took place at new homeowner Genesis' home on Elmont Street in Dorchester, developed by Norfolk Design & Construction.

“Homeownership is one of the most powerful tools we have to build generational wealth and keep neighborhoods strong,” said Mayor Michelle Wu. “I’m proud to celebrate these new homeowners alongside the local developers who have partnered with the City and the Boston Home Center to help more families afford to make Boston home.”

Welcome Home, Boston Phases 1, 2 & 3

The Mayor announced the Welcome Home, Boston program at her State of the City address in January of 2023. To date, phases 1 and 2 of the program have resulted in 28 parcels being developed into 144 future homes, many of which are now under construction or currently in closing and will begin construction in the summer and fall of 2025.

Welcome Home, Boston is part of Mayor Wu’s strategy to close the racial wealth gap by increasing the number of homeowners in Boston and supporting local developers of color. Phase 1 and 2 development teams include Dorchester Design Collaborative, Codman Square Neighborhood Development Corporation, Boston Neighborhood Community Land Trust, African Community Economic Development of New England, and many others. By providing developers with City-owned land, capital, and technical help, the City is creating more affordable homes and building community wealth.

Yesterday, the Mayor announced the next phase of the Welcome Home, Boston (WHB) program: WHB III will make 12 City-owned parcels available to create more than 30 new homes for first-time middle-income homebuyers in Hyde Park, Roslindale, Dorchester, and Roxbury. The BPDA Board will vote on the release of an RFP to redevelop these parcels this Thursday. Developers are encouraged to utilize efficient and cost-effective construction methods that could reduce costs, shorten construction timelines, minimize the impact on surrounding neighborhoods, and meet Boston’s carbon neutrality and sustainability goals. Staff will give preference to proposals that demonstrate how innovation can help build a more inclusive, efficient, and resilient housing delivery ecosystem.

“We are excited to be able to offer this public land to address the need for more middle-income housing in our city,” said Chief of Planning Kairos Shen. “We are leveraging every tool available to us to help alleviate the housing shortage, and this initiative is another way we can work towards those goals.”

“The Wu administration has made increasing homeownership rates in Boston a reality. Through the development of affordable homes, increased downpayment programs, and lower interest rate mortgage products, we are helping our residents own a piece of the City that they love,” said Sheila Dillon, Chief of Housing. “By ensuring that our programs are serving both BIPOC families and development teams, we are also investing in a more equitable Boston.”

“As co-founders of a veteran-and minority-owned firm, Duane and I take great pride in delivering quality homes and driving economic opportunity across Boston,” said Adler Bernadin, President of Norfolk Design & Construction. “Developments represent more than just buildings—they’re an investment in families, a commitment to this community, and a critical step toward a more equitable future.”

“This work supports the Office of Black Male Advancement’s mission to advance equity and increase wealth-building opportunities for Black residents living in Boston,” said Frank Farrow, Executive Director of the Office of Black Male Advancement. “Homeownership is a vital tool that helps us close the racial wealth gap and break

cycles of systemic inequality. By empowering emerging developers of color and supporting first-time homeowners, we're helping build a stronger, more connected Boston."

"Today is about more than just new keys and new doors — it's about new beginnings," said Tito Jackson, Chair of the Black Men and Boys Commission. "The Black Men and Boys Commission is proud to support efforts like Welcome Home, Boston that provide opportunities for emerging developers of color to build on City-owned land while also ensuring that Black families have equitable access to affordable homeownership opportunities. This is how we close the racial wealth gap — one home, one family, one neighborhood at a time."

"Welcome Home, Boston exemplifies the modern approach we need for the future of housing in our city," said City Council President Ruthzee Louijeune. "Combining community-driven development with intentional investment in our Black and Brown neighborhoods."

"The short-term benefits of more housing from Welcome Home, Boston are desperately needed, but it's the intentionality of this program that is going to deliver for generations of Bostonians," said City Councilor Brian Worrell. "We're giving BIPOC-led development teams a chance to grow their business, and we're helping dozens of Bostonians buy their first-home, creating long-term stability for them in their neighborhood."

Part of a Larger Homeownership Strategy

The Welcome Home, Boston program is one of the many ways that the City is supporting homeownership. The Boston Home Center, working closely with a network of non-profit partners, is providing homebuyer classes, financial support for downpayments and closing costs and One+ Boston mortgages. The goal is to help families build stability and wealth while strengthening neighborhoods across the city.

In the first 3-plus years of the Wu Administration, more income-restricted homeownership opportunities were created than during any comparable time period in the last 25 years: 836 new homes were completed or moved into construction during this time. But it's not just about new units; it's also the people who will call them home. Under Mayor Wu's leadership, 1,000 Bostonians have become first-time homeowners through financial assistance in the form of downpayment and closing cost assistance, access to lower cost mortgage products including the One+ Boston program, and/or purchase of income-restricted homes. More than 65% of homebuyers assisted through City of Boston initiatives are BIPOC.

"Homeownership builds stronger communities and helps create long-term generational wealth," said MassHousing CEO Chrystal Kornegay. "MassHousing is proud to support investments in new homeownership opportunities as part of our work to make Massachusetts a more affordable place to live and raise a family."

"As a first-time homebuyer, my experience working with the City of Boston has been both transformative and deeply meaningful. From the initial stages of education and guidance through the affordable housing lottery to the final steps of securing a home, the process was thorough, transparent, and supportive," said new homeowner Genesis. "I felt supported and informed at every turn, and I am truly grateful for the City's dedication to making homeownership accessible to families like mine. This opportunity has allowed me to establish long-term stability for my children and build a future rooted in the city we love. I am honored to share my story and extend my sincere appreciation to all those who made this possible."

To learn more about affordable homeownership opportunities and support for first-time homebuyers in Boston, visit the Boston Home Center [website \(https://5twmznuab.cc.rs6.net/tn.jsp?f=001t1ldht5vsMcknRLTEb518Aie2QE9biSqsyclhPsCrpWIDRfERTTWCwiVkz3s7zBmhrR_J9FZOiSxN5YL8L1-BKKoSFOU_kQcsdo-o1k-exa-8EwfE27twrj6RcvifYRXBNYpdINxpOv3LUc030DeJ4Zlrae9GykwHLY_Gy-Wzo6qTTuYbWRrKt_Hr-mOTvyK_ovnEwjCluk=&c=NsYJivyKlj-SFA4XRzcjBov4dJGCv4g7wNkwBOsVWzBPUHHAehLvfg==&ch=Efd7rU-amfF3L7BO9ul8CKby1QhW5N9hdgVuTTBoUzb2BJ3yAdJttg==\)](https://5twmznuab.cc.rs6.net/tn.jsp?f=001t1ldht5vsMcknRLTEb518Aie2QE9biSqsyclhPsCrpWIDRfERTTWCwiVkz3s7zBmhrR_J9FZOiSxN5YL8L1-BKKoSFOU_kQcsdo-o1k-exa-8EwfE27twrj6RcvifYRXBNYpdINxpOv3LUc030DeJ4Zlrae9GykwHLY_Gy-Wzo6qTTuYbWRrKt_Hr-mOTvyK_ovnEwjCluk=&c=NsYJivyKlj-SFA4XRzcjBov4dJGCv4g7wNkwBOsVWzBPUHHAehLvfg==&ch=Efd7rU-amfF3L7BO9ul8CKby1QhW5N9hdgVuTTBoUzb2BJ3yAdJttg==).

About the Mayor's Office of Housing

The Mayor's Office of Housing is responsible for addressing homelessness, creating and preserving affordable housing, and ensuring that renters and homeowners can secure and maintain safe, stable housing. The department develops and implements the City of Boston's housing creation and homelessness prevention plans and collaborates with local and national partners to find new solutions and build more accessible housing, particularly for those with lower incomes. For more information, please visit the Mayor's Office of Housing [website \(https://5twmznuab.cc.rs6.net/tn.jsp?f=001t1ldht5vsMcknRLTEb518Aie2QE9biSqsyclhPsCrpWIDRfERTTWCza-ReNtovzFunfnayJReJYIshFwc_h-F5NOFHfgKe8VZGNbleIWpVxvz7403KgpnmkiGS45ky7Mt2o7Eb7lGZpryU3dE6Bpi41QkXb4R4O6ZFBWWw18Nmb0FD_SFA4XRzcjBov4dJGCv4g7wNkwBOsVWzBPUHHAehLvfg==&ch=Efd7rU-amfF3L7BO9ul8CKby1QhW5N9hdgVuTTBoUzb2BJ3yAdJttg==\)](https://5twmznuab.cc.rs6.net/tn.jsp?f=001t1ldht5vsMcknRLTEb518Aie2QE9biSqsyclhPsCrpWIDRfERTTWCza-ReNtovzFunfnayJReJYIshFwc_h-F5NOFHfgKe8VZGNbleIWpVxvz7403KgpnmkiGS45ky7Mt2o7Eb7lGZpryU3dE6Bpi41QkXb4R4O6ZFBWWw18Nmb0FD_SFA4XRzcjBov4dJGCv4g7wNkwBOsVWzBPUHHAehLvfg==&ch=Efd7rU-amfF3L7BO9ul8CKby1QhW5N9hdgVuTTBoUzb2BJ3yAdJttg==).

About the Planning Department

The City of Boston's Planning Department shapes growth that serves Boston's residents and centers their needs. Our mission is to address our City's greatest challenges: resilience, affordability, and equity, and to take real estate actions and prioritize planning, development, and urban design solutions that further these priorities. We seek to build trust with communities through transparent processes that embrace predictable growth and shape a more inclusive city for all. Learn more at [bostonplans.org \(http://bostonplans.org/\)](http://bostonplans.org), and follow us on Twitter and Instagram @BostonPlans.

Last updated: July 23, 2025



PUBLISHED BY:

[Mayor's Office \(/departments/mayors-office\)](/departments/mayors-office)



PUBLISHED BY:

[Housing \(/departments/housing\)](/departments/housing)



PUBLISHED BY:

[Planning \(/government/cabinets/planning\)](/government/cabinets/planning)

PROVIDE YOUR FEEDBACK
(/FORM/WEBSITE-FEEDBACK-FORM?
SOURCE_ENTITY_TYPE=NODE&SOURCE_ENTITY_ID=16391061)

[PRIVACY POLICY \(/GOVERNMENT/CABINETS/INNOVATION-AND-TECHNOLOGY/TERMS-USE-AND-PRIVACY-DIGITAL\)](#)

[VULNERABILITY DISCLOSURE \(HTTPS://DOCS.GOOGLE.COM/FORMS/D/E/1FAIPQJSEFWRMPJC1KZAHZJ43LAO8UWN9TJEQVTDfBPRJZ\)](#)

[PUBLIC RECORDS \(HTTPS://BOSTONMA.GOVQA.US/WEBAPP/_RS/\(S\(DEN310HNRPQZ2RZH5LGBGSBY\)\)\)/SUF](#)
[ACCESSIBILITY \(HTTPS://WWW.BOSTON.GOV/DEPARTMENTS/LANGUAGE-AND-COMMUNICATIONS-ACCES](#)
[ACCOMMODATIONS\)](#)

[CONTACT US \(HTTPS://WWW.BOSTON.GOV/DEPARTMENTS/MAYORS-OFFICE/CONTACT-BOSTON-CITY-HAL](#)

Exhibit C

City of Boston Assessment of Fair Housing

January 20, 2022



Mayor Michelle Wu

LEAD AGENCY OR ORGANIZATIONS: MOH, with the Massachusetts Housing Partnership (MHP) and the Massachusetts Affordable Housing Alliance (MAHA)

8.3 Continue to target homebuyer outreach and education efforts in Black and Latino neighborhoods.

The City targets a significant amount of its homebuyer outreach and education to Black and Latinx neighborhoods. The City will continue to do so, and look for new ways to reach households of color, such as advertising in ethnic papers, attending community events, and co-sponsoring events and clubs. Such an effort is important to assure that Black and Latinx families can take advantage of down payment assistance, specialty mortgage programs, and income restricted homeownership opportunities.

The Boston Home Center's program documents are being translated into 11 languages and MOH is continuing to participate in ethnic media roundtables as part of our outreach.

LEAD AGENCY OR ORGANIZATIONS: MOH's Boston Home Center

8.4 Expand the Family Self-Sufficiency program with a specific emphasis on homeownership.

Family self-sufficiency and homeownership are critical to reducing poverty and stopping families from being displaced due to gentrification in Boston. The HUD Family Self-Sufficiency (FSS) program was created to help families with Housing Choice (Section 8) vouchers overcome barriers to increasing their income and independence. The program provides for an escrow/savings account and case management services. Each household, in conjunction with a case manager, creates a five-year program to achieve their goals. The escrow account grows along with increases in income, and the family can use it to further their education, start a business, or buy a home after five years.¹⁷⁸

Both the BHA and Metro Housing|Boston administers Housing Choice Vouchers and both work with Compass Working Capital, a non-profit leader in financial empowerment programs. Expanding the program, setting numerical goals, and addressing obstacles to participation will help more families move out of poverty and become homeowners, where they can further build their wealth.

LEAD AGENCY OR ORGANIZATIONS: BHA and Metro Housing|Boston, with Compass Working Capital and local foundations.

8.5 Get additional commitments from banks and mortgage lenders to meet the needs of low-income families and communities of color through mortgage lending and foreclosure prevention programs.

¹⁷⁸ For more information, see <https://www.bostonhousing.org/en/For-Section-8-Leased-Housing/Resident-Information/Family-Self-Sufficiency.aspx>.

Traditionally, communities have used the federal Community Reinvestment Act (CRA) as a tool to encourage banks with local branches to invest in their neighborhoods through mortgage lending programs, small business loans, and other efforts. Today, the federal government is introducing new CRA regulations that will likely undermine the importance and usefulness of this tool.¹⁷⁹ In addition to the federal CRA, Massachusetts also has a CRA law that covers mortgage lenders, as well as state-chartered banks.¹⁸⁰ With or without these tools, the City will encourage banks and mortgage lenders to increase their lending in communities of color and participate in foreclosure prevention efforts. The City of Boston manages homebuyer and foreclosure prevention programs through the Boston Home Center,¹⁸¹ and has 27 participating lenders in its first-time homebuyer financial assistance program, and 17 lenders and lending agencies are participating in a program to provide relief to homeowners as part of the City's response to the economic consequences of the COVID-19 pandemic. While there is a lot of work underway in this area, lenders can do more, and the City will work to secure those commitments, including commitments to not foreclose before efforts are made to resolve issues with an affordable loan modification.

LEAD AGENCY OR ORGANIZATIONS: MOH's Boston Home Center with MassHousing, the Massachusetts Housing Partnership (MHP), the Massachusetts Affordable Housing Alliance (MAHA), and mortgage lenders.

8.6 Continue to enforce the City of Boston Responsible Banking Ordinance.

The City of Boston has a Responsible Banking Ordinance to assure the City is investing money only in banks that engage in non-discriminatory lending and banking practices. This Ordinance requires yearly reports; the Linked Deposit Banking Report to the Mayor, which summarizes these disclosures and includes additional supplemental information, is intended to assist City officials as they compare the activities and performance of banks in order to help ensure that City monies are invested in institutions that contribute positively to the Boston community.¹⁸²

LEAD AGENCY OR ORGANIZATIONS: Office of the Collector-Treasurer

8.7 Support the establishment and growth of cooperatives and community land trusts, in part through the use of city-owned parcels.

Cooperatives serve as an alternative to homeownership, especially for lower-income households. The cost to join a housing cooperative can be very low, and provides some opportunity to build a small asset, while providing residents the opportunity to control their own

¹⁷⁹ For information on changes in the CRA regulations, see the final rule of the Office of Comptroller of the Currency at <https://www.federalregister.gov/documents/2020/06/05/2020-11220/community-reinvestment-act-regulations> and a review of the changes by the National Community Reinvestment Coalition at <https://ncrc.org/treasureCRA/>.

¹⁸⁰ For more information, see <https://www.mass.gov/community-reinvestment-act-cra>.

¹⁸¹ The Boston Home Center can be found at <https://www.boston.gov/departments/neighborhood-development/boston-home-center>.

¹⁸² The most recent report, published in April 2020, can be found at <https://www.boston.gov/sites/default/files/file/2020/05/2018%20Linked%20Deposit%20Report%20to%20the%20Mayor.pdf>. All reports are available at the Treasury Department's website, at <https://www.boston.gov/departments/treasury>.

Exhibit D

DECEMBER 2023

Boston Housing Strategy 2025

A policy document to shape
Boston's housing future



City of Boston
Housing



boston planning &
development agency



BOSTON
HOUSING
AUTHORITY

Priority 3: Boston residents will have equitable access to homeownership opportunities.

2022-2025 Goals:

- 1,000 homeownership units permitted, built, or sold to households with low-to-middle incomes
- 750 households, at least 65% BIPOC, have opportunities to buy homes through City of Boston initiatives
- 3,000 current homeowners stay in their homes through foreclosure prevention and funding critical home repairs

Objective 1: Broaden down payment and other assistance for low- and moderate-income homebuyers, particularly BIPOC residents.

Objective 2: Accelerate development of homeownership units affordable to moderate-income homebuyers.

Priority 4: Boston residents will live in housing that is carbon neutral and climate resilient.

By 2025:

- 100% of new City-funded income-restricted housing reaches fossil fuel-free standards
- 300 homes for low-to-moderate-income Bostonians undergo or are in the process of undergoing deep green energy retrofits
- 1,500 public housing units weatherized and provided with heat pumps to eliminate gas or electric baseboard heat, and 5 sites solarized
- 2,000 homes occupied by low-to-middle-income Bostonians undergo comprehensive energy assessments

Objective 1: Require new income-restricted housing to be carbon neutral.

Objective 2: Develop scalable programs to support green retrofits for existing buildings.

Objective 3: Support the creation of a larger and more diverse building contractor workforce.

Priority 5: Boston's existing supply of affordable housing will be preserved and accessible to those who need it.

By 2025:

- 100% of expiring privately-owned affordable housing preserved, estimated to be 307 units
- 2,700 existing BHA units modernized through extensive upgrades
- 500 units of naturally occurring affordable housing acquired to preserve affordability

Objective 1: Track and maintain affordability restrictions on existing housing stock.

Objective 2: Acquire and income restrict naturally occurring affordable housing.

Objective 1: Broaden down payment and other financial assistance for low- and moderate-income homebuyers and current homeowners, particularly BIPOC residents

Homeownership is a vital pathway to equity and intergenerational wealth, but many Bostonians are barred from this opportunity. City resources will be used to help low-to-moderate-income and/or BIPOC residents put together a down payment and access financing, and to assist current homeowners with staying in their homes.

Key Strategies	
Continue	Use \$22 million in ARPA funds to assist Boston homebuyers with increased down payment assistance and low interest mortgages.
	Work with banks, lenders, developers, real estate agents, and other stakeholders to increase the number of BIPOC homebuyers using private financing and buying units in the open market.
	Evaluate the effectiveness of deed-restricted homeownership in Boston to advance the goals of affordable homeownership and wealth creation.
	Track foreclosure activity and maintain the Foreclosure Prevention and Intervention and Home Preservation programs to support and stabilize housing costs for low-to-moderate-income Boston homeowners.
New	Expand opportunities for public housing tenants and housing voucher holders to access homeownership by increasing down payment assistance, piloting a homeownership voucher program, and leveraging the BHA's scattered site condo portfolio to create new income-restricted homes.

Objective 2: Accelerate development of homeownership units affordable to moderate-income homebuyers.

The high costs of development in Boston make it challenging to produce housing for ownership. Land costs often mean bigger (more expensive) homes or developments deliver the greatest return on a developer's investment. To create affordable homeownership opportunities, the City will provide and leverage subsidies in the form of land, funding, or other developer incentives.



Exhibit E

Mayor's Office of Housing FY26 Recommended Budget

*City Council Committee on Ways and Means
May 19, 2025*



City of Boston
Mayor Michelle Wu



Mayor's Office
of Housing

HOMEOWNERSHIP



FY25 Accomplishments

- **1,900** residents received first-time homebuyer education
- Provided **270** homebuyers with downpayment/mortgage assistance (**65%** BIPOC)
- **650** homeowners assisted through home repair/rehab programs
- **155** homeowners provided with foreclosure prevention counseling
- Launched new Accessory Dwelling Unit (ADU) bank loan program
 - **28** ADUs in process

FY26 Goals

- Provide financial assistance to **250** first-time homebuyers
 - At least **65%** identifying as BIPOC
- Help at least **750** homeowners with home repairs, including **60** seniors with efficient heating units
- Assist **160** homeowners with foreclosure prevention counseling
- Support residential decarbonization and electrification through the **HomeWorks Green** loan program and partnership with MassSave



First-Time Homebuyer at 23 Magnolia Street, Dorchester with BHC Senior Program Manager Sylvia Adorno



120-122 Hancock St, Dorchester
15 home-ownership units on City-owned land

Exhibit F

A Place to Thrive



Illustration by Justin Liu

ANTI-DISPLACEMENT

ACTION PLAN FOR BOSTON

CITY of BOSTON

TABLE OF CONTENTS

LETTER FROM MAYOR WU	2
01 INTRODUCTION	3
02 EXECUTIVE SUMMARY	4
03 HOW WE GOT HERE	6
Definitions of displacement	7
Rationale	8
Our framework	10
04 ADDRESSING GAPS IN OUR TOOLBOX	11
Residential stabilization: New tools	12
<i>Deploying the displacement risk map</i>	14
Commercial/cultural stabilization: New tools	36
Implementing the Plan: Access, Education, Engagement	48
05 ACKNOWLEDGMENTS	54
06 APPENDIX	56

Corresponding with new planning and strategic initiatives, and in response to extensive community feedback and advocacy, the City of Boston developed this Anti-Displacement Action Plan to confront the issue of displacement. The Action Plan is an initiative of wide-ranging City departments, demonstrating the broad coalition of stakeholders invested in this work.

The goals of this effort are to:

- Stabilize residents, including renters and homeowners, so they can anchor and flourish here, while creating space to welcome new neighbors
- Stabilize neighborhood commercial and creative enterprises, enabling their diversity and vibrancy

The Action Plan builds on two foundational reports completed as part of an extensive Discovery Phase. The first, [Laying the Foundation: Community Anti-Displacement Priorities](#), analyzed the displacement concerns and issues constituents have shared with the City in recent years via major planning initiatives, projects, and surveys. The second, [Boston's Existing Toolkit & Progress Report](#), describes the more than 80 tools the City already deploys to mitigate direct and economic displacement risk for residents, businesses, and cultural operators.

Back/
Forward

B

Residential Displacement Risk Map

Tutorial

Legend

MBTA Lines

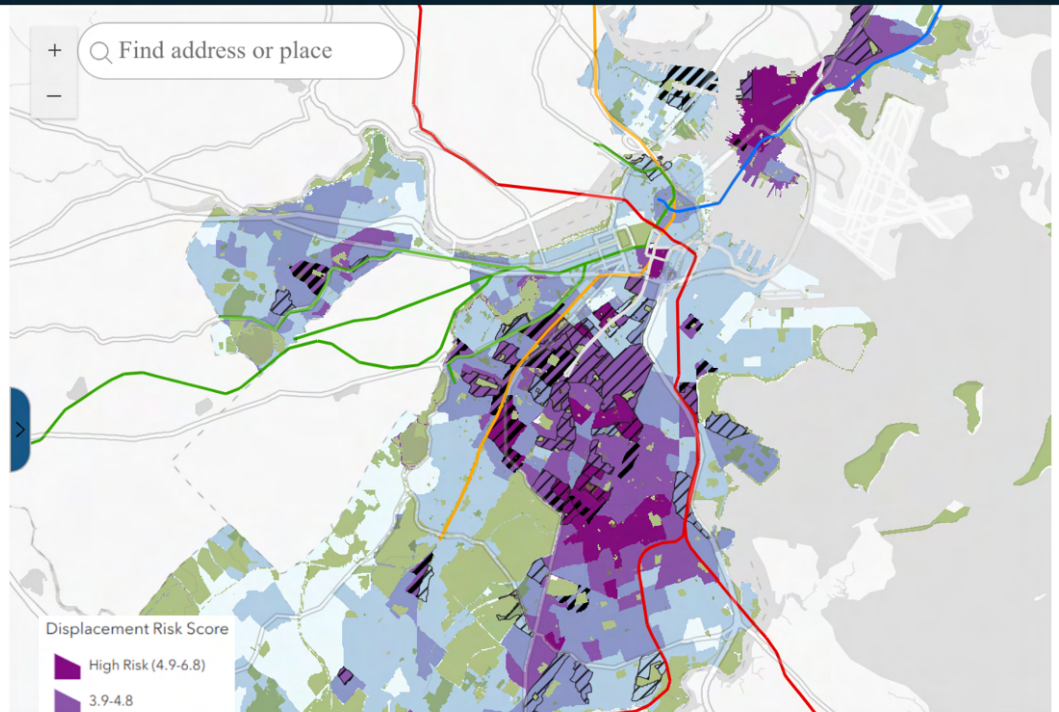
- BLUE
- GREEN
- ORAN
- RED
- SILVEF
- others

Neighborhood Boundaries



Income-Restricted

+ Find address or place



DEPLOYING THE DISPLACEMENT RISK MAP

The Mayor's Office of Housing has developed a new dynamic mapping tool that allows both the City and residents to assess residential displacement risk at the Census Block Group level for the first time. This Displacement Risk Map fulfills a key priority outlined in the Assessment of Fair Housing, which called for the creation of a "displacement risk tool" to rigorously evaluate displacement risk at the neighborhood level. This Displacement Risk Map validates longstanding community concerns about displacement, and demonstrates that risks exist in a number of areas in Boston.



Photo by Justin Liu

Based on 18 indicators correlated with direct displacement, this new tool assesses the risk of **community-level displacement**, or when high numbers of households are displaced from an area, changing its fundamental demographic makeup. The map measures direct displacement (when residents are forced to move from their homes, such as in an eviction or a foreclosure) to estimate economic displacement (when current residents of an area can no longer afford to live there).

SELECT KEY FINDINGS:

- ▶ Income-restricted housing provides community-level protections in high risk areas
- ▶ 8% of block groups (49 in total) in Boston have the highest displacement risk scores, meaning a score of 4.9 or above on a scale of 0.2 to 6.8. They are scattered across multiple neighborhoods, including East Boston, Roxbury, Mission Hill, and Dorchester, and are home to 9% of Boston households.
- ▶ High-risk areas have similar characteristics to one another, including higher proportions of renters, cost-burdened households, non-native English speakers and non-white populations, and higher rates of investor activity in housing.
- ▶ Low-risk block groups are mainly concentrated in Charlestown, Downtown, North End, Seaport, West End, and West Roxbury. They tend to be whiter, and have higher proportions of college-educated, homeownership, and native English speaking residents.
- ▶ Some low-risk areas are also racially diverse. 93 low-to-moderate-risk Block Groups have more than 50% non-white residents, along with characteristics indicative of inclusive prosperity, like higher rates of homeownership.

The City will use the map to inform planning, outreach priorities, and decision-making, including but not limited to:

- 1** Targeted marketing and outreach to high-risk areas to increase utilization of existing resources, including income-restricted housing lotteries, first-time homebuyer programs, tenant stabilization programs, and eviction sealing support.

- 2** Inform development of the Eviction Prevention Action Plan, particularly small geographies where focused engagement with landlords and tenants around housing stabilization and eviction prevention will yield the greatest impact.

- 3** Inform recommendations from the [Boston Interagency Fair Housing Development Committee](#) (BIFDC), which guides Large Project proponents (developments over 50,000 sq feet) and Planned Development Areas on how to meet their Affirmatively Further Fair Housing (AFFH) obligations.

- 4** Inform City priorities when negotiating with the State on the future land use and development of State-owned property, such as Designated Port Areas being considered for redesignation to allow housing.

- 5** Inform priorities of the BERDO Review Board when evaluating proposals by market-rate properties to the [Equitable Emissions Investment Fund](#). The Fund supports carbon abatement projects in Environmental Justice communities.

- 6** Serve as a resource for Impact Advisory Groups convened to advise proponents of private development projects, and the Planning Department's Development Review Team, on voluntary mitigation measures.

- 7** Inform community discussions on priorities for disposition of City-owned land, such as using public land for development of new affordable housing and "below market" commercial space.

- 8** Inform rezoning to prime transit-oriented, neighborhood commercial areas in the city for growth via Squares + Streets.

To support community research efforts, the Mayor's Office of Housing has made displacement risk scores by Census Block Group available on [Analyze Boston](#), the City's open data hub.



Boston Residential Displacement Risk Map

Technical Documentation

Introduction

The Residential Displacement Risk Map identifies areas in Boston where housing displacement is most likely to occur. The map shows a displacement risk score, which is an index that combines several indicators into a single score. This document explains the methodology for creating that index.

Summary of the Methodology

The Residential Displacement Risk Map shows a displacement risk score based on 18 indicators (see list on page 7).

We know where direct displacement occurs based on eviction and foreclosure data. We don't have data, however, on economic displacement that happens when a household is pushed out of the area they live due to rising housing prices. So how do we predict displacement risk with incomplete data?

While we don't have hard data on economic displacement, we know a lot about who it affects and the types of places they live from academic studies and reports from residents, housing advocates, practitioners, and others. So we take what we know about the people and places where economic displacement occurs (captured by the indicators in the table at the right), and see what is associated with direct displacement as measured by evictions and foreclosures. We apply this logic because research suggests that if an area has high direct displacement, then it has a high likelihood of also having high economic displacement. While the nature of the displacement may be different—a household moving out of an apartment due to a rent increase, versus a household that's evicted—the characteristics of those households are likely similar. Once we know which indicators are associated with predicting direct displacement, we can see where those indicators are prevalent across all of Boston.

Let's look at an example of how this works. We know anecdotally that renters are more likely to experience displacement than homeowners. So we look to see if the percentage of renters an area has is associated with direct displacement. It is, so we then look across the city and say "all areas—regardless of whether or not direct displacement has occurred there already—have a higher risk of displacement than areas with high homeownership." This is how we use direct displacement and the indicators listed to predict more general displacement risk.

So, the indicators were tested to see how strongly they correlate with direct displacement, and only the strongest indicators were included in the index. Since some indicators are stronger predictors of displacement than others, each indicator is weighted according to its predictive strength. For purely organizational purposes, indicators are grouped in categories pertaining to people, place, and market conditions.

Processing Indicators to Test

We started with the indicators used in the 2020 version of the residential displacement risk map. Then, a literature review was conducted in order to understand if other indicators should be considered. To decide which indicators will be included in the index, statistical tests were completed. But first, all indicators needed to be processed and standardized.

Many of the indicators are from the U.S. Census Bureau, at the block group level. These do not require special processing. The indicators below, however, are at different geographic levels from block groups, and need to be processed so that they can be analyzed in one layer at the block group level.

Indicators that require processing in ArcGIS Pro

Initial Indicator	Initial Data Format	Desired Data Format
Proximity to MBTA station	Vector Polygon (miles)	Block Group Vector Polygon (Mean miles)
Proximity to a High Income area	Vector Polygon (miles)	Block Group Vector (Mean miles)
Commercial Pipeline	Point	Block Group Vector (Mean density)
Residential Pipeline	Point	Block Group Vector (Mean density)

This was done in ArcGIS Pro. We added a spatial join from these indicator layers to a helper grid feature (a grid of points) that can transfer our data from the vector layer to the block group vector layers. The Environment_Grid_Point is a grid of points across the City of Boston (excluding the Harbor Islands, Open Space, and Logan Int. Airport) every 0.05 sq mi. The feature Environment_Grid_Point was created from centroids of the Environment_Grid_Polygon shapefile using the “Generate Fishnets” tool.

Once we processed all indicators to a layer in ArcGIS, we combined all of the indicators into a single feature, which we will use to run our regression analysis in the next section.

Testing Indicators for Statistical Significance

The indicators were tested to see how strongly they correlate with direct displacement. Additionally, we tested the indicators against each other for redundancy, so that we didn’t include multiple indicators that were too similar, in effect weighting those indicators too

strongly in the index. These statistical tests were done in R. Only indicators with strong predictive power of displacement and little redundancy were included in the index.

Now that our displacement data (dependent variable) and indicators (independent variables) are all joined into a common table, we can now test each indicator to see how it is related to displacement. This process was completed in R. Our displacement data (dependent variable) was data on eviction executions and foreclosures. In this process we vetted indicators for co-linearity (redundancy, so that similar indicators weren't over-represented in the index), relationship to displacement (R), statistical significance (p-value) and prediction power (R^2). The goal of this exercise was to only include indicators that correlated with evictions and foreclosures, and were therefore strong predictors of displacement risk, and reduce redundancy of the indicators. The end result is a reduced number of indicators, all of which are statistically significant to the 95% confidence interval. We then found how much of displacement our model is able to predict (using the sum of R^2). The details of this process are described below.

Data Transformations

Before running the statistical tests, we checked for Normal Distribution in the data, since regressions work best when the data is normally distributed. We used histograms and QQPlots to look for data that is not normally distributed. In some cases, the data was heavily skewed to one side of the X axis. In these cases, we ran the Log() Transform Data code block to transform data from non-normal to normal distribution.

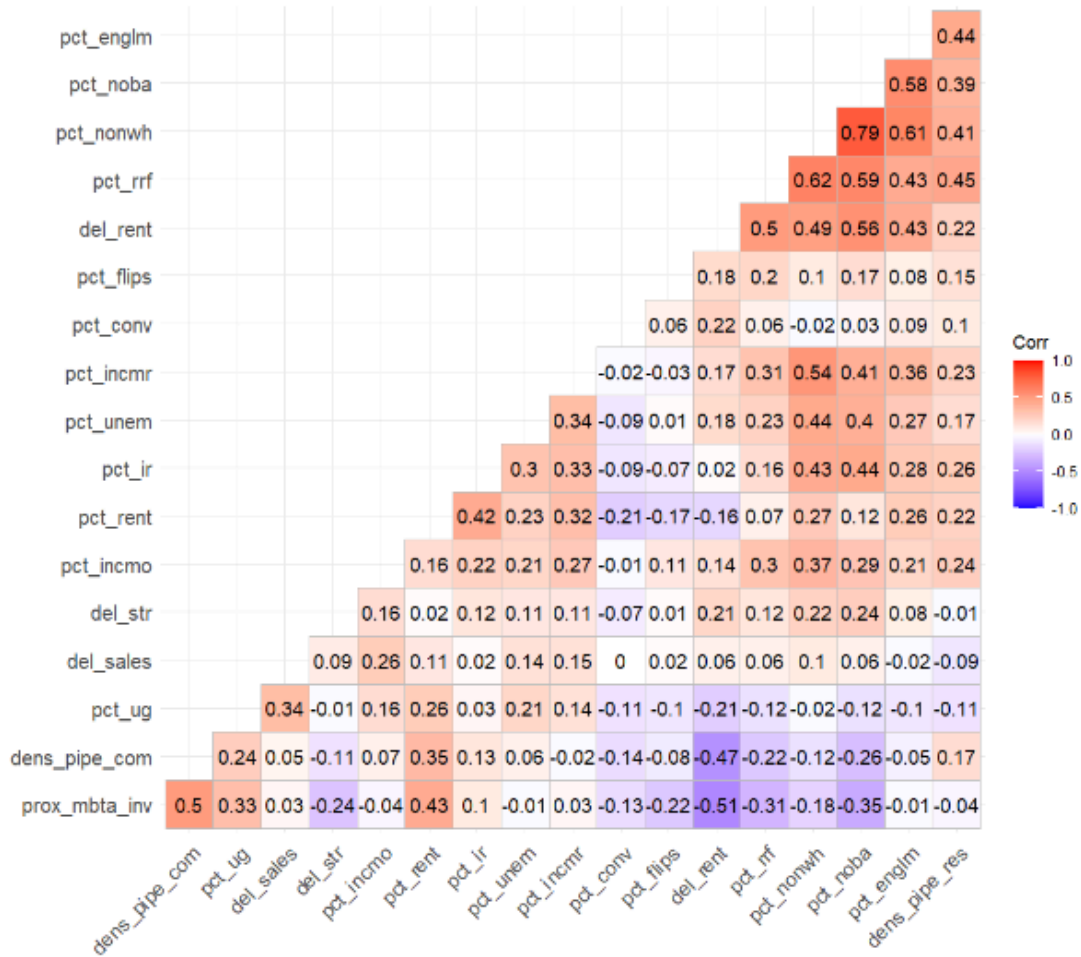
Redundancy

This step checked the indicators for collinearity (redundancy). We ran the "Indicator Colinearity" code block to show the correlation matrix of between indicators. We identified indicators that had a correlation of greater than 0.7. Variables over 0.7 are "highly correlated" (highly redundant). Moderate to High correlation between indicators suggests that we will need to use a regression model that controls for indicator multicollinearity. Otherwise, our model would become highly inaccurate and biased. To improve the model's results, we needed to find which indicators are worth keeping and which to remove without losing too much information. To do this, LASSO and Ridge regressions were used because they have built in controls for multicollinearity. These are described in the next section.

Regressions

Regressions are statistical models that use independent variables (such as our indicators), and test them against a dependent variable (Displacement) to make predictions. Usually, Of Least Square (OLS) prediction models (regressions) are used. However, because we know that we have moderate to high correlation between our indicators, OLS is not advised - the results will be biased and inaccurate. Instead, we needed a model that can take into account our relatively high level of correlation between our indicators.

Figure 2: colinearity between all indicators tested.



Instead of OLS, we used two machine learning regression models with built in features to account for multi-colinearity to reduce the number of indicators and find the indicators' correlation with displacement.

Least Absolute Shrinkage and Selection Operator (LASSO) Regression is a method we used to fit a regression model where multicollinearity is present in the data. It sets the correlation of insignificant indicators to 0 by setting Elasticity Alpha to 1. LASSO is the *maximum* number of indicators that can be removed from the index.

Ridge Regression: Similarly to LASSO, Ridge Regression is a method we used to fit a regression model where multicollinearity is present in the data. It assigned a penalty to the indicator's correlation to displacement by setting Elasticity Alpha to 0. Unlike LASSO, the correlation can never be set to 0, and thus it does not reduce the number of indicators in the index. Ridge as the *minimum* number of indicators that can be removed from the index.

While we may jump to the conclusion that LASSO should be used, because it removes all indicators that are only marginally influential from the model, there are several reasons that this model is not advised. Primarily, The results of the LASSO mode dramatically reduce the number of indicators from 19 to 8. Reasons for including these indicators were their known frequency in Office of Housing Stability displacement cases, external literature, and other U.S. cities' Displacement Risk Indexes.

The Ridge Regression model similarly is flawed for our purpose. While the Ridge regression model did change the correlation to account for collinearity, it is not very useful for getting rid of indicators that are not very impactful to the model - to simplify the index to be more readable and manageable.

What we sought is a trade-off between the LASSO and Ridge models. The Elasticity Alpha provides a means for us to adjust the model's sensitivity to removing indicators from the model. Alpha can be set to any value between 0 and 1. We then calculated the LASSO model, Ridge model, and a 3rd "DRI_Model" with an Alpha of 0.05.

To interpret the results:

LASSO Regression:

Model Coefficients: The predictors that have non-zero coefficients are the variables that the LASSO model identified as important.

Model Prediction: Compare the predicted values to the actual values to assess the model's performance. You can calculate performance metrics like Mean Squared Error (MSE) or R-squared to evaluate the model.

The LASSO prediction model was able to explain 29% of the variance ($R^2 = 0.29$) in Displacement with 7 indicators.

Ridge Regression:

Similarly to LASSO, Ridge Regression is a method we can use to fit a regression model when multicollinearity is present in the data. It assigned a penalty to the indicator's correlation to displacement by setting Elasticity Alpha to 0.

The Ridge model explains 30% of the variance ($R^2 = 0.30$) in Displacement with all 18 indicators.

DRI Model and Prediction:

Recall, what we sought is a trade off between the LASSO and Ridge models. The Elasticity Alpha provides a means for us to adjust the model's sensitivity to removing indicators from the model. Alpha can be set to any value between 0 (lowest sensitivity) and 1 (highest sensitivity). We calculated the LASSO model (Alpha=1), and Ridge model (Alpha=0). Then we calculated the

"DRI_Model" with an Alpha of 0.05 for each indicator. This is the model that will be used to predict the occurrence of displacement. The DRI model explains 30% of the variance ($R^2 = 0.30$) in Displacement with 18 indicators.

Regression Results

Results of the DRI machine learning model

Indicator	Correlation to Displacement (coefficients)
Rental Relief Fund	0.2088
Investor Flips	0.1297
Proximity to High Income Neighborhood	0.1245
Housing Cost Burden (Owner)	0.1181
Access to rapid transit	0.0637
Low English fluency	0.0414
Development Pipeline (residential applications)	0.0254
High concentration of college students	0.0164
Renter tenancy	0.0113
Housing cost-burden (Renters)	0.0089
Rent appreciation	0.0055
Unemployment	0.0039
Condo Conversions	0.0036
Property appreciation	0.0032
Race/Ethnicity	0.0027
Low Education Attainment	0.0012
Short Term Rentals	0.0011
Lack of IR housing	-0.0014

R-squared = 0.3

Root Mean Squared Error = 1.17%

Interpreting the Regressions

The DRI Model accurately predicts displacement 30% of the time (R-squared of 0.3).

Displacement and its indicators are inherently difficult to predict and measure. For such social science cases, it is generally acceptable to have an R-squared of 0.1 to 0.5 (Ozili 2023, [https://www.researchgate.net/publication/369154164_The_Acceptable_R-Square_in_Empirical_Modelling_for_Social_Science_Research#:~:text=Ozili\(2023\)%20argues%20that%20negative,correctly%20predict%20the%20human%20psychology.](https://www.researchgate.net/publication/369154164_The_Acceptable_R-Square_in_Empirical_Modelling_for_Social_Science_Research#:~:text=Ozili(2023)%20argues%20that%20negative,correctly%20predict%20the%20human%20psychology.)).

R^2 is a number between 0 and 1, with 1 being a perfect model. A model with an R^2 of 1 would be able to predict the occurrence of displacement 100% of the time - perfect prediction.

- Given the inherent difficulty of gathering and testing data on housing displacement at the local level, we concluded that 30% predictive power (R-squared) was acceptably accurate at reliably estimating degrees of displacement. The index's findings are consistent with the 2020 Displacement Risk Index and the literature review.
- Displacement is very difficult to predict, and there are many different circumstances that can lead to displacement. There may simply be a lot of randomness in displacement by nature.
- How we measure displacement may be inaccurate. Data on dependent variables for displacement are very difficult to measure and often unavailable at the census block group level. There may be more to consider than just court evictions and foreclosures. For instance, many evictions occur informally outside of the courts, and tenants are often forced out of their homes indirectly by increases in rent prices. These are not captured in the data we're using.
- More types of qualitative indicators should be tested. How people perceive changes in their neighborhood may impact displacement - such as a longtime corner store turning into a luxury boutique. This is hard to measure and would probably require new surveys.

By this point, we had a list of indicators to include in the final Displacement Risk Index.

Final List of Indicators

Indicator Name	Description	Source
People Indicators		
Race/Ethnicity	% of residents who are Non-White (here, non-White includes Hispanic/Latinx residents).	ACS 2018-2022 5-Yr Estimates, Table B03002
Renter tenancy	% of households who are renters	ACS 2018-2022 5-Yr Estimates, Table B25003
Rent burden	% of income spent on rent (median)	ACS 2018-2022 5-Yr Estimates, Table B25071_001
Homeowner cost burden	% of owner households paying over 30% of their income on mortgage	ACS 2018-2022 5-Yr Estimates, Table B25091
Concentration of college students	% of population enrolled in an undergraduate program	ACS 2018-2022 5-Yr Estimates, Table B14002
English fluency	% of population with low English fluency	ACS 2018-2022 5-Yr Estimates, Table B16001
Educational attainment	% of population over 25 without a Bachelor's Degree	ACS 2018-2022 5-Yr Estimates, Table S1501
Place Indicators		
Access to rapid transit	Miles from an MBTA train station	MassGIS Data: MBTA Rapid Transit .

		MBTA NODE, 2022
Proximity to high-income neighborhood	Proximity (miles) of low-income block groups (less than 80% of Area Median Income) to high-income block groups (over 120% of AMI).	Calculated Using: (1) ACS 2018-2022 5-Yr Estimates, Table B19013_001 (2) ACS 2018-2022 5-Yr Estimates, Table B25010_001 (3) 2022 Boston Income & Rent Limits
Market Indicators		
Lack of income-restricted housing	% of housing units that are income-restricted	MOH Income-Restricted Housing Inventory through 2023
Rent price growth	% change in average rental listing price per square foot between 2019-2023	Rental Beast and MLS, 2019-2023
Home sales price growth	% change in average home sale price per square foot between 2019-2023	The Warren Group, 2019-2023
Residential development	Density of residential development applications per 0.05 square mile	ISD permitting data, analyzed by MOH
Short Term Rentals	% change in short term rental units from 2020-2023	City of Boston Short Term Rental Registration data
Investor Home Flips	% of properties purchased by an LLC in 2020-2023 and flipped within 2 years	The Warren Group, 2019-2023
Rental Relief Fund (RRF) Assistance	% of households receiving City assistance (RRF) to pay rent, moving costs, and/or utilities between 2021-2023	Mayor's Office of Housing data
Unemployment Rate	% of residents in the labor force but unemployed	ACS 2018-2022 5-Yr Estimates, Table B23025
Condominium Conversions	% of rental properties converted to a condo between 2020-2023	Mayor's Office of Housing data

In addition to the indicators eventually selected, several other indicators were considered. There are a variety of reasons why these indicators were not selected, which are explained in the table below. Some of these indicators may be worth exploring in future iterations of the map, especially as new research on these topics are published.

Indicators Considered but Not Included:

Indicator Name	Reason for Excluding
Parks Investments	No precedent for data parameters and unclear impact on residential displacement
Developer Internal Rate of Return	Data not available
Age (population 65+)	Not statistically significant; may be redundant with homeowner cost burden
Potential development sites (unused/vacant parcels)	Used development applications instead (a more direct measure)
Change in individuals over the age of 25 holding a Bachelor's degree or higher	Difficult to measure block group data across time since those geographies change
Change in median income	Difficult to measure BG data across time since BG geographies change

BPDA's Squares + Streets initiative areas	Data not available
Severe Rent Burden	Redundant with regular rent burden
Zoning Changes	Data not available
Commercial Development Applications	Not statistically significant in DRI Model

Next, we created the index.

Applying Weights

Since some indicators are stronger predictors of displacement than others, each indicator was weighted according to its correlation in the DRI Model. The weight (coefficients from the DRI regression model) for each indicator is listed below:

Indicator	Correlation to Displacement (coefficients)
Rental Relief Fund	0.2088
Investor Flips	0.1297
Proximity to High Income Neighborhood	0.1245
Housing Cost Burden (Owner)	0.1181
Access to rapid transit	0.0637
Low English fluency	0.0414
Development Pipeline (residential applications)	0.0254
High concentration of college students	0.0164
Renter tenancy	0.0113
Housing cost-burden (Renters)	0.0089
Rent appreciation	0.0055
Unemployment	0.0039
Condo Conversions	0.0036
Property appreciation	0.0032
Race/Ethnicity	0.0027
Low Education Attainment	0.0012
Short Term Rentals	0.0011

So far, our DRI Model uses the following function to predict Displacement:

$$\text{Displacement} = \sum (\text{Indicators} * \text{Correlation}).$$

In the next section, a weight is added to the function above to account for the geographic spread of the data used in each indicator.

Using the Weighted Geographic Cell Multilinear Regression (WGCMR)

The Displacement Risk Index (DRI) uses a variety of indicators. Though this adds nuance to our model, it also poses unique challenges to creating reliable results. A large challenge faced when creating this index was the different geographic coverage of each indicator. Does each indicator have data that covers the City of Boston as a whole, or does it represent only certain parts of Boston? Some indicator's data cover the entire city, others cover very small areas of the city.

The DRI machine learning model finds correlation between indicators and displacement, however it does not account for the different geographic coverage of each indicator. Thus, the results would be unreliable without taking this into account. The WGCMR weights indicators by their representation of the City of Boston as a whole, then calculates a Displacement Risk Score. The Displacement Risk Score is the final measure of overall housing displacement risk used in the Displacement Risk Index.

The WGCMR accounts for 2 key variations in the data. First, the variation in the amount of geographic coverage of each indicator. How much of Boston does each indicator cover? Indicators that cover large geographic extents of Boston shall be given more weight - as their larger sample sizes and representation of different socio-geographic settings are valuable. Indicators that cover smaller geographic extents still serve a useful purpose, however their weight shall be penalized for not being socio-geographically representative of the city as a whole.

Second, the variation in the number of indicators present at each geographic location. How many indicators does each block group contain? Where do indicators tend to overlap geographically? Similarly the WGCMR weights geographic areas where there are more indicators present higher than geographic areas where few indicators are present. That is, some locations in Boston are covered by all of the DRI indicators, while another location in Boston may only be covered by a small number of DRI indicators. Those locations with more indicators have larger weights. This weight accounts for the variation in how much data is available at each geographic location.

How does our WGCMR account for geographic representation of the indicator? The DRI combines data from a variety of sources into a geographic environment - US Census Block Groups in our case. There are 581 Block Groups in the City of Boston, each representing a row in a table. There are 18 indicators, each a column in a table.

Here is how the first variation (geographic coverage) is controlled for: The greater the number of rows for each indicator without missing data, the greater the indicator's geographic coverage of the city. Each indicator receives a weight (wg) equal to the proportion of block groups (rows) without missing data included out of all 581 block groups in the city.

Here is how the second variation (number of indicators in each block group) is controlled for: The greater the number of columns for each block group without missing data, the greater the number of indicators represented in each block group. Each indicator receives a weight (wi) equal to the proportion of indicators (columns) without missing data included out of all 18 indicators.

WGCMR Weights:

Displacement (wgDis) * (wiDis) = \sum (Block Group Level Indicator Value * (wgInd) * (wiInd))

Or

Displacement * (Displacement WGCMR Weight) = \sum (Block Group Level Indicator Value * Indicator WGCMR Weight)

Calculating the Displacement Risk Score

The Displacement Risk Score is a weighted prediction of the percent of housing displacement by block group. It works by combining block group level data for each indicator in a table, DRI Model Correlations and WGCMR. The DRI Model provides the Index to be used and correlations to be multiplied with each indicator's values by block group. Together, block group level data for each indicator and the DRI Model directly predict "pct_dis" (foreclosures and evictions as a percent of households displaced). The WGCMR is multiplied to the block group level data for each indicator and the DRI Model. This weights the predicted pct_dis to account for their geographic coverage and indicator representation, as discussed in the "Weighted Geographic Cell Multilinear Regression" section above.

Displacement Risk Score = \sum (Block Group Level Indicator Value * WGCMR Weight * DRI Model Correlation)

How to Interpret the Score:

The minimum value is the lowest adjusted displacement risk prediction that is observed in the City of Boston - Lowest Risk. The Maximum value is the highest adjusted displacement risk prediction observed in the City of Boston - Highest Risk. Between the lowest and highest score is a normal distribution of scores by block group. Most Displacement Risk Scores are near the median risk score for the City of Boston.

We also calculated the DRI score broken down into its 3 subindices: People (demographics), Place (amenities), and Market.

Filtering The Map

The last step was to filter out areas on the map that were not applicable to the Displacement Risk Score, such as Logan International Airport, the Harbor Islands (uninhabited), open space, water, block groups outside of the City of Boston, and block groups where more than 80% of the total

housing is income-restricted. Since these areas with over 80% of housing income-restricted have such strong protections against displacement for the majority of housing units, they are skimmed out of the risk analysis.

Limitations

While the Displacement Risk Map was created with much intention and aims to measure displacement risk using sophisticated methods, there are some limitations to the index. First, while we have data on direct displacement (evictions and foreclosures), we do not have a direct way of measuring economic displacement. Thus, the indicators in the index were utilized to estimate this. However, since we used the correlation between these indicators and evictions and foreclosures as a way to estimate risk citywide, the risk assessment may be skewed towards areas with high eviction and foreclosures rates and inadequately predict economic displacement elsewhere. Collecting data on economic displacement would address this issue, though that is a large undertaking.

Second, there are limitations to the statistical analysis done to create the index. LASSO and RIDGE regression methodology was used, but these machine learning approaches hide important statistical information and make interpreting the results very difficult. In future iterations of the index, it may be worth taking a modified approach using Ordinary Least Squared (OLS) regression to make the analysis more transparent and the results easier to interpret.

Additionally, the layer used for the “proximity to the MBTA” indicator included only MBTA train lines and the silver line. It does not include commuter rail lines, which should be included in future iterations of the map.

Finally, the role of income-restricted housing is complex. In the index, income-restricted housing is an indicator that lowers the risk-score in areas with high concentrations of it. However, these same areas generally score as high risk in the index because the prevalence of income-restricted housing increases the prevalence of low-income renter households, which contribute to higher risk scores. Given the number of indicators and the fact that the demographic characteristics of the populations living in income-restricted housing generally correlate to where displacement is highest, the weighting for income-restricted housing in the index does not have as much of a damping effect on the risk score as one would expect. It was decided to *not* manually adjust its weight in the index, given the fact that many evictions do happen in these areas. Further thinking should be done on how to account for the strong protective power of income-restricted housing at the community-level in future iterations of the map.

This documentation was published by the Mayor's Office of Housing, 2025

Exhibit G

DIVERSITY PRESERVATION PREFERENCE

What: The Mayor's Office of Housing will evaluate the Diversity Preservation Preference (DPP) piloted in 2017 to understand how effectively it advanced goals of increasing access to new income-restricted housing for residents in the project area most at risk of displacement. The preference pilot could be applied to up to 50% of units in projects located in non-segregated geographies with high rates of displacement for households at high risk of displacement. MOH will explore legal constraints on authority to use preferences like the DPP, and determine whether this or a preference with similar objectives should be re-established.

Why: A preference like the DPP can be a strong anti-displacement strategy by increasing opportunities for residents at risk of displacement to stay in their neighborhoods and benefit from new housing development. Advocates have voiced support for this or a comparable tool.

INCOME-RESTRICTED HOUSING APPLICATION PORTAL

What: The Mayor's Office of Housing is exploring how to develop a consolidated digital application experience for privately owned affordable housing. This multilingual portal will make it easier for residents to apply to income-restricted units they're eligible for, identify preference categories that apply to their circumstances (e.g. involuntary displacee, extreme rent burden) and track their application progress. While online affordable housing listing services like Boston's MetroList help consolidate the housing search process, a new digital application portal would help consolidate and clarify the application process.

Why: MOH receives thousands of applications for each privately-owned, income-restricted lottery it runs. Building a consolidated application experience that eases the application burden and keeps applicants apprised of their progress will help increase access to stable housing opportunities and reduce the burden on housing seekers and developers alike.

Exhibit H

Homes for equity



What is *Homes for Equity*?



[Key initiatives](#) [The OppCo difference](#) [About](#)

[Memb](#)

discrimination, allowing them to build and to benefit from intergenerational wealth.

Why is homeownership so important?

Homeownership is not only part of the American dream, it is also how many families build **economic security**. Parents use the equity in their homes to pay for college or provide home purchase assistance for their children. Yet for decades, white households bought homes and generated wealth supported by public policies and private actions that excluded Black households from buying homes, contributing to stark **racial inequality** in wealth.



Stories of discrimination

As part of our research on housing discrimination, we interviewed Roxbury residents who have experienced it. Meet the participants of our **oral history project** and hear their stories.

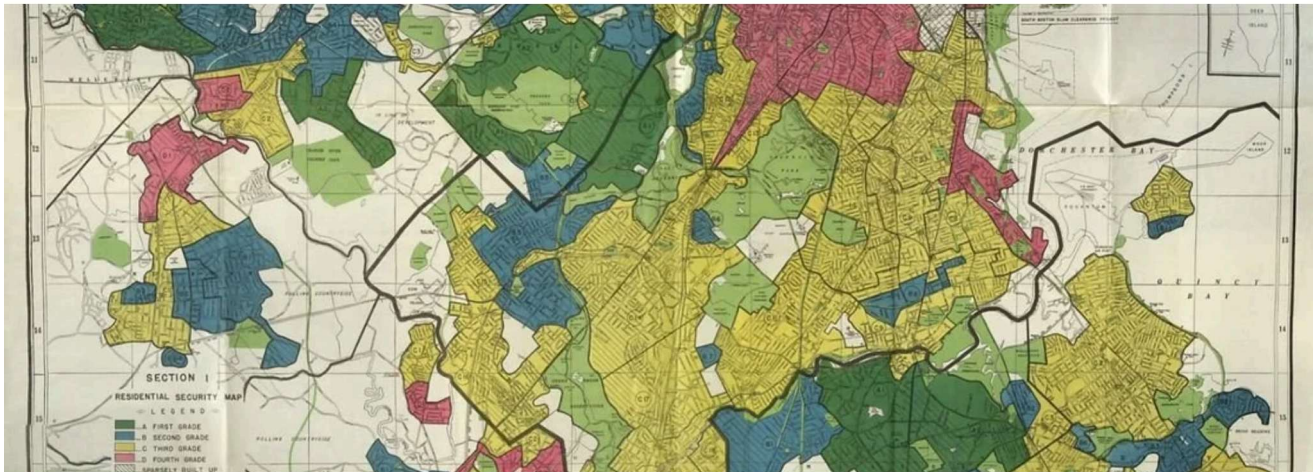
Oral History Project

Report release: City, state, and industry roles in housing discrimination

To achieve housing and wealth equity requires that we acknowledge historic and current discriminatory housing practices and explicitly commit to remedying the economic harm.

We and our partners at StarLuna Consulting have done extensive research to document the history of harm caused by housing discrimination in our *Homes for Equity* pilot neighborhood, Roxbury, Massachusetts.

Our reports show the pervasiveness of housing discrimination across many decades, and illustrate the ways both historical and current policies and patterns of discrimination harm potential homebuyers of color.



The Housing Ownership Loan Corporation, established by the US Congress in the 1930s, created Residential Security maps color-coded based on the “risk” level of the area: red for hazardous, yellow for declining, blue for desirable, and green for best. Thus the harmful practice of “red-lining” began.

Source: www.bostonpoliticalreview.org

Read the Reports

Did you know?



Key initiatives The OppCo difference About

Memb

Massachusetts ranks 46th in the country for homeownership disparities, and white families are two times more likely to own a home than Black families.

The Federal Reserve Bank of Boston found that white households in Boston have \$247,000 in assets on average, while Black households have assets of only \$8.

A legal basis in the Fair Housing Act

The Fair Housing Act prohibits housing discrimination based on race. It also establishes an obligation to remedy or reverse conditions of housing discrimination.

The *Homes for Equity* team posits that the economic harm caused by housing discrimination is so great, it creates an obligation to remedy the harm. Our goal is to employ a racial disparity lens to address housing supply, affordability, and financing. We seek to sponsor race-conscious buyer selection for affordable homes with greater owner access to the equity and appreciation of their homes.

We are prepared to make and test our model in Massachusetts, and then lift up our program design so it is readily deployed nationwide.



[Key initiatives](#) [The OppCo difference](#) [About](#)

[Memb](#)

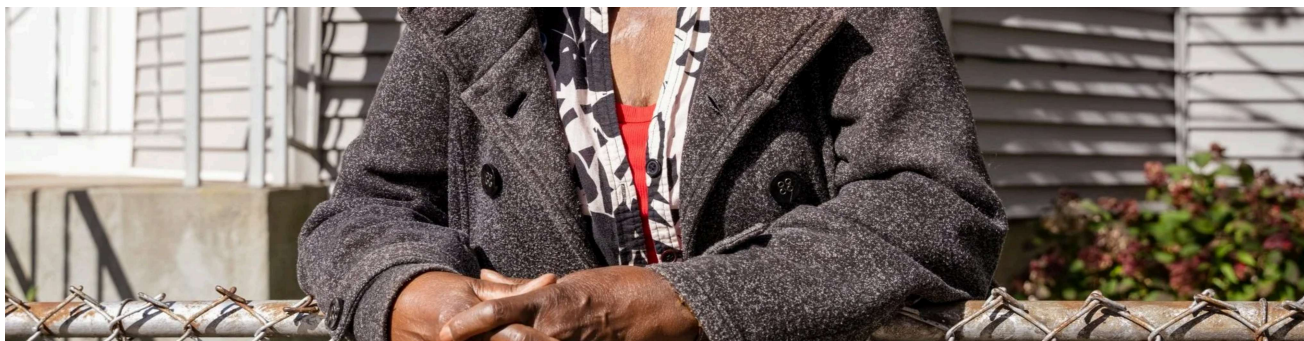


A dual approach to restorative homeownership



[Key initiatives](#) [The OppCo difference](#) [About](#)

[Memb](#)



The *Homes for Equity* pilot focuses on two areas key to restorative homeownership: financing and fair housing marketing innovations that allow:

- 1. Explicit race-conscious marketing and buyer selection; and**
- 2. Greater home equity appreciation to build wealth among buyers of color.**

We will work with individual cities and towns, starting with the City of Boston, to negotiate the terms of the *Homes for Equity* initiative in each locality.

Our goal is to reform policies to begin to redress the economic harm through housing discrimination experienced by generations of Black families. Within the affordable housing sector, subsidy terms limit the ability of homeowners to realize the market value of their homes, and deed restrictions on affordable homes cap resale prices and limit equity that homeowners can earn. Even inheritance of home may be restricted. No such policies were applied to the programs historically used by white households when government programs

homeownership goals while creating wealth-building for households long-denied such opportunity.

Homes for Equity featured at CHAPA Fair Housing Symposium

Thank you CHAPA for the opportunity to share information about this initiative at their recent Fair Housing Symposium. The presentation by Maria Latimore and Neenah Estrella-Luna starts at 16:50.



[Key initiatives](#) [The OppCo difference](#) [About](#)

[Memb](#)

CHAPA's 2023 Fair Housing Symposium: From Research to Redress



Core Project Team

Research Advisory Council

Partners



This initiative is a collaboration between Opportunity Communities (OppCo), Nuestra Comunidad, and the Massachusetts Affordable Housing Alliance (MAHA)



Key initiatives The OppCo difference About

Memb

ADDITIONAL SUPPORTERS

Beth Israel Lahey Health 
Beth Israel Deaconess Medical Center

The Boston Foundation 

 **BUILDING
EQUITY™**
goulston&storr

Klein Hornig LLP
COUNSELORS AT LAW


NeighborWorks®

AMERICA

 **OppCo** | OPPORTUNITY
COMMUNITIES

[Key initiatives](#) [The OppCo difference](#) [About](#)

[Memb](#)

– Brooke A. Linkow, Senior Manager, National Homeownership Programs & Lending, NeighborWorks America

Opportunity Communities

c/o The Neighborhood Developers
4 Gerrish Ave.
Chelsea, MA 02150

Privacy Policy

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties. Learn [more](#).

Copyright © 2024 Opportunity Communities - All Rights Reserved.

Quick links

[Mission](#)

[Careers](#)

[Contact](#)

[LinkedIn](#)



[Key initiatives](#) [The OppCo difference](#) [About](#)

[Memb](#)

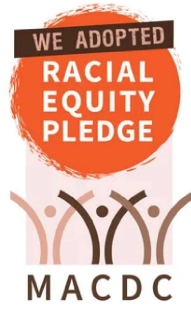


Exhibit I

Submission Requirement:

The City of Boston and the BPDA are strongly committed to ensuring that the disposition of BPDA properties provide opportunities for diversity and inclusion, wealth-creation, and workforce participation for businesses and individuals who have historically been underrepresented in real estate development.

Proponents must submit a Diversity and Inclusion Plan which reflects the extent to which the proponent plans to include significant and impactful economic participation, employment, and management roles by people of color, women, certified Minority-Owned Businesses (“MBEs”), and Women-Owned Business Enterprises (“WBEs”) (collectively referred to as ‘M/WBEs’) on this project.

MBEs and WBEs must have received or have pending applications for certification under the State of Massachusetts Supplier Diversity Office or City of Boston. Firms with pending certification may be included in a proposal on the condition that certification is granted by the start of work or the firm is replaced by a firm certified under the State of Massachusetts Supplier Diversity Office or City of Boston. All replacements or substitutions must be approved by the BPDA.

The Diversity and Inclusion Plan should address all **phases** of development, including but not limited to:

- pre-development (ex. development entity, ownership, equity and debt investment, design, engineering, legal, other consultants);
- construction (ex. general contractor, sub-contractor, trades, workers performing construction, suppliers, engineering and other professional services); and
- ongoing operations (ex. building tenants, facilities management, contracted services).

The Diversity and Inclusion Plan should include the following good faith **measures** relating to M/WBE participation:

- Providing information as to the M/WBE-owned firms participating in the development, the nature of their participation in the particular phase(s) of the development, and the extent to which such M/WBE involvement is committed as of the date of proposal submission. Where possible proponents should include detailed information on the M/WBE role, responsibility and total contract value in the development.
- The proponent’s strategy for supplier diversity and M/WBE outreach, including its goals and its good faith efforts the proponent may propose for M/WBE participation. Proposals should indicate what strategies will be pursued, or are being pursued, to identify M/WBE participation, including outreach and identification activities to timely inform the M/WBE community of upcoming opportunities.

- Strategies which support sustainable capacity development in M/WBE firms, such as mentor-protégé relationships or joint ventures. These partnerships for capacity development should describe the impact of participating in this project on the M/WBE firm's future business growth and opportunities.
- The proponent's strategy to support workforce training/capacity building for populations underrepresented in the construction trades as well as other fields of real estate development.
- A description of the Development Team's prior experience and track record undertaking similar programs at other locations including examples deployed on private property.

The Diversity and Inclusion Plan should discuss why it is specific, realistic, executable, and impactful. The Diversity and Inclusion Plan evaluation criterion shall comprise 25% of the BPDA's comparative evaluation of each proposal submitted.

Evaluation Criterion:

This criterion evaluates the comprehensiveness of the proponent's Diversity and Inclusion Plan to increase opportunities for sustained participation and capacity building for people of color, women, and certified M/WBEs in the development of the Property, including specific measures throughout all phases of development, for the performance of commercially useful and valuable functions. The Diversity and Inclusion Plan should be specific, realistic, executable, and impactful.

This criterion shall comprise 25% of the BPDA's comparative evaluation of each proposal submitted.

Proposals that provide a specific, realistic, executable, and demonstrably impactful Diversity and Inclusion Plan to increase opportunities for sustained, long-term participation and capacity building for people of color, women, and certified M/WBEs, which addresses each phase and measure, will be ranked as **Highly Advantageous**.

Proposals that provide an adequately specific, realistic, executable, and impactful Diversity and Inclusion Plan to increase opportunities for participation and capacity building for people of color, women, and certified M/WBEs, which addresses some phases and measures, will be ranked as **Advantageous**.

Proposals that provide a Diversity and Inclusion Plan which is not specific, realistic, executable, or impactful will be ranked as **Not Advantageous**.



DEI in Development

Policy Overview



**boston planning &
development agency**

What are we doing?

BPDA will be collecting Diversity, Equity, and Inclusion Plan Disclosures as part of the Article 80 Review process.

We are doing this to:

- understand disparities in the real estate market
 - increase M/WBE participation over time, and
 - evaluate strategies to drive greater impact
- We are requesting you submit plans to include economic participation, employment, and management roles for people of color, women, and certified Minority and Women Owned Businesses when filing a project.
 - We are planning to look at the results of these submissions over the next few months and consider a path forward and codify these DEI plan disclosures into the zoning code.



**boston planning &
development agency**

Why now?

- **Diversity, Equity, and Inclusion is of the utmost importance to us as an agency**, as evidenced by our current policy that requires bidders for public land parcels to outline a DEI plan.
- The BPDA is strongly committed to ensuring that the **disposition of publicly-owned properties provide opportunities for wealth-creation and workforce participation** for businesses and individuals who have historically been underrepresented in real estate development. **To continue this important work, we want to bring the same criteria into private development.**

Beginning in 2018, all RFPs for the redevelopment of BPDA-owned land require respondents to outline a Diversity, Equity, and Inclusion plan. **In 2020, the BPDA began weighing this criterion at 25% for all RFPs.**

Since 2018, the **BPDA released over 18 RFPs and designated 11 development projects to diverse development teams.**

How does it work?

- Project proponents will be requested to **list any certified M/WBEs that will participate in the project**, including the type/nature of work performed on the project and/or the financial interest in the project.
- The **policy initiative is non-evaluative** and applies to projects reviewed through **Article 80B, 80C, and 80D** (with the exception of IMP Amendments and Renewals.)
- The **“DEI Plan Disclosure” should be included in the first filing** related to the project, i.e. Project Notification Form, Planned Development Area, or Institutional Master Plan Notification Form.
- Projects that file their **PNF, PDA, or IMPNF after August 11, 2022** will be requested to submit the Disclosure.



What should the DEI Plan Disclosure address?

Pre-development

- Development entity
- Ownership, equity and debt investment,
- Design, engineering, legal, other consultants

Construction

- General contractor / subcontractor
- Trades, workers performing construction
- Suppliers
- Engineering, and professional and other services

Ongoing Operations

- Building tenants
- Facilities management
- Contracted services
- Others



What is included in the DEI Plan Disclosure?

- **Information related to the M/WBE-owned firms participating in the development**
 - Nature of participation, extent to which their involvement is committed to while filing, other detailed information on the M/WBE role where possible.
- **Strategy for supplier diversity and M/WBE outreach**
 - Goals, strategies, and good faith efforts proposed for M/WBE outreach and ongoing participation
- **Strategies that support sustainable capacity development in M/WBE firms**
 - Mentor-protégé relationships or joint ventures, description of potential impact on the M/WBE firm's future business growth and opportunities.
- **Strategy to support workforce training/capacity building**
- **Any prior experience and track record undertaking similar programs**



Implementation timeline



Resources

- Policy statement available online at: <http://www.bostonplans.org/projects/development-review>



The screenshot shows the website's navigation menu with links for "About Us", "Contact Us", "Careers", "News", "Calendar", and "Translate Page". The main content area is titled "What is Development Review?" and includes a sub-section "Diversity, Equity, and Inclusion (DEI) in Development Policy". The text explains that as of August 11, 2022, the BPDA has instituted a new policy to promote diversity within large private development projects. It details the requirements for DEI plans, including the goal of increasing M/WBE participation. A list of phases of development is provided, including pre-development, construction, and ongoing operations. A button labeled "View the DEI in Development Policy" is visible, along with contact information for Nupoor Monani, Deputy Director of Master Planning and Policy.

Development

Article 80 Records Library

Development Projects

What is Development Review?

- What is Article 80?
- Submit Your Project Data
- Large Projects
- Small Projects
- Planned Development Areas
- Institutional Master Plans
- Mitigation & Impact Advisory Groups
- Accessibility Guidelines and Checklist
- Affirmatively Furthering Fair Housing Article 80
- Article 37 Green Building and Climate Resiliency Guidelines
- Article 25A Coastal Flood Resilience Overlay District
- Article 80 Design Review Broadband Ready Buildings Questionnaire
- Building Wraps
- Day Care Facility Requirement
- Language Access Plan for Article 80
- Smart Utilities Checklist
- [DEI in Development Policy](#)

Compliance

What is Development Review?

Diversity, Equity, and Inclusion (DEI) in Development Policy

As of August 11, 2022 the Boston Planning & Development Agency (BPDA) has instituted a new policy to promote diversity within large private development projects in the City of Boston. The policy requests that proponents disclose plans to include economic participation, employment, and management roles for people of color, women, and certified Minority and Women Owned Businesses within their project, as part of the **Article 80** review process for Large Projects. This will also include **Planned Development Areas**, and **Institutional Master Plans**. The policy builds on the BPDA's **Diversity, Equity, and Inclusion (DEI) requirements** that ask bidders for public land parcels to outline a DEI plan. The BPDA is collecting these Plans for informational purposes to understand disparities in the real estate market, increase M/WBE participation over time, and evaluate strategies to drive greater impact.

In keeping with its mission, and in concert with the call by Mayor Michelle Wu to make Boston a city where all can learn about and participate in development, the BPDA is seeking to use this opportunity for information gathering to better understand the ways in which policy can be implemented in furtherance of the goal of economic advancement, particularly for those whose opportunities have been limited in the development arena.

A developer's DEI Plan Disclosure addresses all phases of development, including but not limited to:

- pre-development (ex. development entity, ownership, equity and debt investment, design, engineering, legal, other consultants);
- construction (ex. general contractor, sub-contractor, trades, workers performing construction, suppliers, engineering, and professional and other services such as landscaping, catering, fuel supply, rental equipment, etc.);
- And ongoing operations (ex. building tenants, facilities management, contracted services).

[View the DEI in Development Policy](#)

For more information, please contact [Nupoor Monani](#), Deputy Director of Master Planning and Policy.

Thank you!
