

October 29, 2014

Brian Pine
CEDO
City Hall, 149 Church Street
Burlington, Vt. 05401

Re: Comments on “Building Opportunity: Action Plan for Expanding and Improving Burlington’s Housing Stock”

Dear Brian,

Thank you for the opportunity to comment on the draft report for Expanding and Improving Burlington’s Housing Stock (the “Report”). I write as a Burlington resident with both a professional background and personal interest in affordable housing. Accordingly, my comments will focus primarily on the Report’s discussion of those issues:

Taking Issue with the Basic Premise of the Report. Although there is much in the Report with which I agree, the Report’s discussion of affordable housing appears to view such housing as an additional cost to the City. For example, the discussion of Inclusionary Zoning suggests that IZ “can make project financing more difficult or unworkable.” I would suggest that an approach which views perpetually affordable housing for low and moderate income persons as a “cost” to the City is based on a false premise.

Without a robust program for preserving and developing perpetually affordable housing for low and moderate income persons, the cost to the City will ultimately increase, as buildings deteriorate and social service, police, fire and health costs increase. From a purely economic point of view, the City will become a less attractive place if it has a deteriorating housing stock and an increasing population of distressed and homeless individuals and families. Such conditions reflect poorly on the City and discourage visitors who expect to see a place that takes care of its vulnerable populations. To be blunt, a walk down Church Street this past year shows a City that has not done an effective job in providing for its homeless population.

The most cost-effective way of protecting City resources when it comes to housing is to have a multi-faceted effort for supporting Vermont’s policy of perpetually affordable housing. Indeed, rather than constituting an “added cost”, a strong program of perpetually affordable housing which is located in the City center near services, transportation and jobs will ultimately strengthen the City’s economy, reputation and attractiveness as a home to a wide variety of income groups. Perpetually affordable housing is an extraordinarily effective way to both improve the City and control costs. Similar reasoning underlies other preventative programs such as pre-K, Head Start and the Affordable Care Act.

Inclusionary Zoning. Inclusionary Zoning is one tool that the City has available to it to improve its stock of affordable housing for low and moderate-income persons. For the reasons described above, the potential limitation or removal of IZ is self-defeating. The Report sets forth a number of regulatory reforms in section II that are designed to lower the cost of development. I agree with the Report's recommendations concerning permitting, zoning, building codes and fees, and I support an examination of parking minimums and rehabilitation codes. Savings accrued from these efforts should offset any claimed "costs" of inclusionary zoning.

More fundamentally, all government requirements cost some money – sometimes obtained directly through taxation and sometimes through direct charges to citizens or developers. If we require a developer to provide certain amenities, those too are a "cost". It is very disturbing to me that a program that is designed to assist vulnerable people with their housing needs is identified as a "cost", while other costs to developers are taken for granted as "necessary". I would suggest that for profit developers, as well as the City as a whole, have a direct stake in providing decent and affordable housing to low and moderate-income residents of Burlington.

Housing Trust Fund. I have had direct experience with the Housing Trust Fund. The Fund has served as a vital resource in helping non-profit housing developers for low and moderate-income residents close financing gaps. I strongly support the notion that, at a minimum, the Housing Trust Fund be restored to full funding. For the reasons described above, I would suggest that an increase in funding of the Housing Trust Fund will pay for itself.

Role of the Burlington Housing Authority. I was disappointed to see that the Report makes no mention of the excellent work of the Burlington Housing Authority – the largest provider of affordable housing in the City and an organization with which I am extremely familiar. BHA is not only an excellent manager of public housing, but it has provided a very successful program of preservation and development of other desperately needed housing for some of the poorest residents of our City. It has also taken a leadership role on the issue of homelessness. Along with our superb group of non-profit housing organizations, including CHT, COTS and Cathedral Square Corporation, BHA represents a key component in the effort to provide decent, safe and perpetually affordable housing in the City.

The Housing First Model for Homelessness. Thank you for your support of a housing first model for attacking the plague of homelessness. Providing housing as a platform with wraparound services, as needed, has proven to be a very effective model around the nation. I was surprised then to see a recommendation for yet another shelter. Resources devoted to shelters divert energy and funds from a permanent solution to homelessness. Let's get on with the development of permanent housing as the most effective way of eliminating homelessness.

College Students. One of the most frustrating aspects of the housing shortage in Burlington is the fact that college students have consumed so much housing that would otherwise be available to permanent residents. I recently had occasion to canvass Ward 1, where I live. I was amazed to see the number of homes on Colchester Avenue and its side streets that have been converted to student housing. Fletcher Place, formerly a quiet, family oriented street, is now dominated by students. My own street (Nash Place) seems to be moving in the same direction. If UVM and Champlain College fully housed their students on campus, one of the major reasons for the shortage of housing in Burlington would disappear, as would a cause for flight of middle class families and couples from the City. City officials have been discussing this issue for years. The problem appears to be getting worse. Additional action and ordinances need to be put in place to deal with this very basic problem.

Those are my primary reactions to the Report. I hope you will take them into account in your final draft.

Yours sincerely,

Neil Mickenberg

Hon. Miro Weinberger
Peter Owens, Director, CEDO