



March 5, 2026

Honorable Chairman Stephen Casey

House Municipal Government and Housing Committee  
Rhode Island State House  
Providence, RI 02903

RE: H-8007 – An Act Relating to Towns and Cities – Subdivision of Land

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 Chapter 45-23, the Subdivision Act, to change the definition of a minor subdivision to include “single family infill subdivisions”. This proposed amendment follows one adopted last year to include “oversized lot subdivisions”. Both allow the creation of lots substandard in area for the zoning district in which they are located.

APA-RI supports the concept of infill to create more vacant lots for development of single-family units, if the lots can be supported by adequate infrastructure and do not alter neighborhood character. However, considering the amendments made last year to allow the subdivision of “oversized” lots, our organization questions the purpose of this current bill which appears to have higher thresholds for creating new infill lots than using the provisions now on the books for an oversized lot subdivision.

It is our recommendation that the concept of oversized lot subdivisions and infill lots be combined into one procedure for use by property owners, and that the standards be the same, to avoid confusion on the part of applicants. These standards should include:

1. Compatibility with the sizes of the lots in the neighborhood (based on a survey)
2. Evidence of potable water and sewage disposal capacity
3. Frontage on a public or private road
4. A limit on the number of new lots
5. Minimum lot sizes tied to the zoning district

APA-RI would be happy to provide the language to be incorporated into a substitute bill. We also believe there should be some evaluation as to how well the oversized lot provisions are working in the various municipalities. Thank you for your consideration.

Sincerely,

Sean Henry and Gregory Guertin  
Legislative Committee Co-Chairs

cc RI League of Cities and Towns