

**'SIGNATURE RESIDENCES'
32-UNIT RESIDENTIAL DEVELOPMENT**

**LAND DEVELOPMENT PROJECT
'DIMENSIONAL REGULATION ADJUSTMENT'**

**217 ANGELL STREET, PROVIDENCE, RI
ASSESSOR'S PLAT 13 - LOT 320**



Prepared For: Signature Properties, LLC

By: Pimentel Consulting, Inc.

4 March 2025

INTRODUCTORY STATEMENT

Signature Properties, LLC ("Applicant") has retained the professional land use planning and zoning consulting services of Pimentel Consulting, Inc. ("Consultant") in order to evaluate the appropriateness of developing limited, well under-utilized property, for much-needed residential purposes. Residential development is not only a permitted use of the subject property, but is also more than suitably sized, configured, and neighborhood positioned to accommodate greater density, massing and scale. Such accommodations are quite unique given city-wide limited 'in-fill' land resources.

Residential Areas - *"Most of the land in the city is developed as residential neighborhoods. These areas contribute significantly to the livability of the city and the unique character of individual neighborhoods is what attracts many people to Providence. Growth should be allowed in these areas, but generally in keeping with the scale and massing of the existing built environment. Although Providence is largely built out, there remain opportunities for infill residential development. The city supports the expansion of housing opportunities in residential areas, but with safeguards to ensure that new construction respects the valued attributes and character of the surrounding neighborhood."* [Page 77]

Development of Vacant Lots. *"In the late 1980s and early 1990s many of Providence's neighborhoods were littered with vacant lots. With an increase in market pressure, many of those lots have been developed. While this has been a welcome change and has produced needed housing, the quality of construction on many of these infill lots has been poor. Residential and commercial infill projects have often been constructed with poor quality materials, and do not fit in with the character of the existing homes and businesses. More effort must be made to encourage and mandate quality design for infill construction."* [Page 17]

The applicant proposes a 32-unit density residential project, which could very well be deemed medium-density when contrasted with the proportionate scale and massing of surrounding land uses, which will serve the needs of a variety of groups, to include individuals down-sizing and seniors. In addition, given the visionary expectations of both the Comprehensive Plan and Zoning Ordinance (as evidenced by permissible 'adjustments'), the subject development proposal is not only appropriate but well-supported. Finally, the development has been thoughtfully designed in accordance with the following pertinent Comprehensive Plan Transit considerations: Characteristics of the surrounding roadway infrastructure; Desire to attract development that supports a multi-modal transportation network; and, integration of off-street parking that is complimentary and does not deter usage of land resources for their highest and best potential.

Key Policies - *"The following is a list of key policy changes in each chapter."* [Page 6]

Housing: *"Responds to the national housing crisis at the local level by encouraging increased production of new housing at all price points through various methods, with particular attention to expanding deed-restricted affordable housing, housing for populations*

*with special needs, housing **near public transit**, and energy efficient and accessible housing design.” [Page 6]*

Objective LU12: Mobility - *“Promote the efficient use of land to promote transit, walking and biking through appropriate land use controls.” [Page 92]*

Strategy A. *“Allow for greater density and higher concentrations of development along transit corridors and in dense nodes.” [Page 92]*

The subject development proposal is defined as a ‘Land Development Project’ (“LDP”), in addition to necessitating zoning ordinance regulatory ‘adjustment(s)’ for increased height and certain setbacks, all of which are within the approval authority of the City Planning Commission (“CPC”). The additional height will ensure maximized residential usage of such a rare sizable well situated parcel, while integrating requisite off-street that ensure the development’s success without detracting from all of the Comprehensive Plans worthy goals and objectives.

“The City must encourage a dramatic increase in the production of new housing over the next 20 years to meet the needs of Providence’s growing population. Within this 20-year timeframe, the condition and suitability of the City’s aging housing stock will also have to be addressed through redevelopment and rehabilitation.” [Page 26]

Changes - Evolving Housing Market - *“Demand for housing in Providence remains strong overall, fueled by a combination of factors including population growth, revitalization efforts, and the presence of universities and healthcare institutions attracting students, faculty, and medical professionals...” [Page 26]*

In light of the stated residential development, this Consultant has thoroughly reviewed all submission project materials, in addition to the following regulatory documents:

- o Providence Comprehensive Plan - Approved 22 November 2024 (“Comprehensive Plan”);
- o City of Providence, Rhode Island, Zoning Ordinance - As Amended through 9 December 2024 (“Zoning Ordinance”);
- o City of Providence, Land Development and Subdivision Review Regulations - Effective 1 January 2024 (“LD Regulations”); and,
- o Pertinent Rhode Island General Law (“RIGL”), inclusive of recent statutory amendments, and case law.

Finally, a quite comprehensive analysis of all properties within a several-block radius was completed for the express purpose of evidencing neighborhood compatibility, to include density, massing and scale. This report will conclude that the development is neighborhood compatible, in addition to being ‘consistent’ with the Comprehensive Plan, thereby evidencing the appropriateness of the requested ‘adjustments’.

PRESENT PROPERTY CONDITIONS

The subject parcel is addressed 217 Angell Street, further identified as Assessor's Plat 13, Lot 320, and containing approximately 19,499 square feet of total upland (constraint-free) land resources ("Property"). The Property slopes in a southwesterly direction, having an approximate six (6) foot drop from the northeast corner along Angell Street down towards the southwesterly corner of Fones Alley. This unique site characteristic will be well utilized in the overall site design, by permitting sub-structured garage access from the rear, less vehicular travelled Fones Alley. It also assists in softening the overall facility stature from the perspective of the more active Angell Street.

The Property was previously comprised of three (3) distinct parcels that have since been merged, and historically improved with multiple, multi-unit residences. Therefore, the Property has historically been utilized for residential purposes, albeit well underutilized considering its overall lot size and unique positioning amidst three (3) distinct roadways. Furthermore, although historically improved with a much-reduced residential density, the Property has nevertheless been covered by a sizable quantity of impervious surface, upwards of 13,978 square feet (or 71.68%).

The Property is defined as a double corner-lot and through-lot, having direct frontage on three separate roadways: approximately 168 linear feet along Angell Street; 116 linear feet along Brook Street; and finally, approximately 168 linear feet along Fones Alley. Angell Street is classified a "Principal Arterial" roadway and Brook Street classified a 'Minor Collector' pursuant to the Comprehensive Plan - Map B.21 'Transportation Roads'. The referenced roadway classifications are defined by the Department of Transportation, in the following manner:

Principal Arterial - *"These roadways serve major centers of metropolitan areas, provide a high degree of mobility and can also provide mobility through rural areas. Unlike their access-controlled counterparts, abutting land uses can be served directly. Forms of access for Other Principal Arterial roadways include driveways to specific parcels and at-grade intersections with other roadways..."*

Minor Collector - *"Collectors serve a critical role in the roadway network by gathering traffic from Local Roads and funneling them to the Arterial network..."*

Furthermore, Map B.20 'Transportation' of the Comprehensive Plan, evidences that there is a present quite extensive supportive multi-modal transportation system; Brook Street being improved with a 'High Frequency' Bus Line and Angell Street with a 'Local and Regional' Bus Line. The manner in which the Property is surrounded by such a comprehensive Transit System contributes to its appropriateness for greater residential density, necessitating compatible massing and scale.

Strategy G. *“Encourage the development of housing on existing and potential transit corridors.”* [Page 31]

Objective H5: Housing and transit - *“Promote the integration of housing and transit services.”* [Page 33]

Strategy A. *“Amend the zoning ordinance to create nodes to focus medium density and high-density development, including institutions, in transit-oriented development areas along current and future high use transit lines, in line with the State’s Transit Forward 2040 Plan.”*

The vast presence of direct roadway frontage advances greater access and overall site design. The regulations impose a build-to-zone for the express purpose of maintaining building setback character (averting wasted land resources) and architecturally realizing a more pedestrian like environment. Therefore, the most unique presence of three (3) distinct public rights-of-way allows new construction to be oriented towards the westerly side of the Property and accessed from three (3) different vantage points. Furthermore, it permits the introduction of green-space towards the rear easterly end, affording the singular abutting neighbor proper vegetated separation. These most important site design elements are viable development features because of the unique Property positioning and configuration. They are also well detailed in the Comprehensive Plan.

Strategy B - *“Reduce impervious surface and investigate mechanisms to incentivize pavement reduction, use of permeable surface materials, and green infrastructure/nature-based stormwater solutions.”* [Page 8]

Objective H4: Housing Design - *“Promote high quality residential design throughout the City.”* [Page 32]

Strategy G. *“Determine appropriate residential densities to accommodate growth in areas of change, while valuing the preservation of local communities and their built character.”* [Page 33]

The Property is surrounded by a variety of zoning designations, with the Property being at the focal point and therefore serving in a true transitional capacity. The Property is not only configured and positioned in such a manner as to accommodate greater density and facility growth, but also uniquely sited to realize neighborhood compatibility and regulatory consistency. The Property is zoned in a Residential Professional District (“RP District”) manner, and is in fact the last parcel to be zoned in such a manner prior to transitioning to much more intensively laden zoning designations. The Property abuts the Commercial 1, Commercial 2, and Institutional 2 Districts to the northwest, west, southwest, and south. Alternatively, the majority of less intensive residential districts, to include R-1 and R-3 Districts, are situated west of the Property. The Zoning Map illustrated on the following page, as excerpted from the City’s GIS, evidences the volume of zoning districts and overlay districts that are within proximate distance of the Property, in addition to how it does indeed serve to transition from much greater (to



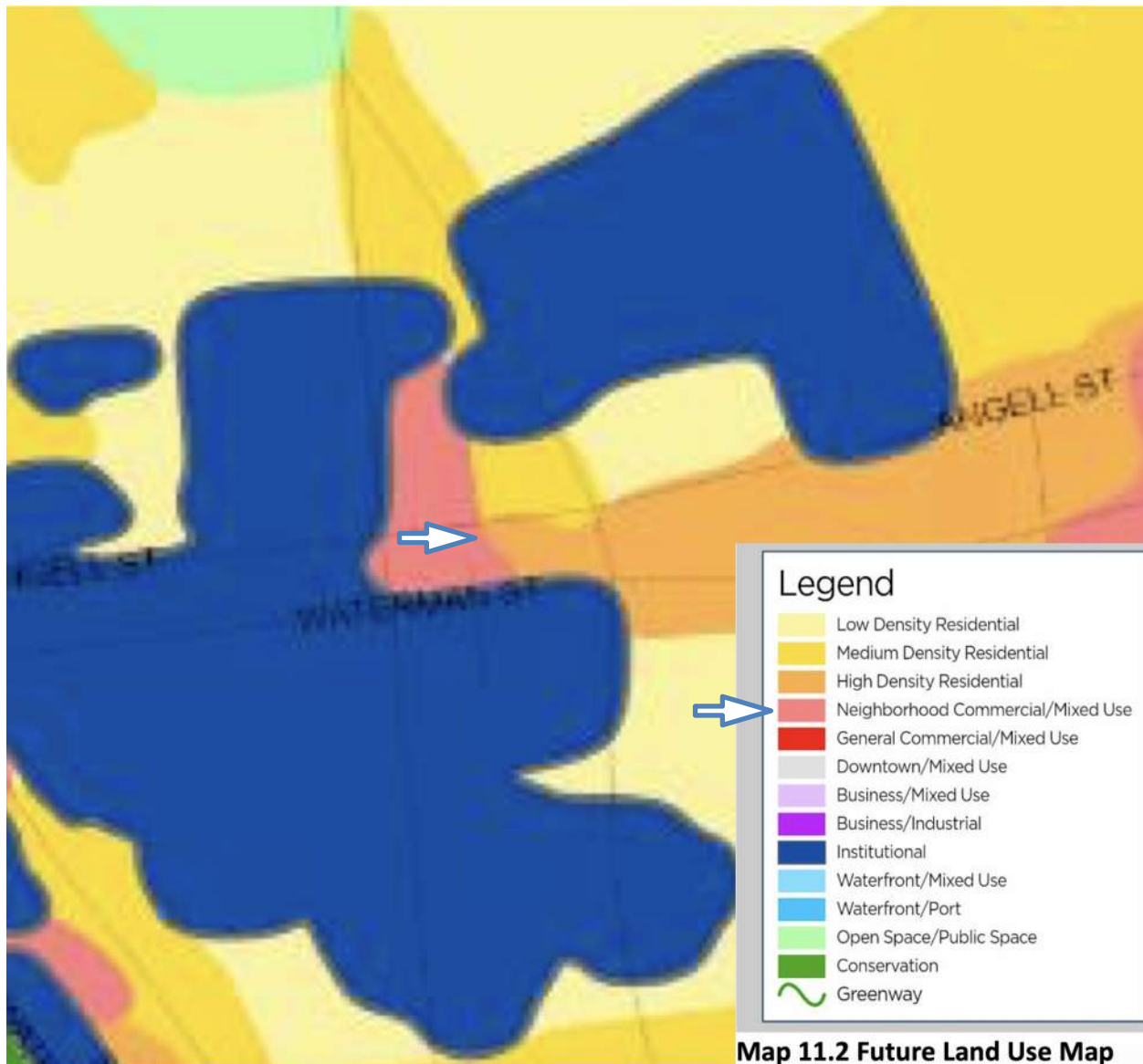
include height and number of stories) to less intense land usage. For example, the Institutional District, which literally surrounds the Property, permits upwards of 75-foot facilities. Property uniqueness is corroborated by the fact that in addition to the base RP District, the Property is also located within the Educational Institutional Overlay District ("I-3E Overlay"). The I-3E Overlay provides flexibility in land usage, albeit still predicated on the RP District dimensional criteria. Nevertheless, it is similarly the last parcel to be zoned in such a manner, further validating this Consultant's determination that it is most appropriate to be treated in a uniquely transitional capacity; evidencing appropriateness of overall height and reduced setbacks, both of which are permitted by 'adjustment'.

The respective zoning designations are corroborated by the Comprehensive Plan - Map 11.2 'Future Land Use Map' ("FLUM"), which actually greatly assists this Consultant in reaching a conclusion of both Comprehensive Plan 'consistency' and facility intensification 'appropriateness'. Given the purposeful blurred imposition of the various land use classifications, it could very well be argued that if not entirely, some sizable portion of the

Property, is classified in a 'Neighborhood Commercial / Mixed-Use' ("NC") land use manner; being the last parcel to be classified in such a manner and once again evidencing its rather unique positioning within the subject neighborhood. It also serves to preclude any further intensification in an easterly direction, all adjoining parcels being zoned in a similar RP District and yet classified in a different High Density Residential land use manner. The NC classification is defined as follows:

Future Land Use Map Designations - Neighborhood Commercial/Mixed-Use: "These areas are characterized by traditional, pedestrian and transit-oriented uses that serve local neighborhood needs for convenience retail, services, professional offices, and housing. Buildings are set close to the street, with entrances and facades oriented toward the street. Residential uses are encouraged." [Page 73]

Comprehensive Plan - FLUM (Page 76)



Map 11.2 Future Land Use Map

The reason why the NC land use classification is of such importance is because it recognizes the appropriateness of greater facility stature, literally supporting greater heights and number of stories when permitted by Ordinance. Therefore, whether entirely, or even just partially, within the NC land use classification, seeking additional height is justifiably 'consistent' with the Comprehensive Plan.

Mixed-Use Areas - *"While most areas in the city contain more than one use, the truly mixed-use areas are the city's downtown, commercial corridors, transitioning manufacturing areas and parts of the city's waterfront. Urban life and vitality are the heart of these areas, with residential, retail, office, industrial, civic, institutional, and entertainment uses jumbled together. Mixed-use takes many forms, such as small commercial blocks, commercial areas along main corridors, shopping areas and plazas, office buildings with retail uses on the ground floor, stores with apartments on upper floors, or former mill buildings with a mix of industrial, office and residential uses."* [Page 79]

*"Mixing uses creates desirable places to live by improving the balance of jobs to housing and creating healthy neighborhoods where residents can walk to shops and services. It is in these mixed-use areas that concentrated development best links to transit networks. **In these areas, greater residential density and buildings heights can be accommodated to create a more efficient pattern of development and protect the character of the nearby residential neighborhoods.**"* [Page 79]

Objective LU4: Promote Vibrant Mixed-Use Areas - *"Within mixed-use areas designated on the future land use map, promote the development of businesses and high-density housing along major corridors."* [Page 79]

Strategy A. *"In areas designated as neighborhood commercial/mixed use, promote the development of a mixture of high-density residential and neighborhood-serving commercial uses. **New buildings may be up to four stories, with incentives that may add up to two additional stories...**"*

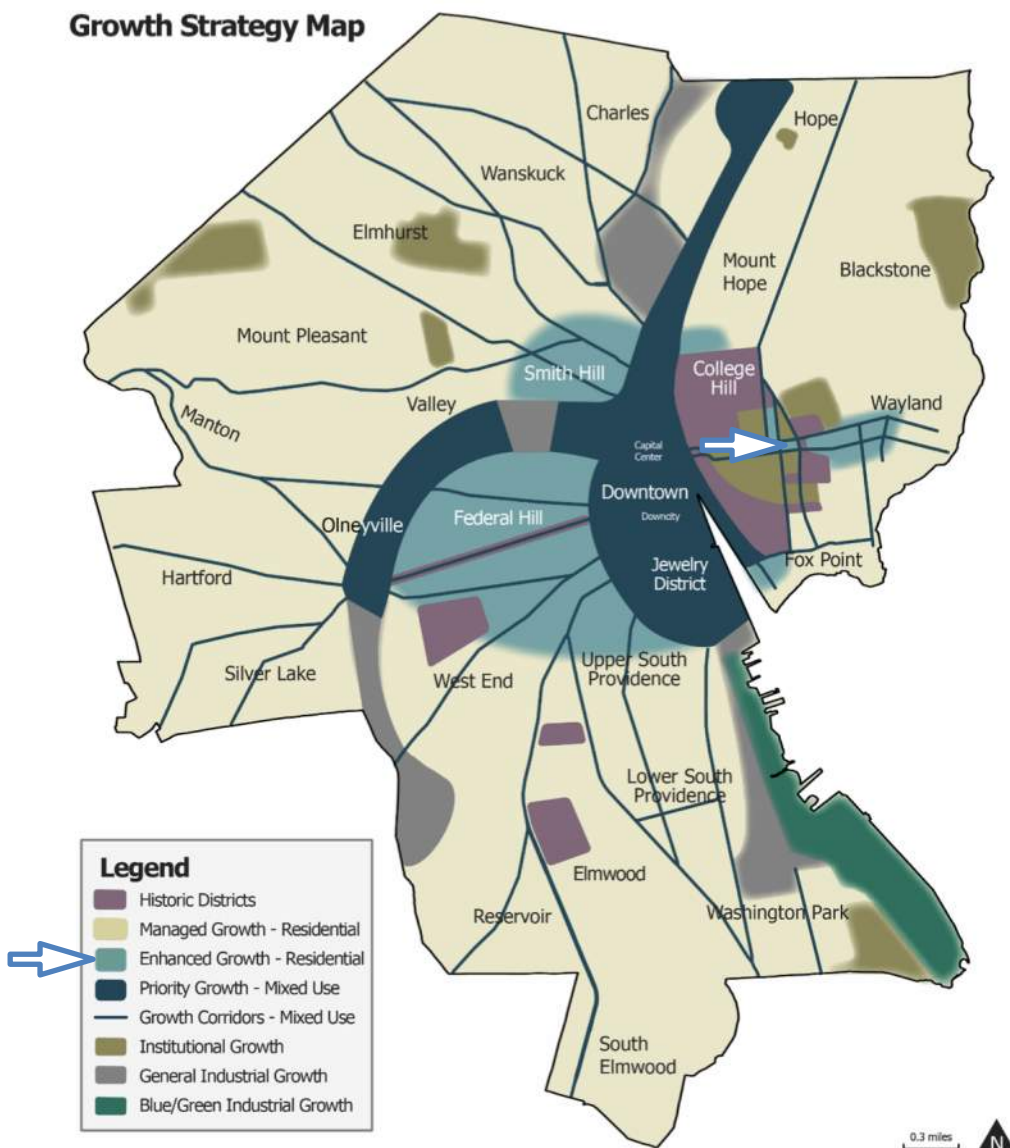
In addition to the variety of zoning designations and similarly land use classifications surrounding the Property, all of which contribute to development appropriateness, is an additional unique layer of development support furnished via the Comprehensive Plan - Map 11.1 'Growth Strategy' [Page 70], which is illustrated on the following page. The City, with valuable input from the community, has devised several development themes based upon the manner in which different parts of the community have organically evolved, thereby assuring that future projects are not only in accordance with the respective goals and objectives of the Comprehensive Plan, but also generally supported by all pertinent stakeholder groups. The property is uniquely located within an area designated for 'Enhanced Growth - Residential', as described below.

"This chapter has two important maps. The first is the "growth strategy" map. This map is a general overview of where significant growth is most appropriate. It also shows the areas of the city where change should be more carefully managed. This map aims to direct growth in a controlled way that complements and builds on the assets of our city. The second map in this

section is the official "future land use" map that forms the basis for the zoning map. It is more detailed than the growth strategy map, but not as precise as the zoning map." [Page 68]

"Map 11.1 "growth strategy," describes general themes for how growth should be managed throughout the city. The map was developed through an analysis of land use patterns and trends, along with considerable community engagement. It identifies eight distinct areas, descriptions of which are below. The purpose of this map is to inform the more detailed future land use map." [Page 69]

Growth Strategy Map Designations 'Enhanced Growth - Residential': "Primarily residential areas of varying densities with limited mixed use that are suitable for higher-density residential growth due to their proximity to Downtown, high degree of mobility options, and the existing built environment that contains a significant portion of high-density housing."



Map 11.1 Growth Strategy

Therefore, a combination of present zoning and being surrounded by a variety of more intensive districts and overlay districts, land use classification, and Growth Strategy, all contribute to evidencing density appropriateness, which includes reasonable increases in overall height.

PROPOSED 32-UNIT RESIDENTIAL DEVELOPMENT

The applicant's proposal is to introduce a 32-unit apartment facility. All of the units to be improved with three (3) bedrooms, thereby serving a great variety of groups, to include seniors and individuals down-sizing. In addition, the facility will be improved with sub-structured off-street parking, thereby not only realizing regulatory compliance, but also assuring residential development success. Residential success necessitates the introduction of parking, and the manner in which it will be secured in a substructure manner averts the loss of precious land resources. The Applicant is therefore seeking permission to maximize land usage by developing in a greater vertical fashion, thereby realizing requisite parking and reasonable density, while also realizing provision of green-space for both aesthetic and natural drainage purposes; upwards of 14,575 square feet of impervious surface (or 74.75%). Therefore, although an intensification of the Property over historical residential densities, developing in a vertical fashion with sub-structured parking merely realize a 3% reduction. It does however realize true drainage controls to handle increased runoff. Such site design improvements are detailed in the Comprehensive Plan.

Objective BE2: New development and traditional character - *"Encourage new development to be compatible with Providence's traditional character."* [Page 19]

Strategy B. *"Encourage developments to be compatible with surrounding uses while not stifling innovative design and architecture."* [Page 19]

Strategy C. *"Ensure that regulations reinforce high-quality urban design and traditional neighborhood character through rules governing size, scale and massing."* [Page 19]

It is the desire of the community, and rightfully so, to vacate unnecessary parking and minimize its provision in order to maximize usage of limited land resources. However, it is equally recognized that appropriate provision is necessary, and can contribute to a balanced multi-modal transportation program. The introduction of parking in the manner so proposed is reasonable and sufficient, while maximizing full usage of the Property.

Objective LU2: Direct Growth - *"Direct growth to areas well suited for larger-scale development and high-density housing."* [Page 71]

Strategy A. In Enhanced Growth – Residential areas: *"Allow for residential development at high densities with reduced or eliminated parking requirements, but with building height and massing compatible with existing development patterns."*

Strategy C. *"Ensure that parking regulations strike a balance between the demand for parking and the ability to develop land to its fullest potential by reducing parking minimums."*
[Page 92]

The facility will be positioned towards the westerly end of the parcel, utilizing Brook Street as the Property's frontage. This accomplishes several note-worthy objectives, to include orienting the facility in the direction of buildings with similar or even greater stature, being positioned directly amidst a high frequency bus line, and taking advantage of the sloping topography from Angell Street down towards Fones Alley to accommodate vehicular garage access.

Strategy 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."*
[Page 33]

Due to the approximately six-foot difference in lot elevation, the average proposed building height from grade will be approximately 57-feet. However, this varying topography serves to soften the overall building stature from the perspective of Angell Street, sub-structured garage being entirely hidden from view. Alternatively, given the lower six-foot elevation along Fones Alley, not only is surface level garage access feasible, but accomplished in the area of reduced vehicular and pedestrian activity. Due to the approximately six-foot difference in elevation, the average proposed building height from grade will be approximately 57-feet. In addition, such accessory but necessary site features as external parking and requisite trash storage, are likewise hidden from view by being placed towards the rear of the facility, along Fones Alley.

Neighborhood Character. *"The increasing need for a broad array of housing options requires a more diverse mix of residential types that are both affordable and complementary to neighborhood character. New construction must be sensitive to the character and qualities of Providence's neighborhoods. It is also important to retain the traditional character of neighborhood commercial districts, while allowing for more density in appropriate areas."*
[Page 18]

It necessitates reemphasizing that developing in a vertical fashion allows for the retention of true green-space, upwards of approximately 4,923 square feet, or 25.25% of the overall Property. This needs to be contrasted with present site conditions that failed to maximize appropriate usage of such limited unconstrained infill land resources, and yet only maintained 5,521 square feet of pervious surface, or 28.32%. The difference is a mere 598 square feet; yet realizing much-needed housing with provision for appropriate off-street parking. Furthermore, runoff will now be properly regulated. Proposed improvements are a combination of natural infiltration and subsurface drainage, thereby realizing both a vast reduction and treatment of site runoff.

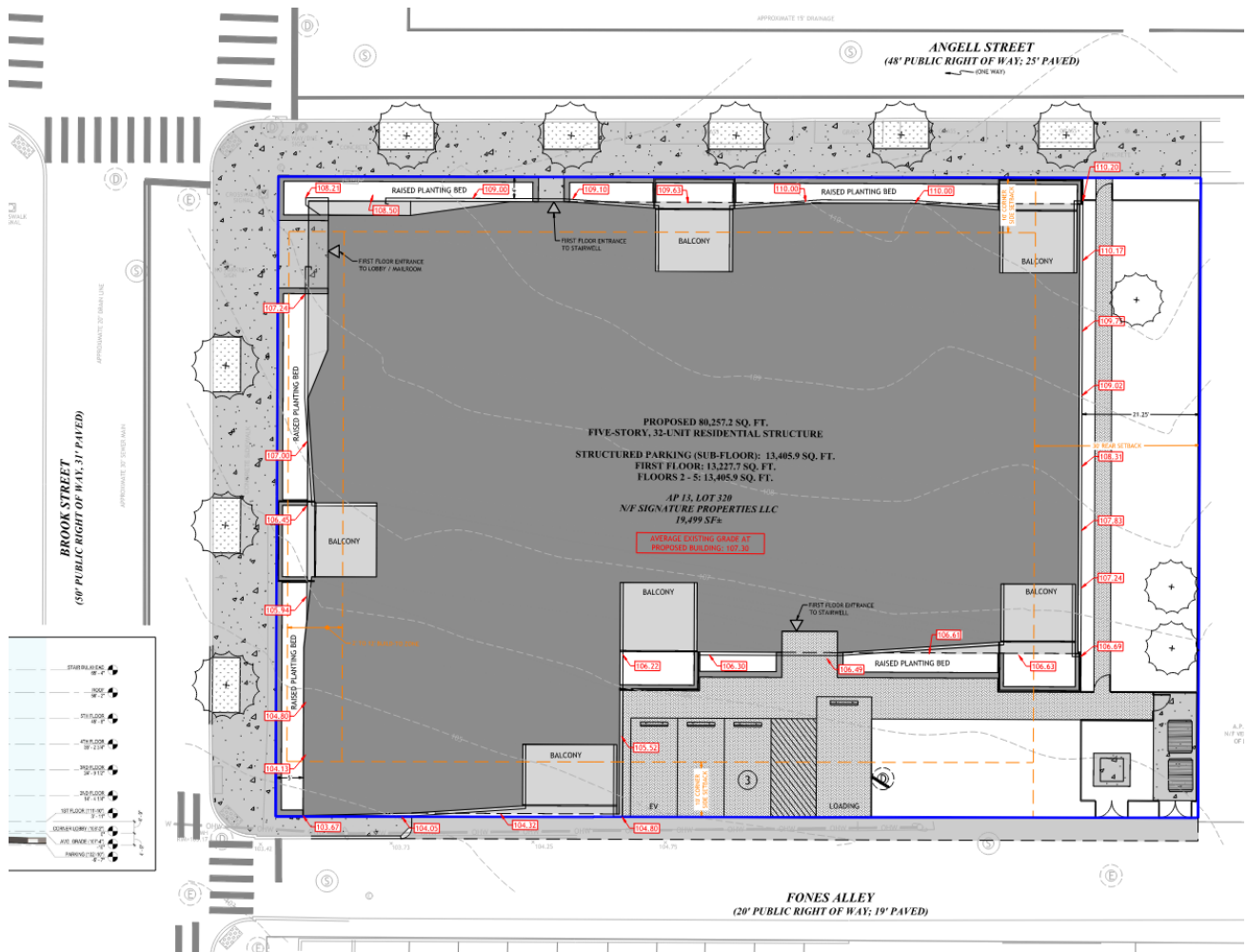
2. Built Environment - Goal: *"Protect, preserve and promote a high quality built environment."* [Page 15]

"An essential element of Providence's quality of life is its urban design — how the city looks, feels, and functions. "Urban design" refers to the basic structural forms on which the city is

built — natural features such as waterways, landforms, and topography; the street grid, alleys, the open space system; the architecture of its buildings, infrastructure, and public spaces; and the relationships among all of these elements. Providence has achieved high-quality urban design consistently over time and people cherish the result.” [Page 15]

Strategy I - “Review and revise the City’s stormwater ordinance to ensure a balance between the desire for increased development and density in certain zones and the impacts of increased impervious area and stormwater to avoid exacerbating flooding. Consider including requirements to address pollutants of concern for specific watersheds. Also consider more stringent on-site stormwater management requirements for new development or substantial redevelopment projects.” [Page 8]

The site plan below [Credit: JCE] and architectural plans [Credit: Kite Architects] on the following pages, excerpted from the Applicant’s submission package, detail proposed development conditions.





VIEW FROM ANGELL & BROOK STREETS

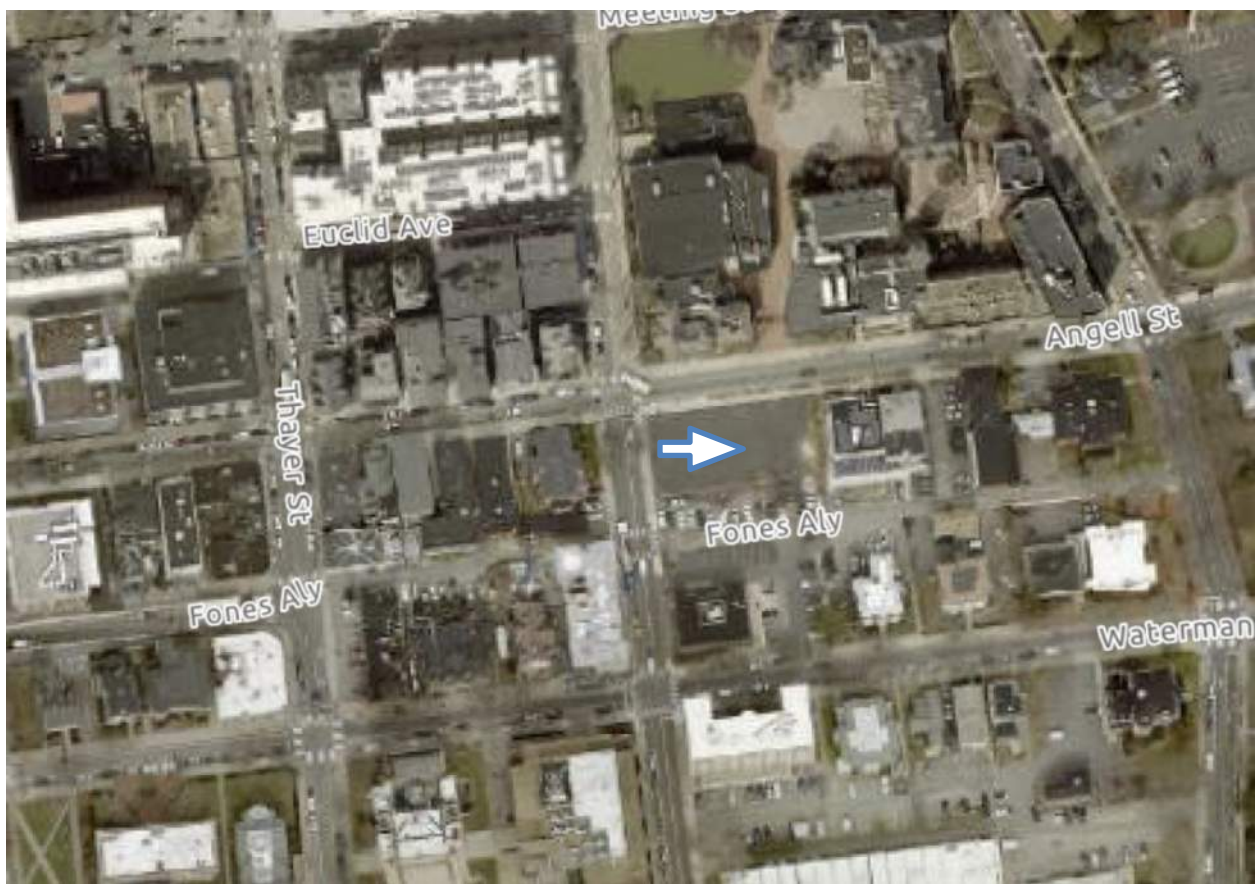


VIEW LOOKING NORTHWEST ON FONES ALLEY

GENERAL NEIGHBORHOOD ANALYSIS

Although the pursued height and setback 'adjustments' are not necessarily dependent on the presence of similar neighborhood circumstances, it is nevertheless important to evidence that development conditions will realize neighborhood compatibility. This Consultant has therefore prepared a 'Neighborhood Analysis' to provide a clear picture of present neighborhood development conditions. As has been repeatedly expressed throughout this report, the surrounding neighborhood represents two (2) distinct development patterns with the Property centrally located, and therefore in the enviable position of serving in a transitional capacity. The Property being one of the larger parcels on average and presently unimproved, affords great development potential; realizing the residential density so desired by the community, while mitigating pre-existing neighborhood constraints, such as deficient off-street parking and green-space.

The results of the 'Neighborhood Analysis' evidences a variety of land uses, architectural styles, density, and more importantly, facility massing and scale. For example, the ratio of gross floor area to lot size ranges from a low of 49% to a high of 484%. The same is true of useable floor area, with the ratio ranging from a low of 46% to a high of 387%. However, most notable, considering the vast majority of properties fail to provide any green-space, the proposed development anticipates maintaining in excess of 25% of the overall lot area naturally green. The following aerial, excerpted from the City's GIS, details just how impervious is the subject neighborhood.



The building coverage ratio ranges from a low of 14% to a high of 97%, with in excess of one-third of the parcels being improved in excess of 70%. Finally, a sampling of proximate larger facilities evidences much greater massing and scale, literally being numerous feet and stories higher than the subject development proposal, and yet failing to either provide any degree of reasonable green space or off-street parking. Alternatively, the neighborhood situated to the east of the Property, which become much more pure residential in character, has a moderately overall lower stature; residences averaging 40 to 50-feet in overall height. The reason why these neighborhood conditions are so important, besides evidencing neighborhood compatibility, is corroborating this Consultant's conclusion that the development does indeed serve in a transitional capacity, particularly when discussing the singer issue of overall height. The personally obtained photographs on the following page illustrates the height of several proximate entities.





The following Table provides a synopsis of present neighborhood development conditions.

NEIGHBORHOOD COMPARATIVE ANALYSIS		
	Lot 320	Surrounding Neighborhood
Lot Size [No Minimum]	19,499 sf	Average 12,350 sf
Building Coverage	68.75%	Average 45.85% [Equal to or in excess of the Property - 42%]
Useable Floor Area [Ratio - sf to lot size]	277%	Average 149% [Equal to or in excess of the Property - 22%]
Gross Floor Area [Ratio - sf to lot size]	411%	Average 179% [Equal to or in excess of the Property - 19%]
No. of Stories	Five	Average - Three Four and Greater - 26%
Sampling No. of Bedrooms [Ratio- bedroom to lot size]	96-Bedrooms Average - One-bedroom per 203 sf	257 Thayer Street - 267-Bedrooms 21 Euclid Avenue - 61-Bedrooms 198 Angell Street - 17-Bedrooms 194 Angell Street - 24-Bedrooms 190 Angell Street - 24-Bedrooms 185 Angell Street - 27-Bedrooms 189 Angell Street - 28-Bedrooms Average - One-bedroom per 141 sf
Sampling Overall Height	Average 57-feet	197 Thayer Street - 180-Feet 361 Brook Street - 80-Feet 227 Angell Street - 55-Feet 257 Thayer Street - 50-Feet 249 Thayer Street - 50-Feet Average - 83-Feet

LAND DEVELOPMENT PROJECT REGULATORY CONSISTENCY ANALYSIS

The subject development proposal is defined as an LD Project pursuant to Section 1904.C.1, as detailed below.

1904.C Land Development Project - Applicability

1. "Any development that meets one or more of the following criteria is considered a land development project:"

a. "New construction of 10,000 square feet or more in gross floor area."

The LD Project submission as presented fully complies with the LD Regulations, not necessitating any waivers. However, a height and certain setback 'adjustments' will be pursued, as permitted by the Ordinance. In order to attain LD Project approval, the Applicant must assure the CPC that the requisite 'Purposes' detailed in Section 103 and requisite 'Required Findings' detailed in Section 1005, are fully addressed to their satisfaction.

Section 103 Purposes - *"The purpose of these regulations is to establish procedural and substantive provisions for the development and subdivision of land that will, consistent with the provisions of Providence's Comprehensive Plan, the Rhode Island Land Development and Subdivision Review Enabling Act of 1992 and the Zoning Ordinance, accomplish the following:"*

A. *"Provide for the orderly, thorough and expeditious review and approval of land developments and subdivisions."*

The proposed 32-unit residential development necessitates formal CPC approval because it likewise necessitates several permissible 'adjustments' as allowed by both the Ordinance and LD Regulations.

B. *"Promote high quality and appropriate design and construction of land developments and subdivisions."*

As will be presented and testified to by all experts in their respective fields, the development has maximized usage of the subject uniquely configured and positioned Property, while meeting respective off-street, drainage and landscaping requirements. The development will locate much-needed housing amidst a major transit corridor, fulfilling numerous Goals and Objectives of the Comprehensive Plan.

C. *"Promote the protection of the existing natural and built environment and the mitigation of all significant negative impacts of any proposed development on the existing environment."*

There are no site constraints that would preclude development of the Property for high-density residential. In-fill development, particularly when situated amidst a mixed-use transit corridor, is most appropriate and in accordance with the Comprehensive Plan. Furthermore, unlike many surrounding properties that are pre-existing, the development will be improved with drainage controls and true landscaping, thereby contributing to both the neighborhood and environment in general.

D. *"Promote design of land developments and subdivisions which are well-integrated with the surrounding neighborhoods with regard to natural and built features, and which concentrate development in areas which can best support intensive use by reason of natural characteristics and existing infrastructure."*

The proposed in-fill development will introduce new residents into a well-established mixture of commercial and residential environment, thereby generating a new customer base to area

businesses, in addition to potential bus-line riders. Proximity to all services will most assuredly mitigate vehicular generation, realizing greater pedestrian activity. Furthermore, it necessitates reemphasizing that drainage controls and true green space, purposefully incorporated between the facility and sole abutting neighbor, will be introduced, approaching in excess of 25% of the overall Property. Finally, requisite off-street parking will be furnished and in a manner that does not detract from maximizing full usage of the Property.

E. *"Encourage local design and improvement standards to reflect the intent of the Comprehensive Plan with regard to the physical character of the various neighborhoods and districts of the City."*

This report has well documented the improvements to be realized, all of which are detailed in the Comprehensive Plan. Improvements include increased residential density amidst a mixed-use transit corridor, development that reflects neighborhood character, and site design elements that are otherwise missing, such as drainage controls and green-space.

F. *"Promote thorough technical review of all proposed land developments and subdivisions by appropriate local officials."*

The community has correctly concluded the appropriateness of the proposed development, necessitating formal CPC review and approval, subject to evidencing to their satisfaction the requisite standards, most notably provision for permissible 'adjustments'.

G. *"Encourage local requirements for dedications of public land, impact mitigation, and payment-in-lieu thereof, to be based on clear documentation of needs and to be fairly applied and administered."*

Not applicable in the subject project instance.

H. *"Encourage the establishment and consistent application of procedures for local record-keeping on all matters of land development and subdivision review, approval and construction."*

All development materials have been properly prepared to the level of a formal Preliminary Plan submission, and the project Certified Complete, thereby being ready for formal review by the CPC.

Section 1005.A 'Required Findings - Findings for land development projects and subdivisions: *"For all administrative, minor, and major land development and subdivision applications, the permitting authorities responsible for land development and subdivision review and approval shall address each of the general purposes stated in Article 1 and make positive written findings on each of the following standards as part of the proposed project's record prior to approval. The requirement to address the purposes stated in Article 1 and make written findings on each of the following standards also shall apply in the case of a denial of an application."*

1. Consistency with the Comprehensive Plan: *"The proposed development is consistent with the Comprehensive Plan and/or has satisfactorily addressed the issues where there may be inconsistencies."*

This report has well documented Comprehensive Plan 'consistency'. The Property is situated within the RP District, which permits by-right the proposed residential development and at the prescribed density. Furthermore, it is the professional opinion of this Consultant that the Property is likewise properly classified in accordance with the FLUM. The Property, if not entirely, is partially situated with the NC land use classification, which corroborates the appropriateness of the requested 'adjustments', most notably increased height. And finally, this professional opinion is corroborated by the Property's unique positioning within the Enhanced Growth - Residential area. This Consultant offers the following excerpted Comprehensive Plan language in further evidencing textual 'consistency'.

4. Housing - Goal: *"Grow, improve, and preserve Providence's housing stock to expand affordable, accessible, healthy, and sustainable housing options for all residents."* [Page 26]

*"...**The City has a responsibility to ensure that its policies encourage a wide range of housing; do not impede housing production;** encourage maintenance and preservation of the existing housing stock; **increase housing choice;** and provide assistance to enable all residents of Providence to live in safe, habitable homes."* [Page 26]

Objective H2: Produce new housing for all - *"Support the creation of new ownership and rental housing citywide at all price points."* [Page 31]

Strategy 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."* [Page 31]

Strategy C. *"Ensure and develop homeownership and rental opportunities for all income groups."* [Page 31]

Strategy I. *"Encourage the development of housing for residents at all points of the income spectrum, low, moderate and high."* [Page 31]

Finally, the Comprehensive Plan [Page 117] evidences the need for units containing three or more bedrooms; it being the sole product that has not been furnished in quantities surpassing past decades..

Table A.26 Housing Units by Type

	2010	2020	Percent Change
No Bedroom	2,760	2,822	2.25%
1 Bedroom	11,881	16,288	37.09%
2 Bedroom	27,156	28,776	5.97%
3 or More Bedroom	31,095	29,705	-4.47%

Source: US Census, 2010 and 2020 Decennial Census

2. Compliance with Zoning Ordinance: *"The proposed development is in compliance with the standards and provisions of the Zoning Ordinance."*

The following Purposes detailed in Section 101 evidences the proposed residential development's consistency with the Ordinance. The development agrees with all general purposes, however those that are specifically applicable are referenced below.

- A. *"Promoting the public health, safety, and general welfare."*
- B. *"Providing for a range of uses and intensities of use appropriate to the character of the city and reflecting current and expected future needs."*
- C. *"Providing for orderly growth and development which recognizes:"*
 - 1. *"The goals and patterns of land use contained in the Comprehensive Plan."*
 - 2. *"The natural characteristics of the land, including its suitability for use based on soil characteristics, topography, and susceptibility to surface or groundwater pollution."*
 - 4. *"The values of unique or valuable natural resources and features."*
 - 5. *"The availability and capacity of existing and planned public and/or private services and facilities."*
 - 6. *"The need to shape and balance urban and rural development."*
 - 7. *"The use of innovative development regulations and techniques."*
- E. *"Providing for the protection of the natural, historic, cultural, and scenic character of the city or areas in the municipality."*
- H. *"Promoting a balance of housing choices, for all income levels and groups, to assure the health, safety, and welfare of all citizens and their rights to affordable, accessible, safe, and sanitary housing."*
- K. *"Promoting a high level of quality in design in the development of private and public facilities."*
- L. *"Promoting implementation of the Comprehensive Plan."*

The project does not necessitate several 'adjustment' in accordance with Section 1904.E.2, to include modification on setbacks and overall height. However, the referenced adjustments are within the prescribed authority of the CPC. The 'adjustments' are allowed provided the development realizes the provision of certain incentives. In the subject instance, the development proposes sub-structured parking, which is not important because it will ensure the success of the residential development, while also averting usage of already constrained neighborhood parking. The referenced incentive is detailed in Section 1904.E.1.h.

This Consultant has already detailed throughout this report why the increased height is both supported by the Comprehensive Plan and generally compatible with the character of the surrounding neighborhood. However, should there still be some concern or questioning as to its legitimacy, this Consultant would contend that the Ordinance specifically prescribes for an increased height 'adjustment' when associated with the provision of a detailed incentive and that said 'adjustment' is likewise specifically authorized by RIGL. RIGL 45-22.2-13(c) 'Compliance and Implementation' states the following:

§ 45-22.2-13(c) Compliance and implementation - *"Each municipality shall amend its zoning ordinance and map to conform to the comprehensive plan in accordance with the implementation program as required by § 45-22.2-6(b)(11) and § 45-22.2-6(b)(12)(iv). The zoning ordinance and map in effect at the time of plan adoption shall remain in force until amended. Except with respect to comprehensive plans that have failed to be updated within twelve (12) years, as set forth in § 45-22.2-6(b)(11), in instances where the zoning ordinance is in conflict with an adopted comprehensive plan, the zoning ordinance in effect at the time of the comprehensive plan adoption shall direct municipal land use decisions until such time as the zoning ordinance is amended to achieve consistency with the comprehensive plan and its implementation schedule. In instances of uncertainty in the internal construction or application of any section of the zoning ordinance or map, the ordinance or map shall be construed in a manner that will further the implementation of, and not be contrary to, the goals and policies and applicable content of the adopted comprehensive plan."*

3 Environmental Impact: *"There will be no significant negative environmental impacts on the natural and built environment from the proposed development as shown on the final plan, with all required conditions for approval."*

Once again, there are no site constraints that would preclude development of the Property for high-density residential. In-fill development, particularly when situated amidst a mixed-use transit corridor, is most appropriate and in accordance with the Comprehensive Plan. Furthermore, unlike many surrounding properties that are pre-existing, the development will be improved with drainage controls and true landscaping, thereby contributing to both the neighborhood and environment in general.

4 Buildable Lot: *"The subdivision, as proposed, will not result in the creation of individual lots with any physical constraints to development that building on those lots according to pertinent regulations and building standards would be impracticable."*

Not applicable, no lot subdivision is proposed. Regardless, there are no site constraints that would preclude development of the Property for high-density residential. Furthermore, green space will be retained and long missing site improvements introduced, such as drainage controls.

5. Street Access: *"All proposed development projects and all subdivision lots shall have adequate and permanent physical access to a public street. Lot frontage on a public street without physical access shall not be considered compliance with this requirement."*

The development will be furnished permanent physical access from Fones Alley, which is most appropriate given the lower elevation and ability to realize street level garage access, in addition to the much-reduced vehicular and pedestrian activity level.

802 Impact Statements - *"In order to make positive findings required by these regulations, the permitting authority may require impact statement(s) to be prepared at the expense of the applicant. The applicant may choose the person or company to prepare such statements. Impact statements may include, but are not limited to, the following."*

A. Natural environment - *"The permitting authority may require a statement of the impacts on the natural environment. This may include, but is not limited to, the impact of light, noise, air pollution, stormwater, the removal of pervious surfaces or plantings, and other impacts addressed in Section 1304 of the Zoning Ordinance."*

The development in question is purely residential, thereby neither generating any air pollution or excessive noise. Lighting will be residential in character and architecturally appropriate. True stormwater drainage controls will be introduced, an improvement that is presently non-existent. And finally, a sizable quantity of green-space will be retained, even after maximizing usage of the Property in the manner-so-described.

B. Built environment - *"The permitting authority may require a statement of the impacts on the built environment. This may include, but is not limited to, the visual impact of the size, scale, and massing of the building; shade impacts; and impacts to the pedestrian experience."*

This Consultant has prepared an exhaustive neighborhood analysis evidencing the appropriateness of the proposed facility massing and scale from a purely land use perspective. Likewise evidencing the development's 'consistency' with the Comprehensive, due to the Property's unique positioning amidst a variety of zoning designations and land use classifications. The Property's unique sloping topography softens the massing and scale along Angell Street, thereby contributing to the immediate more-so predestine environment.

C. Traffic - *"The permitting authority may require a statement of the impacts on vehicular, bicycle, and pedestrian movement in and around the subject site. All traffic studies shall be reviewed by the city's traffic engineer, who may identify requirements for mitigation of negative impacts."*

The Property's unique site features, to include multiple lot frontages and sloping topography, permits contributing to the more pedestrian like-environment along Angell Street, while more

importantly, separating and locating vehicular parking and travel towards the rear Fones Alley; area in which current vehicular and pedestrian interaction is limited.

803 Mitigation of Negative Impacts - *"In order to promote the general purposes of these regulations, the permitting authorities may impose conditions on approvals to mitigate negative impacts identified by the permitting authorities. Mitigation may require the applicant to pay for improvements on site, off site, or within the public right-of-way. The permitting authority may consider public access or dedication of land for public purposes offered by the applicant as mitigation measures. Any mitigating activity required as a condition of approval must be related in kind and degree to the identified impact. Mitigation measures include, but are not limited to."*

A. Impacts to the natural environment - *"The permitting authority may require modifications to the site or its vicinity to mitigate negative impacts to the natural environment. The permitting authority may consult with the city forester to develop mitigation measures. Mitigation measures may include, but are not limited to, the amount and location of landscaping, preservation of tree canopy, and modifications to stormwater systems."*

Once again, the development will realize true drainage controls to mitigate any off-site runoff. In addition, and as mandated by the Comprehensive Plan, the Applicant has submitted a landscape plan that evidences vegetative and shading compliance.

B. Impacts to the built environment - *"The permitting authority may require modifications to the plans to mitigate negative impacts to the built environment. Mitigation measures may include, but are not limited to:"*

1. *"Building design, including, but not limited to, overall scale, massing, and height; fenestration; building materials; and setback."*

This report has well detailed all of the unique site features, to include multiple frontages and sloping topography, that contribute to the appropriateness of the proposed residential facility massing and scale. Thus evidencing the appropriateness of the requested 'adjustments' detailed in the next section of this report.

2. *"Preservation of certain features on a site or building."*

Not applicable. Property is presently unimproved. There are no site features necessary of being preserved.

3. *"Photographic records and detailed written descriptions documenting buildings proposed for demolition when the City Plan Commission finds that they are historically significant."*

Not applicable. Property is presently unimproved.

C. Impacts to vehicular, bicycle and pedestrian traffic - *"The permitting authority may require modifications to vehicular, bicycle, or pedestrian circulation in and around the site to mitigate negative impacts. The permitting authority may consult with the city's traffic engineer and/or Green and Complete Streets Advisory Council to develop mitigation measures."*

This Consultant reiterates that the development has been thoughtfully designed in accordance with pertinent Comprehensive Plan Transit considerations: Characteristics of the surrounding roadway infrastructure; Desire to attract development that supports a multi-modal transportation network; and, integration of off-street parking that is complimentary and does deter usage of land resources for their highest and best potential. Furthermore, Map B.20 'Transportation' of the Comprehensive Plan, evidences that there is a present quite extensive supportive multi-modal transportation system; Brook Street being improved with a 'High Frequency' Bus Line and Angell Street with a 'Local and Regional' Bus Line. The manner in which the Property is surrounded by such a comprehensive Transit System contributes to its appropriateness for greater residential density, necessitating compatible massing and scale. Finally, appropriate bicycle storage will be provided, and in appropriate quantities to meet the needs of respective tenants.

B. Findings for dimensional adjustments for land development projects - *"For all requests for dimensional adjustments for land development projects, the City Plan Commission shall make positive written findings on all items below as part of the proposed project's record prior to approval."*

1. *"The application is eligible for a dimensional adjustment because it meets one or more of the eligibility criteria of Section 1904.E.1 of the Zoning Ordinance."*

Sub-structured off-street parking will be furnished, and in quantities realizing regulatory compliance. This is in direct accordance with Section 1904.E.1.h of the Ordinance.

2. *"The requested or approved dimensional adjustment is within the allowable adjustments listed in Section 1904.E.2 of the Zoning Ordinance."*

The applicant proposes setback reductions and a height increase, as evidenced by both the submitted Civil Engineered Site Plan and Architectural Plan, that are within the prescribed 'Adjustment Table' range. The following illustration, excerpted from the Applicant's submission package [Credit: JCE, Inc.], details each respective adjustment.

3. "The extent of the dimensional adjustment is reasonably related to the condition that makes the project eligible for the dimensional adjustment."

ZONING CRITERIA	REQUIRED	EXISTING	PROPOSED
ZONING DISTRICT	R-P	R-P	R-P
MINIMUM LOT AREA (EXISTING/NEW)	NONE / <u>5,000 SF</u>	19,499 SF	19,499 SF
MINIMUM LOT WIDTH (EXISTING/NEW)	NONE / <u>50 FT</u>	116.3 FT	116.3 FT
MAX. BUILDING HEIGHT	45 FT (+12 FT) = 57 FT	N/A	57.0 FT ³
MAXIMUM BUILDING COVERAGE	55% (+25%) = 68.75%	N/A	68.75% ⁴
MAX. IMPERVIOUS SURFACE COVERAGE - FRONT YARD	33%	N/A	10.7%
MAX. IMPERVIOUS SURFACE COVERAGE - REAR YARD	50%	N/A	25.1%
TOTAL MAX. IMPERVIOUS SURFACE COVERAGE	65%	N/A	74.75% ⁵
TOTAL MINIMUM PERVIOUS SURFACE COVERAGE	1,000 SF	N/A	5,565 SF
FRONT SETBACK ZONE	2 FT - 12 FT BUILD-TO ⁽¹⁾	N/A	5 FT
MIN. INTERIOR SIDE AND CORNER SIDE SETBACK	6 FT / <u>10 FT⁽²⁾</u>	N/A	0 FT ⁶
MINIMUM REAR SETBACK	<u>30 FT</u>	N/A	21.25 FT ⁷

- FRONT SETBACK IS A REQUIRED BUILD-TO ZONE CALCULATED ACCORDING TO SECTION 402.B OF THE PROVIDENCE ZONING ORDINANCE. SEE CALCULATION ON SHEET 3.
- LOT WIDTH LESS THAN 60' = 6'; LOT WIDTH 60' OR MORE = 10'.
- ADJUSTMENT REQUESTED FOR 12 FEET (+12 FEET ALLOWED = 57 FT MAX.)
- ADJUSTMENT REQUESTED FOR 25% (+25% ALLOWED = 68.75% MAX.)
- ADMINISTRATIVE MODIFICATION REQUESTED
- ADJUSTMENT REQUESTED FOR 10 FEET (±10 FEET ALLOWED)
- ADJUSTMENT REQUESTED FOR 8.75 FEET (±10 FEET ALLOWED)

This report has thoroughly documented the appropriateness of all requested adjustments, most notably the height increase. Appropriateness is corroborated by the Ordinance, Comprehensive Plan, and RIGL, alike.

CONCLUSION

The proposed residential development is consistent with numerous goals and objectives of the Comprehensive Plan, as well as in-keeping with the character of the surrounding neighborhood. There are neither environmental nor physical constraints to development, and approval in the manner so proposed will realize much-needed housing, without sacrificing requisite off-street parking. Requested 'adjustments' are most appropriate because they are supported by the Comprehensive Plan and realize neighborhood compatibility. Therefore, the CPC should not have any reservations in granting LD Project approval, in addition to the issuance of several reasonable 'adjustments'.