

DUKES COUNTY REGIONAL HOUSING AUTHORITY

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*The mission of the DCRHA is to assist the 6 towns of Martha's Vineyard
with increasing the year-round housing opportunities for residents with low and moderate incomes.*

August 1, 2021

Re: Housing Bank Parameters and Policies relative to Federal and State Statutes & Special Designation

Dear members of the Housing Bank of MV Review Committee and Coalition Steering Committee,

Following this past year's successful advocacy by the Coalition with the Island towns, the Dukes County Regional Housing Authority (DCRHA) would recommend updates to the legislative language to the Review Committee and the Coalition.

From our experience in managing affordable and community housing, we strongly recommend a legal review of Federal and State statutes related to Fair Housing, Civil Rights, ADA, and Public Accommodation, as well as any applicable special conditions or statutes, which will be fundamental to all future Housing Bank efforts.

During the Coalition's past year of consensus building, DCRHA assisted in answering many queries by using our agency's various program, applicant and selection definitions, policies and procedures. Our agency's required training and experience with Affirmative Fair Housing precepts dictated by funding sources and attendant regulatory bodies were serviceable to the needs of the Coalition in this important initial phase of Housing Bank development.

Throughout the Coalition's important efforts, it became clear to the DCRHA Board & staff that planned funding uses by the Housing Bank would require their own legal basis and specificity. Clear parameters related to the special nature of the Housing Bank will guide all aspects of program creation, application and selection by the Housing Bank Commission, the town advisory committees, and prospective applicants.

A comprehensive legal review could additionally define opportunities to directly address the Island's need for prioritization of "essential" town, regional and non-profit employees at higher incomes not served by "affordable" housing offers at up to 80% of AMI. The nature of this particular funding stream should be reviewed for particular utilization of employee preferences, percentage of units so designated in a project, and continuance of such employee preference after initial offer. Likewise, definitions of residency, asset allowance, and comportment with required and desired Affirmative Fair Housing objectives are all important elements of Housing Bank practices going forward.

The DCRHA Board of Directors and staff, sincerely suggest a comprehensive legal review in hopes of clarifying and support future Housing Bank efforts and assisting with their future success.


Ann Wallace, Chair


David Vigneault, Executive Director

Ann Wallace, Chilmark; Dan Seidman, Tisbury; Mark Leonard, Oak Bluffs; Linda Mott-Smith, Governor's Appointee; Lucy Morrison, At-Large; Rise Tierney, West Tisbury; Jason Mazar-Kelly, Edgartown; Rudy Sanfilippo, Aquinnah; Ariel Farina, Tenant Representative