



March 27, 2024

The Honorable Robert E. Craven  
Chairman House Judiciary Committee  
Rhode Island State House  
82 Smith St  
Providence RI, 02903

RE: Bill Number: 7951 RELATING TO TOWNS AND CITIES -- SUBDIVISION OF LAND

Dear Chairman Craven and Honorable Members of the House Judiciary Committee:

I am writing to you on behalf of our organization to express our concerns regarding House Bill 7951, which seeks to clarify the circumstances under which a municipality can limit accepting and hearing development applications, as well as restrict building permits. While we understand the importance of streamlining development processes, there are several issues with the proposed bill that we respectfully urge you to consider.

First, we are deeply concerned about the arbitrary time limit of 60 days imposed by the bill on any moratorium a municipality may wish to implement. This limitation fails to account for the diverse range of situations that may necessitate a temporary halt to development activities. For instance, if a municipality faces challenges such as non-compliant sewer or water treatment facilities requiring upgrades, a mere 60 days is insufficient for conducting necessary assessments, let alone implementing substantial improvements. It is essential to recognize that imposing an auditory time limit disregards the complexities and unique circumstances faced by different communities and could hinder effective problem-solving efforts.

We are troubled by the severe restrictions placed on municipalities' ability to enact moratoriums on residential construction. While we acknowledge the need for practicality in development regulations, overriding or limiting moratoriums to just 60 days may prove impractical, particularly in cases where infrastructure incapacity necessitates temporary halts to construction activities. Such rigid constraints risk undermining municipalities' ability to address pressing issues and adequately plan for sustainable development.

Finally, the feedback we received from our members suggests that this bill appears to infringe upon a municipality's existing local control by imposing statewide restrictions. This loss of local autonomy could result in a diminished local voice and identity, as communities are forced to conform to standardized regulations that may not align with their specific needs or priorities. Preserving local control is crucial for ensuring that decisions regarding development reflect the values and interests of the communities they impact.

In conclusion, we respectfully urge you to reconsider the provisions outlined in House Bill 7951 and work towards solutions that prioritize local autonomy, flexibility, and the ability of municipalities to effectively address the unique challenges they face. Collaboration between state and local entities is essential to developing legislation that balances the need for streamlined development processes with the preservation of community interests and identities.

On behalf of the League of Cities and Towns and affiliate members, thank you for your attention to our concerns, and we look forward to continuing our engagement on this important issue.

Sincerely,

A handwritten signature in black ink that reads "David M. Bodah".

David M. Bodah  
Associate Director

Cc: House Judiciary Committee  
Ernie Almonte, Executive Director, RILCT