



**STATE OF RHODE ISLAND**  
**Rhode Island Department of Housing**  
**1 Capitol Hill, 3rd Floor**  
**Providence, RI 02908**

May 1, 2025

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

RE: H 5689 – Relating to Towns and Cities – Low and Moderate Income Housing

Dear Chairman Casey:

While the Department of Housing appreciates the intent of H 5689 to enhance protections for municipalities from potentially unwanted impacts of large-scale affordable housing development, we write to express opposition to this bill as currently drafted.

H 5689 creates a new classification of application called “substantial multi-family housing project” for affordable housing projects exceeding 60-units in municipalities with a population under 35,000. The proposed bill establishes that substantial multifamily housing projects shall be excluded from the comprehensive permit process and instead requires separate applications to applicable local boards. This expansion is contrary to the efforts that the General Assembly has made over the past few years to streamline Rhode Island’s permitting process to make our state a more attractive and less expensive environment to develop housing. This would unravel the “comprehensive” aspect of comprehensive permits and would undo the recently passed mandate for unified development review for projects involving zoning relief.

Furthermore, H 5689 would require that even minor changes to approved plans to be reviewed by the review board instead of the administrative officer. This is unnecessary due to the insignificant nature of minor changes. Please know that administrative officers have the authority to elevate minor changes to major changes based on their discretion, so this provision takes away local autonomy to run their processes efficiently.

We also note that the bill would exempt substantial multi-family housing projects from approvals via “failure to act” that apply to all other application types. The bill does not extend the timeline for municipalities to render decisions but would instead open the door for communities to fail to act *indefinitely*, without consequence.

Lastly, the bill would require a majority of the approving body, not just a majority of those present, to approve these applications. This again directly unravels recently passed pro-housing legislation on this issue.

Thank you for your time and consideration.

Sincerely,

Deborah J. Goddard  
Secretary of Housing

CC: The Honorable Members of the House Municipal Government and Housing Committee  
The Honorable Deborah A. Fellela  
Nicole McCarty, Esquire, Chief Legal Counsel to the Speaker of the House  
Lynne Urbani, Director of House Policy