



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
HISTORICAL PRESERVATION & HERITAGE COMMISSION
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March 9, 2017

Mr. John M. Fowler, Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 306
Washington, DC 20001-2637

Re: Termination of the Providence Viaduct Bridge Programmatic Agreement

Dear Mr. Fowler:

The Rhode Island State Historic Preservation Office (Rhode Island Historical Preservation & Heritage Commission – RIHPHC) fully participated in Section 106 review of the Providence Viaduct Bridge replacement project. In our opinion, the project has no effect on above-ground historic structures. The project has an adverse effect on potential archaeological resources, and I have enclosed a brief summary of archaeology issues that we considered and the reasons why we supported alternative mitigation in this case.

The Providence Viaduct Bridge Programmatic Agreement provides for alternative mitigation for the project. In our opinion, the key mitigation is acquisition of a land area known as the “Salt Pond Archaeological Preserve.” This privately owned land was the proposed site of intensive residential development until a major, nationally significant archaeological site was discovered during project permitting under the RI Coastal Zone Management Act. Following the provisions of the Providence Viaduct Bridge Programmatic Agreement, the RI Department of Transportation (RIDOT) acquired the “Salt Pond Archaeological Preserve” parcel of land in 2013 in order to preserve the Salt Pond Site forever and to forestall the proposed development. I have enclosed a brief summary description of the Salt Pond Archaeological Site.

Termination of the Providence Viaduct Bridge Programmatic Agreement must not upset the State’s ownership of the Salt Pond Archaeological Preserve and its commitment to preservation of the site. As RIDOT, Federal Highway Administration, Narragansett Indian Tribal Historic Preservation Office, and RIHPHC planned the Salt Pond Site acquisition, we agreed that in addition to acquisition of the parcel, certain additional costs should be considered, including protecting exposed site features, completing archaeological research and laboratory work and report writing that had been started by the former owner/developer, and stabilizing and protecting land areas where partial development activities have occurred. We also discussed a minimum level of work to establish a passive historical park open to the public with a walking path and simple interpretative waysides. These are essential components of preserving the Salt Pond Site and exercising responsible stewardship of the archaeological resource. RIHPHC

remains committed to this project, and we stand by our commitment to work with the Narragansett Indian Tribal Historic Preservation Office to establish a management plan for the Salt Pond Archaeological Preserve. However, the inability to carry out the Providence Viaduct Bridge Programmatic Agreement has stifled any preservation efforts beyond the completed acquisition.

The rationale for alternative mitigation in the form of acquisition and preservation of the Salt Pond Archaeological Preserve remains unchanged and is not the subject of dispute that has led to termination of the Providence Viaduct Bridge Programmatic Agreement. Whatever the resolution of the current termination action, the RIHPHC believes very strongly that the Salt Pond alternative mitigation should be endorsed and fully implemented.

Yours very truly,



Edward F. Sanderson, Executive Director
State Historic Preservation Officer