

Project Narrative 144 Benefit Street, Providence, RI 02903

I. Project Overview and Context

This project narrative is submitted in support of a dimensional variance request for the redevelopment of the property located at 144 Benefit Street. The subject lot used to house the Old Court Inn.

This project seeks to convert the former Old Court Inn into an efficient, multi-unit style residential building. The proposed layout uses the existing layout of the former bed and breakfast units, and efficiently distributes these units across the existing structure: 2 units on Level 1 (studio and 1 bedroom), 3 units on Level 2 (studio and a 1 bedroom), 4 units on Level 2 (studios), and 4 units on Level 3. This layout strives to preserve the historic character of the building.

The site features an existing, paved parking lot that accommodates 6 existing zoning compliant parking spaces. Due to the historic building's fixed footprint and the physical boundaries of the parcel, there is no opportunity for expanding the parking situation and providing the requisite number of parking spaces. Because the ordinance requires 13 spaces for a thirteen-unit residential building, the owner requests dimensional relief for the additionally required 7 spaces. Of note, we believe that this lot can have its previous use classified as a subject lot had a grandfathered deficiency of 4 parking spaces, due to having 10. Only 3 additional spaces would be needed, not 7. This would still require a request for relief as the lot is unable to accommodate any addition of parking spaces. However, it would just be a variance request from 3 parking spaces.

Any current dimensional nonconformities are existing and relief is not required of them.

A core principle of this project is to maintain and utilize the existing interior and exterior layout of the structure to the greatest extent possible. The main purpose and goal with adaptive reuse is to reuse as much of the existing structure and layout as possible. Looking particularly at adaptive reuse of historic buildings, it is constantly struggling with trying to adapt today's zoning standards to buildings constructed in a time when vehicles were not at the forefront of everything.

The reuse will be done based upon existing layout to simplify and maximize interior space.

Preserving the structural layout allows the unique historic architectural character of the building to remain intact. There is no exterior work being proposed. Every effort is being put in to minimize impact to the building and avoid taking away the historic character of the building. Forcing a reduction in the number of units would require major interior structural demolition and alteration, directly resulting in the permanent loss of the building's historic interior charm and character. The proposed layout is the most logical, efficient, and preservative layout for a conversion to residential units.

II. Satisfaction of Variance Standards (RIC 24-45(d))

Relief Requested: Dimensional variance from the off-street vehicle parking requirements to provide 6 parking spaces where 13 are required by ordinance.

In accordance with RIGL 45-24-41(d), (e)(2), this application satisfies the required findings necessary to approve a dimensional variance.

1. The Hardship is Due to the Unique Characteristics of the Subject Structure and Land, Not Due to the General Characteristics of the Surrounding Area, nor a Physical or Economic Disability of Applicant (RIGL 45-24-41(d)(1))

The hardship at present is having to comply with the parking requirements for a substandard R3 lot with a long existing structure that logically has itself laid out for a 13 unit efficiency apartment configuration. Alternatively speaking, it is adapting a building and lot that have been in existence prior to the advent of the automobile, to the modern zoning requirements that generally focus on automobiles. This logical layout promotes the preservation of the historic character of the long existing structure. The subject structure was built over 150 years ago. The structure takes up the vast majority of the lot. The existing parking was present when owners acquired the property and has not changed.

This spatial and structural constraint is unique to the subject property. The requested relief stems from the goal of preservation of the buildings historic character and layout by performing as little internal work as possible. Adaptive reuse dissuades starting over anew with a gut and remodel. The hardship stems specifically from the unique layout of the existing structure.

There is no evidence that the hardship is due to any economic or physical disability.

2. The Hardship is Not the Result of Prior Action of the Applicant (RIGL 45-24-41(e)(2))

The building footprint, layout, and parking area are pre-existing. The structure and lot are how they were when owner acquired the property.

3. The Relief Requested Will Not Alter the General Character of the Surrounding Area or Impair the Intent of the Ordinance or Comprehensive Plan (RIGL 45-24-41(d)(3))

A. General Character of the Surrounding Area

The surrounding area is comprised of a mix of uses ranging in intensity. In the immediate vicinity, there are residential uses, ranging from single family to multifamily, with some mixed use or strictly commercial uses as well. The subject property is surrounded by a mix of zoning of R3, C2 right across the street and down the street, RP, I2, OS, and Downtown district zoned parcels. Not all parcels appear to be providing a 1:1 on site off street parking. Directly across the street, the building housing 149 through 155 Benefit Street has no offstreet parking provided for those units on site. These lots are similarly constrained and their historic character, coupled with their location amongst the historic neighborhood developed pre-automobile. These individual lots do not have space nor means to provide on site parking. There are limited parking opportunities in the area. Granting the requested relief would be in line with the general character of the surrounding area as the surrounding area is comprised of lots that are non-compliant regarding parking.

B. Alignment with the Providence Comprehensive Plan

The proposed project at 144 Benefit Street actively advances several core goals, policies, and objectives outlined in the multi-decade city roadmap:

- Objective LU3:** *Promote the development of a wide range of housing types to ensure a diversity of living options... [and] encourage infill residential development that is consistent with existing residential character.* This provides 13 efficiency style apartments, within an existing structure. This prevents urban sprawl and promotes the reuse of existing structures.
- Strategy LU3-E:** *Encourage adaptive reuse of historic residential buildings for housing.* This was a hotel/bed and breakfast residential uses. This lot is located within the College Hill Historic District. This project seeks to create housing within this historic building via adaptive reuse. Granting parking relief will promote the adaptive reuse of a historic non residential building.
- Strategy LU2-B:** *Prioritize the elimination of parking minimums wherever feasible to direct growth efficiently and prevent excessive asphalt coverage.*
- Strategy BE1-F:** *Encourage, support, and use enforcement tools to ensure the maintenance and stewardship of all buildings in Providence.* Approval of this development will ensure that the existing building will be maintained in its current state with minimal impacts to the interior.
- Strategy BE2-G:** *Promote adaptive reuse of existing buildings.* This application seeks to use adaptive reuse to create new housing supply.
- Objective BE4:** *Preserve the historic buildings and districts that contribute positively to Providence's urban fabric.* The current layout would promote an efficient unit distribution and efficient use of the existing historic building. The building would be preserved as there would not need to be any real changes inside, with nothing substantial currently proposed to the outside. The 13 unit layout promotes the preservation of the historic building. The current proposed unit count not only creates efficiency apartment units, but promotes an efficient redevelopment of the building, which will in turn strive to keep the historic character of the building.
- Housing Goal:** *Grow, improve, and preserve Providence's housing stock to expand affordable, accessible, healthy, and sustainable housing options for all residents.* These accessible housing options will be provided. These will be efficiency style apartments, making them more affordable and accessible to more people.
- Objective H2:** *"Support the creation of new ownership and rental housing citywide at all price points." As efficiency apartment units, they will be cheaper than a standard sized unit in this neighborhood.*
- Strategy H2-A:** *"Provide for diversity in the type, density and location of housing within the city to provide an adequate supply of safe, sanitary housing at price levels appropriate to the financial capabilities of all city residents."* This area has varying levels of residential density, and this will continue to provide a diverse level of density, providing lower price levels due to the efficiency style of the apartments.

- **Strategy H5.C** *Place new residential developments at locations that increase potential ridership on the transit system and support Providence as the region's employment and cultural center.* The subject lot is one block removed from North Main Street and Canal Street, providing access to multiple transit lines. It is approximately ¼ mile from Kennedy Plaza, providing easy access to a major transit hub. Within close proximity are the State Offices, City Hall, State Courts, RISD, Brown, and a multitude of large scale employers. Being next to North Main Street puts this next to the R-line bus line, which further creates a connection point to the new Pawtucket Central Falls MBTA station.
- **Strategy M1.M** *Focus residential growth around existing high-frequency transit corridors, such as on North Main Street.* This lot is just one block removed from North Main Street. Not requiring 1:1 parking will promote the use of this high-frequency transit corridor due to its close proximity.
- **Future Land Use Map** This lot appears to be in an area deemed Medium Density Residential, characterized primarily by single, two, and three family dwellings, but may contain residential development at higher, but appropriate densities. This lot is abutting High-Density Residential and Neighborhood Commercial/Mixed-Use areas. Being next to these areas, and next to a major transit corridor, higher density would be appropriate. Not requiring a 1:1 parking would promote this higher density.
- **Strategy SRE2.P** *Reduce VMT (Vehicle Miles Traveled), expand, and prioritize public transit, bicycle, scooter, and pedestrian transportation and mobility through infrastructure investments* Benefit Street is highly walkable and uniquely connected to alternative transit. The 51, 54, 58, 72, and R lines all have a stop right at the bottom of North Court Street. The train station to access Amtrak and the MBTA are within a 10 minute walk from the subject lot. Using a bicycle gets a future tenant within minutes of downtown, the state offices, Brown University, RISD, JWU, the Courts, Fox Point, Jewelry District, Federal Hill, and the hospitals. A 1:1 unit-to-parking ratio is unnecessary and actively counterproductive to these climate frameworks.

C. Conformance with Zoning Ordinance Section 101 (Intent & Purpose)

Granting this requested relief will not impair the intent of the Zoning Ordinance; rather, it actively facilitates the execution of the Core Purposes outlined in **Section 101**

Ordinance Section 101 Purpose	How the Project Satisfies and Nonimpairment Status
101.A Promoting public health, safety, and general welfare.	The project provides safe, code-compliant, and secure residential apartments within a stable neighborhood zone. It enhances the local welfare by creating living options near central jobs.

Ordinance Section 101 Purpose	How the Project Satisfies and Nonimpairment Status
101.B & 101.H. Providing a range of uses appropriate to the city's character; Promoting a balance of housing choices	Converting a vacant hotel, that did not unfortunately survive the pandemic, into permanent residential multifamily housing matches the neighborhood fabric. It fulfills the mandate to provide modern residential options within historic neighborhoods.
101.C. Orderly growth recognizing the goals of the Comprehensive Plan.	As detailed above, the project complies completely with core growth principles of the Land Use, Housing, and Built Environment elements by driving density inward rather than sprawling outward.
101.E. Providing for the protection of the natural, historic, cultural, and scenic character of the city.	This is the project's primary victory. The relief requested to protect the historic character of Benefit Street and this building. Minimal structural work is proposed, allowing the building to maintain its historical character. The requested relief ensures the character of the property remains unchanged.
101.G. Protecting public investments in public transit and transportation infrastructure.	Limiting on-site parking spaces encourages the use of urban alternatives, leveraging state and local public investments in localized transit loops, bicycle networks, and high-frequency bus lines.
101.K. Promoting a high level of quality in design in the development of facilities.	The architecture retains a seamless, authentic aesthetic facade. The interior will be highly preserved.

4. Denial of the Dimensional Variance Would Result in More Than a Mere Inconvenience (RIGL 45-24-41(3)(2))

Adaptive reuse is a permitted use in an R3 zone. The relief sought, parking relief for the proposed adaptive reuse use of the property, is minimal to reasonably enjoy this parking configuration is preexisting. There is no room to add zoning-compliant parking. Denial of the requested relief will cause the loss of the historic character of the building as the entire interior layout will have to be redone to split 6 units among 4 floors when the building does not currently lay out for this unit count. Denial of the requested relief would defeat the goal with the adaptive reuse of this building. New housing will be lost in a structure that can reasonably accommodate the proposed housing units.

The relief sought maximizing the existing six parking spaces without necessitating the demolition and alteration inside the existing structure—represents the absolute minimum relief necessary to successfully execute this adaptive reuse project of a historic building.

III. Satisfaction of Adaptive Reuse Standards (R.I.G.L. § 2-437(h))

Adaptive reuse is a permitted use for the conversion of any commercial building into residential units. As an adaptive reuse project, there are certain qualifications laid out by the Rhode Island General Laws to submit such an application for development. These qualifications are met.

1. Conversion of a Commercial building into residential units

This used to be a hotel/bed and breakfast. Both uses are permitted by right in a commercial zone. These entail business transactions to function. Hotels are not permitted in any residential zone. Bed and breakfasts are permitted in the RP zone and only by special use permit in R3 and R4 zones, all of which can accommodate limited residential uses. This would be a conversion from commercial to residential.

2. At least 50% of existing gross floor area will be turned into residential units. Well more than 50% of the existing gross floor area will be used for residential units. This is proposed as a complete reuse into residential. There will be no non-residential use left over.

3. There are no Environmental Land Use Restrictions recorded on the property. There is no evidence of any ELUR recorded on the subject property.

4. This is neither an industrial or manufacturing zoned district, nor was it used as such within the past year.

This is an R3 zone. The building has been vacant for more than one year.

Further, 1202.K.7 lays out specific and objective criteria for performing adaptive reuse into multifamily. Some of the criteria mirror 2-437(h).

1202.K.7.a There are no prohibitions preventing the conversion to residential use by environmental land use restrictions recorded on the property by the State of Rhode Island Department of Environmental Management or the United States Environmental Protection Agency

As stated above, there is no evidence of any ELUR against the property.

1202.K.7.b The conversion shall include the development of at least 50% of the existing gross floor area into residential units.

As stated above, well more than 50% of the existing gross floor area will be converted to residential units.

1202.K.7.c Non-residential uses may be provided if they are permitted by right or special use in the zoning district pursuant to Table 12

There are no non-residential uses proposed as part of this adaptive reuse.

1202.K.7.d The residential density permitted in the converted structure shall be the maximum allowed that otherwise meets all standards of minimum housing.

The efficiency apartments will meet all of the standards of minimum housing.

1202.K.7.e The conversion shall not occur within the M1, or M2 zones in accordance with the Future Land Use Map, which designates those areas as "Business/Industrial" or "Waterfront/Port." As

the public health and safety needs of industrial and residential uses often conflict, the Comprehensive Plan prohibits any residential development in these areas within Objective LU5.

The subject lot is in an R3 zone.

1202.K.7.f*The conversion shall not occur within any building previously used for industrial or manufacturing use(s), which has not been vacant of an industrial use for less than one year prior to the submission of the permit or application for adaptive reuse.*

The subject structure was used as a hotel/bed and breakfast industrial or manufacturing use.

This project meets the specific and objective criteria to qualify for an adaptive reuse project. By project. developing here using adaptive reuse, the historic character of the building is maintained.

Conclusion

This request for relief stems from having to convert a historic mobile structure, lot, and neighborhood with today's vehicle oriented requirements. Approving this dimensional variance will promote the preservation and reuse of buildings in manners that limit any disturbances to the building. Based upon the foregoing, we request that the Board make a determination that this application satisfies all of the required findings and approve the requested dimensional variance.