



April 7, 2026

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

**RE: Comments on S3092**

Dear Chairman Bissailon and Members of the Committee,

On behalf of the Housing Network of Rhode Island, thank you for the opportunity to offer comments on **S3092**, legislation that allows a municipality to request a one-time extension (of up to twelve months) for the updating their Comprehensive Plans.

As a former planning professional, I can very much appreciate the time and energy that goes into a Comprehensive Plan update and the significance that the finished products holds for a municipality in help guiding development and redevelopment. That being said I would like to comment specifically on the practicality of implementing a one-time extension provision and the challenges associated with enforcing such a measure over time.

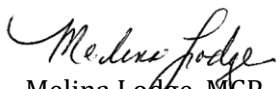
While the concept of a one-time extension may appear straightforward in statute, its administration raises important questions. In practice, agencies or entities responsible for implementation would need a clear and consistent method to determine eligibility, verify whether an extension has already been granted, and ensure that no applicant receives more than the permitted single extension. Without a centralized tracking mechanism or standardized reporting requirements, this could lead to inconsistent application or unintentional duplication.

Over time, the difficulty of policing a “one-time” provision increases. Records may become fragmented across departments, personnel changes can reduce institutional memory, and differing interpretations of what constitutes prior use of the extension may emerge. These factors can undermine both fairness and compliance.

To address these concerns, the bill would benefit from (1) Clearer definitions of eligibility and what qualifies as use of the extension; (2) A standardized, possibly centralized tracking system; (3) Explicit guidance on documentation and verification requirements; (4) Consideration of whether administrative costs and enforcement complexity outweigh the intended benefit of the one-time flexibility

Ensuring that the provision is both practical to administer and enforceable over time will be critical to achieving its intended purpose. Thank you for the opportunity to offer comments on **S3092**. I am available to answer any questions you might have and can be reached at 401-721-5680 ext. 104 or [mlodge@housingnetworkri.org](mailto:mlodge@housingnetworkri.org).

Respectfully submitted,

  
Melina Lodge, MCP  
Executive Director