

**Other comments:**

The bill would become effective upon passage, with no time for making the necessary amendments to local regulations. For the third consecutive year in a row, municipalities must undertake significant changes to their Land Development and Subdivision Regulations, an effort that will require resources, time and staff, as well as education on revised procedures for planning board members, and outreach to the development community and the public.

Our organization would request instead that the concerns that led to these amendments be discussed more openly between the drafters and representatives of the municipalities. In working with the amended state land use laws over the past couple of years, planners in the APA-RI chapter have identified a number of other adjustments that could be made. It would be best to work together on a collaborative bill.

**Section 45-24-37. General provisions – Permitted uses.**

**(h) Adaptive reuse**

APA-RI supports these amendments, as they address concerns with how allowable density is determined, relative to the percentage of LMI units, but would suggest the following changes:

- In the prohibitions section require that the industrial or manufacturing building be vacant for a period of two years rather than one year.
- In the density section clarify that the LMI unit percentage is only applicable for projects with more than 4 units (rather than less than 4 units).

**Section 45-24-38. General provisions – Substandard lots of record.**

In the subsection governing minimum setbacks, frontage and widths for lots nonconforming in area, APA-RI supports the amended language giving communities the option to apply the dimensional requirements of a compatible zoning district. This also addressed a concern relayed by our organization.

Thank you for your consideration.

Sincerely,



Jane Weidman  
Legislative Committee Chair

cc RI League of Cities and Towns

**Other comments:**

The bill would become effective upon passage, with no time for making the necessary amendments to local regulations. For the third consecutive year in a row, municipalities must undertake significant changes to their Land Development and Subdivision Regulations, an effort that will require resources, time and staff, as well as education on revised procedures for planning board members, and outreach to the development community and the public.

Our organization would request instead that the concerns that led to these amendments be discussed more openly between the drafters and representatives of the municipalities. In working with the amended state land use laws over the past couple of years, planners in the APA-RI chapter have identified a number of other adjustments that could be made. It would be best to work together on a collaborative bill.

**Section 45-24-37. General provisions – Permitted uses.**

**(h) Adaptive reuse**

APA-RI supports these amendments, as they address concerns with how allowable density is determined, relative to the percentage of LMI units, but would suggest the following changes:

- In the prohibitions section require that the industrial or manufacturing building be vacant for a period of two years rather than one year.
- In the density section clarify that the LMI unit percentage is only applicable for projects with more than 4 units (rather than less than 4 units).

**Section 45-24-38. General provisions – Substandard lots of record.**

In the subsection governing minimum setbacks, frontage and widths for lots nonconforming in area, APA-RI supports the amended language giving communities the option to apply the dimensional requirements of a compatible zoning district. This also addressed a concern relayed by our organization.

Thank you for your consideration.

Sincerely,



Jane Weidman  
Legislative Committee Chair

cc RI League of Cities and Towns

**Other comments:**

The bill would become effective upon passage, with no time for making the necessary amendments to local regulations. For the third consecutive year in a row, municipalities must undertake significant changes to their Land Development and Subdivision Regulations, an effort that will require resources, time and staff, as well as education on revised procedures for planning board members, and outreach to the development community and the public.

Our organization would request instead that the concerns that led to these amendments be discussed more openly between the drafters and representatives of the municipalities. In working with the amended state land use laws over the past couple of years, planners in the APA-RI chapter have identified a number of other adjustments that could be made. It would be best to work together on a collaborative bill.

**Section 45-24-37. General provisions – Permitted uses.**

**(h) Adaptive reuse**

APA-RI supports these amendments, as they address concerns with how allowable density is determined, relative to the percentage of LMI units, but would suggest the following changes:

- In the prohibitions section require that the industrial or manufacturing building be vacant for a period of two years rather than one year.
- In the density section clarify that the LMI unit percentage is only applicable for projects with more than 4 units (rather than less than 4 units).

**Section 45-24-38. General provisions – Substandard lots of record.**

In the subsection governing minimum setbacks, frontage and widths for lots nonconforming in area, APA-RI supports the amended language giving communities the option to apply the dimensional requirements of a compatible zoning district. This also addressed a concern relayed by our organization.

Thank you for your consideration.

Sincerely,



Jane Weidman  
Legislative Committee Chair

cc RI League of Cities and Towns