



State of Rhode Island  
DEPARTMENT OF BUSINESS REGULATION  
1511 Pontiac Ave Bldg. 68-2  
Cranston, RI 02920

February 4, 2025

The Honorable Stephen M. Casey  
Chair, House Committee on Municipal Government and Housing  
Rhode Island State House Room 101  
Providence, Rhode Island 02903

RE: H 5100 – AN ACT RELATING TO HEALTH AND SAFETY – STATE BUILDING CODE –  
ADMINISTRATION AND ENFORCEMENT

Dear Chair Casey:

I write on behalf of the Department of Business Regulation in support of House Bill 5100.

The bill before you today aims to expedite the siting and installation of a specific variety of emergency shelter units in a way that preserves important life-safety considerations while recognizing the importance of rapid deployment in very specific situations. In particular, the bill allows – conditional on a disaster declaration by a municipal chief executive – the deployment of “SAVE Units” apart from the traditional plan-review and inspection process, provided that the state fire marshal and/or a state building official certify that the units satisfy a variety of criteria laid out in the proposed legislation.

According to the proposed legislation, these units are expressly intended to provide “temporary safety and privacy for people experiencing homelessness...during periods of severe weather or during the aftermath of a natural or man-made disaster.” Furthermore, the legislation appropriately provides strict time-bound parameters for the use of SAVE Units, ensuring that these units are deployed on a temporary, emergency-driven basis as a bridge to more traditional, code-compliant housing environments.

As a procedural matter, the Department would suggest amending the legislation to allow local fire and building authorities having jurisdiction (AHJs) to verify the compliance of the SAVE Units with the conditions spelled out in the bill. The following language is a preliminary and directional example of such an amendment to Sec. 23-27.3-111.0(a)(1). SAVE Units – Requirements (added language in **bold**):

*“Is confirmed by the state fire marshal **and state building code commissioner, or a local assistant deputy state fire marshal and local building official, depending on the proposed location and the authorities having jurisdiction thereof, to comply with the following:**”*

This would align the verification procedure with the existing state-local delegation structure relative to fire and building code compliance, where (as a general matter) the State Building Code Commissioner and State Fire Marshal are responsible for code enforcement relative to state-owned properties and buildings, and local fire and building authorities are responsible for these duties relative to privately-owned and municipal properties and buildings. This amendment would further streamline deployment of the SAVE Units and clarify lines of authority and responsibility.

We are happy to further discuss the points raised in this letter at your convenience. Thank you for your consideration of our testimony.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth K. Dwyer". The signature is fluid and cursive, with the first name being the most prominent.

Elizabeth K. Dwyer, Esq.  
Director  
Department of Business Regulation  
Elizabeth.dwyer@dbr.ri.gov

Cc:       Honorable Members of the House Committee on Municipal Government and Housing  
          The Honorable K. Joseph Shekarchi  
          Nicole McCarty, Esq., Chief Legal Counsel to the Speaker  
          Lynne Urbani, Director of Policy  
          Matthew Santacroce, Deputy Director, Department of Business Regulation  
          Timothy McLaughlin, State Fire Marshal  
          James Cambio, CBO, State Building Code Commissioner