



April 3, 2025

Senator Jacob Bissaillon  
Chairman, Senate Committee on Housing and Municipal Government  
Rhode Island Statehouse, Providence, RI 02903  
RE: In opposition to S900

Dear Chairman Bissaillon and members of the Committee,

On behalf of the Housing Network of Rhode Island, our member agencies, and the low income Rhode Islanders we seek to serve, I write in opposition to **S900**, legislation that seeks to allow municipalities to count manufactured homes as LMIH units if subject to a long term (at least 30 years) ground lease.

Last session legislation was passed that gave municipalities some latitude in allowing mobile homes that met certain criteria to be counted towards their LMIH goal. The primary focus of that legislation was to establish criteria related the design and construction standards of manufactured homes and resident ownership of the land. These criteria were very purposely included to ensure that the State was not promoting affordable housing as substandard housing, which many older mobile homes are, and to uplift that resident ownership and control of the land could be considered as proxy for affordability.

Similar previous attempts to count all mobile homes as LMIH units, **S900** is little more than an effort to re-label existing housing units in an effort to aid a municipality in achieving its 10% LMIH goal and exempting it from accepting Comprehensive Permit applications and new development. Efforts like **S900** weaken the intent of the LMIH Act– to address the “acute shortage of affordable, accessible, safe, and sanitary housing for its citizens of low and moderate income, both individuals and families” (§ 45-53-2), and diminishes its value as a tool to ensure affordable housing opportunities for Rhode Island’s most vulnerable residents. Rhode Island has a serious lack of housing stock. Low building permit activity, low vacancy rates and the state’s underinvestment in affordable housing has led to this significant numerical shortage of homes.

Re-labeling existing housing stock, mobile homes or otherwise, as “affordable housing” does nothing to address this urgent need for new housing units.

**S900** seems to suggest that the existence of a 30-year+ ground lease is comparable to a park being resident park. This is not the case as long-term ground leases include provisions for annual increases to pad fees. Pad fees are not tied to affordability but typically the value of the land, which tends to appreciate over time. Also, it appears that based on the length of time of the ground lease suggested within the bill, there is an insinuation that a 30-year+ ground lease and a 30-year deed restriction are comparable tools, which they are not.

For these reasons, we oppose **S900** and urge the Committee to reject it. I welcome questions from the Committee and can be reached at 401-721-5680 ext. 104 or [mlodge@housingnetworkri.org](mailto:mlodge@housingnetworkri.org).

Respectfully submitted,

A handwritten signature in black ink that reads "Melina Lodge". The signature is written in a cursive, flowing style.

Melina Lodge, MCP  
Executive Director