

General comments:

1. Main substantive comment: So far, the Plan seems to rely on the theory that if we incentivize housing production and remove disincentives, there will be a general increase in the supply of housing, and, even if it were all market-rate housing (which it would be, absent public sector involvement in the housing market), this increased supply will lower housing costs at all levels of the Burlington market.

But this will NOT be the result if there is an increase in demand for Burlington housing equal to or greater than the growth in supply of Burlington housing units. The Housing Vermont testimony characterized the Burlington housing market as a “hot market.” In a “hot market”, there is unsatisfied demand to live in Burlington. If supply increases, the new units are filled by those who currently want to live in downtown Burlington, but cannot. Result: no rise in vacancy among existing units, and current Burlington residents continue to face an affordable housing crisis.

This is why it is so important to have a very strong affordable housing component to this plan in addition to the “incentivizing” component of the plan. In the current draft, the “incentivizing” strategies will lead to a larger increase in the production of market-rate housing than the one strategy that will support the production of more affordable housing (doubling the Housing Trust Fund). Another supply-side strategy that would address both ends of the market would be for the City to actively promote and support larger-scale mixed-income, public-private projects on City-owned sites along the lines of the Thayer School project on North Avenue.

I think the Plan should take a “segmented market” approach in which we set broad, rough, 5-10 year policy targets for the # of units we need at each level and type of housing (market rate, median income, 80-100% of median, 65-80% of median, below 65% of median, senior housing), and then identify which tools (regulatory changes, HTF, IZ, partnering with CHT and Housing Vermont, etc) address which segment(s). By doing so, the report will reflect an awareness of the wages and incomes actually being earned by Burlington residents, which is missing from the current Plan.

2. The document should re-affirm the principle that when public dollars or public powers are used to create housing, that this housing shall be permanently affordable. This has been the cornerstone of the City’s housing policy, and is the overarching principle in the State of Vermont’s Consolidated Plan.

3. Document should state that the creation of inclusive communities is one of the general goals of the Plan.

4. We need to add displacement and gentrification strategies. At the same time that we create new market rate housing, we need to be aware of its potential impact in terms of displacing existing residents. A balanced approach is needed to ensure Burlington remains a community with socioeconomic diversity.

5. We need to add a strategy regarding the preservation of the affordable housing stock at Farrington's Mobile Home Park, which will identify the support and resources that will be forthcoming from the City.

6. The strategies need to be prioritized. We need to say which ones we will pursue first, and why.

Specific comments follow.

Page 1

para 2: acknowledge the broader economic context of falling real wages. The high % of income devoted to housing is a function of both high housing costs and low wages. Burlington compares poorly to the other cities in the report in part because wages in Burlington are lower than in the comparison cities.

para 4, line 3: insert "and moderate income" after "low-income"; the City's "celebrated affordable housing non-profits" do not serve only low-income households.

Page 2

Strategy I.1 Eliminate parking minimums in the downtown: Am open to this; request that staff provide estimate of the cost savings to developers of this change in zoning regulations.

Strategy 2. Form-Based Code: Fine. (Note grammatical problem with sentence starting 'On October 20, 2014 . . .')

Strategy 3. Consider revisions to the Inclusionary Zoning Ordinance. I am open to looking at the IZ Ordinance, but I cannot support the Action Plan as this section is currently written. The problems I have:

- The report now says that testimony and research "have raised serious concerns about the effectiveness of the IZ Ordinance in meeting its stated goals and its impact on new housing construction." I have heard all of the testimony and I did not hear ANY testimony that questioned the effectiveness of the IZ ordinance in meeting the goal of creating economically integrated communities.
- The goal of the IZ Ordinance is NOT to produce the maximum possible number of affordable housing units, or housing units generally, which is how the goal has been represented in this document and by some in the process to date. In Sec. 9.1.1. of the Ordinance, on Intent, it says that the intent is: "to meet the specific mandates of 24 VSA Chapter 117 related to housing opportunities for all of the Vermont's citizens, particularly for thos . . of low or moderate income; . . to ensure the provision of housing that meets the needs of all economic groups by precluding construction of only market rate hosing on the limited supply of available land within the City; to improve the quality of life for all residents by having an economically integrated housing supply throughout the City; and to prevent overcrowding and deterioration of the limited supply of affordable housing . . ."

That is: the purpose of the IZ ordinance is inclusion, not maximum production. The IZ ordinance should be judged against this goal, not against the goal of maximum possible unit production. To judge the ordinance against any goal other than inclusion, is to ensure that the consultant's report finds that IZ failed. But this would not be a fair test.

- Do we really need a consultant? I think we can do a good job updating the ordinance using the resources of our city staff and community. If a consultant is hired, the CDNR committee should be involved in the selection of a consultant for the report on the IZ Ordinance. I would request that a member of the CDNR committee be present at all meetings of the IZ consultant with the CEDO Director and/or Mayor.

Strategy 4: Reform the Building Code: Fine. Should be a high priority.

Page 3

Strategy 5: Rehab Code: Fine.

Strategy 6: Zoning and Building Fees: Fine.

Strategy 7: South End Zoning and Housing: Need to explicitly include anti-gentrification strategies aimed at existing artists. Need to be very careful about the impact of changing zoning to allow more housing on job creation in this district. We need both housing and jobs in Burlington.

Strategy 8: New, purpose-built, student housing . . .where (it) will not conflict with residential neighborhoods: Need to clarify that no City resources will be used to subsidize this housing; all resources will come from private and institutional investment. In my view, one building with 100% student housing, the Champlain project that is in the review process, is enough for our downtown. To build more such 100% student housing will potentially put us over the tipping point, and threaten our ability to attract a rich mix of residents to our downtown. I am not comfortable with the idea of a dorm (and it would be effectively a dorm) in the middle of our downtown.

Page Four

Strategy 9: College Housing Commitments: Fine, except reference to strategy #7 is confusing.

Strategy 10: Neighborhood Stabilization Program: Fine; consider specifying that we will seek to work with local financial institutions to create a program for owner-occupied duplexes/triplexes/quadplexes. Also, reference to strategy 7 again confusing. Finally, this is the only strategy with a specific timeline (90 days); why this strategy, why 90 days, and, with the vacancy in the Assistant Director for Housing position, is a 90 day deadline realistic?

Heading for Part III: should refer to "low- and moderate-income housing strategies." The HTF is not just for low-income residents.

Strategy 11: Housing Trust Fund. Fine. Good.

Strategies 12, 13: Housing First and Low-barrier, cold weather shelter: Fine.

Page Five

Strategy 14: Accessibility. Fine. Good.

Strategy 15: Home-Sharing. Restore previous draft's reference to a tax abatement incentive for home sharing. Current language is vague and unlikely to lead to any real progress.

Strategy 16: Fine.

Strategy 17: Universal Design. Fine. Good.