Date: November 18, 2019

RE: Waites Wharf Demolition Review

The Applicant has submitted one Demolition Approval Application for the following addresses:

- 25 Waites Wharf, TAP 32, Lot 155 (30 Waites Wharf?)
- 20 West Extension Street, TAP 32, Lot 267 (14 West Extension?)
- 1 Waites Wharf, TAP 32, Lot 268 (24 and 26 Waites Wharf?)
- 16 Waites Wharf, TAP 32, Lot 248
- 23 Coddington Wharf, TAP 32, Lot 293

The proposed demolitions are to provide for the future construction of two buildings; for a 150 room transient guest facility, to include restaurant, banquet and wedding facilities, and associated parking and site amenities.

On February 22, 2019, in accordance with Section 220 of the Coastal Resources Management Plan, RI Historic Preservation and Heritage Commission submitted a letter to CRMC which concluded that this project will have no effect on any significant cultural resources. The letter was signed by Charlotte Taylor, the Senior Archaeologist, on behalf of J. Paul Loether, the Executive Director. This position in contradiction to the State’s own Nomination Forms for the creation of the 2008 Southern Thames Historic District. The City’s Preservation Planner has been in contact with the RIHP&HC and is waiting for clarification from the State regarding this contradiction.

A June 30, 2019 report, entitled Waites Wharf Property Analysis, prepared by A4 Architecture and Planning, concluded that “none of the structures on the subject properties...have value that should prevent their demolition” and further states that none of the structures are noted in Appendix E of the Southern Thames Historic District inventory of contributing buildings.

On October 7, 2019, after public notice was provided, review of the proposed demolitions was scheduled to be heard by the Planning Board. This meeting was cancelled due to lack of a quorum.

After review of the area and the Nomination Forms for the Southern Thames Historic District, the City’s Preservation Planner identified errors in the Waites Wharf Property Analysis. On November 8, 2019, an amended report was submitted by A4 Architecture which corrected information about two of the subject properties, 23 Coddington Wharf and 16 Waites Wharf. Both of these properties are listed on the National Registration Nomination forms as “contributing properties” within the Southern Thames Historic District. The Property Analysis report still contends that none of the subject buildings “have true historic or architectural value that should prevent their demolition” and that the expectation is that “any new development will better comply with current code, quality and design standards.”
On November 12, 2019, after public notice was provided, review of the proposed demolitions was scheduled to be heard by the Planning Board. At the request of the Project Attorney, the review was continued to a special meeting to be held on November 18, 2019.

On November 15, 2019, city staff identified additional inconsistencies regarding the buildings located at 20 West Extension Street and 1 Waites Wharf. These buildings appear to be described in the National Register forms and are considered to be contributing structures, however, 20 West Extension is listed as 14 West Extension and 1 Waites Wharf is listed as both 24 and 26 Waites Wharf. 25 Waites Wharf, a non-contributing structure, is listed as 30 Waites Wharf in the Nomination forms.

A site review by the Department today notes the structure between 24 and 26 Waites Wharf appears to be of the same time period and present a similar historic use. This structure does not appear to be analyzed in the Nomination Forms.

The Planning Department is of the opinion that the application, as presented, is deficient. There appear to be buildings that are contributing structures that have possible issues with building addresses. Another structure may warrant investigation. Due to these outstanding issues, planning staff recommends additional time to verify this information prior to proceeding with the review of the demolition.