



Valley Affordable Housing Corporation

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Jeffrey Swanson, Executive Director

April 10, 2025

The Honorable Stephen Casey
Chair, House Committee on Municipal Government & Housing
Rhode Island State House
Providence, RI 02903

Re: Opposition to House Bill H5268 – Act Relating to Towns and Cities – Home-Fit Dwelling Units

Dear Chair Casey and Esteemed Members of the Committee,

My name is Jeffrey Swanson, and I serve as Executive Director of Valley Affordable Housing Corporation. I write today to respectfully express our **strong opposition to House Bill H5268 – the Home-Fit Dwelling Units Act**. While we appreciate the bill's intent to enhance accessibility in housing, we have significant concerns regarding the bill's overly broad language, potential misalignment with existing accessibility standards, risks of increased costs and construction delays, and punitive enforcement mechanisms.

About Us:

Founded in 1995, VAHC is a nonprofit organization committed to developing and maintaining high-quality, affordable housing for seniors, low-income individuals, and families across Rhode Island and Massachusetts. Our mission is to create housing opportunities that foster stability, support economic mobility, and promote inclusive, thriving communities. Over the past three decades we have developed approximately 650 units of affordable housing, serving as a key partner in the region's effort to combat housing insecurity, reduce urban blight, and improve quality of life for vulnerable populations. We share the goal of ensuring that housing is available to people of all abilities, but believe this legislation, as written, would inadvertently impede progress toward that goal.

Below, we outline several key concerns with the bill:

1. Overly Broad Language and Applicability

- The bill references “covered dwelling units” in a circular and unclear way, with a high likelihood of different interpretations.
- The broad definitions of “public financial assistance” could capture virtually any housing project. Additionally this requirement will disproportionately impact affordable housing developments, where margins are already tight.

2. Design Standards

- The bill mandates adherence to the ANSI 2017 Type A standards, requiring 25% of units to meet these standards, and in some cases, entire floors or buildings to follow Type A or B requirements.
- These standards differ markedly from current state and federal building codes, and the bill lacks a reasonable transition period for developers to adapt.
- The new requirements will significantly increase construction costs, which will in turn reduce the number of affordable units produced.

3. Implementation and Enforcement

- The bill does not clearly explain how its provisions align with current permitting and code enforcement processes.
- Without clear direction on how developers should navigate multiple, possibly conflicting review systems, this bill could create confusion and bottlenecks in an already burdened approval pipeline.
- These administrative hurdles will delay much-needed housing construction and increase project costs.

4. Punitive Measures

- The bill defines liability broadly, potentially implicating developers, contractors, architects, and even private homeowners for violations—whether during original construction or subsequent renovations.
- The statute of limitations for claims extends three years beyond discovery of noncompliance, opening developers and others to prolonged legal exposure.
- This uncertainty will have a chilling effect on investment and participation by risk averse lenders and syndicators.

For these many reasons, I respectfully urge you to oppose House Bill 5268, which we believe will impede rather than facilitate the development of affordable housing. We welcome the opportunity to engage in a collaborative conversation about how to enhance accessibility standards in ways that are clear, consistent, and economically feasible.

Please do not hesitate to contact me with any questions. I can be reached at (401) 334-2802 or jswanson@valleyaffordable.org.

Sincerely,



Jeffrey G. Swanson
Executive Director
Valley Affordable Housing Corporation