

December 14, 2021

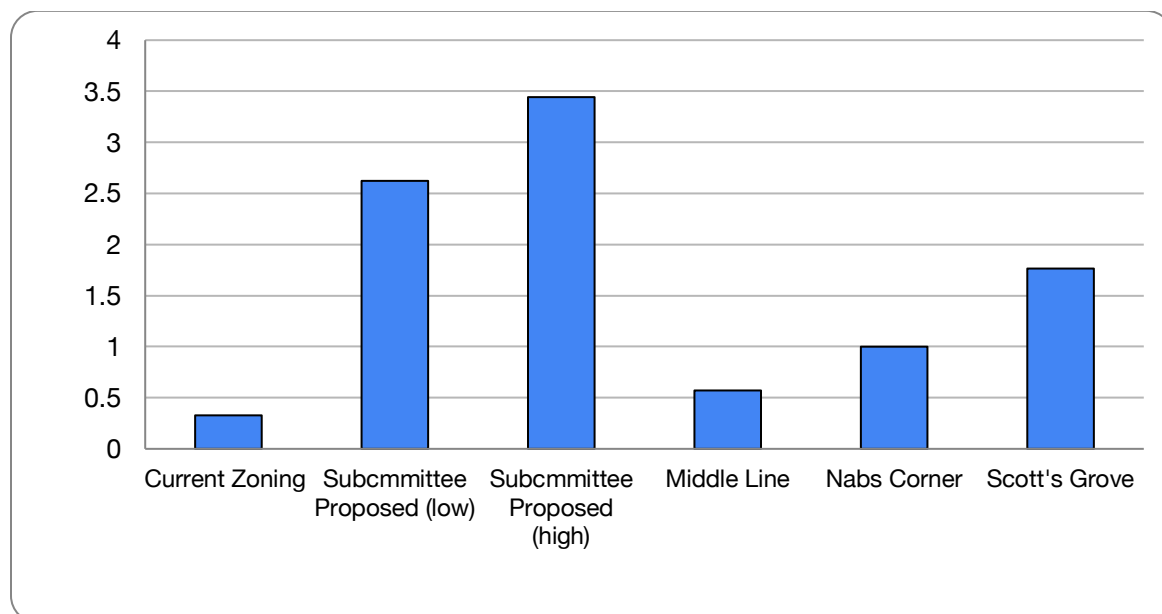
To: Select Board of Chilmark

I am writing to comment on the proposal under review to use approximately six acres of Town owned land at Peaked Hill Pastures to provide affordable housing.

The proposal as put forward by the subcommittee raises very serious concerns. First, it fundamentally fails to serve what should be the heart of the effort — creating more ownership opportunities for young Chilmark families who are unable to afford a home in the current market. There is far too much weight on rental units and the development model is driven by highly restrictive income limitations that will likely disqualify the young families we need to encourage to remain and settle in the Town.

Why would we not follow the successful precedents of the Town’s prior programs? Middle Line Road and Nabs Corner are universally regarded as excellent outcomes. The youth lot program as evolved over the years has worked well and under the current rules is building a permanent reservoir of affordable home ownership opportunities. Peaked Hill Pastures itself provides a successful example. Of the four year-round households, two are one acre youth lots that the Town awarded about 20 years ago. The recipients included two public school teachers (one of whom was an EMT), a volunteer fireman, and two self-employed people. In the years since, they have made tremendous contributions to the town and community island wide.

The subcommittee’s focus on rental units inevitably drove it to recommend an unprecedented level of density that is totally at variance with 350 years of rural tradition in Chilmark. As the chart below comparing units per acre demonstrates, the density proposed by the committee is much greater than anything done here before and even nearly double the density of the Scott’s Grove project in West Tisbury committee members often cite as a model.



I would urge the Select Board to adopt some very simple guiding principles:

- 1) Set a goal of 5 to 6 ownership units and cap the rental segment of the total units at no more than 50%, which is the proportion at Middle Line. In addition to ensuring that the project creates more ownership opportunities, this provides a critical mass of long-term stable residents who will have a deep commitment to the neighborhood, which is a benefit to the renters as well.
- 2) Establish an overall limit of 10-12 units and 20-25 bedrooms depending upon the final outcome of a detailed analysis of the impact of the project on groundwater, nearby wetlands, traffic on Tabor House, North, and Middle Roads, and the Town budget after full occupancy.
- 3) The Town should utilize its normal processes for permitting and variances and not seek to apply the state "40B" process to the project.
- 4) The Select Board should directly manage the remaining stages of the process to develop a proposal the Board can recommend to voters at the Town Meeting and give it the best chance of being approved.

It is especially critical that the Select Board assume control moving forward, using Town and outside resources as required. Inevitably process has a major effect on the substance of the outcome. It is very seductive to say that we should turn implementation over to the "experts", solicit comments from experienced potential developers, and turn loose hired professional affordable housing consultants to develop an RFP without the balanced oversight the Select Board can provide.

To be blunt, the incentive structure of the developers and consultants is not aligned with the broader interests of the Town. They have a strong bias to greater density and more rental units because that is what improves the economics of the project for the developers and generates the greatest opportunity for state grants and Federal tax credits that can be marketed to high income taxpayers. They don't care about preserving the things that make Chilmark unique even among the island towns, nor do they care about giving young families a chance to own a home here.

Finally, I know there are some who will disparage the points I have made and dismiss these comments as "not in my back yard" sentiment. Those folks might want to look at the annual report of Island Housing Trust, where they will note our family has been a major supporter of IHT's work to address housing needs for years. Our prior personal experience with the Town affordable housing effort has been terrific. We gained wonderful neighbors who are raising great kids. That's the model we know works and that should guide what happens at Peaked Hill Pastures.

Thank you for permitting me this opportunity to comment.

Fred Khedouri