

## 257 Thayer Street Project

For the past five months, the Gilbane Development Company (developer) has engaged the community and the City Council in its proposal to change the comprehensive plan and the zoning ordinance to accommodate a student apartment building. On July 26, I decided to vote in favor of the project. The basis for my decision follows.

### 1. Current Conditions

The 257 Thayer Street Project (“Project”) would occupy most of the block bounded by Meeting Street, Brook Street, Euclid Avenue and Thayer Street (“Project Area”). The Project Area currently consists of nine multifamily houses that primarily serve as student apartments but also include some commercial uses. The apartments house approximately 44 students. The Project Area also includes a Ben and Jerry’s ice cream store, and the Squires barber shop. The buildings are in poor condition and are unlikely to be improved, creating a setting of “demolition by neglect.”

The Project Area is located within a larger area (referred to below as the “Surrounding Area”) of five blocks bounded by Cushing, Hope, Angell and Thayer Streets. The Surrounding Area includes Thayer Street commercial buildings, Pembroke Field, and the Wheeler School. People refer to the Surrounding Area as the “doughnut hole” because it is bounded, by institutional and commercial buildings including the Brown University athletic complex, Brown University institutional buildings and the Thayer Street business district. The Project Area straddles two property zones. The eastern half is classified as R-3 (medium density residential, or 2,000 square feet per unit), while the western half is classified as C-2 (commercial, which would accommodate higher-density construction of 1,200 feet per dwelling unit).

The Surrounding Area resides within the College Hill National Historic District. This

district consists of 500 buildings, of which 348 are historic structures. The nine multifamily houses in the Project Area are not historic structures; instead, they are considered supporting structures. The Surrounding Area has not been designated as a historic district by either the State of Rhode Island or by the City of Providence. As a result, the Surrounding Area is not subject to historic district restrictions concerning construction or demolition.

2. Description of Proposal

The Gilbane Development Company proposes building high-end student apartments in the Project Area. The original proposal called for a four-story, 45-foot tall building containing 104 units to house 225 students. Subsequent revisions changed the design to two buildings linked by a gate to contain an interior courtyard, with the same overall height, but slightly fewer apartments. The Project would include 85 underground parking spots. Although Brown University does not sponsor this project or participate in any way, it acknowledges the need for additional student housing. At this point in time, 1,200 Brown University students live off campus.

The Proposal calls for planning during the 2012/13 school year, with construction to begin in June, 2013. Construction is expected to take around 15 months, so that the apartments will open for students in late August, 2014 in time for the 2014/15 school year.

The developer has an option to purchase the Project Area that expires on September 1, 2012; therefore, he seeks a decision from the City Council on or before that date. Because the City Council traditionally does not meet during August of each year, this amounts to a request for the review to be completed by the end of July. The current property owner has informed the developer that if he does not meet the September 1 deadline, the owner will begin to renew leases

for the 2013/14 academic year, and also will put the properties for sale on a piecemeal basis.

This writer contacted the property owner to ask him to extend the option deadline by two weeks, or until September 15. This could have added six weeks to the City's review window.

This writer suggested that the property owner could still obtain renewals for all of his apartments even after waiting two weeks, given the highly desirable location. Unfortunately, the existing property owner was not willing to consider this alternative.

3. Reviewing the Project

The developer began presenting the Project proposal in March. Among others, the following groups considered it since that time.

a. College Hill Neighborhood Association (CHNA)

The College Hill Neighborhood Association is "a non-profit organization representing the residents of the historic heart of Providence, Rhode Island." Formed in 1984, it has advocated on behalf of the neighborhood with regard to quality of life issues, including development, since that time.

The developer first presented a version of the Project to CHNA in early March, producing comments and suggestions. He presented a revised plan on April 10. On April 18, the CHNA Board wrote a letter to this writer with eight basic suggested changes, namely (1) the review process time should be extended, (2) the City should consider this project in conjunction with others that could affect the same neighborhood (such as a proposal by Edward Bishop to build a hotel nearby), (3) the Project should be restricted so that it would not be transferred to a tax-exempt entity, (4) the developer should engage a local architect to enhance the building design, (5) there should be a design review process for this and subsequent projects, (6) the developer

should post a completion bond, (7) the developer should engage in low impact demolition practices and (8) the developer should do more to preserve the existing structures in the Project Area.

On June 26, CHNA made another statement regarding the Project (recorded in a letter dated June 27), stating at this time that (1) it supported limited changes to the comprehensive plan and zoning ordinance in the form developed by Sam Shamoon (about which more will be said below), (2) the developer should work to improve the project's design further, (3) the City should facilitate an effort to fashion an updated development plan for the Thayer Street neighborhood by 2013 and (4) the developer and the City should encourage proactive preservation planning. On July 19, CHNA confirmed its prior position, with some clarifications.

b. Providence Preservation Society (PPS)

The Providence Preservation Society is a preservation advocacy group formed in 1956. Its first focus was on the revitalization of the Benefit Street area. PPS conducted its own review of the Project. On March 14, the developer presented his initial plan to PPS, and he presented a revised plan on April 11. On April 17, PPS sent the developer a letter stating comments concerning the project, identifying four concerns, namely (1) the Project does not address the goal of historic preservation with regard to the existing structures, (2) the current review timetable is inadequate, (3) the Project should be included as part of a broader review of other development in the neighborhood and (4) the building's design should be improved to make it a "model for excellence."

On June 26, PPS submitted a second letter updating its position regarding the Project. The letter identified four concerns, namely (1) the Project should better address issues related to

density and preservation of historic buildings, (2) even if the timetable for reviewing this project cannot be changed, the City should undertake a broader planning process for the Thayer Street neighborhood to take place over the next 6-8 months, (3) the City should improve its process for reviewing future projects and (4) the design of the current Project should be improved further.

c. The Providence Department of Planning and Development

The Providence Department of Planning and Development (DPD) reviewed the Project and submitted its recommendation to the City Plan Commission. It recommended that the City Plan Commission schedule a public hearing to gather public input and discuss the proposed changes. It analyzed the project, finding “much to like” about it, viewing it as an example of “smart growth.” It viewed the Project as having the following elements that were consistent with the existing comprehensive plan:

- Locating high density housing in areas proximate to public transportation;
- Providing lower parking ratios and bike storage to promote walking and biking;
- Providing below-grade parking;
- Locating student housing proximate to campuses to discourage driving and conflicts with neighbors;
- Eliminating curb cuts to prevent vehicle-pedestrian conflicts and open up more on-street parking;
- Installing new landscaping;
- Reconstructing sidewalks;
- Providing mixed use;

- Reducing stormwater runoff over current conditions;
- Promoting energy efficiency through LEED certification;
- Increasing property tax revenue.

DPD found the following negative impacts from the Project:

- More vehicular traffic than currently exists;
- Demolition of nine existing buildings;
- The large massing of the building that could set a precedent for other developments in the area.

DPD found that the proposed Project required a change in the comprehensive plan and zoning ordinance, and the proposed changes would accommodate the Project. It found there were no significant environmental impact from the proposed project. It proposed requiring a detailed stormwater plan, a traffic study and an assessment of the impact of the built environment through a survey of the existing structures on site. DPD also recommended that the developer improve the architectural plan.

d. The City Plan Commission

The developer submitted to the City Plan Commission (CPC) proposed language drafted by his attorneys that would change the comprehensive plan and the zoning ordinance. The City Plan Commission first reviewed these proposals at its April 26 meeting. It submitted a draft decision on April 27. It accepted DPD's proposed findings regarding the project's elements that were consistent with the Comprehensive Plan and the identified potential negative impacts. The City Plan Commission recommended approval of the plan, subject to the following conditions (1) presenting a utility and stormwater management plan, (2) conducting a traffic study, (3)

preparing a built environment assessment thorough a survey of the existing structures and (4) refining the architectural design. The CPC scheduled a May 15 hearing to solicit public comments, after which it submitted its decision to the City Council.

e. My own review

When I first learned about the project, I asked Sam Shamoon, a planner who previously served as Director of the Providence Department of Planning and Development, and as Director of the Bureau of Inspection and Standards, to advise me concerning this Project. He generously agreed to my request, and has contributed his extensive expertise and countless hours of work on a volunteer basis.

On April 10, I held a community meeting at Hope High School to solicit community input. We heard from many community residents, as well as from Robert Azar from the Department of Planning and Mike McCormick of Brown University.

After reviewing the April 17-18 letters from CHNA and PPS, I suggested that they organize a Steering Committee along the lines suggested in the PPS letter. James Hall, the Executive Director of PPS, agreed to chair the Steering Committee.

I visited the site with Sam Shamoon and the developer. I attended many of the community meetings, and three of the Steering Committee meetings. Mr. Shamoon had traveling plans during June 23 – July 23, but I met with him to discuss the project and his views concerning the underlying issues shortly after his return to Rhode Island.

On July 24, Mr. Shamoon prepared a memo analyzing the Project.. I have placed a copy of it in the “257 Thayer Street” section of my website. In his memo, Mr. Shamoon concluded that the Project would benefit the neighborhood if, and only if, it proceeded under a set of

conditions he identified as the following:

- Gilbane (Applicant) commits to enter into a deed restriction with the City of Providence that will keep the property at 257 Thayer Street on the city property tax rolls in perpetuity. The restriction should be binding upon all heirs and successors of the Applicant including any private, public or nonprofit institutional potential owners.
- The Applicant commits to preparing and submitting to the City (Council, Planning Department, and City Plan Commission) a scale model of the project no later than November 1, 2012. The model should include the immediate vicinity of the project. The model should be available for public viewing including the CHNA and PPS. Based on the model and other contextual drawings and digital images, the Applicant is committed to modifying the exterior façades, including further fragmentation of massing and more careful visual integration with the historic properties in the project's immediate environs.
- The Applicant commits to dedicating \$200,000 towards the preservation of one or more of the existing nine houses to appropriate sites nearby. If the Applicant dedicates this sum as a matching grant, others, including the City, Brown University, PPS, and CHNA should undertake fundraising efforts to make this happen.
- The Applicant agrees to submit a completion bond for all improvements associated with the project.
- The Applicant agrees to low impact construction so as to minimize construction activities on College Hill and the immediate neighborhood.
- The Applicant commits to providing public amenities such as benches, street trees, street lighting, elimination of curb cuts and sidewalk repair for all areas impacted by the project.
- The Applicant agrees to participate in the planning study that will be initiated by the Planning Dept.
- The Applicant agrees to invest in and participate in the Thayer Street District Management Authority.

f. The Steering Committee

The Steering Committee met on May 22, June 7, June 13 and June 21. During its meetings, the Steering Committee accomplished the following:



First, it decided that the developer's proposed changes to the comprehensive plan and zoning ordinance were too general and vague, presenting the risk of further development in the area that would go far beyond what was contemplated by the Project. At the Steering Committee's request, Sam Shamoon drafted new versions of these two documents. His proposed revisions to the comprehensive plan emphasized the surrounding area's existing character, and discouraged future decisions that would view the Gilbane Project as a precedent for dramatic change. Mr. Shamoon also drafted a new zoning ordinance revision that would create a classification called "R-M High Density", that would accommodate the proposed apartments within a residential classification rather than a commercial one, encouraging some mixed use but limiting commercial development to an ancillary role.

The Steering Committee met with Don Powers, the new architect, to review improvements to the Project design. They offered suggestions for further improvements, which led to further revisions of the design.

The Steering Committee then worked on developing a "checklist" of conditions the Project would have to meet to satisfy neighborhood concerns, consistent with the timetable imposed by the property owner. The Steering Committee developed a list with the following elements:

- The project should not seek or qualify for any tax abatement, and a restriction should be placed on the deed to require payment of property taxes regardless of future transfers;
- The project should save as many existing structures as possible;
- The developer should develop a three-dimensional model;
- The developer should conduct a traffic study;

- The developer should post a completion bond;
- The developer should engage in low impact construction;
- The developer should provide public amenities in the area around the project;
- The developer should support planning efforts of the greater Thayer Street area;
- The developer should play a constructive role in supporting the Thayer Street District Management Authority.
- The DPD should lead a process to plan for the Thayer Street neighborhood including the following elements:
  - Creating a design/review overlay district;
  - Analyzing parcels and clusters to determine density
  - Performing a build-out analysis for density;
  - Conducting a traffic and parking analysis;
  - Strengthening the Thayer Street Management Authority;
  - Reviewing the contours of the Brown Institutional Zone, including placing restrictions on Pembroke Field.

The Steering Committee submitted its “checklist” to the developer, who responded to it by agreeing to some recommendations but not to others as follows:

- He agreed to maintaining the property’s taxable status as part of a tax stabilization agreement.
- He agreed to make the properties available for relocation, working with PPS to find suitable locations through the end of the current year, with a relocation deadline of June 15, 2013.
- He agreed to work on further design improvements and to submit a three-dimensional design.
- He indicated Gilbane will submit the traffic study during the Preliminary Plan

Phase under the City's Major Land Development approval process.

- He agreed to provide a completion bond.
- He agreed to low-impact construction.
- He agreed to provide public amenities such as benches, street trees, street lighting, eliminating curb cuts and side replacement.
- He agreed to participate in a planning study.
- He agreed to invest in and participate in the Thayer Street District management Authority.

The Steering Committee held a public meeting on July 16 to present its proposed findings. It then presented them to the Providence City Council Ordinance Committee on July 19.

f. The Providence City Council

The developer filed his proposed amendments to the zoning ordinance and the comprehensive plan with the Providence City Council, which referred them to the Ordinance Committee. The Ordinance Committee held a public hearing on June 26, receiving comments from PPS, CHNA, local residents and others. The Ordinance Committee continued the meeting on July 19, at which time the Steering Committee presented its findings, and other residents and stakeholders presented their comments. At the July 19 meeting, the Ordinance Committee voted to substitute the versions of the Comprehensive Plan and Zoning Ordinance developed by Mr. Shamoon in consultation with the DPD.

The Ordinance Committee scheduled a meeting for Wednesday, July 25 to review the pending amendments. At that time, I stated that I accepted Mr. Shamoon's recommendation, and that I would support the Project if, and only if, the Developer would agree to comply with a clear

set of conditions.

On Thursday, July 26, the Ordinance Committee met again. At that time, the lawyers produced a signed “Statement of Intent” from the Developer. The City’s lawyer confirmed that the document would provide sufficient safeguards for the Developer to comply with the conditions specified in Mr. Shamoan’s Memorandum. On that basis, the Project was approved by the Ordinance Committee. The City Council approved the changes at meetings that took place on July 30 and August 1.

4. Arguments For And Against The Proposal

Supporters and opponents of the Project raise several issues for consideration.

a. The review process

Supporters of the project note with favor the developer’s proactive approach of engaging the two major stakeholder groups, and changing the project over time to accommodate many of their concerns. In this way, supporters suggest this developer is offering a new model for how future developers should engage the community when seeking project approvals.

Opponents of the project identify other flaws in the review process that outweigh the developer’s proactive initiatives. For one thing, they question whether any change in the comprehensive plan is appropriate at this time, in light of the fact that the current plan was adopted in 2009. Also, they question whether the property seller’s deadline has created time constraints that are too severe to permit meaningful review.

b. Historic preservation

Opponents of the project note that the nine existing buildings are listed on the National Historic Register, and that all are slated for demolition. They note that the proposed

comprehensive plan could place a total of 21 such structures at risk. In addition to the losses associated with these structures, they question whether such a wholesale demolition could jeopardize the neighborhood's National Historic Register status as a whole.

Proponents of the project note that the nine existing buildings are "supporting structures" not actual historic buildings on the National Register, which is more interested in buildings that predate the construction dates of these nine. They note that these nine buildings have not earned preservation status from either the State of Rhode Island or the City of Providence. In theory this means that the current property owner and/or his successors have the ability to demolish any or all of these buildings at any time without needing to obtain extensive permission or review. Supporters point to the changes in the comprehensive plan prepared by Mr. Shamon that reduce the risk of the current project starting down a "slippery slope" of wholesale change. Finally, they note that since the College Hill National Historic District consists of 500 buildings, the demolition of nine "supporting structures" is unlikely to put the status of the rest of the district into question.

**DRAFT**  
**AUGUST 7, 2012**

c. Managing growth

Proponents of the Project see benefits from the introduction of additional students into that portion of the Thayer Street neighborhood. According to them, the increased foot traffic will benefit local merchants. Also, proponents suggest the infusion of additional people might provide a public safety benefit, reducing the risk of criminal activity (drugs and street crime) that can occur in this area at night when foot traffic becomes too scarce.

Proponents also note that the current zoning classification of C-2 for the western half of the Project Area could support a different kind of growth that would be a greater burden on the

community. For example, Mr. Azar suggested a future owner could construct an office building on the western half of the Project Area that would hold 150-200 office workers but contain only 60 parking spaces, creating traffic issues at regular hours each day, in contrast to the intermittent use of automobiles by the student tenants at times generally spread out through the day and through the week. (One exception to this observation would be when students move in and move out of the apartments at roughly the same time, a problem that would need to be managed.) Mr. Azar also noted that other East Side residential buildings have comparable densities.

Opponents note that the Project would increase the density in this area from 43 students to around 225, an increase by a factor of more than five. They note that the proposed permitted density of 300 square feet per unit would bring to the neighborhood levels that are only permitted by right in downtown Providence. They submit that this, along with the 85 automobile parking spots, cannot help but have an adverse impact on the neighborhood which will be aggravated if other student tenants bring their cars with them, and park them elsewhere in the neighborhood.

d. Local support

The developer has worked to meet CHNA's conditions for support. At this point, he appears to be within reach of addressing all of the concerns listed by CHNA in their June 26 submission to the Ordinance Committee. The developer also has addressed most of the concerns listed by the Steering Committee, which is comprised of representatives from CHNA and PPS. The developer did not address the historic preservation concerns of PPS.

Opponents of the project made a demonstration of local opposition through an electronic petition drive. The drive produced 343 (non-redundant) signatures, including 125 signers who are Ward 2 voters. A large proportion of the petition signers live within a few blocks of the

Surrounding Area.

e. Economic development

The City is in need of economic development, as half of its property is exempt from taxes. Also, one speaker noted at the July 19 meeting that 90 per cent of the City's housing stock was built before 1950. If approved, the Project would likely add significantly to the \$140,000 in annual tax revenues generated by the status quo. The developer predicted that the project would, when completed, generate between two and three times the current amount of taxes, *i.e.* producing an annual revenue increase of \$140,000 to \$280,000. There are reasons to believe, however, that this figure is conservative, or perhaps based on an assumption the Project will qualify for a significant tax stabilization agreement.

The Acting Director of Planning, Robert Azar, stated that the administration was not agreeable to a tax stabilization, under which the Project would begin at less than full taxation, and scale up to 100% over a period of years. He did say, however, that the administration was willing to consider a "tax treaty" under which the developer would pay full taxes (or slightly more than full taxes) today, but future increases over the life of the agreement would be limited or not allowed.

In any event, the project would also generate employment.

f. Quality of life issues

Opponents maintain that the economic development benefits are outweighed by quality of life losses for local residents, in terms of greater congestion and a loss of the historic character of the Thayer Street neighborhood. They also view the gain in construction employment as outweighed by the local burden the construction process will impose.

5. Analysis and findings

As presented, there are strong arguments on both sides of this issue, and the stakes are high. Any change brings risk, and the increased student population could represent a large change, and therefore a large risk. On the other hand, the Project presents a unique opportunity that may not reoccur, as this developer is seeking to purchase a collection of contiguous properties that the current owner plans to sell off piecemeal should this Project not go forward.

A threshold issue for me is whether, as argued by some opponents, any consideration of the project amounts to a violation of my duty, as an elected official, to be accountable to the voters. Opponents identify two different ways in which the people have spoken. First, they point to the comprehensive plan and the public engagement that underlies it. Second, they point to the public voices that have been raised in opposition in recent months, including the petition drive.

I view the comprehensive plan as a legislative enactment, which is subject to reconsideration and review as times change. Change should be considered carefully, as it can affect expectations.

In the case of Thayer Street, the neighborhood has been changing steadily over the past few decades, and it does not appear possible at this time to restore the neighborhood to its condition of 30 or 40 years ago. Instead, the housing stock in the Surrounding Area has continued to deteriorate, and we now have a situation where the current owner is ready to sell, which produces a risk of further “demolition by neglect” without the realistic prospect of any meaningful improvement. The Project presents an unanticipated situation where a block of properties that are in poor condition can be united to bring a combination of impacts, good and bad. I believe this unexpected situation provides a justification for reviewing the comprehensive



plan and zoning ordinance.

The public response to the Project I have seen includes voices on both side of the question with different levels of intensity. The College Hill Neighborhood Association is a major barometer of local sentiment and, as noted, CHNA has set forth conditions that, if met, would make the project worth pursuing in its view. On the other hand, there has been an organized effort by opponents of the Project to express their views through emails, telephone calls and an electronic petition.

The organized opposition has contributed greatly to the public debate. It consists of people who have strong views about the Project, raising serious issues that must be considered. Their views are not based on any economic self-interest; instead, most of the opposition is motivated by a sincere desire to improve the neighborhood and the City. It is also worth noting that there is no organized group that is lobbying with similar intensity in favor of the Project.

The electronic petition has generated a wide range of responses from across the City. For example, a large number of signatures came from residents in the West Broadway area, where there is a neighborhood association that has been committed to historic preservation issues for many years. Other signatures came from residents across the country, and there were a small number of signatures from people who did not take the petition seriously. On the other hand, I have received numerous emails from and had conversations with supporters of the project as well.

As is true with many petitions, however, I do not view it as a popular mandate from the entire neighborhood or the City. For one thing, it represents a snapshot of public opinion which is shaped by the petition's wording. For example, the petition refers to the medium-density residential zoning in the Surrounding Area, but not to the existing commercial zone. In this way,

the signers may not have been aware of the risk of future commercial development in the Thayer Street area under the current comprehensive plan that could be addressed through the Project. More generally, I have had conversations with people who signed the Petition about some of the underlying issues that are not expressed in its language. These people have found this additional information to provide a basis to reconsider their decision to sign the petition. Also, the size of the sample (124 from Ward 2, 332 overall) must be viewed in the context of the overall universe of Ward 2 (contains around 7,000 voters) and the City of Providence (more than ten times that amount).

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In short, I believe that the people have spoken on both sides of this issue, and that the policy issues underlying this legislative decision must be taken into consideration.

In my opinion, the risks associated with this Project can be managed if approval is limited by the right set of conditions. Those conditions include the initiation of a new planning process to address the remaining properties in the Surrounding Area. For example, the Surrounding Area includes parcels of Brown University property within the institutional zone that are not currently subject to extensive regulation. If the planning process leads to a repositioning of that zone (for example, to protect Pembroke Field from future development), then the overall neighborhood character would be better preserved than it currently is. In a similar way, the new classification of the Surrounding Area would prevent the “nightmare scenario” of a major office building on Thayer Street.

AUGUST 7, 2012

For these reasons, I supported the approval of the changes of the Comprehensive Plan, the Zoning Ordinance, as well as the Project itself, once a list of conditions are met. The first set of conditions comes from the Steering Committee, which are as follows:

- The project should not seek or qualify for any tax abatement, and a restriction should be placed on the deed to require payment of property taxes regardless of future transfers;
- The developer should contribute financially to preserving the existing structures;
- The developer should develop a three-dimensional model;
- The developer should conduct a traffic study;
- The developer should post a completion bond;
- The developer should engage in low impact construction;
- The developer should provide public amenities in the area around the project;
- The developer should support planning efforts of greater Thayer Street area;
- The developer should play a constructive role in supporting the Thayer Street District Management Authority.
- The DPD should lead a process to plan for the Thayer Street neighborhood including the following elements:
  - Creating a design/review overlay district;
  - Analyzing parcels and clusters to determine density
  - Performing a build out analysis for density;
  - Conducting a traffic and parking analysis;
  - Strengthening the Thayer Street Management Authority;
  - Reviewing the contours of the Brown Institutional Zone, including placing restrictions on Pembroke Field.

The DPD has announced its commitment to undertake the planning process requested by the Steering Committee. For the most part, the other conditions are sufficiently specific to support commitments that the developer can make today that can be monitored and, if necessary,

enforced as the Project develops. I asked the City Solicitor's assistance in documenting an agreement with the developer that provides adequate assurance that these conditions will be satisfied. I believe, however, that the issue of historic preservation needs to be addressed more specifically, as the issue often comes down to finding adequate resources to support the moving of a structure to another location. With that in mind, I support an additional condition that the developer match up to \$200,000 raised by the community, on a dollar for dollar basis, to preserve and relocate the existing structures.

The developer signed an agreement which was reviewed and approved by the City Solicitor's office as providing sufficient protections to the neighborhood in satisfying the conditions just listed. The document does permit the developer to seek a tax treaty with the City. A tax treaty is an agreement whereby the developer agrees to pay full taxes as assessed at the beginning of a period (in this case, once construction is complete), but not to be subject to increases for a fixed period of years. The administration has indicated that it is receptive to such an agreement within narrow boundaries. The City Solicitor stated her opinion that if the developer and the City cannot reach such an agreement, or if the developer does not complete the project for any other reason, the changes to the comprehensive plan and zoning map will expire and the property will revert to the status quo ante.

Nobody can predict the future, but I believe that the conditions attached to this project minimize the risks going forward, while removing the risk of inaction. As Mr. Shamoan noted, the current use of the Property amounts to demolition by neglect, and as Mr. Azar noted, the current commercial zoning classification could create significant congestion issues that this project will not. Finally, the Project should generate employment and significant additional tax

revenue that will benefit the entire City as well as the neighborhood. For example, many residents noted the neighborhood's inadequate infrastructure. The City needs an adequate infrastructure budget, and it is necessary to support economic development to create the revenues to support such a budget.

6. Conclusion and acknowledgments

I would like to thank the College Hill Neighborhood Association and the Providence Preservation Society for their civic involvement in this process. I also wish to thank Sam Shamoon for his wise advice, and the large number of citizens who have stepped forward to contribute their voices to the discussion of this important issue.

The current use of the Project Area is in great need of improvement, and the Project presents an opportunity that is unlikely to be duplicated in the foreseeable future. On the other hand, the Project will bring impacts, both anticipated and unanticipated, that present risks to the neighborhood. While nobody can predict the future with certainty, I believe it is worthwhile to support this Project provided that the proper conditions can be met to enhance its potential benefits while minimizing the risk of negative impacts. I believe the assurance provided by the developer in the "letter of intent" provide the right conditions for the project to be beneficial to the neighborhood and the City.

Moving forward, I will be introducing a resolution urging the City Planning Commission to conduct a thorough review with public hearings as recommended by Mr. Shamoon. I will encourage the Planning Department to implement the planning process it promised to conduct. I also will be available to facilitate efforts by preservationists to relocate the structures currently in place in the Project Area.

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**AUGUST 7, 2012**