



May 26, 2026

The Honorable Stephen Casey
Chair, House Committee on Municipal Government and Housing
Rhode Island State House
82 Smith Street,
Providence RI 02903

Re: In Opposition H8468

Dear Chair Casey and Members of the Committee:

On behalf of the Housing Network of Rhode Island, our member agencies, and the low and moderate income Rhode Islanders we seek to serve, I write in opposition to **H8468**, legislation that seeks to allow Coventry to partially count manufactured homes as LMIH units if the park in which they are located is age restricted.

In prior legislative sessions, the General Assembly passed legislation that gave municipalities some latitude in allowing mobile homes that met certain criteria to be counted towards that municipalities LMIH goal. Coventry has in fact already benefited from that change, with 162 mobile home units being added to the LMIH inventory. The primary focus of that legislation was to establish standards related the design and construction standards of manufactured homes and resident ownership of the land. These criteria were very purposely included to ensure that the State was not promoting affordable housing as substandard housing, which many older mobile homes are, and uplift that resident ownership and control of the land could be considered proxy for affordability. In mobile home parks where the land is owned by investors, it is well documented that monthly pad fees are anything but affordable to its residents, typically upwards from \$500 a month and in some instances, even over a \$1,000 per month!

Similar previous attempts to count all mobile homes as LMIH units, **H8468** is little more than an effort to re-label existing housing units in an effort to aid a municipality in achieving its 10% LMIH goal and exempting it from accepting Comprehensive Permit applications and new development. Efforts like **H8468** weakens the intent of the LMIH Act– to address the “acute shortage of affordable, accessible, safe, and sanitary housing for its citizens of low and moderate income, both individuals and families” (§ 45-53-2), and diminishes its value as a tool to ensure affordable housing opportunities for Rhode Island’s most vulnerable residents. Rhode Island has a serious

lack of housing stock. Low building permit activity, low vacancy rates and the state's underinvestment in affordable housing has led to this significant numerical shortage of homes.

Re-labeling existing housing stock, mobile homes or otherwise, as "affordable housing" does nothing to address this urgent need for new housing units.

For these reasons, we oppose **H8468** and urge the Committee to oppose. I welcome questions from the Committee and can be reached at 401-721-5680 ext. 104 or mlodge@housingnetworkri.org.

Respectfully,

A handwritten signature in cursive script that reads "Melina Lodge".

Melina Lodge, MCP
Executive Director