



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

HISTORICAL PRESERVATION & HERITAGE COMMISSION

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27 March 2020

Via email: jrjackson@millerscott.com

J. Russell Jackson
Miller Scott Holbrook & Jackson
122 Touro Street
Newport, Rhode Island 02840-2967

Re: Waites Wharf development project
Newport, Rhode Island

Dear Mr. Jackson:

The Rhode Island Historical Preservation and Heritage Commission (RIHPHC) staff has reviewed the *Structural Inspection and Evaluation* reports by Narragansett Engineering, Inc. and Merk Structural Consulting that you submitted at our request. These three reports cover the following properties: three buildings at 1 Waites Wharf (Newport tax assessor's plat 32 lot 268), the "Lynch Stables" building at 16 Waites Wharf (P32 L248), and the "Crawford Building" at 20 West Extension Street (P32 L267). The proposed construction project will necessitate the demolition of these buildings, plus those at 23 Coddington Wharf (P32 L293) and 25 Waites Wharf (P32 L155). The property at plat 32 lot 272, also included in this project, contains no standing structures.

The structural reports indicate that the buildings' utilized spaces are "below the Design Flood Elevation and does [sic] not meet the current FEMA standard for flood resistant design and construction". While the framing in the three buildings on lot 268 are reported to "appear[s] to be in good condition", the framing at the other two buildings is reported to have minimal structural integrity or be in disrepair. All of the buildings are described with the following statements: "It is highly unlikely the building is robust enough to handle additional loads, e.g. is not suitable for the basis of additions or enlargements. In short, this building is of little to no value with respect to future improvements, and it seems prudent it be demolished if new, conforming structures are to be built."

As you are aware, all of the above buildings save for 25 Waites Wharf are contributing resources in the Southern Thames Historic District, which is listed in the National Register of Historic Places. In our letter to the Coastal Resources Management Council dated 2 December 2019, we stated that, "It is the RIHPHC's conclusion that the demolition of the buildings on lots 248, 267, 268, and 293 will constitute a direct and adverse effect on the significance, integrity, and character of the historic district."

In light of the findings of the structural reports and other considerations, it appears that retention of the buildings is not feasible, and relocation appears not to be feasible or prudent. We have considered various methods of mitigation for the demolition of these buildings, including relocation, architectural salvage, documentation, and the installation of interpretive panels at the site.

Because the RIHPHC review of these demolitions is being conducted in an advisory capacity under the regulations of the Rhode Island Coastal Resources Management Council, we cannot require a Memorandum of Agreement to elucidate the terms of mitigation for the adverse effects, as we would if we were reviewing this in a regulatory capacity under the National Historic Preservation Act. However, it is the opinion of the RIHPHC that, as mitigation for the adverse effects, each of the buildings proposed to be demolished should be the subject of a *Rhode Island Historic Resources Archive* (RIHRA) documentation prior to demolition. The three buildings on plat 32 lot 268 may have historically been part of one commercial operation and therefore, the preparation of one RIHRA form for the three may be appropriate.

These comments are provided in accordance with the Rhode Island Code of Regulations Title 650 Chapter 20 Subchapter 00 Part 1.2.3 (formerly Section 220) of the Coastal Resources Management Council. If you have any questions, please contact RIHPHC Deputy Director Jeffrey Emidy at 401-222-4134 or jeffrey.emidy@preservation.ri.gov.

Sincerely,



For

J. Paul Loether
Executive Director
State Historic Preservation Officer

Copies (by email):

Grover Fugate, Executive Director, R.I. Coastal Resources Management Council
(CRMC File Number 2019-02-0070)

Patricia Reynolds, Director of Planning & Economic Development, City of Newport

Helen Johnson, Preservation Planner, City of Newport

Catherine Zipf, Architectural Historian