



# PROVIDENCE PRESERVATION SOCIETY

April 18, 2018

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State of Rhode Island General Assembly

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Hon. David Salvatore  
Council President  
Providence City Council

Mr. Robert C. Davis, Chair  
I-195 Redevelopment District Commission

Ms. Christine West, Chair  
City Plan Commission  
City of Providence

Dear Madam and Sirs:

The Providence Preservation Society has grave concerns about the proposed tower on Parcel 42 in the I-195 Redevelopment District, currently known as Hope Point Tower. We appeal to you because the body that you lead and represent will play a key role in the complicated review or legislative process of the Fane Organization's application. **This proposal fails to meet existing development and design guidelines set forth by City and State entities and is wrong for Providence.**

Chief among our concerns is the reality that a cross-section of Providence leaders and stakeholders is expending energy on this problematic application, yet we hear time and again that the project will not be built. Discussion of this mythic tower is diverting time and resources from the real construction and redevelopment that Providence is experiencing currently. It is distracting from key issues of economic growth, job creation, affordable housing, and long-term environmental sustainability.

A controversial project like the Fane proposal requires that organizations and citizens evaluate the proposed project in light of the characteristics that define Providence's distinctive and recognized sense of place. The mission of PPS is to improve Providence by advocating for historic preservation and the enhancement of the city's unique character through thoughtful design and planning. **We find that this application for a tower on Parcel 42 defies universal urban planning and preservation principles, and cite the following:**

Architectural History Consultant  
Wm McKenzie Woodward

Advisors  
Oliver H.L. Bennett  
Arria C. Bilodeau  
Sean O. Coffey  
Linton A. "Jay" Fluck  
Peter B. Freeman  
Vance Freymann  
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William J. Penn  
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Robert D. Reichley  
Deming E. Sherman

Executive Director  
Brent Runyon

1. **SPOT ZONING:** The approval of a structure four times the height allowed by the zoning ordinance requires spot zoning. Typically, this planning tool is employed to achieve special use for a property not to change allowable building dimension, and while legal, it is poor planning practice and not without challenges in the courts.

Spot zoning gives preferential treatment to an applicant seeking a use or form *wholly at odds* with a city's zoning ordinance; otherwise a variance or other means would be sought to overcome the incompatibility. The brazen use of spot zoning to accommodate an individual development at Parcel 42, or any I-195 or downtown parcel, is a blatant defiance of the civic process undertaken by the City of Providence and its people to create and adopt the new zoning ordinance in 2014. The potential precedent set by such spot zoning is dangerous and compromises the public and private investment undertaken in our downtown over the last 30 years and the vision for the future city embodied in the zoning ordinance. Moreover, the approval of this tower by elected and appointed representatives prioritizes the vision of a single out-of-state developer over the agency and intent of the people.

2. **SCALE:** The Providence scale that has developed organically over the last three centuries, and which is one of the city's best attributes, would be compromised and adversely affected. A 46-story project that touts "living in the sky" is antithetical to the fabric and character of Providence. We believe residential development should promote *living in the city*. This tall tower would cast a looming presence over the soon-to-be riverfront park, dominating and (literally) overshadowing this public space.

Also questionable is the economic viability of a massive, high-end residential tower—whether the Providence market needs or can bear such density, certainly more easily absorbed in Boston with four-times the population. We prefer energy and attention be directed to the challenges and vacancy of our existing iconic building, which has remained the tallest in Rhode Island for 90 years. Providence does not need another problematic, over-scaled tower. It needs in-fill and adaptive reuse.

Wexford is a prime example of appropriately-scaled, mixed-use development that works within the guidelines set forth by the I-195 District. The success of the seven-story Wexford project, located on Parcels 22 and 25, will be undermined by the proposed tower directly across Dyer Street. The vulgar disparity in scale that would result is neither appropriate nor desirable.

3. **STREETSCAPE:** While design specifics are still being conceived and the latest renderings have not been made available to the public, the reported six-story podium base of the tower with ground-floor retail and five levels of parking is detrimental to an active and enjoyable streetscape.
4. **SUBSIDY AND PUBLIC BENEFIT:** The obvious tax incentives required for a project of such economic magnitude should necessitate certain public benefit to the taxpayer. We cannot envision a public benefit for a development that produces five stories of structured

parking for residents of the tower at the same height of the existing built environment and that under construction. Furthermore, the plan takes 23,004 square feet of public land from the adjacent future riverside park and would monopolize available tax incentives.

We do not oppose new development. We encourage it, but we demand that it be appropriate, well-planned, and realistic. Providence is in the unusual position, and ahead of the curve nationally, in having rerouted an urban interstate to provide prime redevelopment parcels. The concentration of luxury residential density represented in this project should be combined with significant, long-term job creation and dispersed throughout the district, *the* charge of the I-195 Redevelopment District Commission. We do not interpret this charge as the short-term creation of construction jobs alone.

We implore you to consider these points, and we encourage complete transparency in the multi-faceted and cross-jurisdictional review process of a tower that would forever alter the skyline of Providence.

Sincerely,



Brent Runyon  
Executive Director

cc:

Hon. Gina Raimondo, Governor, State of Rhode Island  
Hon. Dominick J. Ruggerio, President of the Senate, Rhode Island General Assembly  
Hon. Jorge Elorza, Mayor, City of Providence  
Edward F. Sanderson, State Historic Preservation Officer, RIHPHC  
Grover Fugate, Executive Director, RI Coastal Resources Management Council  
Peter McNally, Executive Director, I-195 Redevelopment District Commission  
Bonnie Nickerson, Director, Planning and Development, City of Providence  
Mike Devine, Vice President of Development, Wexford Science and Technology, LLC  
Valerie Talmage, Executive Director, Preserve Rhode Island  
Scott Wolf, Executive Director, Grow Smart RI  
Cliff Wood, Executive Director, The Providence Foundation  
Sharon Steele, Jewelry District Association