



GREATER BOSTON
LEGAL SERVICES
...and justice for all

August 10, 2018

Dan Ruben
Executive Director
Equal Justice America
Equal Justice America
13540 East Boundary Road, Building II, Suite 204
Midlothian VA 23112

Dear Mr. Ruben:

I am writing to express my gratitude to Equal Justice America for funding the internship of Zhuoran Zhong in Greater Boston Legal Services' Housing Unit this summer. I am a Senior Attorney in the Housing Unit and was Zhuoran's supervisor.

Zhuoran's work this summer was truly outstanding. Zhuoran worked with us on many aspects of the effort to create and preserve affordable housing in the City of Boston on behalf of low-income tenants and community organizations. He was one of the very best, most productive and most capable interns I have worked with in over 30 years. He was enthusiastic and motivated, worked extremely hard, and created work products that we will be relying upon and referring to for years into the future.

Boston is facing the most extreme housing crisis I have seen in my legal services career. The current economic expansion has generated a tidal wave of luxury housing and commercial development, starting in traditionally high-priced neighborhoods and now spreading throughout the city. Housing costs are skyrocketing in a city that not too long ago in some neighborhoods had rents and home sale prices affordable to low- and moderate-income residents. Compounding the problem, long-term use restrictions for privately-owned, publicly subsidized housing created in the 60's, 70's and 80's are expiring, causing many owners to exit subsidy programs and convert to market rents. Low-income tenants cannot find rental housing even with Section 8 vouchers because of the tight market. As a result, once-affordable neighborhoods are becoming out-of-reach for long-term residents, resulting in massive displacement from the City.

A key neighborhood organization in the Roxbury neighborhood of Boston convened a group of public interest attorneys to look for legal handles to address this crisis, especially the impact of new luxury construction in displacing low- and moderate-income residents. Zhuoran wrote a masterful legal analysis regarding fair housing theories to address City of Boston zoning and development approvals leading to the displacement of members of protected classes. This memo is being shared in the group and will be a valuable future reference as we work to develop a legal strategy.

When a Boston charitable organization began displacing long-term elderly and disabled residents so that it could rent out once-affordable units on AirBnB, Zhuoran researched Massachusetts law governing charitable organizations so that we could develop a legal approach to stop the displacement. When a neighborhood organization asked for our help in getting the Boston Planning and Development Agency (BPDA) to do legally-required outreach for public meetings to low-income residents of color who would be most impacted by a proposed huge commercial and luxury housing development, Zhuoran researched and drafted a letter informing the BPDA of its obligations under the Limited English Proficiency Title VI regulations and the Fair Housing Act. When a tenant organization in a subsidized development in Boston's Chinatown asked for help in reviewing the owner's contractual obligations and potential contract violations, Zhuoran met with the group and prepared an analysis.

To assist in analyzing the impact of federal legislative changes allowing potential rent increases in Low-Income Housing Tax Credit developments, Zhuoran collected data going back 20 years and created an invaluable spreadsheet illustrating how the rent increases would exclude Section 8 voucher holders from the housing. We will be submitting Zhuoran's spreadsheet to the state agency working on implementing regulations.

Zhuoran also analyzed and compiled notices about the timing of expirations of use restrictions from owners of affordable housing developments required under Massachusetts General Laws Chapter 40T. Chapter 40T was created to ensure that residents and communities will have sufficient advance notice of the loss of use restrictions to mount a preservation effort. Zhuoran's assistance in compiling key information will be useful long into the future in our work with tenants in "expiring use" developments.

I know that Zhuoran is keenly interested in public interest law. With his exceptional skills, his insight and intelligence, his commitment, and his amazing work ethic, he will undoubtedly make a truly significant contribution to the cause of justice. His work this summer was invaluable to us and to our low-income clients. We are deeply grateful to Equal Justice America for funding Zhuoran's work with us this summer.

Very truly yours,



Margaret F. Turner
Senior Attorney