

April 8, 2025

The Honorable Stephen Casey
Chair, House Committee on Municipal Government & Housing
Rhode Island State House
Providence, RI 02903

Re: Opposition to House bill H5268, Act Relating to Towns and Cities – Home-Fit Dwelling Units

Chair Casey and Esteemed Members of the Committee:

Crossroads Rhode Island respectfully writes in **Opposition to House bill H5268, Act Relating to Towns and Cities – Home-Fit Dwelling Units**, which would require that all new construction of “covered dwellings” comply with certain design provisions aimed to enhance accessibility in residential dwelling units. While we acknowledge the bill’s intent, we must respectfully oppose this legislation due to concerns regarding its broad language, misalignment to current federal and state accessibility standards, potential to delay construction timelines and increase costs, and highly punitive measures.

Founded in 1894 as The Travelers Aid Committee of the YWCA to assist vulnerable women traveling to Providence, Crossroads has been serving those in need for over 130 years. Today, we are the leading provider of housing and services to those experiencing homelessness in Rhode Island.

Crossroads is in the process of developing more than 300 accessible housing units in response to the need for affordable housing through its Roads to Home campaign. These projects encompass the Providence headquarters location so residents will have access to services within walking distance. The units at Summer Street, slated to open fall 2025, will include accessibility and usability features for people with a wide range of physical and cognitive abilities, such as visual cues for safety and way finding. Permanent supportive housing for medically-vulnerable adults experiencing homelessness at 371 Pine Street will break ground at the end of spring 2025.

Below, we have outlined more specifically some of the concerns about the unintended consequences of this legislation.

- **Overly broad language and applicability**
 - Specifically, the bill makes a circular reference to what is a “covered dwelling unit,” referencing units that are subject to the provisions of the bill.
 - The bill includes very broad definitions of “public financial assistance” which could be applied to almost any housing project, but will especially impact affordable housing development.
- **Design standards**

five percent (25%) of units shall follow Type A standards, in (b), it requires that the first floor of a "multi-story building" (which could be interpreted as a two-or three story single family home) must comply with Type A and requires that second and higher-floor units must be Type B adaptable units. It is not clear which standard is superior.

- The requirements represent a significant shift from existing federal and state building code standards without consideration for timeline to implementation (requirements are effective upon passage) and significant cost increases to produce these units which could lead to a reduction of units produced.

- **Implementation and enforcement**

- There are important questions regarding applicability, implementation and enforcement that require clarification.
- How do the requirements of the bill align to current building code and the process for review and approval? The legislation establishes a different process for review and approval, without making clear how a developer would be expected to interface with multiple distinct processes - at a time when it's clear the state should be moving to streamline production.
- The implementation and compliance are likely to lead to delays in construction and drive costs up.

- **Punitive measures**

- There is a broad definition of "person" responsible for design and construction that could lead to 1) lack of clarity about the responsible party, and 2) could involve multiple people or entities, including those involved with original design/construction or subsequent renovations, including individual homeowners and private contractors.
- A person or organization who is "harmed" by noncompliance can bring a cause of action up to three years after the discovery of noncompliance. This means it could be years after the unit is constructed, during which time a developer and potentially anyone else involved with the unit's design and construction are vulnerable to a lawsuit, and if found in violation, liable for damages *and* to bring the unit to compliance. Because the statute also applies to renovations, it has the potential to impact individual property owners of existing units.

For these reasons, I respectfully oppose H5268. I am happy to answer any questions the Committee might have and can be reached at (401) 277-4300 and mwilcox@crossroadsri.org.

Sincerely,



Michelle M. Wilcox
President & CEO