

August 10, 2020

Mr. Doug Sederholm, Chairman  
Martha's Vineyard Commission  
P.O. Box 1447  
Oak Bluffs, MA 02557

RE: 2019 Standards and Criteria (DRI Checklist) Revision

Chairman Sederholm,

On behalf of the non-profit Island Housing Trust (IHT), please accept this second set of comments and recommendations regarding the 2019 Standards and Criteria (DRI Checklist) Revision – Draft Version 14 currently being considered by the Martha's Vineyard Commission (MVC).

We appreciate the MVC including language exempting affordable/community housing in Section 4.1 - Multiple Residential Units. However, IHT still has concerns about the impacts of Section 2 - Division or Subdivision of Land and Section 4.1 - Multiple Residential Units on the six island towns' affordable and community housing production goals.

The IHT has had recent success in developing small scale multi-family housing (6-9 units) in accordance with local town zoning by-laws designed to encourage affordable and community housing that would have been unnecessarily delayed through a 3-6 month DRI permitting process. These developments also included enhanced denitrification septic system technology approved by the state Department of Environmental Protection (DEP). As a result, we created 9 rentals at Scotts Grove in West Tisbury, 7 rentals at Perlman House and 6 townhouses at Greenwood Avenue both in Tisbury. The added uncertainty and delay due to the proposed MVC DRI permitting process will likely render smaller scale multi-family affordable/community housing unfeasible.

We would ask the MVC to consider exempting any affordable/community housing under Section 2 - Division or Subdivision of Land for any Development of 9 or fewer dwelling units as currently required in DRI Checklist dated April, 15, 2017. Furthermore, we would ask the MVC to consider exempting affordable/community housing under in Section 4.1 – Multiple Residential Units from the MVC Water Quality Policy provided that the Development utilize state DEP approved enhanced denitrification septic system technology or is connected to town sewer as certified in writing by the Board of Health or Waste Water Department in the town in which the Development is located.

The need for affordable rental housing island-wide has been well documented. The Martha's Vineyard Housing Needs Assessment conducted in 2013, recommends the creation of 50 units of affordable community housing per year, with 20% for affordable homeownership and 80% for year-round rental housing serving those earning 60% or less of the area median income. The Dukes County Regional Housing Authority currently has certified 210 households on their rental housing waitlist island-wide. Housing Production Plans (HPP), encouraged and partially funded by the MVC and adopted by the Towns of Tisbury, West Tisbury, Oak Bluffs, and Aquinnah identify the need to create both affordable

housing and community housing. The island-wide HPP identifies the need to create a total of 223 units of affordable housing serving low/moderate income residents and 71 units of community housing over the next five years.

There is a very limited amount of multi-family rental housing on Martha's Vineyard, and the first goal of the island-wide HPP is to increase housing options alternative to conventional single family houses, including multi-family housing. Only 1.5% of the Island's total housing stock (11,604 units) consists of larger multifamily rental apartments. The HPPs identified *“regulatory barriers and that the community on Martha’s Vineyard recognizes the need to encourage affordable housing and housing options and has adopted zoning provisions to help address these needs.”* and that *“communities also have regulatory barriers, primarily because of restrictive zoning provision including limited provisions for multi-family housing, which can have an effect of excluding lower-income families with children but also other protected classes of persons that are disproportionately low-income such as racial and minority groups.”*

The proposed changes to the DRI Checklist are not only inconsistent with the plans and policies developed and adopted by the MVC and island towns but further discourages development of critically needed small scale multi-family housing island-wide.

The MVC serves an essential role not only in its regulatory review of DRIs, but also in planning at both the town and island-wide level. We would urge the MVC to consider how these proposed DRI Checklist revisions may further burden both MVC staff and commissioners. A lower threshold will increase the number of DRI applications requiring review annually; the increased regulatory function will impact the MVC’s ability to provide general planning assistance, including assistance to towns in implementing their HPPs.

Thank you for this opportunity to comment and for your consideration.

Sincerely,



Philippe Jordi  
Executive Director

Cc: DCRHA  
Edgartown Affordable Housing Committee  
Edgartown Planning Board  
Oak Bluffs Affordable Housing Committee  
Oak Bluffs Planning Board  
Tisbury Affordable Housing Committee  
Tisbury Planning Board  
West Tisbury Affordable Housing Committee  
West Tisbury Planning Board  
Chilmark Affordable Housing Committee  
Chilmark Planning Board  
Aquinnah Affordable Housing Committee  
Aquinnah Planning Board