

**Vermont Affordable Housing Coalition**  
**Act 250/Priority Housing Project Recommendations**  
February 4, 2020

The Vermont Affordable Housing Coalition (VAHC) is a membership organization representing most of the state's non-profit affordable housing developers, community land trusts, homeless shelters and service providers, public housing authorities, funding agencies, residents' associations, community action agencies, regional planners, and housing, disability and tenants' rights advocates. Our mission is to ensure that all Vermonters, particularly low and moderate income persons and those in protected classes have safe, adequate, physically accessible, and affordable housing.

The affordable housing community strongly supports the need for more housing in Vermont for diverse income levels and would not take any stance that would inhibit its development. We also strongly support Vermont's long-standing policy of developing housing in established downtown and village centers – served by water and wastewater infrastructure and with access to employment, transportation, and essential services – and we support strategies promoting that focus.

We encourage the committee to consider the impacts of changes to Act 250 regulations on housing affordability in the context of economic vitality, impact on housing supply, and inclusivity. Focusing on housing supply alone does not ensure that those most challenged by cost and availability have realistic opportunities to live in downtown and village centers and access the related economic opportunity and services. This can have a disparate impact on people in protected classes who have low income by limiting their housing options. Any incentives to increase housing in and around our downtowns and village centers must include assurances that at least some of the homes will be accessible to a wide range of incomes and backgrounds.

The Vermont Affordable Housing Coalition and the affordable housing community it represents support exempting development in Designated Downtowns and Neighborhood Development Areas from Act 250 review, and request the inclusion of these additional provisions to ensure inclusivity:

- Require that all state Designated Downtowns and Neighborhood Development Areas, where exemption from Act 250 is proposed, have two of the following meaningful inclusivity measures in place, or a plan to establish them ahead of receiving Act 250 exemption:
  - Inclusionary Zoning,
  - A funded Housing Trust Fund,
  - A Housing Commission as defined at 24 VSA 4433(5), and/or
  - Impact fee reductions for affordable housing, or their absence.

- Add a housing representative to the Downtown Board
- Require that the municipal plan include a housing element that meets or exceeds the requirements of 24 VSA 4382(10), as determined by the Downtown Board. In addition, the plan must articulate clear implementation steps for achieving mixed income housing, including affordable housing, which shall include a timeline, responsibility for each step, and funding source – as a condition of receiving or renewing a Downtown or NDA designation.
- Require interim (4-year) review and renewal of NDA's (already required for Downtowns)

It is our understanding that PHPs will still exist in Village Centers if they have an NDA, and that PHPs will still exist in Growth Centers and New Town Centers.

The affordable housing community would also like a commitment to fully fund VHCB.