FROM: Brent Runyon, Executive Director, PPS
TO: Providence Historic District Commission
CC: Friedrich St. Florian, Joseph Furtado, Fox Point Neighborhood Association, Councilman John Goncalves
RE: Proposed development at 59 Williams Street and 6 John Street
DATE: July 22, 2020

Recommendations to HDC
The cottage at 59 Williams Street has been in its current location for 150 or more years. Its setting is anomalous within the district but moving it is in opposition to the Standards and Guidelines (page 50). A better solution in this context would be to add it onto the existing cottage in the location of the existing paving and mid-century garage.

Suburban-style detached garages are not in character with this area of the historic district. We urge disallowing of garages at this location both to preserve the character of the district and to preserve pervious surfaces and landscape features, such as trees.

We are opposed to any loss of or damage to the masonry and brownstone wall on Williams and John Streets. Any change to these features would have a negative effect on the historic streetscape, as the experience of the streets is dominated by historic walls, gates, and fences.

Additional Recommendations to the City
Informal landscapes provide ecological benefits and should be incorporated into a review of potential developments by the City Plan Commission.

The process of review for subdivided properties should include the complete development of the three contiguous parcels rather than piecemeal review. Parcel C should be amended so that it is entirely within the R-1 zone.

Background
Developer Joseph Furtado has submitted two applications to the Providence Historic District Commission (HDC) for properties within the College Hill local historic district. He is proposing to construct a three-story, two-family dwelling and detached four-car garage at 6 John Street, currently a vacant lot. At 59 Williams Street, which has been subdivided into two lots (Parcels A and C per the City Plan Commission in March 2019), he proposes the following changes: demolition of a four-car garage (approved at HDC in June 2020), relocation of the existing cottage to the west and closer to the street; construction of an addition to the rear of the cottage; and building a new detached two-car garage. Plans for 6 John Street and the lot at 59 Williams Street, Parcel C, have not been defined other than as stated above.
The applications were presented to the HDC in June 2020, but due to a discrepancy in lot lines, both projects were continued for review at the next regularly scheduled meeting. The 59 William Street proposal is scheduled to be heard by HDC on July 27, 2020, and the developer has indicated that 6 John Street will return to HDC in August.

At a July 10 convening with the development team, several interested neighbors expressed these primary concerns: loss of green space/ecosystem and a faulty regulatory process. The remedies for these issues are related but must be addressed separately from the current track on which the development proposal is now traveling, namely the upcoming hearings by the HDC. The best and only remedy for preserving the green space is to purchase the land and use legal tools, such as an easement, to ensure it is preserved. The remedy for addressing a faulty administrative process requires legal expertise to research the issues and a challenge based on the findings.

PPS has identified issues related under the purview of the HDC, which must consider projects using their Standards and Guidelines. While other neighborhood concerns are valid and within the purview of the City of Providence, they may be outside the jurisdiction of the HDC. For example, the Standards and Guidelines are not effective at preserving informal landscapes.

**Consideration of Landscapes**
The HDC Standards and Guidelines contain the word “landscape“ or “landscaping“ nineteen times. Below are the relevant statements. There seems to be little support for retaining informal landscapes such as those on the properties in question.

*Installation, replacement or removal of trees, shrubs, hedges and plants is not reviewed except where part of a historic landscape (see “Site Improvements” guidelines)* - page 7

*Historic site plans and features should be identified, retained and preserved.* - page 31

*The following site improvements will be subject to a public hearing before the PHDC:* 
...alterations to historic landscapes or settings of highly significant historic buildings... - page 32

*Major grade changes that would alter the historic setting of the property are generally discouraged – page 37

*When a historic structure is moved from its original site, it loses its integrity of setting and its sense of time and place, which are important aspects of the historic building and its environment. Their loss is irreplaceable. Ordinarily, a contributing historic structure listed on the National Register of Historic Places (as are many of the buildings in Providence’s local historic districts) will lose its National Register status if moved from its original site.* – page 50

**Qualities of 59 Williams Street**
The cottage and its setting have picturesque qualities in the asymmetry, the variety of plantings, and the integration of the cottage into the landscape. However, it lacks significant features of a formal Picturesque planned landscape. The setting is contrasted with the formality of the large estates around it, which have a rigid symmetry as hallmarks of their styles, and, like most of the houses around them, have similar setbacks from the street that create uniform view corridors. The cottage on Williams Street and the vacant adjacent lot are anomalies in that the setting deviates from the rhythm of surrounding
buildings on Williams, Benefit, or John Streets (see diagram below), and creates a desirable private front garden

**Concerns**

We have identified the following areas of concern, which respond to all information provided by the development team as of July 13, 2020.

- Density
- Landscape features
- Size, scale and massing of new construction
- Need for new development to respond to the immediate context
- Impact of moving of the cottage at 59 Williams Street

**Potential density should be considered.**

A new lot on Williams Street was created by a minor subdivision of 59 Williams Street and 6 John Street by CPC in March 2019, an action which did not require notice to abutting property owners. The subdivision was accomplished by shortening the depth of 6 John by roughly 17' on the east and 61.56' on the west. 59 Williams Street was then divided into two parcels (A and C), with both encroaching into land to the south, previously part of 6 John Street.

This means that both Parcels A and C now have a portion of them that straddles the line separating the R-1 and R-2 zoning districts. While this is legal, it could allow a developer to make the case that all of Parcel C is subject to R-2 zoning. This should be remedied so that all of Parcels A and C are within one zoning district, preferably the predominant R-1.

The intensity of the planned subdivision, as a whole, could include a total of four housing units (three new) and eight garages. While the three lots are larger than required in R-1 and R-2 zones, this intensification of development could have a negative impact on the quality of life in the immediate area, especially by reducing the amount of pervious surface area and removal of canopy. Additionally, this neighborhood does not have simple auto garages. These would be out of character for the historic district.

The current regulations, according to HDC staff, do not allow review by the HDC of the proposed development of the entire site (the three parcels). We are concerned that a piecemeal approach to the review of major changes within a local historic district is inadequate to ensure no negative impacts. If the regulations work this way, we urge that they be amended so that situations like this are treated as major land development.

**Important historic landscape features need to be preserved.**

The brownstone wall that surrounds the original Hoppin House estate (383 Benefit Street) presumably dates to 1853-55 and is attributed to Alpheus C. Morse, a prominent local architect. The HDC has purview over this historic wall. The wall has been damaged previously for a surface parking lot to the rear of 383 Benefit, but it is intact at the location of 6 John Street. If new development is permitted on the land behind this wall, it should not undermine or damage the wall. Vehicular access to the site should be permitted through an existing easement for the property that is immediately east of the wall (Lot 240). Additionally, as a condition of the March 2019 minor subdivision, the CPC conditioned review of the wall by the HDC. The HDC Standards and Guidelines state: Historic site plans and features [including retaining and boundary walls] should be identified, retained and preserved (page 31).
Any new buildings must respect the size, scale and massing of the neighborhood.
The HDC Standards and Guidelines apply design criteria to new construction, which include height, scale, massing, form, proportions, topography, and parking (page 48). The building proposed at 6 John Street, as presented in June, did not include sufficient information to render a decision as to whether it complies with these criteria. We are very concerned about the building being compatible with surrounding structures and responding to the site’s topography.

Development needs to respond to the immediate context.
This location is especially identified in relation with several major buildings and several smaller ones. The property itself appears to have once been part of the Hoppin House estate (383 Benefit Street). It abuts the Carrington-Coats House at 77-79 Williams Street and is across the street from the Corliss-Carrington House (66 Williams) and the Nightingale-Brown House (259 Benefit). It is very near the Lippitt-Green House (14 John) and the James T. Rhodes House (367 Benefit). Four smaller houses are within the immediate neighborhood, but the context is the major houses mentioned above. Each is grand and has a generous landscape surrounding it. This landscape contributes greatly to the character of the neighborhood in this location. One can read the context that existed here, that of major houses built by early, prosperous merchants and mariners. The development, as proposed, could be too intense for this location, especially if each house is built to the extent of its zoning envelope. The landscape is of great importance for the context of this area and should be considered.

How will moving of the cottage at 59 Williams Street affect the character of the property?
The origin of the cottage is in doubt. Whether it was purposely built at this location is unknown because detailed structural analysis and archival research has not been completed. What is known is that it has existed at this location prior to 1889 per the earliest Sanborn map. Therefore, its setting on this location has been this way for at least 145 years per the National Register nomination for College Hill. That should be taken into account when any proposal is made to move it.

The HDC Standards and Guidelines regarding the moving of historic structures state that relocation “is discouraged except as a last alternative to demolition” (page 50). We urge the HDC to carefully consider how allowing this move will or will not uphold the guidelines.

Moving the cottage to the street will destroy the setting this cottage has enjoyed for arguably 150 years. While removing the large paved area and mid-century garages will improve the character of the property and neighborhood, there is a way to achieve two goals at once. An addition to the cottage could be built on the site of the paved area, adding to the streetscape and providing enhanced living space, as desired by the developer.

As mentioned in the Standards and Guidelines, moving a building is discouraged because it could cause a loss of its National Register status. However, in most cases, no steps are taken to remove moved properties from the Register. In some cases, as with the Old Town House in Wickford, the resource continues to be listed on the Register even when moved to a completely new site. In this case, the resource is being moved within the same site, a less extreme example, but still a consideration.

In looking at the simple diagram below, the setback is an anomaly. However, it would also be an anomaly to move a cottage that was clearly a backyard follow or rear portion of a larger building (in Mack Woodward’s conjecture) to a prominent street frontage position.
Diagram of front and sideyard setbacks along Williams Street.

**In Summary**
The landscape at 59 Williams Street and 6 John Street is not a planned and historic landscape, such as the ones that exist in conjunction with the larger houses in the area. But the informal landscape provides ecological benefits that should not be ignored by any planning body, though the HDC’s Standards and Guidelines do not necessarily provide protection of this type of landscape.

The current paving and four-car garage at 59 Williams Street negatively affect the character of the historic district. We are not opposed to the moving of the cottage if it remedies this issue, but an addition to the cottage could remedy this anomalous setback, retain the cottage’s historic site, and enhance the streetscape. As stated in our mission statement, we are advocates for thoughtful design and planning, therefore we are not opposed to new, sensitive development on the vacant lot to fill in the gap in the streetscape. The HDC is unable to prevent new development on this parcel, so it is in the neighborhood’s best interest for PPS to work with the developer and architect to ensure the best design possible.

Suburban-style detached garages are not in character with this area of the historic district. While developers believe garages are necessary, this is simply not the case in the historically dense Fox Point. We urge disallowing of garages at this location both to preserve the character of the district and to preserve pervious surfaces and landscape features, such as trees.
We are opposed to any loss of or damage to the masonry and brownstone wall on Williams and John Streets. Any change to these features would have a negative effect on the historic streetscape, as the experience of the streets is dominated by historic walls, gates, and fences.

We urge the process to include review of the complete development of the three contiguous parcels rather than piecemeal review. Parcels A and C should be amended so that they are entirely within the R-1 zone.