

ONLINE PUBLIC COMMENTS FOR REVIEW

Date: 12/16/2025

Regulation: 310-RICR-60-35-1

Title: Rules and Regulations for the Establishment of the Transit-Oriented Development Pilot Program

Reviewed Comments

Comment ID: 13415-2667

Comment By: Peter Friedrichs **On:** 11/24/2025

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Comment:

I think the draft regulations strike a balance between procedure and operational efficiency. My only real substantive comment is that it may be easier to utilize the general assembly's definition of affordable housing from RIGL 45-53-3, rather than creating a new definition.

Reviewed by: Tamara Dallaire **On:** 12/05/2025

Comments Pending Review

Comment ID: 13415-2668

Comment By: Andrew Teitz **On:** 12/15/2025

This comment is currently disabled for public display.

Comment:

1 I agree with Peter in the First Comment. Why use a different term "affordable housing" and a different definition when there is already a long-used definition of "low and moderate income housing" in the General Laws to which you could reference. The definitions seem very similar except for the sale requirement at "110%". Why is this in here?

2 As a general comment, a lot of the "meat" of the regs is somewhat "buried" in the definitions. That is common in land use regs, but it would be less confusing if more of the standards were moved out of the definitions.

3 Why do you need Preliminary District Approval and Final? If the proposal submitted to you is approved, and passed without changes by the municipality, it should be approved. If any changes are made, it must come back to the Executive Office for approval. Why complicate the process?

4 Definition Z-2. Why require comparison with the Prior Zoning, and why require increased density ? If the Prior Zoning meets all the requirements, why do you need "increased density"

5 Definition X. "Suitable for Families" is going too far to say that there must be "NO" restrictions on the number of bedrooms and number of occupants. You do want municipalities to adopt this, and that may well scare them away.

6 Definition Z-3. Why require parking ratio to be "eased" as to Prior Zoning, if it was already eased, as several municipalities have already done in all or parts of their downtowns.

7 Definition BB. Overall, this is a definition with a lot of "standards" in it that would be better moved to a different section of the regs. Specifically, the last sentence beginning with "Notwithstanding" is VERY important and should not be buried at the end of this definition.

8 Definition DD-2. I am troubled by the subjectivity of "as demonstrated by existing or anticipated market conditions" which sounds like it would lead to an appraiser finding as to "highest and best use." Almost any use could conceivably be found to be Underutilized.

9 Section 1.6.A.4 - Again why is it a given that restrictions must be "eased" from the Prior Zoning. And what if some are eased and some are tightened?

10. Section 1.7.C - The Scoring criteria perhaps should be ranked? I would think that since you are the Housing office, that #4, "the total number of affordable units proposed" should rank at the top. Or, since this is "TRANSIT" oriented development, #8 "frequency and accessibility of current and future transit services" should also rank at the top.

Thank you for considering my comments.

Andrew M. Teitz, Esq., AICP

Please note that these are my PERSONAL comments and not the comments or policies of any of the municipalities which I represent