

COMMONWEALTH OF MASSACHUSETTS
SUFFOLK SUPERIOR COURT

MITCHELL MATORIN, and
LINDA SMITH

Plaintiffs,

v.

COMMONWEALTH OF
MASSACHUSETTS, and its EXECUTIVE
OFFICE OF HOUSING & ECONOMIC
DEVELOPMENT,

Defendants

Civil Action No. 2084-CV-01344

AFFIDAVIT OF LYNDIA DOWNIE

I, Lyndia Downie, hereby declare as follows:

1. I am over the age of 18 and am otherwise capable of making this Affidavit. I make this declaration based on my personal knowledge except where I have indicated otherwise.

2. I am currently the President and Executive Director of Pine Street Inn and have been in this position since 2000. I have been a member of Pine Street's staff for 35 years, working in roles throughout the organization. Pine Street Inn is now the largest provider of permanent supportive housing for men and women moving out of homelessness in New England, with 850 units of housing. In collaboration with other key agencies, the Commonwealth of Massachusetts, and the City of Boston, we have brought the population of unsheltered homeless individuals to under 3 percent. To place that in context, in San Francisco, a city of similar size and high housing costs, the unsheltered homeless rate is over 50 percent.

3. Since its inception in 1969, Pine Street Inn (PSI) has been serving Greater Boston's homeless through a variety of responsive, community-based programs and services. PSI is the most comprehensive homeless services agency in New England, providing not only food, clothing,

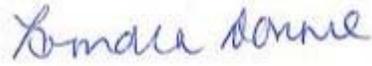
and shelter, but also day and night-time street-based outreach, access to health care, job training, affordable housing and other critical resources for nearly 1,900 men and women each day and night at its 40 locations throughout Metropolitan Boston.

4. Like most of the world, Pine Street Inn, New England's largest provider of shelter and housing for unaccompanied homeless adults, has had to make significant shifts in how services are delivered, and at great cost. This spring, universal COVID-19 testing was conducted at four of PSI's shelters and the positivity rate was 36%. Clearly, the overcrowded conditions contributed to the viral spread as CDC recommended social distancing could not be provided. In an effort to stop the spread, we needed to reduce our existing shelter capacity by about 35%. A variety of temporary options were set up in the city for isolation, quarantine and shelter depopulation. Testing has consistently continued and with the depopulation strategy the positivity rate plummeted to 1.7%

5. We now know with certainty that the temporary depopulation strategy that was instituted needs to be permanent. Very quickly, we were able to set up new shelters and this must now be a springboard to the creation of more permanent supportive housing. Why create shelters when we could and should be creating or maintaining housing?

6. We also know that our capacity to take in new guests is severely limited. An increase in evictions will eventually bring new men and women to our doors. And behind those doors there is simply no room. Shelters are obligated to abide by public health guidance and the presence of COVID-19 for the foreseeable future changes our capacity to shelter new homeless. It is important that we do everything we can to keep people housed.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on this 24th day of July, 2020.

A handwritten signature in blue ink that reads "Lyndia Downie". The signature is written in a cursive style.

Lyndia Downie