

July 8, 2025

Board of Zoning Review  
Department of Planning and Development  
444 Westminster Street, 1st Floor  
Providence, RI 02903

Re: Objection to Variance Request – 66 Williams Street (Plat 16, Lots 201 & 514)

Dear Members of the Board:

We write as abutting property owners to respectfully object to the application for dimensional variances submitted for 66 Williams Street, located in the R-1 Residential District and the Historic Overlay District. The applicant seeks relief from the Providence Zoning Ordinance to allow:

- A garage apron of approximately 24 feet in depth, exceeding the maximum 20 feet legally permitted, and
- The introduction of a second curb cut on the property, contrary to the legal limit of one curb cut.

As the neighbors most directly affected by the proposed development, we are deeply concerned about both the proposal's lack of legal basis and substantial negative impact on the neighborhood, which we detail below.

**1. No Legal Hardship Under Rhode Island Law**

Rhode Island law (R.I. Gen. Laws §45-24-41) allows dimensional variances only when a true hardship exists due to the unique characteristics of the property, not the owner's preferences or convenience. The purported hardship—that this historical home has no multi-car garage—is a mere inconvenience. By definition, historic homes are not equipped with all of the conveniences of modern homes and that this property lacks one such convenience proves no hardship. Most historic homes on College Hill are not equipped with modern covered garages and those that do typically have garages much smaller than what is being proposed.

We are fully supportive of our neighbors' desire to enhance the convenience of their property with a garage, we just ask that is done by choosing one of the many options available that would avoid the negative impacts to the neighborhood.

**2. Negative Impact to the Surrounding Area and Impairment of Zoning Intent**

The proposed garage would be accessed via Copley Lane, a narrow, single-lane alley with no pedestrian walkway. The lane is a popular and safe place for walkers, runners, children, and dog walkers to enjoy the historic neighborhood. Copley Lane is used today for routine access solely for our two homes. The proposal introduces a new traffic flow into the lane, which creates significant unmitigated risk to the safety of drivers and pedestrians.

The plan contemplates cars entering Copley Lane at its narrowest point (barely 10 feet wide) where it meets Power Street to park in the garage. This creates significant safety hazards:

- It is simply impossible for a car traveling east on Power Street to turn south into Copley Lane without crossing the center line of Power Street to create the turn radius needed to enter the narrow lane.
- Parking a car traveling west on Power Street would necessitate a tight right turn from the narrow lane into the apron and then a similar tight turn blindly in reverse onto the lane to egress out on to Williams Street against the usual flow of traffic on Copley Lane.
- The lane cannot accommodate traffic flowing simultaneously from both directions and there is not sufficient width for cars to pull aside—one car would have to back up blindly onto Williams or Power Street.

Further, the variances, if granted, would undermine the intent of both the R-1 Residential District and the Historic Overlay. The proposed demolition of a significant portion of a historical wall to provide vehicular access for a large, multi-car garage from a historic, narrow lane would:

- Increase light and noise pollution on Copley Lane, impairing enjoyment of our properties,
- Breach an existing historic stone wall, undermining the character protected by the Historic Overlay,
- Visibly and functionally alter the historic, residential streetscape of the area and Copley Lane, and
- Undermine the “scale and character” of the surrounding homes as envisioned by the zoning plan.

### **3. Relief Sought Not Minimal to Enjoyment of Permitted Use**

The good news is that the property is large and could accommodate a compliant garage in other locations. Notwithstanding the existence of such zoning compliant options that facilitate the permitted use, the applicant has chosen a design that cannot comply with existing law without the requested variances. As such, the application fails the statutory requirement that relief granted be “minimal to reasonable enjoyment of the permitted use.”

For example, the exact proposed garage, if rotated 180 degrees and moved closer to the east wall, could be built without requiring new access or zoning variances. See attached Exhibit A for a depiction of this option.

The existing curb cut and ingress on Power Street has been used for centuries by vehicles to access the property. Whether for horse-drawn coaches in earlier years, or for automobiles in modern times, all previous owners have comfortably used that access for their vehicles.

Further, the turning radius inside the courtyard could be sufficiently improved by small alterations to interior garden walls and/or utilization of a small portion of the existing property lawn. These alterations—which require no zoning variance—would have no impact to the property’s structures or significant trees. See attached Exhibit B for a depiction of the open space that could be utilized to improve the turning radius inside the courtyard with little impact. By rotating and moving the proposed garage as noted and making these small adjustments to the internal courtyard layout, no relief from existing zoning requirements would be required.

Additionally, an apron less than 20 feet could be constructed on the Power Street side of the property to achieve the same results. A narrower apron is possible in the Power Street location because of the much greater radial capacity that can be achieved with the garage adjacent to Power Street, which is over triple the width of Copley Lane. We would support a variance to 1302.J.2.d if such option was pursued. See attached Exhibit C for a depiction of this option.

Of course, these alternative options are just two of many potential garage locations that could be utilized for the permitted use without any zoning variances. Please refer again to Exhibit A—the area within the red box is of sufficient size to allow for a myriad of garage locations that do not require the variances requested. Without a doubt, the excellent advisors supporting the proposal could design a garage location within these parameters.

For all these reasons, it is clear that options exist that would not necessitate the extensive relief being requested. Therefore, the request is not the “minimal to reasonable enjoyment of the permitted use” and should be denied.

#### 4. Conclusion

In sum, the requested variances have no legal basis and should be denied.

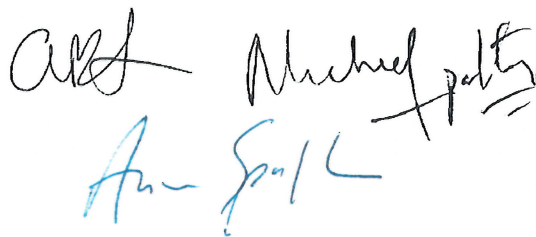
- There is no hardship
- The proposal creates significant unmitigated safety concerns
- The proposal materially alters the general character of the surrounding area
- Because there are options available that do not require variances, the proposal is not “minimal to a reasonable enjoyment of the permitted use”

Sincerely,



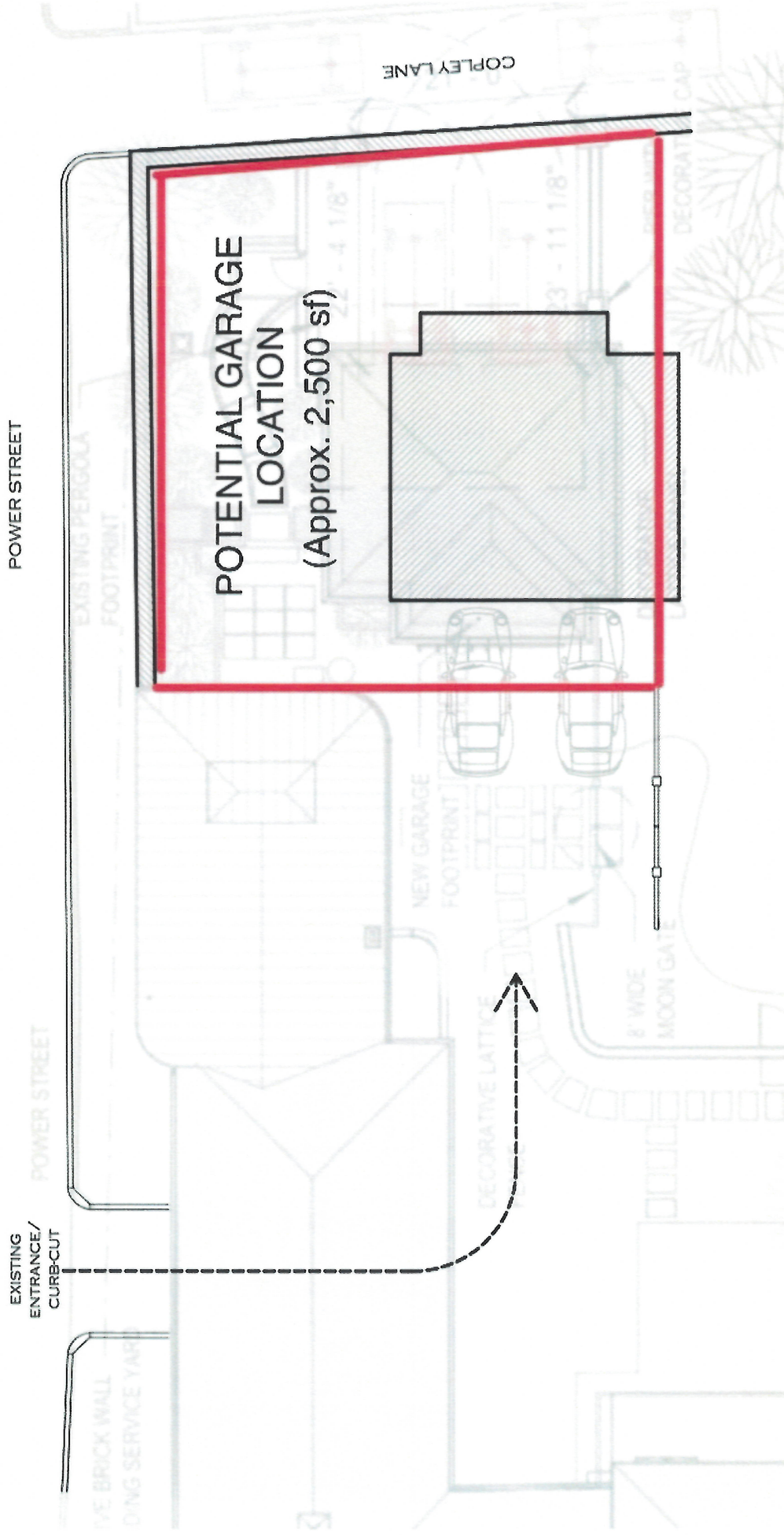
Matthew W. Crowe  
81 Power Street  
Providence, RI 02906

Anne, Michael & Amelia Spalter  
88 Williams Street  
Providence, RI 02906





# EXHIBIT A





# EXHIBIT B



DBVW



# EXHIBIT C

