

Comments received regarding ARPA-SFR Proposed Priorities & Uses

Comments Compiled from both Info Sessions on 7/12/21 & 7/14/21:

Questions w/comments embedded re: Farmworker housing (*staff did not alter original wording*):

- It seems that you are proposing loans for repairs for farm worker housing, yet cost and being in debt is a key barrier to farm investment in housing. Why are you saying repair loans for farmworker housing?
- Are you looking for numerous organizations to oversee a bunch of farm worker housing rehabilitation? Why don't YOU administer this farm worker housing projects? It would be far more efficient.
- The stakeholders in the farm worker housing area need capacity building to help us up front collaborate and coordinate. The housing and agricultural intersection is unique. If it wants success, VHCB will need to invest in specific capacity building NOW to coalesce the housing, construction, energy efficiency, farm and farm worker stakeholders.
- It would be helpful to clarify the process VHCB will use to develop the farmworker housing program. Right now there is a group that meets, but the process for providing input is not clear so that all the stakeholders have the opportunity to provide their perspective.
- Hi who is the lead organization working on the farm housing?? What housing organizations are in support?? Could a housing organization build like 20 affordable homes for farmers and farm workers in Addison area??

Additional comment (posed as question):

- Given the time lag in development, is there enough money allocated to expanding shelter capacity given the transition in emergency housing in hotels

Emails Received (as of 8/1/2021):

Comment submitted by Robert H. Anderson, resident of KTP Park in Bristol, submitted via email on 7/14/21:

Dear ladies and gentlemen:

On June 28 Vermont Business magazine reported that ca. \$ 144 million of State general Funds and other funds may be allocated for various purposes including Mobile Home Park infrastructure upgrades and other park -related costs.

As a resident of one such park, "KTP" Park in Bristol, VT, I would like to please ask if there would be anything in the details or rules regarding allocation of these funds, which would prohibit direct use of some funds to hire carpenters, painters and other repair people to make needed repairs on some of the existing units in KTP or other parks. There may be some units in need of such repairs because their owners might not be able financially to afford such repairs.

It is my understanding that some "infrastructure upgrades" envisioned might include road and septic repair. However, it would be interesting to know whether there is anything which would prevent use of some of the funds for needed repairs to existing units - such repairs could conceivably be as important to some park residents as better roads.

I am not asking for any sort of commitment ,but simply for an answer as to whether there is anything in the conditions regarding the allocation of these funds which would forbid use of some of the funds for repair of existing units.

Many thanks in advance sincerely, Robert H Anderson, Bristol, VT

[Comment from Rebekah Mott, Director of Development at COTS, submitted via email on 7/14/21:](#)

Finally, I wanted to offer a comment regarding the prioritization of funds for multi-family affordable housing. COTS firmly believes this is the most urgent priority at this time, which is why we have decided to pursue this project. As the largest service provider for people experiencing homelessness in Vermont, our data shows that this type of project meets the largest need at this time.

[Comment from Vermont Legal Aid, submitted via email on 7/27/21:](#)

Dear Mr. Seelig and VHCB:

Thank you for the opportunity to comment on VHCB's allocation of the American Rescue Plan Act ("ARPA") State Fiscal Recovery Fund. Thank you for your work -- past and present -- to create the affordable housing Vermonters and Vermont communities need. We are commenting on behalf of Legal Aid and the low income and BIPOC tenants and homeless people we represent and with public health needs in mind.

We request that in responding to the present housing crisis and unprecedented funding, you balance urgency with intention and prioritize equity and community. Because you understand the permanence of the housing you build now and its role in creating communities, we request that you:

1. Balance urgency with intentionality;
2. Build affordable housing in opportunity communities;
3. Build flexible, unrestricted housing for present and future needs; and
4. Promote community by building housing in downtowns.

### **1. Balance urgency with intentionality.**

ARPA provides an unprecedented opportunity to expand housing choice across the state. We know that VHCB has the knowledge, experience, and expertise to make the best possible use of those funds. We ask you to develop a summary plan to guide the overall allocation of these funds.

Vermont has an affordable housing crisis. We understand the urgency of building as many homes as possible as quickly as possible, and we are grateful to VHCB for doing

so. However, despite the need for haste, we ask that you create a plan to guide your selection of projects and further request that the plan prioritize additional factors beyond speed. The housing you urgently create now is permanent and will shape the communities it is put in for decades to come; thus, we urge you to prioritize *where* this affordable housing is built as much as you emphasize it being built quickly.

Every community in Vermont needs affordable housing. We understand that addressing Vermont's housing needs will vary region by region and even village by village and that the needs of rural communities are different from the needs of bigger towns and Chittenden County. Building affordable housing throughout the state, to the scale that meets the current and future needs in Vermont's diverse locations, will allow low- income Vermonters to make their home in any county or town.

## **2. Create racial equity, inclusivity, and better outcomes by building in opportunity locations.**

We know we are preaching to the choir when we highlight that housing insecurity is not experienced equally by all Vermonters. The 2020 Housing Needs Assessment (HNA) documented that BIPOC households in Vermonters fare worse than White households according to almost every housing metric. Because of systemic racism, BIPOC Vermonters also are statistically far more likely to be low income and therefore need below-market housing. Finally, BIPOC Vermonters also face high rates of discrimination in the private housing market.

Because of the high statistical correlation between being BIPOC and being poor, shortages of affordable housing in high opportunity locations represent a barrier to achieving racial equity and inclusive communities in Vermont. This shortage also deprives better off White Vermonters of inclusive communities. Dispersing affordable housing throughout Vermont and building it in opportunity areas will help to create the conditions necessary to decrease economic, and thereby racial, segregation. Building affordable housing in opportunity communities throughout Vermont will immediately decrease economic segregation and will create the conditions necessary to eventually decrease racial and ethnic segregation. Every corner of Vermont needs more affordable housing in inclusive locations. Over the long span of time this housing will exist, Vermonters will move to these communities now that they have a choice.

We understand that ARPA funding is particularly targeted to qualified census tracts, but affordable and supportive housing should be located in high opportunity areas as well. Living in higher income neighborhoods provides a multitude of benefits. Studies have documented that children who move to higher opportunity neighborhoods show gains in physical and mental health and, ultimately, educational and economic attainment, while adults see improvements in physical and mental health.

In addition to the particular challenges BIPOC Vermonters face, the HNA also documents Vermont's chronic and growing shortage of adequate affordable housing for people with complex housing challenges. This group includes families with children and people who use housing vouchers. Both groups face widespread discrimination in the private market. The HNA also documents the affordable housing needs of people with disabilities, including people with severe mental illness and substance use disorder; people exiting the corrections system; survivors of domestic violence; frail elders; and migrant and other farm workers. The state cannot end its housing crisis without removing the barriers that

create these disparities. Building in opportunity communities decreases isolation and increases access to services and community support.

### **3. Build flexible, unrestricted housing.**

The housing you build urgently today will impact communities and housing choice for decades to come. Therefore, we urge you to prioritize projects that are highly flexible to changing demographic needs by not focusing only on current and short-term demographic needs but also future housing needs. We believe that the simplest way to do this is to build housing that does not restrict who may live in it other than by qualifying income. Vermont's demographics will change over time. A slow but steady increase in population, climate migration, and shifting age distributions are all likely impacts on future housing needs. Rather than building for any particular demographic bubble, we urge you to build housing that is flexible to whatever demographic changes may occur. We urge VHCBC to fund housing affordable housing projects that have the maximum flexibility of use over time. This means, in part, not funding projects that are restricted by age, particular disability, or other demographic characteristic.

As you know, all housing constructed after 1991 must be physically accessible. We applaud VHCBC and its partners for going beyond just the FHA's and ADA's legal requirements by incorporating universal design. We urge you to take a further step and include in the concept of "accessible," housing that is accessible to people with mental health disabilities. A few possible examples of making housing more accessible to people with mental health disabilities are: including a few more-highly sound proofed units; locating mailboxes outside highly congregate areas; and providing another, less frequented, entrance than the main entrance.

In addition, walkable distances to services and community and close connections with health and mental health care will enhance all residents' well-being. Vermont successfully house the vast majority of currently unhoused people, including those with significant healthcare needs, mental illness, or criminal justice involvement, in permanent supportive housing with good design and location near services.

### **4. Promote community by building housing in downtowns.**

Finally, we ask that you consider project sites holistically and continue to prioritize locations in downtowns. Many tenants benefit from living near grocery stores, schools, jobs, health care and other services, community events, and transportation. Homes that are within walkable distances to services and community features are more accessible to people with low incomes -- who may not be able to afford a car -- as well as to people with disabilities.

Thank you for considering our comments. Sincerely,

/s/ Rachel A. Batterson, Director, Housing Discrimination Law Project

/s/ Maryellen Griffin, Staff Attorney

/s/ Anne N. Sosin, Policy Fellow, Dartmouth

/s/ Elizabeth Cave, Legal Intern

/s/ James Sanchez, Legal Intern

[Comment from Elise Shanbacker, Executive Director at ACCT, submitted via email on 7/30/21:](#)  
[Mobile Home Communities](#)

Mobile Home Communities will largely fall under preservation projects serving people who are already housed in those communities, and the guidelines for accessing the ~\$6M allocated from one-time general funds should be aligned with those priorities. As we accelerate our pipeline of mobile home park projects to access this funding source, the timeline for applying for an using the funds should be as flexible as possible given the especially long lead times of getting through the preliminary feasibility and engineering process when developing projects.

#### Preservation Projects

VHCB should consider preservation projects more generally for one-time general funds and, if possible, ARPA funds. As our existing portfolios serve a greater number of formerly homeless households, their needs increase not only for capital reinvestment but also for social infrastructure that can be added with redevelopment. Additionally, the current funding environment represents a moment when housers and shelter providers are collaborating more than ever. As we seek to answer the question of whose role it is to own and operate Permanent Supportive Housing, we are finding that the existing PSH portfolio (largely owned and managed by the shelter system) is in need of serious reinvestment that hasn't been available to them outside the tax credit program. This funding provides an opportunity to reimagine what our existing PSH stock can look like and make it potentially feasible for housers to take a bigger role in doing what we do best—developing and managing permanently affordable housing—so that shelter providers can focus on providing the supports and services residents need to be successful.

[Comment from Connie Snow, Development Consultant, submitted via email on 7/30/21:](#)

And, if you are still taking public comment—I'd love to offer my 2 cents regarding the new money. I think, the faster it is distributed, the less the small groups will be able to take advantage of it. Especially since it involves homeless projects. These projects involve labor intensive, local partnerships. So time consuming!

If it were able to be stretched to 24 months, I think that would support more widespread participation and quality projects.

I may be wrong—you are obviously getting a ton of applications! But right now I'm something of an "insider" at 3 of your nonprofits, and I know that they are not geared up for this and it will take some time.

[Comment from members of the Orleans and Northern Essex Continuum of Care \(names at end of letter\) submitted via email on 7/30/2021:](#)

July 31, 2021

Dear Vermont Housing and Conservation Board:

Thank you for the opportunity to comment on the best uses for the American Rescue Plan Act State Fiscal Recovery Fund. We appreciate your efforts to balance the need to build housing quickly with the need to be intentional about what housing is built and where it is located.

As members of the Continuum of Care serving Orleans and Northern Essex Counties, we are writing to stress the need for more supportive housing and more affordable housing across our service area. As a high-functioning network of direct service providers who already meet, conspire, and coordinate, we work well together and are uniquely positioned to support the creation of more affordable and supportive housing in our region.

While the ravages of the pandemic have impacted the entire State, the impacts on Orleans and Northern Essex were especially harsh as local economies and businesses rely on customers from Canada. The closing of the border has been hard on our economy – and our residents and further isolated our already rural communities.

Moreover, in Newport and in much of our area, there were very few hotels willing and available to house people experiencing homelessness. The primary lodging options secured were in Barton and Canaan. Many of our neighbors in unsafe housing situations faced the impossible choice between safe shelter and the loss of connection to support networks, jobs, and schools in their communities. As some opted to stay in the communities they knew, a secondary impact resulted and rates of homelessness in Orleans and Northern Essex Counties appeared lower than they actually were.

The housing needs of Orleans and Northern Essex County are not the same as those in the rest of the state. A lack of transportation infrastructures and distance to services create social challenges out of proportion to our population.

We are well aware of your investment in our region and so grateful for your ongoing support of RuralEdge and its 152 units in Newport, 34 units in Derby and 82 other units across Orleans and Essex Counties. Overall, our area has the lowest rates of subsidized housing in the state <https://www.housingdata.org/profile/housing-programs/comparison-supply-apartments>, making these units so vital to our most vulnerable residents. RuralEdge's units, with 70% occupied by households with incomes less than 30% of area median income are truly imperative to our success, but the area needs more investment to create more units. In addition to lack of permanent units, we have no homeless or inclement weather emergency shelter.

We do have a qualified census track in Newport, which is specifically mentioned as a priority for this funding, and we would support the corresponding priority that mixed-income housing be created in these areas which already support high concentrations of affordable units. We must acknowledge the challenges that exist in Newport given the many interested factions involved in Newport's core downtown redevelopment and that prime location for new units that most likely will not fit the timeline

for this funding. A project of scale is being investigated in Newport, and we also see opportunities for smaller developments in nearby communities. The small scale of our communities also places us further at a disadvantage to other areas of the State as there is a limited inventory of large, underutilized structures or surplus properties that could be easily repurposed to create new units quickly. As such, we strongly advocate that at least \$5 million in the ARPA funding be reserved for projects in Orleans and Northern Essex Counties.

We are a committed group with untold connections and resources across our rural communities. Many of our members have participated in your informational sessions and reviewed your program materials. That said, nothing would better inform our discussions about the possibilities for siting more affordable and supportive housing in our area than having a representative from VHCB at our table. We understand the demands on your staff and time and invite your participation over the next few months in our meetings. We meet remotely and would be glad to schedule a meeting around your availability.

Thank you for your commitment and efforts in serving the residents of Orleans and Northern Essex Counties and for considering our comments.

Sincerely,

Carmina Garcidealba, Outreach Specialist, Vermont 211

Ed Sunday-Winters, Pastor of Greensboro United Church of Christ

Tim Daley, President, Joshua House Inc.

Lila Bennett, Executive Director, Journey to Recovery

Megan Marquissee, MS, CPhT, RRT-NPS, Care Continuum Manager, Blueprint for Health Program Manager, North Country Hospital

Samantha Stevens, Equity and Community Outreach Coordinator, North Country Supervisory Union

Joy Ely, Deputy Director, Northeast Kingdom Community Action

Jenna O'Farrell, Executive Director, Northeast Kingdom Community Action

Lucy LeMay, Director of Care and Support Services at the Northeast Kingdom Council on Aging

Paul Bengtson, Interim Executive Director of Northeast Kingdom Human Services

Michelle Faust, Executive Director, Northeast Kingdom Learning Services

Michael Costa, CEO, Northern Counties Health Care, Inc.

Barbara Morrow, Executive Director, Orleans County Restorative Justice Center

Nick D'Agostino, Executive Director, Rural Community Transportation, Inc.

Robert Little, Director of Community Development, Rural Edge

Juliet Emas, Director of St. Johnsbury Community Hub

Amanda Cochrane, Executive Director of Umbrella

Roxie Rivard, Director of Advocacy-North, Umbrella, inc.

Rev. James Merriam, United Church of Newport

Maryellen Griffin, Staff Attorney, Vermont Legal Aid