

April 21 2010

Mr. Tayt Brooks
Commissioner
Department of Housing and Community Affairs
National Life Building 6th Floor
One National Life Drive
Montpelier, VT 05620

RE: 2010 – 2015 HUD Consolidated Plan

Dear Commissioner Brooks:

The Vermont Coalition to End Homelessness (VCEH) would like to comment on the draft HUD Consolidated plan. We represent over 20 statewide agencies covering a network of homeless shelter and service providers from Newport to Bennington. As shown in the Housing Needs Assessment, homelessness is a growing population in Vermont, and the preliminary 2010 one-day count of people who are homeless shows a double-digit increase in homelessness as the economy continues to falter.

After reviewing the draft of the 2010-2015 Vermont plan in our Balance of State Continuum of Care monthly meeting, we would like to express support for the plan, while voicing some concerns. First we would like to thank you for your work and your openness for feedback.

We wholly support your efforts to point out the need for more subsidized rental housing units in the state. We ask you to keep in mind that not all subsidized housing is affordable to the majority of Extremely Low-Income Vermonters (below 30 per cent of Area Median Income) that we serve. Housing assisted with capital subsidies alone cannot be made affordable without project based rental assistance.

The success of special needs housing programs depend on linking available services with a tenant's housing and this connection needs to be referenced and supported in the plan. A 2007 study in Pennsylvania showed that low-income family housing developments yield higher financial returns to property owners when they provide resident services. So, if the state is interested in protecting public investment in existing assisted housing developments, it would be well served by ensuring resident services are available. Pairing services with housing reduces property vacancy losses, legal fees and bad debts

We believe that Extremely Low-Income individuals are not referenced or focused on well enough throughout the plan, even though the Needs Assessment states that this population is the most cost-burdened and has a high level of housing needs. While this may be a simple oversight, it is imperative that the State send a clear message to developers and housing professionals that it prioritizes those who are Extremely Low-Income, and not just mention them one time on page 34.

Prioritizing the State's scarce resources for Vermonters below 30 percent of Area Median Income has been a key feature of the Con Plan since it was first developed in the early 1990's. It should retain that prominence in the 2010-2015 rewrite.

Lastly, home ownership, though a valuable goal, should hold a lesser priority than affordable rental housing since those Vermont households able to achieve homeownership often have other assets (namely the equity in their home) available to them. The people we serve are hardly able to have their housing stabilized, much less able to afford homeownership. They need housing made affordable through rental assistance.

While it is understandable that the state would like to address the growing number of Vermonters facing foreclosure, there are several federal programs addressing that population already. Prioritizing rental housing assistance serves to quickly stabilize a family who has gone through foreclosure by ensuring there are affordable rentals for them to move to. Also, the National Low Income Housing Coalition estimates that 40% of the households who lose their homes because of foreclosure are renters. They need similar protections and resources.

Thanks for the opportunity to share our comments with you. We look forward to reading the next draft that has these suggestions addressed.

For the Vermont Coalition to End Homelessness,

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Executive Director
Safe Haven

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