



DEPARTMENT OF PLANNING & DEVELOPMENT
MAYOR BRETT P. SMILEY

March 10, 2025

Rep. Stephen Casey, Chair
Committee on Municipal Government and Housing
R.I. House of Representatives
82 Smith Street
Providence, RI 02903

Re. House Bill 2025-H5798

Dear Chairman Casey and Members of the Committee:

I am writing to comment on House Bill H5798. The City of Providence has long permitted rowhouses. We are in the process of revising the zoning ordinance to allow for rowhouses (aka detached single-family dwellings) in every residential zone and to allow for each unit to be on a separate lot, as the bill contemplates.

We are in support of the proposed language in section 45-24-37(j), which states that “the number of attached single family units allowed and the dimensional requirements shall be the same as the corresponding vertical construction density for the property and zoning district.” We would suggest clarifying the sentence by deleting “corresponding vertical construction density” and replacing it with “residential density,” which is a term already defined in the Zoning Enabling Act.

A concern is that this language seems to be contradicted by the proposed language in section 45-24-33(a)(25)(ii), which states, “the zoning ordinance shall allow each single-family unit to be located on its own lot, without requirements for minimum lot size, lot width, lot frontage or lot depth and allow for a zero lot line setback along the common property line to accommodate the subdivision for these units.”

When read together, these two sections imply that in the same zone, the overall residential density for an attached housing subdivision would be the same as a detached housing subdivision, but dimensional standards would be relaxed for each lot. However, this is not explicit, and we fear that this bill will be misinterpreted to allow for unlimited density of attached housing. A potential fix would be to say in 45-24-33(a)(25)(ii), “the zoning ordinance shall allow each single-family unit to be located on its own lot, without increased requirements for minimum lot size, lot width, lot frontage or lot depth...”

Thank you for the opportunity to comment on the bill.

Sincerely,

Robert E. Azar, AICP
Deputy Director