



February 15, 2022

Representative Raymond Hull
Chair, House Committee on Municipal Government and Housing
State House
Providence, RI 02903

Re: H6638 – An Act Relating to Towns and Cities – Zoning Ordinances

Chairman Hull and Members of the Committee:

On behalf of the Rhode Island Chapter of the American Planning Association (APA RI), we thank you for the opportunity to raise some concerns for H-6638, which seeks to prohibit single-family residential zoning in municipalities with populations of over twenty-thousand (20,000) and mandate that those municipalities adopt zoning regulations for middle housing in single-family residential zones. We submitted similar comments last year for H-6093.

APA RI members include over 200 municipal planners, private sector planners, planning board members, citizen planners, and more. We greatly appreciate the sponsors' intention to expand the supply of homes affordable to most Rhode Islanders by mandating zoning that allows greater residential density in larger municipalities. APA RI has been working for years to find solutions for accommodating greater residential density and housing choices while simultaneously protecting our farms, forests, and shorelines. This commitment is most notably embodied in the Land Use element of the State Guide Plan: [Land Use 2025](#). The vision laid out in this plan is as relevant and critical today as it was when first released over 15 years ago.

APA RI understands the impetus of this bill and has been following similar policy decisions and proposals in Minneapolis, the State of Oregon, and elsewhere across the country. Closer to home, Massachusetts and Connecticut have begun to examine and change local and state laws for similar purposes noted in this bill. However, most of these laws have sought to direct growth in proximity to public transportation and other infrastructure. While this bill does mention the "urban growth boundary" (a concept we assume to be similar to the "Urban Services Boundary" of Land Use 2025) and "city centers," these are undefined concepts in Rhode Island General Law.

Beyond Land Use 2025, there have been many efforts in Rhode Island to address this issue that APA RI has supported and will continue to advocate for. These include the Statewide Planning Program's various efforts around establishing Growth Centers and studying Opportunity Maps, Grow Smart RI's study of potential Transit Oriented Development nodes, and exploring options for establishing policies similar to Massachusetts' 40R and 40S programs, to name just a few. There are many tools in the toolbox, and we look forward to working with this bill's sponsors and the General Assembly as a whole to find alternate ways to address this very valid concern.

We suggest that H6638 be held for further study and referred to the ongoing Land Use Commission.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff C. Davis'.

Jeff C. Davis, AICP
Past President, APA RI

cc RI League of Cities and Towns