



## TOWN OF OAK BLUFFS, MA PLANNING BOARD

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March 15, 2019

Martha's Vineyard Commission  
Affordable Housing Policy - Review Committee  
The Stone Building  
33 New York Avenue  
Oak Bluffs, MA 02557

Dear Review Committee,

The need for Affordable Housing in Duke's County is acute. Therefore, the Oak Bluffs Planning Board believes the purpose of this policy should be a pay-to-play mandate.

The Draft Policy states that the purpose is: *"not an attempt to solve the island's Affordable Housing problems, but is focused on ensuring that new residential development and new commercial projects do not further exacerbate the existing problem."*

This does not align with the severity of challenge faced by the Martha's Vineyard community.

### **Under 1.2 Applicability**

We do not believe there should be a link to the project's likelihood *"to generate an incremental need for affordable housing."* The lack of affordable housing is a crisis and the need is clear. We recommend deleting that qualifier.

### **Under 1.3 Strategies**

The Planning Board believes that the strategies employed should be more specific.

- *Provision of land* -- this is not effective without a commitment of capital for the construction of units.
- *Provision of housing units* -- this is indistinguishable externally to the market rate units of the project.
- *Payment of monetary mitigation* -- the Planning Board suggests it be paid directly to the Town Housing Trust of project's location.

### **Under 2A.1( C ) Mitigation Contribution**

Again, the Oak Bluffs Planning Board believes monetary contributions should be made to the Housing Trust of the town where the project resides. This ensures that funds are funneled immediately to where they are needed most.

**Under 2B.1 ( c) Mitigation Contribution**

It is important that the Affordable Housing policy strengthen the town’s ability to execute housing reform. Each of the six towns has adopted a Housing Trust. We believe the policy should honor the wishes of the voters and support those town trusts which are already in place.

**Under 3.3 Determination of Total Additional Square Footage**

The Oak Bluffs Planning Board suggests that the payment be based on total square footage and recommends removing the idea of “*only additional*” square footage.

**Under 4.1 Specific Exemptions**

The Oak Bluffs Planning Board believes there should be no exemptions. The inclusion of language that could exempt non-profit organizations and quasi-publicly owned entities undermines the housing challenge this policy is said to address.

**Under 4.2 Other Exemptions and Modifications**

Again, the Oak Bluffs Planning Board maintains that exemptions and modifications undermine the stated purpose of the policy.

**Under 5.1 Deed Restricted Housing**

The Oak Bluffs Planning Board believes that the Affordable Housing policy should specify deed-restricted housing in perpetuity.

**Under 5.9 Ongoing Compliance and Reporting**

The Oak Bluffs Planning Board believes that stronger language supporting enforcement, fines and other legal actions should be used.

Sincerely,



Ewell Hopkins, Chairperson  
Oak Bluffs Planning Board

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Mark Crossland, Vice Chair

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JoJo Lambert

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Erik Albert