



March 3, 2026

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

RE: H 8005 – An Act Relating to Towns and Cities – Zoning Ordinances

Dear Chairman Casey and Committee Members:

Please accept the following comments from our organization, the RI Chapter of the American Planning Association, regarding this bill, which amends municipal zoning authority regarding parking schedules located near certain transit assets. APA-RI supports the goals of Transit Oriented Development, however there are some technical issues with this bill that could be revised through amendment.

In our review of this bill, we agreed that this issue deserves study to analyze the relationship between parking requirements and housing costs. If parking requirements in transit areas exceed local demand, local zoning ordinances should be amended to reduce them and incorporate transit into development plans. However, the specific prescriptions in the text of the bill would have been best left to municipalities to develop based upon their local needs, because the text as written presents considerable challenges to the practical administration and enforcement of these policies, such as:

1. The terms that the bill claims are defined in the 2020 Transit Master Plan- “transit oriented area”, “frequent transit stop”, and any qualification of what constitutes a “planned” hub or stop- are not defined in that document. Those terms should be defined in the statute itself to avoid confusion.
2. How are the 1/4-mile and 1/8-mile distances to be measured? Is it from a point within the transit stop, or from its outer boundaries? Does it measure out “as the crow flies”, or do the distances correspond to streets and walking distances along the streets?
3. To what areas do these overriding provisions actually apply? What is a “planned frequent transit stop”? Is it a stop that has been merely conceptually proposed? Does the stop need to attain any certain levels of review or qualification before it can be considered to be “planned”? How long can a transit stop retain it’s “planned” status before that status may out of date or expired?
4. What happens to areas where a stop may be located now, but is removed in the future? What are the parking requirements for such dwelling units in those areas once a stop is gone?

While APA-RI supports the strategy of transit-oriented development, alignment with other policies and goals would create a better context-based planning strategy for areas located along transit routes. Thank you for your time and consideration.

Sincerely,

Sean Henry & Gregory Guertin
Legislative Committee Co-Chairs