



WAYLAND SQUARE NEIGHBORHOOD ASSOCIATION

January 14, 2021

Bob Azar, AICP, Deputy
Director
Department of Planning & Development
444 Westminster Street, Suite 3A
Providence, RI 02903

Dear Bob,

We are writing to respond to the draft Anti-Displacement and Comprehensive Housing Strategy report. We attended your meeting with the College Hill Neighborhood Association (CHNA) and thank you for the briefing. We have also had the opportunity to review the CHNA letter to you and would like to associate ourselves with their comments, which apply to the Wayland neighborhood as well as to College Hill. In addition, we would like to emphasize the following points:

We recognize the need for more affordable housing in Providence and strongly support efforts to meet that need. Toward that end, we welcome greater economic, racial, and ethnic diversity in the Wayland neighborhood. However, there is no evidence that upzoning Wayland neighborhoods to R4 would achieve that goal. Where large houses have been broken up into smaller units, they have either become upscale apartments aimed at single professionals or student housing. The likely outcome of a zoning change would be to benefit real estate investors and speculators at the expense of individual homeowners, while making housing less, not more, affordable.

Indeed, as Bob Azar explicitly stated in reference to College Hill, the proposed upzoning *will not likely create more affordable housing* on College Hill—and by extension in Wayland either—the stated purpose of the report's recommendations.

Instead, we encourage focusing on policies that are more likely to produce the desired result, such as building actual affordable housing. The report notes that “there is a reported market preference for single family homes, townhomes, and condominiums.” This points toward emphasizing creating incentives for developers to build affordable housing including especially single-family homes or town homes, and “larger units” for “extremely low-income households.” We note, for example, that the North Main Street area in Providence is an area ripe for revitalization, and would be an ideal location for mixed use development, including affordable housing (in the Wayland neighborhood, there is little buildable land. When developers do tear-downs, they replace them with upscale apartments, e.g. 219 Waterman St, 225 Waterman St., 68-74 Pittman St. City regulations do not require these properties to provide parking, which might be fine for urban professionals and students without cars but does not work for most families. Of

course, increased density without required parking exacerbates the already limited on-street parking problem in the Wayland neighborhood).

Finally, we share the view of the CHNA that many City officials and policies, including some of the recommendations in this report, seem distinctly to favor absentee landlords/ developers/ investors over individual homeowners and other long-term residents. We see this again and again in Providence: the Zoning Board and the City Plans Commission give waivers to developers without requiring them to provide a single affordable unit; the City Council approved the Fane project over the objections of residents, provided tax breaks, and failed to require the developer to provide any affordable units; and some City Councilors proposed changing the property tax structure to place a greater burden on individual homeowners on the East Side, while easing the burden on absentee landlords/investors. The report seems to have extensively consulted landlords, but not residents who will be affected by the changes. Community members are critically important stakeholders and should not be an afterthought.

Thank you very much for your attention to our concerns. We look forward to working with you collaboratively to determine how best to serve the housing needs of all residents in the City of Providence.

The Wayland Square Neighborhood Association
Board of Directors