



March 28, 2024

Honorable Chair Stephen M. Casey
House Committee on Municipal Government and Housing
Rhode Island State House
Providence, RI 02903

RE: H-7984 – Relating to State Affairs and Government – Rhode Island Housing Resources Act of 1998 and Low- and Moderate-Income Housing Act

Chairman Casey and Committee Members:

On behalf of APA-RI, I am forwarding these comments on H-7984, which provides that mobile and manufactured homes be identified and counted as affordable housing under certain conditions. We support this bill which proposes to include such units which are owner occupied, located within resident-owned mobile/manufactured home communities, and meeting the U.S. Department of Housing and Urban Development’s manufactured home construction and safety standards as meeting the definition of “affordable housing” under § 42-128-8.1 and counting towards the municipality’s low- and moderate-income housing units under § 45-53-3.

Our suggestion is to correct an assumed language error under 45-53-3. (5)(i) as follows:

Mobile and/or manufactured homes qualifying as affordable housing under the definition of affordable housing in § 42-128-8.1(d), shall each count toward ~~one-half percent (0.5%)~~ **one-half (0.5) of one unit** of year round housing units for purposes of the calculation of low- and moderate-income housing units within a city or town, and shall not require a subsidy as a requirement to be counted toward the calculation of low- and moderate-income housing units.

APA RI supports the General Assembly’s exploration of these homes as already contributing to a municipality’s affordable housing stock. We also suggest that a substitute bill with the above correction consider that such mobile or manufactured units qualify as a whole unit if the occupant is income qualified. Due to their size, less costly construction and location on commonly owned land, these units will likely always be affordable without a subsidy and a deed restriction.

Sincerely,

A handwritten signature in blue ink that reads 'Jane Weidman'.

Jane Weidman, AICP
Legislative Committee Chair

cc RI League of Cities and Towns