



# PROVIDENCE PRESERVATION SOCIETY

February 9, 2023

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Executive Director  
Brent Runyon

Mr. Michael Gazdacko, Chairman  
Providence City Plan Commission  
444 Westminster Street  
Providence, RI 02903

RE: Case No. 22-033MA 116 Waterman Street, Providence

Dear Mr. Chairman and Members of the Commission:

The heritage of College Hill is being eroded, especially the area between Thayer and Brook Street, from Waterman Street to Cushing Street, an area the City has rezoned to C-2. The Elorza administration's desired intensification of this section of Providence is resulting in a loss of historic buildings, loss of neighborhood character, loss of old growth wood, and loss of intangible heritage, namely the workmanship inherent in these older buildings.

As the City embarks on the development of its next Comprehensive Plan, we urge the CPC to consider the impacts of the case before you, and the precedents it could set.

The zoning code envisions that in this zoning area, there will be new buildings that contribute to a downtown type environment by including street level activation. Yet this applicant is asking for a waiver from that requirement along Brook Street. It is said by many that we have too many vacant ground-floor spaces throughout the city, 1292 Westminster Street being one such example. I would argue that the cause for these vacancies is not the zoning policy; it is with the design of the spaces and the interest of the developers to activate them. Another developer in that section of the city is hungry for additional retail space. What potential tenants are seeking, in many cases, is spaces that are smaller and less expensive. 1292 Westminster and many of the newer spaces are too large and too expensive for most neighborhood-scale commercial tenants. Streets need activation and developers should not be exempt from building the type of city that residents want to have, so **we urge you to deny the application for a design waiver.**

We also concur with the College Hill Neighborhood Association that this corner is one that should help step down the scale of buildings in commercial zones to the sale of residential ones, such as the R-P zone nearby.

The City Plan Commission's charge is, in part, to ensure compliance with the Comprehensive Plan. While this project may meet some goals and objectives of the Plan, there are numerous goals and objectives the proposed development does not meet. Is it enough to cherry pick those sections with which it complies, or should it seek to comply with the Plan as a whole? Below are some of the important sections this development ignores.

Stated Goal/Objective	This Development
Under the Sustainability and the Environment section: <b>OBJECTIVE SE3: RESOURCE CONSERVATION</b> Conserve resources.	The demolition of old buildings that have embodied energy and old growth materials without a salvage plan flies in the face of Objective SE3.
<b>OBJECTIVE SE4: SUSTAINABILITY AND THE BUILT ENVIRONMENT</b> Promote and implement environmentally sustainable design and development.	There has been no mention by the applicant (during the public meeting) about how this development promotes environmental sustainability.
Under the Built Environment section: <b>OBJECTIVE BE5: PRESERVATION PLANNING</b> Preserve the historic buildings, districts and areas that contribute positively to Providence's urban fabric.	The demolition of two historic buildings is antithetical to this goal and objective.
<b>OBJECTIVE BE2: NEW DEVELOPMENT TO COMPLEMENT TRADITIONAL CHARACTER</b> Adapt Providence's traditional urban design character to new needs, expectations, and technologies.  <b>OBJECTIVE BE7: NEIGHBORHOOD CHARACTER AND DESIGN</b> Protect the existing character of the city's neighborhoods by supporting design excellence and historic preservation.	The proposed development ignores the existing context completely.

The Providence Preservation Society favors higher density in certain areas in order to fill the intense need for housing in Providence. We must point out that in the current Comprehensive Plan, this area was identified as an Area of Stability. Growth and densification must be balanced by other community and neighborhood needs. If the CPC grants the dimensional adjustment and design waiver, the developer gains a lot. We urge you to consider what is being gained or lost by those who live nearby and those in the greater community. **We urge you to deny the applicant's request for a design adjustment and a design waiver, based on the design shown at the January CPC meeting.**

Thank you for your consideration.



Brent Runyon  
 Executive Director