



STATE OF RHODE ISLAND

HISTORICAL PRESERVATION & HERITAGE COMMISSION

Old State House 150 Benefit Street Providence, RI 02903

Telephone 401-222-2678  
TTY 401-222-3700

Fax 401-222-2968  
[www.preservation.ri.gov](http://www.preservation.ri.gov)

20 January 2023

Via email: [cskuncik@195district.com](mailto:cskuncik@195district.com)

Caroline Skuncik  
Executive Director  
I-195 Redevelopment District  
225 Dyer Street, 4<sup>th</sup> Floor  
Providence, Rhode Island 02903

Re: "Pre-Concept Review"  
I-195 Redevelopment District Parcel 2  
Providence, Rhode Island

Dear Ms. Skuncik:

Thank you for coordinating consultation between the Rhode Island Historical Preservation and Heritage Commission (RIHPHC) and Urbanica, the I-195 Redevelopment District's selected developer for I-195 Redevelopment District Parcel 2 (Parcel 2). As we have previously discussed, early coordination with the RIHPHC for the redevelopment of Parcel 2 is, in our view, beneficial to the Redevelopment District, the development team, the RIHPHC, and the public.

As you are aware, Parcel 2 is located within the bounds of the College Hill Historic District, which is listed in the National Register of Historic Places. Though the parcel is currently vacant and was, for over 50 years, occupied by Interstate 195, redevelopment in a manner that is sensitive to its historic surroundings is both desirable and necessary. Indeed, new construction on the parcel must, per the regulations of the National Historic Preservation Act of 1966 Section 106, strive to result in, to use the Act's language, "No Adverse Effect" to historic resources.

Redevelopment within College Hill has been discussed for decades. The groundbreaking 1967 study, *College Hill: a demonstration study of historic area renewal* cited the neighborhood as subject to "architectural erosion" with areas defined as "slums" and "substandard" leading to a recommendation for an Urban Renewal project – now a much maligned term in municipal planning and historic preservation circles. However, even while recommending an Urban Renewal approach, the College Hill Study recognized the value of the historic building stock of the neighborhood. In discussing a proposed development program along South Main Street, the College Hill Study mentions alleys leading to the water and surviving structures "of historic and architectural worth." In listing objectives for the area, the College Hill Study has, as its first, "to develop an architectural scheme which would make use of the existing examples of merchant warehouses and other old building [sic] of note in the area." The College Hill Study authors further expressed their regard for the historic architecture of the neighborhood by recommending that "special zoning regulations for the protection of the historic area of College Hill be adopted." This recommendation was acted upon, and a local historic district was designated in College Hill.

Planning efforts and studies of College Hill and Downtown have taken many forms over the years since the College Hill Plan, and, as you know, the opening of the I-195 land through these areas has been directly responsible for a number of efforts. These plans have continued to reinforce the importance of recognizing the historic architecture of College Hill. The 1992 *I-195 Old Harbor Plan*, in listing “the rich inventory of historical and physical assets” of the district, included a number of individual historic industrial buildings, six “gangways” that formerly connected South Main Street to shipping wharves, and “extensive Historic Districts... on each side of the Old Harbor.” The 2009 *Rhode Island Interstate 195 Relocation Surplus Land: Redevelopment and Marketing Analysis* by Chan Krieger Sieniewicz (the CKS Analysis) included, as one of its urban revitalization objectives, “Address the historic character of surrounding properties.” All of this background is to say that the development of I-195 Redevelopment District parcels on the east side of the Providence River, particularly north of Wickenden Street, has for decades been intended to reflect the historic character of their surroundings.

Whenever asked, the RIHPHC has, too, advocated for contextual design on these parcels. In December 2009, then RIHPHC Executive Director Edward Sanderson wrote an internal memo in response to the CKS Analysis. At the time of the report, what is now designated as Parcel 2 was Parcels 2 and 3, separated by an extension of Transit Street. CKS suggested Parcel 2 (north of Transit) and 3 (south of Transit to Dollar Street) have maximum building heights of 45 feet or three stories. In doing so, it put forward a theoretical development proposal for the parcels, with 13 townhouses on Parcel 2 and 10 on Parcel 3, each three stories tall, lining South Main, Transit, and South Water Streets, with a variation for commercial space on the first floor and residential above. Mr. Sanderson’s response memo stated that, “The suggested building height (3 floors – 45 feet) is compatible with the surrounding historic area. Monolithic buildings should not occupy these parcels. Townhouse or rowhouse development would be appropriate. Parking should be concealed.”

In a letter dated 16 February 2010 to R.I. Economic Development Corporation Executive Director Keith Stokes, Mr. Sanderson shared his comments on the CKS Analysis. Regarding the East Side Development Area, Mr. Sanderson recounted that, “...in the nineteenth and early twentieth century, buildings along the east bank of the Providence River were generally 3 to 4 stories in height, were often brick or stone masonry construction, and functioned as commercial buildings, mills, or warehouses.” In explaining RIHPHC review of the I-195 redevelopment parcels, Mr. Sanderson wrote, “...under the terms of the Memorandum of Agreement, RIHPHC has the responsibility to assure that new development does not have adverse effects on the surrounding historic districts; our general goal is that new development not conflict with the historic patterns of development and not be intrusive on individual historic buildings and the historic character of surrounding areas.” Mr. Sanderson also conveyed his earlier, internal comments on Parcels 2 and 3, regarding height, massing, and parking.

In a 29 August 2012 letter to R.I. Department of Transportation (RIDOT) Chief Civil Engineer Peter Healey, Mr. Sanderson opined on 90 percent plans for RIDOT Contract 15 that did not reestablish the historic course of Transit Street across South Main Street to South Water Street, contrary to how it had been shown in previous redevelopment studies. Mr. Sanderson alluded to his earlier comments about building massing on Parcels 2 and 3, writing, “While we do not object to this change [Transit Street], we are concerned that not reestablishing Transit Street

creates a very large parcel between James Street and the new Dollar Street which may invite a scale of development which would be out of character with the surrounding area.”

In a letter to I-195 Redevelopment Commission Chairman Joseph Azrack dated 27 June 2017, writing for Mr. Sanderson, I commented on the Commission’s Development Guidelines for Parcel 2 (by this point a combination of the former Parcels 2 and 3), among which were that building height should be capped at 50 feet and four stories. I echoed Mr. Sanderson’s earlier comments about massing and parking and wrote, “50 feet should be the maximum, not increasing to contain four stories. This is compatible with the surrounding historic area. Additional bonus height should not be allowed.”

In 2018, the I-195 Redevelopment District afforded the RIHPHC the opportunity to review three proposals for Parcels 2, 5, and 6. A proposal by the Carpiolato Group included a single building on Parcel 2, made up of two masses connected by a bridge above a first-floor pass-through for the Transit Street easement. Among other comments on more detailed aspects of the design for these and a building on Parcel 5, I wrote, “The massing of the three buildings is not compatible with the surroundings.” Spencer Providence LLC also submitted a proposal for Parcels 2 and 5. On Parcel 2, Spencer proposed nine, four-story, townhouse residential buildings. I commented, “The Spencer Properties proposal appears, at this early stage, to best relate to the historic building stock and overall design of the lower slope of College Hill.”

In 2019, you invited then RIHPHC Executive Director Paul Loether and me to provide comments on the *Draft 195 District Development Plan*. In a memo dated 29 November 2019, regarding Parcels 2 and 5 we commented that, “We would like to see the maximum height kept at 50 feet or 4 stories on these two parcels, without the potential for bonuses.”

As the above references show, the RIHPHC has been consistent over the past 12 plus years regarding the maximum height (3 or 4 floors and 45 or 50 feet) of construction on Parcel 2. In doing so, we have drawn on the characteristics of surrounding historic buildings and those that predated the interstate; Sanborn Fire Insurance company maps from 1889, 1900, and 1921 show multiple, predominantly two- and three-story buildings on what is now Parcel 2.

Urbanica has proposed a six-story building on Parcel 2, consisting of two masses connected by residential space over the Transit Street utility easement. Understanding that this is a very early design stage, it is our opinion that the building design that we have seen does not read as though it is within the College Hill historic district. It is closer in appearance to the new buildings on the I-195 parcels west of the Providence River and the formerly industrial area south of Wickenden Street than to those along South Main Street north of Wickenden. In our meeting with you and the Urbanica team and in the materials that they have provided, we have come to understand and appreciate their efforts to integrate the building plan with the nearby pedestrian bridge and park lands, design in an effort to enliven both South Main and South Water Streets, and take cues from the surrounding building stock. Further, examples of Urbanica’s projects on the firm’s website show historic renovations and new construction projects that respect and enhance their historic surroundings. I am confident that Urbanica can design a project for Parcel 2 that provides modern amenities while respecting the historic College Hill neighborhood. Among the design parameters that we believe should be explored are: treating the land on both sides of the Transit Street utility easement as separate buildings, keeping building heights below 50 feet, maintaining first-floor commercial uses like those shown in the current design, and being

reflective of the design elements of historic buildings in the area. We welcome the opportunity to work with Urbanica toward a design that enhances this historic neighborhood.

These comments are provided in accordance with Section 106 of the National Historic Preservation Act. If you have any questions, please contact me directly at 401-222-4134 or [jeffrey.emidy@preservation.ri.gov](mailto:jeffrey.emidy@preservation.ri.gov).

Sincerely,



Jeffrey D. Emidy  
Executive Director  
Interim State Historic Preservation Officer