



Greetings,

My name is David Martins, and I am the Director at the Vermont Affordable Housing Coalition (VAHC). We are a coalition of over 90 members including the housing development community, various nonprofits, small businesses, and individual Vermonters who are united in a passion for the development of more safe, decent, perpetually affordable housing.

The housing crisis that faces our nation impacts Vermont in unique ways due to the rural nature of our State. Since the pandemic many new residents came to the Green Mountain State seeking safe harbor from the quickly spreading threat of COVID-19. These changes further constricted the already limited housing stock, and drove the market even higher. The affordability gap for middle income Vermonters made home ownership out of reach for most, and rental rates rose accordingly.

These growing disparities further marginalized populations that have been historically impacted by housing insecurity. By way of example, only 24 percent of black occupied homes are owned by their residents, as opposed to 72 percent of white homes. In Burlington, our most densely populated municipality, the disparity is 1:41%.

While housing advocates are working as hard as they can to enact legislation that creates more incentives for smart growth development, and lowers barriers to new development, we recognize that this is an intersectional problem, that will require intersectional solutions.

Central to the development of new affordable housing is the Low-Income housing Tax Credit. As the affordable housing crisis continues to worsen, the regulations impacting the Housing Credit must be stronger than ever, but I am concerned that aspects of the interagency NPR may significantly reduce the motivation for banks to invest in the Housing Credit. What stands out to me in particular are (1) the proposed removal of the separate Investment Test, which currently drives Housing Credit investment, and (2) the higher weighting of the Retail Test over the Community Development Test, which may reduce the incentive to perform highly on the Community Development Test.

As we struggle with the realities of things like increases in no cause evictions, a terrifyingly low vacancy rate, sky rocketing rental and home sale prices, and families continuing to enter homelessness, it is absolutely essential that we stay earnest in our work of developing more safe, decent, and affordable housing for all Vermonters.

Sincerely,



David Martins, Director
Vermont Affordable Housing Coalition