

October 3, 2019

Jim Vercruysse, Chairman
Martha's Vineyard Commission
P.O. Box 1447
Oak Bluffs, MA 02557

RE: 2019 Standards and Criteria (DRI Checklist) Revision

Dear Jim,

On behalf of the non-profit Island Housing Trust (IHT), please accept these comments and recommendations to the 2019 Standards and Criteria (DRI Checklist) Revision currently being considered by the Martha's Vineyard Commission (MVC). As Martha's Vineyard's leading non-profit affordable housing developer, the IHT has serious concerns about the impacts of Section 4.1 Multiple Residential Units on the six island town's affordable and community housing production goals. The IHT's recent success in developing small scale multi-family housing (6-9 units) that was reviewed and approved through local town zoning by-laws that encourage affordable and community housing (i.e. 9 rentals at Scotts Grove in West Tisbury, 7 rentals at Perlman House and 6 townhouses at Greenwood Avenue both in Tisbury) would have been unnecessarily delayed through a 3-6 month DRI permitting process. This added uncertainty and delay due to the MVC DRI permitting process will likely render smaller scale multi-family housing unfeasible.

We would ask the MVC to consider exempting any Developments, including an expansion or Change of Use of any existing Development, which proposes to create or allow: 9 or fewer dwelling units including guest houses or any number of rooms for lease or rent that are deed restricted for affordable and community housing (as defined by the MVC's Affordable Housing Policy) from its DRI Checklist.

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), 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.”* 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
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