

**From:** Joan Malkin [mailto:joanmalkin@gmail.com]  
**Sent:** Friday, June 21, 2019 11:40 AM  
**To:** Dan Seidman  
**Cc:** Doug Ruskin; Adam Turner; Lucy Morrison; Philippe Jordi; David Vigneault; fredupfront@comcast.net; Christine Flynn  
**Subject:** Re: Housing Policy comment

Dan, thanks for taking the time to put your comments in writing. It ensures people on the committee aren't relying on my interpretation of your oral remarks - always risky!!!

Stay tuned for how we deal with your and others' comments.

Joan Malkin  
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Sent from my iPhone

On Jun 21, 2019, at 9:17 AM, Dan Seidman <[dseidman@sprynet.com](mailto:dseidman@sprynet.com)> wrote:

To help with the problem, it is land, and building the housing.

If possible, within zoning, a bonus for density should be granted on the "affordable" portion of land donated. The developer should be required to either build or engage a builder to complete that portion.

Buying your way out should not be available except for small fractional interests.

We do need to realize the more property that is deed restricted, it will increase the value of non-restricted properties.

Thank you for the opportunity to speak last night.

-----Original Message-----

From: Joan Malkin  
Sent: Jun 21, 2019 8:29 AM  
To: Doug Ruskin  
Cc: Adam Turner , Lucy Morrison , Philippe Jordi , Dan Seidman , David Vigneault  
Subject: Re: Housing Policy comment

Thanks Doug. Fred will no doubt include your comments (and all the others) for discussion at our next meeting. I'm sure I speak for the committee when I express my gratitude for your thoughtful participation.

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Sent from my iPhone

On Jun 21, 2019, at 7:38 AM, Doug Ruskin <[doug.ruskin@gmail.com](mailto:doug.ruskin@gmail.com)> wrote:

Hi Joan –

As requested, below are my comments to last night's meeting regarding the new Housing Policies. Please confirm receipt.

1. The draft document acknowledges that 10% may be “conservative” in the footnote 4 on page 6. I believe that 10% is definitely inadequate in light of the escalating problem. When I started working on this over 15 years ago, year-round rentals were not ubiquitous, but were available. Today there are none advertised or listed with realtors and only to be had by lucky word of mouth. In addition, the Housing Production Plans (HPP) referring to 10% are primarily linked to the state's housing inventory threshold of 10% which is measured only up to 80% AMI. While this remains the majority of the need, there is a growing shortage above that. The HPPs acknowledge that as well. As you know, even an income of 150% AMI cannot generally qualify for a Vineyard home when prices are starting around \$650K. Therefore 20% is a better figure. Though I respect the concern that it may be considered onerous, the point is that if a DRI has a housing impact it needs to be addressed at a level that can actually help.
2. All housing impacts must be considered. Having served on multiple non-profit boards, I am quite familiar with the monetary pressures and fund-raising challenges. But despite being non-profit, those organizations are businesses. If they expand and add staff, they need to be responsible for their impact on the community – no less than their benefit to it. Similarly for governmental entities. If you exempt them, then the need must be filled by others – which means everyone else should contribute beyond their direct impact. A slippery slope in my opinion...

To be clear, I do agree that any project with no demonstrable housing impact should be exempt, as should any project that includes sufficient units to mitigate its impact, provided they are perpetually restricted up to 100% AMI. The partial exemption for 100%-150% AMI also makes sense, though I urge that units be provided for the differential, not money (#3 below) .

3. Following on the last point in #1, units or land are far more necessary than money at this point. Monetary mitigation should only be used for fractional mitigation.
4. As mentioned by others, I agree that the determination of what AMI is to be served by the mitigation cannot be left solely to the applicant's discretion. I realize this may be a bit tricky, but there needs to be a formula or at least a mechanism – implemented by the MVC or perhaps the municipality involved – whereby that is not within the applicant's sole control.
5. It was stated at the meeting that the intensity codes in Appendix B were derived from a 2003 study. I am concerned about creating formulae based on 16-year old analysis. The codes should be supported by more recent data. In addition they are not entirely clear: If I have medical practice, am I a code 2 (professional services) or a 3? What about a single practitioner vs. a medical suite with multiple doctors? I would also argue that a distribution and wholesale, which

involves customer traffic is a higher use than warehouse. A current study would help, though I would implement as written while such a study is underway.

Feel free to call or email if anything is unclear.

Thanks,  
Doug Ruskin  
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