An aerial photograph of the Metacomet area, overlaid with various regulatory and planning maps. The maps show property lines, building footprints, and different colored zones in shades of green, blue, and grey. A large blue area on the left side of the map suggests a water body or a specific regulatory zone. The text is centered over the map.

Report on Regulatory Consistency for Map 107, Block 15, Lot 1 Metacomet Redevelopment

Prepared for Metacomet Property, LLC

Prepared by Ashley V. Sweet, Team Leader

Weston & Sampson

September 25, 2024

Introduction

Weston & Sampson was retained to review a development proposal for property located at 500 Veterans Memorial Parkway, East Providence, RI to redevelop a golf course into a mixed-use development consisting of housing, retail, open space, and recreation uses. This report summarizes the application and provides an analysis of the proposal's consistency with the East Providence Zoning Ordinance, Waterfront Special Development District Plan, and the Comprehensive Plan. This is accomplished by providing specific citations from these documents within the report to demonstrate how the various components of this proposal are consistent with the purposes and intent of the city's regulatory framework. The review and analysis were conducted by Ashley V. Sweet, a team leader with the firm who has over 20 years of experience in municipal planning and related topic areas. A copy of her resume is attached to this report as an addendum.

Application Overview

The proposal has received the following approvals to date:

- **Zone Change and Creation of the Metacomet Subdistrict:** Approved by the East Providence City Council in July 2021.
- **Subdivision:** The East Providence Planning Board considered a subdivision to separate the open space land area from the remainder of the development area. This was approved in May 2022.
- **Comprehensive Plan Amendment:** The East Providence Waterfront Commission amended their comprehensive plan to include the real property comprising the Metacomet Subdistrict in July 2022. The City Council subsequently ratified these modifications in August 2022.
- **Phase One Approval:** The East Providence Waterfront Commission approved Phase One of the project in May 2024, allowing construction of the golf course to move forward.

The applicant has submitted a development proposal for the property after receiving the above local approvals necessary for the filing of that development application.

The project now seeks approval from the Waterfront Commission Pursuant to Section 19-470 of the Waterfront Special Development District Ordinance for development of the site. The project seeks to provide for an appropriate mixed-use development within the context of protecting and enhancing the important scenic and recreational resources along the East Providence waterfront. The proposed development advances land use policies and design practices that respect the uniqueness of both built and natural environments and remains consistent with the goals and policies of the city's regulatory framework.

Project Location

The project site, located at 500 Veterans Memorial Parkway (Assessor's Map 107, Block 15, Lots 1 and 1-10), encompasses ± 140.64 acres. It is bordered by Lyon Avenue (commercial and residential), Fort Street (residential), Fisher Street and South Broadway (residential), Metacomet Brook/Watchemoket Cove (a tributary of the Providence River), and Veterans Memorial Parkway. Excluding the cove area, the usable parcel size is approximately 131 acres. The development includes the donation of 9.6 acres of open space to the City of East Providence and the development of a 43-acre renovated 9-hole golf course. With these considerations, the usable lot area for this project is calculated to be ± 94.9 acres. See Figure 1 for an aerial view of the subject site.



Figure 1. Aerial View of the Subject Property
 Source: Google Earth

Project Description

The proposed development is a mixed-use project on the former Metacomet Golf Course site. It includes approximately 890 residential units, comprised of 845 multifamily rentals, 22 duplexes, and 24 townhouses. Additionally, there will be about 153,000 square feet of commercial space. To meet city requirements, 10% of the housing will be designated as affordable inclusionary units. Table 1 provides the proposed unit count by bedroom as well as the number of units proposed within each building.

Table 1. Unit Type by Building

	Unit Type				Total Unit Count per Building
	Studio	1 Bedroom	2 Bedroom	3 Bedroom	
Building A	4	42	18	4	68

	Unit Type				Total Unit Count per Building
	Studio	1 Bedroom	2 Bedroom	3 Bedroom	
Building B	9	45	22	4	80
Building C	12	50	17	5	84
Building D	22	55	27	5	109
Building E	-	30	18	4	52
Building F	12	53	27	4	96
Building G	-	30	18	4	52
Building H	7	35	17	4	63
Building I (Age Restricted)	-	44	36	-	80
Building J (Age Restricted)	-	36	44	-	80
Building K (Assisted Living)	-	40	40	-	80
Townhomes	-	-	24	-	24
Duplex Houses	-	-	-	22	22
Total Unit Type Count	66	460	308	56	890

A central feature of the development is the town center anchored by a grocery store and surrounded by neighborhood scale retail shops. Amenities include a pedestrian promenade, an outdoor amphitheater, and a 9-hole golf course. We note that the area defined as the “amphitheater” is being provided as an internal site amenity for the development and was created based upon the grading and topography in that area of the site and the scenic views the area provides to the golf course and the tidal cove. A portion of the existing golf course was renovated and opened as a new 9-hole course in June 2024. The project also proposes to deed 9.6 acres to the city to be preserved as open space.

Overall, the project will offer one-stop living for residents where they will be able to travel from their residence to retail and services businesses and recreation areas without having to leave the development. This mix of services, easily accessible to the residents of the development, will help to ensure that the traffic impacts to the surrounding area are minimized. In a mixed-use development such as this, the residential component of the project is expected to contribute a significant amount of the trips to and from the commercial uses proposed within, this is defined as *internal capture*. Specifically, the grocery market and other smaller service-oriented retailers proposed within the neighborhood shopping center element, would be patronized by customers already within the site. These inter-related trips from the residents to the businesses do not generate trips at the site driveway intersections, or on to the adjacent roads, they are all internal to the site, minimizing the traffic impact to the areas adjacent to the development.

The project is proposed to provide sidewalks, multi-use shared paths, secure bicycle parking, and a safe connection across Veteran's Memorial Parkway (the Parkway) to the East Bay Bike Path. All features that will add to the quality of life of residents, neighbors, and the city as a whole. The design of the site has carefully considered new residents within the development, existing residents adjacent to the development, those visiting the site to shop or eat, and overall, how the project fits in with the character of the immediate neighborhood and the larger city. The East Bay Bike Path will connect across Veteran's Memorial Parkway, into the system of shared walkways throughout the development. Allowing those utilizing the bike path to easily access the amenities within the development and vice versa for those that live in the development and utilize the bike path. The neighborhood surrounding the site to the east and north will benefit from easier access to the bike path through the system of shared paths, where currently they need to use the street to access the bike path. Figure 2 represents the location of pedestrian amenities and open space proposed for the site.



Figure 2. Pedestrian Circulation and Open Space
Source: Bohler

The design of the site has made landscaping a priority and focal point of the project. The entire length of the Veteran's Memorial Parkway adjacent to the site will enjoy a 100-foot landscaped buffer to maintain the park like scenic nature of the roadway. The largest of the proposed structures are proposed toward the interior of the site, keeping smaller structures along the perimeter of the site which will minimize the visual impact on the Parkway as well as adjacent properties. The proposed residential units have been positioned on the site to be the closest structures to abutting residential

lots, ensuring that existing homes are adequately buffered from the proposed commercial uses. Additionally, the residential lots on the east side of Fort Street will be buffered by approximately 250 feet of open space land that will be donated to the city. Those residential properties on Fisher Street will remain adjacent to the golf course as they are presently.

The project proposes to plant over 600 new trees on the site. Approximately 100 of the existing trees on the site will be retained, resulting in over 700 trees spread throughout the area of the property proposed for redevelopment. Figure 3 provides an overall view of the proposed project.

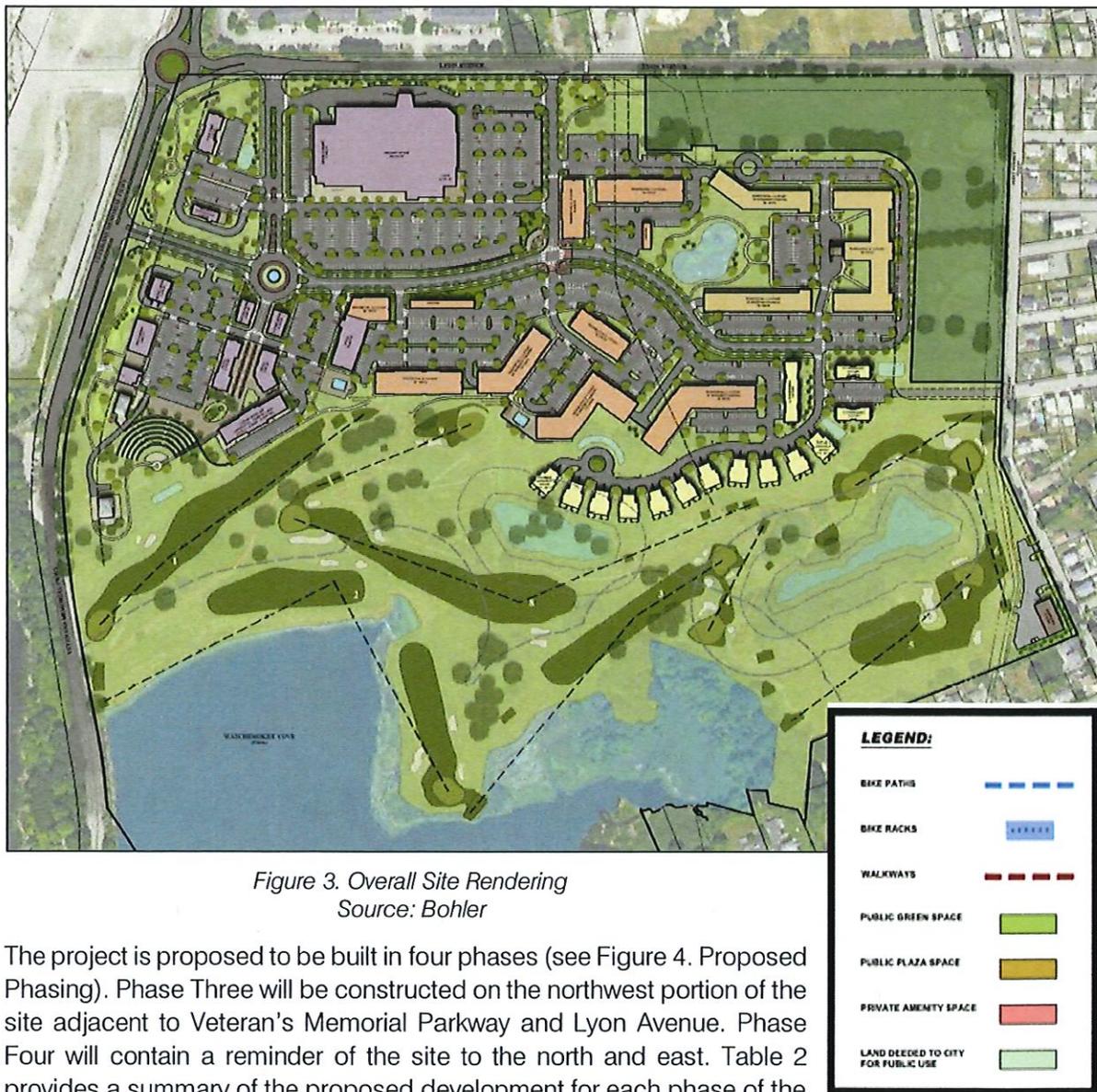


Figure 3. Overall Site Rendering
Source: Bohler

The project is proposed to be built in four phases (see Figure 4. Proposed Phasing). Phase Three will be constructed on the northwest portion of the site adjacent to Veteran’s Memorial Parkway and Lyon Avenue. Phase Four will contain a reminder of the site to the north and east. Table 2 provides a summary of the proposed development for each phase of the project.

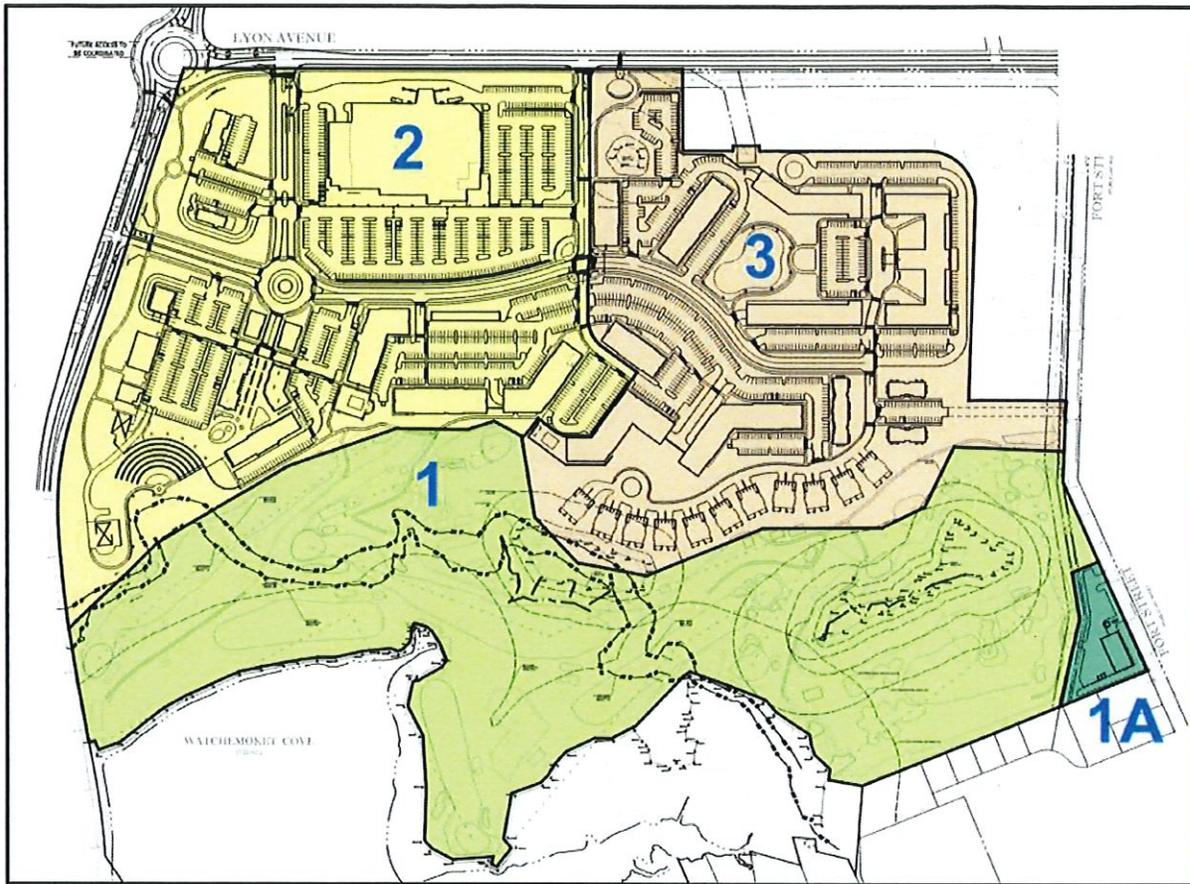


Figure 4. Phasing Plan
 Source: Bohler

Table 2: Proposed Development by Phase		
Phase	Retail and/or commercial (in square feet)	Number of residential units
One	None (golf course only)	None (golf course only)
Two	Golf course maintenance shed	None (golf course maintenance shed only)
Three	162,804 (includes 10,000 for golf facility)	232
Four	None	660
Total	162,804 (includes 10,000 for golf facility)	890

Required State Permits

It is anticipated that this proposal will require a permit from three different state agencies. Those requirements are described in more detail in this section.

Coastal Resources Management Council (CRMC)

The Coastal Resources Management Council (CRMC) was established by the state under R.I. Gen. Laws Chapter 23 of Title 46, with the responsibility for overseeing the planning and management of Rhode Island's coastal resources. The CRMC's regulatory jurisdiction covers land within 200 feet

inland from any coastal feature, which includes both the project property and Veterans Memorial Parkway. According to a map survey, these areas fall under the CRMC's jurisdiction. CRMC has established regulations for its Coastal Management Program (650-RICR-20-00-1), which detail the permissible activities within the coastal region. Since the property contains wetlands regulated by the CRMC, it is expected that the development will alter these wetlands, requiring a Council Assent under specific regulations (650-RICR-20-00-1.1.3.A.5 and I.I.3.B.4). Additionally, the CRMC must seek input from the Rhode Island Historic Preservation and Heritage Commission regarding any potential adverse impacts on properties that are eligible for inclusion in the National Register of Historic Places, even if not officially listed. Since Veterans Memorial Parkway is eligible for this designation, any permits for the development affecting the Parkway or property will likely require CRMC to engage in this consultation process.

Rhode Island Department of Environmental Management (RIDEM)

The proposed development will likely need to obtain coverage under the RIPDES General Permit for Stormwater Discharge Associated with Construction Activity (CGP). This permit is required because, under the federal Clean Water Act, stormwater discharge approval is necessary if construction activities are expected to disturb one or more acres of land or create 10,000 square feet or more of impervious area within a location under CRMC jurisdiction. The development is expected to exceed this threshold, triggering the need for the permit.

Additionally, Veterans Memorial Parkway, established around 1910 by the Metropolitan Parks Commission, falls under the authority of the Rhode Island Department of Environmental Management (RIDEM), per R.I.G.L. § 32-1-1 et seq. RIDEM holds the power to oversee the establishment, maintenance, and development of all state parks. Therefore, any alterations to the Parkway may require RIDEM approval.

Rhode Island Department of Transportation (RIDOT)

The Rhode Island Department of Transportation (RIDOT) has regulations that govern alterations to state-maintained roads and highways. According to these regulations (290-RICR-20-00-4), a Physical Alteration Permit (PAP) is required before making any changes to curbs, signals, or installing driveway access on state-maintained roads. Since Veterans Memorial Parkway is classified as a state-maintained road, it is likely that a Physical Alteration Permit will be needed for this development. Moreover, because Veterans Memorial Parkway is designated as a Scenic Roadway, any construction or alterations to the Parkway as part of the development will require review by the Scenic Roadways Board before the issuance of the Physical Alteration Permit.

Zoning Ordinance Consistency

The proposed development complies with a majority of the requirements of the zoning district, which designates a portion of the areas as open space and includes the overlay district known as the Waterfront Special District – Metacomet sub-district (see Figure 5: Zoning Analysis Table). During the public meeting process, several changes were made from the original proposal, including increasing the buffer along Fisher Street from 50 feet to 100 feet, expanding the buffer along Fort Street from 50 feet to 75 feet, and adding a 100-foot landscape buffer along the full length of the Parkway. With these modifications the project is proposing to provide in excess of the minimum required setbacks and buffers. In all instances the buildings are set back further from the property line than the minimum requirement. Building coverage for the site is approximately 7.5% in a district that permits 70% building coverage and the impervious coverage for the total site is approximately 33.3%.

ZONING ANALYSIS TABLE			N/A - NOT APPLICABLE N/S - NOT SPECIFIED (V) - VARIANCE REQUESTED (W) - WAIVER REQUESTED (E) - EXIST. NON-CONFORMANCE
ZONING DISTRICT	OPEN SPACE 1 (O-1)		
OVERLAY DISTRICT	WATERFRONT SPECIAL DEVELOPMENT DISTRICTS - METACOMET		
REQUIRED PERMIT	SITE PLAN FROM WATERFRONT COMMISSION, CRMC		
ZONE CRITERIA	REQUIRED (OVERLAY)	EXISTING	PROPOSED
MIN. LOT AREA	N/A	131.0± ACRES (5,707,886± SF)	NO CHANGE
MIN. LOT WIDTH	N/A	N/A	N/A
MAX. BLDG COVERAGE	70%	N/A (2)	7.5%
MIN. FRONT SETBACK	5-15'; 100' FROM PARKWAY R.O.W	N/A (2)	5' < ; 100' <
MIN. SIDE SETBACK	5'	N/A (2)	5' <
MIN. REAR SETBACK	N/A	N/A (2)	N/A
MAX. BUILDING HEIGHT	N/A (1)	N/A (2)	1-5 STORIES
MAX. IMPER. COVERAGE	N/A	3.2%	33.3%
PARKING SPACES REFER TO PARKING TABLE THIS SHEET	2,345	227	2,333 (V)
ACCESS. PARKING SPACES	34	4	54
ACCESSIBLE PARKING CRITERIA STANDARD: 8 FT x 18 FT STALL (MIN.) 5 FT x 18 FT AISLE (MIN.) VAN: 8 FT x 18 FT STALL (MIN.) 8 FT x 18 FT AISLE (MIN.)	1-25 SPACES = 1 MIN. ACCESSIBLE SPACE 26-50 SPACES = 2 MIN. ACCESSIBLE SPACES 51-75 SPACES = 3 MIN. ACCESSIBLE SPACES 76-100 SPACES = 4 MIN. ACCESSIBLE SPACES 101-150 SPACES = 5 MIN. ACCESSIBLE SPACES 151-200 SPACES = 6 MIN. ACCESSIBLE SPACES 201-300 SPACES = 7 MIN. ACCESSIBLE SPACES 301-400 SPACES = 8 MIN. ACCESSIBLE SPACES	401-500 SPACES = 9 MIN. ACCESSIBLE SPACES 501-1,000 SPACES = MIN. 2% OF TOTAL 1001+ SPACES = MIN. 20 + 1 FOR EACH 100 SPACES OVER 1,000 1 ACCESSIBLE VAN SPACE PER 6 STANDARD ACCESSIBLE SPACES (MIN.)	

Figure 5. Zoning Analysis Table
 Source: Bohler

Zoning Variance Requests

Although the proposed uses are permitted in the district, there are three requirements in the zoning ordinance that the applicant is seeking relief from. Those are presented in more detail below.

Signage Relief

The variance to install a monument signage is requested because the current zoning ordinance, specifically Sec. 19-483 - Site Development Criteria, prohibit pole signs and monuments in the Waterfront District. Instead, signage for multiple uses in a single building or complex is required to be integrated into decorative wall signs or screening elements, such as walls used to screen parking areas. The applicant is proposing a monument sign at the entrance to the development on Veterans Memorial Parkway. This monument sign is necessary to retain the 100 foot plus setback of any building from Veterans Memorial Parkway. In order to achieve the standard set in the zoning ordinance the project would have to move buildings closer to the street to achieve the required visibility of the sign for the development. The applicant feels strongly that keeping the buffer from along the roadway is a priority and would be prefer to request a variance to the sign requirements in order to do so.

To move forward with this design, the applicant is requesting a variance from the zoning ordinance to allow the monument sign, and the application includes the dimensions and proposed materials for this signage. This variance is crucial to achieve the desired visual and branding impact for the development at its entrance, while maintaining the 100-foot buffer along the Parkway.

Parking Relief

A variance from the parking requirement has also been requested. The zoning ordinance (Sec. 19-482 - Performance Standards) requires two parking spaces per residential unit, including for artisan live/work uses. The proposed development includes a residential component consisting of 890 units, resulting in a parking requirement of 1,780 parking spaces for the residential units. The applicant is proposing 1,421 parking spaces dedicated to the residential units, which amounts to 1.5 parking spaces per unit.

The total parking requirement for the site, including both the residential and retail uses, is 2,345 spaces. The applicant is proposing to provide 2,333 parking spaces. So, while the residential parking provided is short of the required number by 359 spaces, the total parking provided for the entire development is only 12 spaces short of the overall requirement of 2,345 spaces for the entire project. This slight deviation is considered minimal in the context of the entire development, but the variance is still necessary to approve the proposed parking arrangement.

The requested parking variance related to the amount of parking provided for the residential use is an appropriate variance. The parking standards in the zoning ordinance is a blanket requirement of two spaces per unit, regardless of the potential number of occupants for the unit. This project proposes to construct 66 studio and 460 one-bedroom units, comprising of 59% of the total units. These units are more likely to be rented for single occupancy. With over half of the residential units likely to be single occupancy units, requiring more than one parking space would result in excessive parking. In this instance, the area that would normally be utilized to provide two parking spaces per unit, can be reprogrammed for additional landscaping and amenity space, instead of parking area.

Fenestration Percentage

The variance for fenestration percentage is being requested as the Metacomet Design Guidelines require that side and rear elevations of buildings have a minimum average of 25% fenestration (window or glass openings) across all wall surfaces, with a minimum of 10% fenestration on any individual wall surface larger than 250 square feet. While the proposed development complies with the 25% minimum fenestration on all primary retail frontages, it seeks relief from the requirement for 25% fenestration on certain side and rear elevations.

This variance request is reasonable due to the type of commercial development that is proposed. Retail and/or restaurant buildings often require a certain amount of solid wall on the exterior for programmatic elements such as back of the house kitchen storage, merchandising, and utilities. Although the application does not specifically meet the 25% average fenestration in all cases, the proposed design meets the minimum requirements for all storefront and primary retail frontages. The relief sought is only applicable to certain side and rear elevations of structures for the reasons provided herein.

Comprehensive Plan Consistency

The East Providence Comprehensive Plan is the blueprint for development for the community. According to RIGL §45-22.2-3(a)(1):

Comprehensive planning by municipal government is necessary to form a rational basis for the long-term physical development of a municipality and to avoid conflicting requirements and reactive land use regulations and decisions.

This statement in Rhode Island General Law provides the basis for the requirement that all land use decisions must be consistent with the local comprehensive plan. In order to ensure that land use decisions are consistent, zoning ordinance provisions must also be consistent, as the zoning ordinance sets the parameters for allowable development within a community.

Chapter 19, Article I, Section 19-3 states that “the districts and regulations contained in this chapter are made in accordance with the city comprehensive plan as adopted and amended, in accordance with state statutes.” This statement ensures that all districts and regulations established in the city’s zoning ordinance are consistent with the comprehensive plan. Any addition, deletion, or amendment to the ordinance is required to be consistent as well.

Table 3 presents sections and direct citations from the City of East Providence Comprehensive Plan that are supportive of the creation of the proposed development. Emphasis has been added (in bold) to highlight certain provisions as they relate to this proposal.

Table 3. Comprehensive Plan Consistency		
Citation	Page/Location	Comment
General		
The challenge for the city is to ensure quality development of the remaining undeveloped lands and the re-development of land for new uses, such as land in the waterfront districts, while protecting the quality of life for residents, protecting the natural resources of the city, and creating an environment that can promote a favorable economic climate.	Intent and Purpose of the Comprehensive Plan Page 3	The proposed mixed-use development would provide a range of opportunities for residents through the development of housing, retail, service businesses, recreation opportunities, and open space. The project is designed to offer high-quality housing and services, which will offer additional housing and economic development opportunities in the city, while also protecting natural resources through open space protection.
Continue to implement the East Providence Waterfront Special Development District Plan (adopted by the East Providence City Council on December 2, 2003) requiring mixed-use redevelopment with various residential, commercial, office, retail, hospitality, and light manufacturing uses in the northern and southern districts.	Summary of the Comprehensive Plan Page 5	The project moves the city forward in their efforts to continue to implement the Waterfront Special Development District Plan by proposing to develop high-quality housing, retail, and services within the district.
Continue to require a minimum of ten percent (10%) affordable units in developments in the Waterfront Districts and expand this requirement elsewhere in the city where possible and seek voluntary inclusion of affordable units in	Summary of the Comprehensive Plan Page 5	The proposed development includes 10% affordable housing, resulting in approximately 89 units of affordable housing.

Table 3. Comprehensive Plan Consistency		
Citation	Page/Location	Comment
developments.		
Continue to maintain and enhance city parks, playgrounds, and open space properties.	Recreation, Conservation, and Natural Open Space Element Page 7	The proposed development intends to donate nearly 10 acres of land to the city for preserved open space and has renovated a 9-hole golf course.
Require dedication of recreation, open space, and waterfront access as part of new development where appropriate and feasible.	Recreation, Conservation, and Natural Open Space Element Page 7	The proposed development intends to donate nearly 10 acres of land to the city for preserved open space and has renovated a 9-hole golf course.
Waterfront Development District projects along the Parkway will be executed with full regard to the preserving this roadway's unique attributes.	Natural Resources Waterfront Development Page 118	The proposed application recognizes its proximity to the historic and scenic resource that is Veterans Memorial Parkway. The proposed 100-foot vegetated buffer along the entire length of the site will ensure that the scenic character is not negatively impacted.
Land Use Element		
East Providence shall seek to make development and investment decisions that promote economic development and broaden the tax base of the city and provide employment opportunities for city residents, that enhance potential downtown and village centers, that provide a range of housing choices, that maintain the density and character of existing neighborhoods, that provide recreation and open space, parks, playgrounds and linkages such as pedestrian paths and bikeways, that provide new opportunities for public access to the waterfront, and new places to work, live and recreate on the waterfront, that maintain infrastructure, that lessen our community's impact on the	Land Use Element Page 15	The proposed development spans approximately 60 acres of mixed-use land, including residential, commercial, retail, and recreational areas. The site is well-designed for pedestrian connectivity, allowing residents to live, work, and enjoy recreational activities, with a safe link to the bike path across the Parkway. According to a study by 4Ward Planning, the development is expected to generate \$5.3 million in taxes for the city, create around 3,640 full- and part-time jobs during construction, and provide approximately 630 permanent full- and

Table 3. Comprehensive Plan Consistency		
Citation	Page/Location	Comment
environment by becoming more sustainable and that look for opportunities to increase use of renewable energy, and decisions that retain the qualities that residents desire and cite as to why they choose to live in East Providence.		part-time jobs in the first year of stabilized operation in the county.
Permit infill development or redevelopment of properties provided they are compatible with adjoining land uses in terms of density and the neighborhood's predominant character.	Land Use Element Page 16	This project will encourage the redevelopment of a portion of the sub-district, enhancing the existing waterfront district, in a manner shown in this report to be compatible with surrounding land uses.
Ensure that remaining vacant land or redeveloped parcels in the city are used for their maximum benefit to the community, and are of high-quality design and in character with the adjoining parcels and neighborhood.	Land Use Goals and Objectives Goal 1.0 Page 25	The proposed development would provide a large tax benefit to the city at the same time it will provide needed housing, jobs, recreation space, and open space.
Rezone parcels, where appropriate, to provide opportunities for development, residential, commercial, or mixed-use, that is compatible with surrounding land uses.	Land Use Goals and Objectives Objective 1.5 Page 25	This project received a zone change in July of 2021 in accordance with this directive.
Target future land uses that will increase the tax base of East Providence as municipal costs increase and residential growth decreases	Land Use Goals and Objectives Objective 1.6 Page 25	The proposed project will provide an opportunity for redevelopment that will offer a diversification of the city's tax base.
Target future land uses that will create significant job opportunities in the community, in a manner compatible with surrounding land uses.	Land Use Goals and Objectives Objective 1.7 Page 25	The proposed project will provide for new job creation in a variety of industries. A report by 4Ward Planning indicates that a total of around 3,640 full- and part-time jobs during construction and provide approximately 630 permanent full- and part-time jobs in the first year of stabilized operation in the county.
Continue to assess the existing zoning ordinance and revise as necessary to	Land Use Goals and	The proposed project furthered this goal by seeking a targeted

Table 3. Comprehensive Plan Consistency		
Citation	Page/Location	Comment
promote flexibility in development, to maintain the scale and character of existing areas and preserve the densities of existing residential neighborhoods.	Objectives Objective 2.2 Page 25	amendment to the zoning ordinance to provide for flexible yet appropriate standards by which to redevelop approximately 60 acres directly adjacent to the existing waterfront district.
Work with private landowners to prepare plans that meet the goals and objectives of the Plan and the developer.	Land Use Goals and Objectives Objective 2.6 Page 26	The proposed project is the result of a private landowner requesting to work with the city in a collaborative manner that will assist the city in implementing many of the goals and objective outlined in the comprehensive plan.
Link the approval of new development proposals, including infill proposals, to the existing capabilities of the infrastructure.	Land Use Goals and Objectives Objective 2.7 Page 26	As shown in Figure 6 of this report the city has identified this general area for infill development and discussed and planned for infrastructure to support such. The project proposes to construct the roundabout at the intersection of Veterans Memorial Parkway and Lyon Avenue.
Diversify the city's existing tax base to reduce the tax burden on residential properties.	Land Use Goals and Objectives Objective 3.4 Page 27	According to a study by 4Ward Planning, the development is expected to generate \$5.3 million in taxes for the city, create around 3,640 full- and part-time jobs during construction, and provide approximately 630 permanent full- and part-time jobs in the first year of stabilized operation in the county.
Continue to encourage a mix of land uses throughout the city.	Land Use Goals and Objectives Objective 3.5 Page 27	The project proposes a mixed-use style development on the site, and within the immediate vicinity when considered in the broader land use context.
Economic Development Element		
The vision of economic development in East Providence includes the development of a diverse tax base predicated on attracting new high-quality industry to the city, as well as maintaining a wide variety of existing businesses within	Economic Development Element Page 66	This proposed project will provide an opportunity to diversify the city's tax base, provide high quality development, enhance the existing business diversity within the city, while respecting neighborhood context.

Table 3. Comprehensive Plan Consistency

Citation	Page/Location	Comment
the community. New industry should respect existing neighborhoods, maximize the use of existing infrastructure, and positively contribute to the city's tax base. The city should also develop a comprehensive program of support services to encourage the consolidation and expansion of existing businesses through targeted assistance and public infrastructure improvements and should be consistent with the goals and policies identified in the Land Use Element of the Comprehensive Plan.		According to a study by 4Ward Planning, the development is expected to generate \$5.3 million in taxes for the city, create around 3,640 full- and part-time jobs during construction, and provide approximately 630 permanent full- and part-time jobs in the first year of stabilized operation in the county.
Mixed Use: Development should, in the aggregate, provide a self-sustaining mix of commercial, residential, institutional, light industrial, civic, and recreational uses.	East Providence Waterfront Special Development District Page 68	The proposed development features a mixed-use layout and includes dedicated space for open areas and recreational facilities. As designed, residents of the development will have access to retail, services, recreation, and open space without having to leave the development.
Foster a positive business environment for the existing business community within East Providence	Economic Development Goals and Objectives Goal 1 Page 71	According to a study by 4Ward Planning, the development is expected to generate \$5.3 million in taxes for the city, create around 3,640 full- and part-time jobs during construction, and provide approximately 630 permanent full- and part-time jobs in the first year of stabilized operation in the county. New development that provides jobs and a positive tax flow for the city has a positive impact on the business economy.
Facilitate economic development of appropriate vacant or underutilized parcels of land within the city to broaden the tax base and create local and regional job opportunities.	Economic Development Goals and Objectives Goal 2 Page 72	The proposed project will allow for the expansion of the waterfront district in a manageable and appropriate way, changing an underutilized parcel to an economically viable business model.

Table 3. Comprehensive Plan Consistency		
Citation	Page/Location	Comment
Modify city development regulations, as appropriate, to encourage the development or redevelopment of various underutilized parcels (e.g., waterfront, Central).	Economic Development Goals and Objectives Objective 2.6 Page 73	This project seeks three minor variances from the zoning ordinance requirements in an effort to redevelop an underutilized parcel. The benefits realized by the city through the development of this project will outweigh any relief granted.
Diversify the economic base of the city of East Providence through a combined effort to market the city in general as a "good place to do business" and pursue targeted economic development opportunities matched to the city's assets.	Economic Development Goals and Objectives Goal 3 Page 73	According to a study by 4Ward Planning, the development is expected to generate \$5.3 million in taxes for the city, create around 3,640 full- and part-time jobs during construction, and provide approximately 630 permanent full- and part-time jobs in the first year of stabilized operation in the county.
Recreation, Conservation, and Open Space Element		
Identified General Recreation Needs: <ul style="list-style-type: none"> • Pedestrian path systems in neighborhood parks and playgrounds • Preserved natural areas for passive recreation and reflection 	Community Standards for the Recreation and Open Space System Page 137	The proposed development includes pedestrian pathways throughout the site and provides both active and passive recreational activities, such as a public promenade and an amphitheater.
Provide 2.5 acres of developed recreational space for every 1000 persons within a general ½ mile walking distance of individual residences.	Recreation, Conservation, and Open Space Element Goal 1 Page 141	The donation of almost 10 acres of open space to the city will assist the city in reaching this goal.
Provide city residents with an increased diversity of recreational opportunities close to where they live.	Recreation, Conservation, and Open Space Element Objective 1.3 Page 141	This proposed development provided almost 10 acres of open space for ownership by the city, as well as renovated new 9-hole golf course with preference for city residents.
Review major residential and commercial development proposals and other infrequent land use projects, such as the	Recreation, Conservation, and Open	This proposed development provided almost 10 acres of open space for ownership by the city, as well as

Table 3. Comprehensive Plan Consistency		
Citation	Page/Location	Comment
building of new transportation routes and extension of public utilities, for unique opportunities to expand the recreation system through the donation of easements or land, or fee in lieu of donations.	Space Element Objective 1.4 Page 141	renovated new 9-hole golf course with preference for city residents.
Provide the opportunity for passive and active recreation by all persons of all ages in each new or rehabilitated site.	Recreation, Conservation, and Open Space Element Objective 3.8 Page 143	This proposed development provided almost 10 acres of open space for ownership by the city, as well as renovated new 9-hole golf course with preference for city residents.
Encourage private recreational facilities to open to residents during specified hours at no charge or a minimal charge.	Recreation, Conservation, and Open Space Element Objective 4.1 Page 143	This proposed development included nearly 10 acres of open space for city ownership and a newly renovated 9-hole golf course, offering facilities with preference for city residents.
Serve both young and old and passive and active recreation needs.	Recreation, Conservation, and Open Space Element Objective 4.3 Page 143	This proposed development included nearly 10 acres of open space for city ownership and a newly renovated 9-hole golf course, offering facilities with preference for city residents
Support the continued operation and maintenance of three private golf courses presently operating within the city.	Recreation, Conservation, and Open Space Element Objective 6.2 Page 143	This proposed development included nearly 10 acres of open space for city ownership and a newly renovated 9-hole golf course, offering facilities with preference for city residents
Establish a mix of activity both recreational and functional in nature that preserved natural resources and aesthetics and contributes the quality of life and economic stability of the community.	Recreation, Conservation, and Open Space Element Goal 7	The proposed project provides an opportunity to create a true mixed-use development with commercial, retail, residential, open space, and recreation.

Table 3. Comprehensive Plan Consistency		
Citation	Page/Location	Comment
	Page 144	
Preserve, expand, and enhance open space within the city of East Providence while broadening access to the public where warranted.	Recreation, Conservation, and Open Space Element Goal 8 Page 144	This proposal will result in the donation of almost 10 acres of open space to the city expanding public access to open space areas.
Investigate means for the protection and preservation of the city's private golf courses.	Recreation, Conservation, and Open Space Element Objective 9.4 Page 145	This project will result in the donation of almost 10 acres of open space to the city, expanding public access to open space areas and redevelop a private golf course into a public 9-hole golf course.
Require all future subdivisions, commercial developments, and Land Development Projects to provide for open space, active recreation space, buffers, and/or landscaping.	Recreation, Conservation, and Open Space Element Objective 9.6 Page 145	This proposed development will result in nearly 10 acres of open space for city ownership and a newly renovated 9-hole golf course, offering facilities with preference for city residents

Source: Adapted from the City of East Providence Comprehensive Plan Update 2010-2015

While the comprehensive plan sets policy to guide decision making for the community, the plan also contains information specific to the East Providence waterfront and creates specific plans for certain areas of the community that may benefit from a more tailored and detailed approach. The comprehensive plan contains a Veteran's Memorial Parkway Corridor Specific Plan, the contents of which are provided in more detail in the following section of the report.

It should be noted that the comprehensive plan contains a Waterfront District Element. This element identifies the overall goals for the waterfront identified in the Waterfront Special Development District Plan and incorporates them into the comprehensive plan for the entire city. This project's consistency with those goals, and the Waterfront Special Development District Plan is discussed in detail in a later section of this report.

In summary, the above table of plan text, goals, and objectives from the comprehensive plan are provided to demonstrate how the proposed redevelopment of this site embodies so many of the goals, policies, and actions identified in the comprehensive plan. The proposed development provides an opportunity to enhance open space, continue the operation of a portion of the golf course, provide economic development that will contribute positively to the city's tax base, provide

much needed housing, generate full and part time jobs, both short and long term, while remaining sensitive to the adjacent land uses.

Veteran's Memorial Parkway Corridor Specific Plan

As part of the City of East Providence Comprehensive Plan, the Land Use Element provides a more detailed map of several specific areas of the city. One of the areas highlighted is the Veteran's Memorial Parkway Corridor Specific Plan Area. Figure 6 represents the map presented in the comprehensive plan of this area. The map depicted in Figure 6 provides details regarding development plans for the area surrounding the proposed sub-district area (identified in green and labeled "Metacomet Country Club"). These details clearly show the intent of the city to provide for a phased mix use development directly across the street from the subject property. The map includes details of traffic calming measures, pedestrian access, and provisions for utilities. This map represents the clear intent of the city to enhance the development options in this area and to provide for the appropriate infrastructure to manage and serve these development opportunities. This map from the comprehensive plan provides further support of the development intent of this area by the city.

It is important to note that the map represented in Figure 6 identifies the intersection of Veteran's Memorial Parkway and Lyon Avenue as the location to install a "context-sensitive round-about for traffic calming, safe pedestrian access, and efficient vehicular circulation at Village on the waterfront".

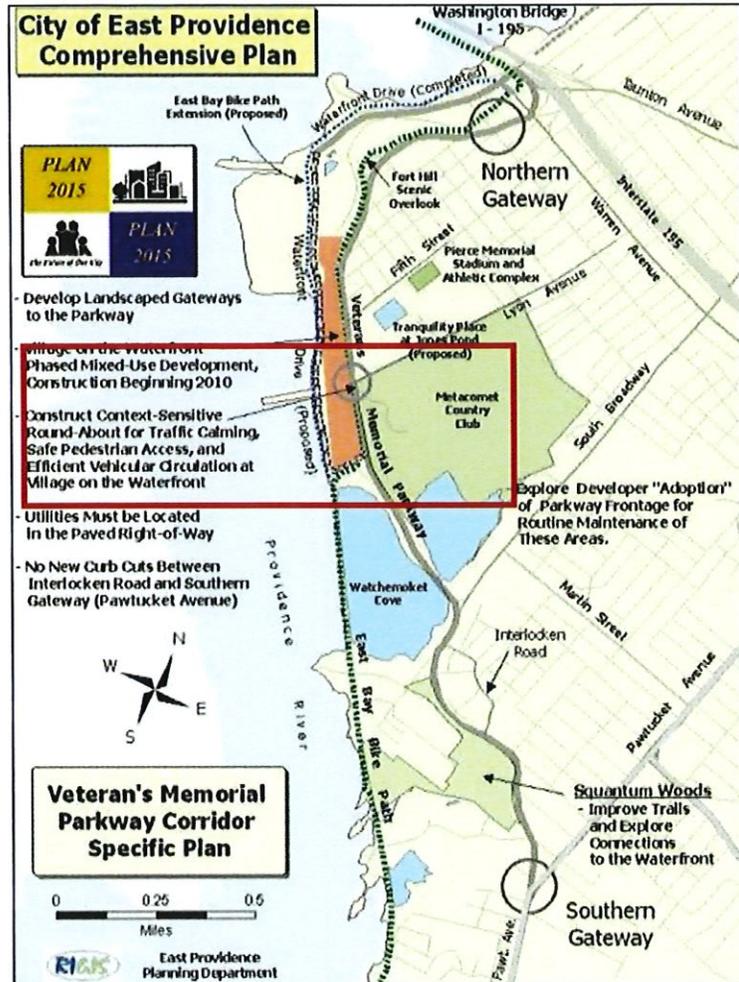


Figure 6. Veteran's Memorial Parkway Corridor Specific Plan Map
 Source: East Providence Comprehensive Plan Update 2010-2015

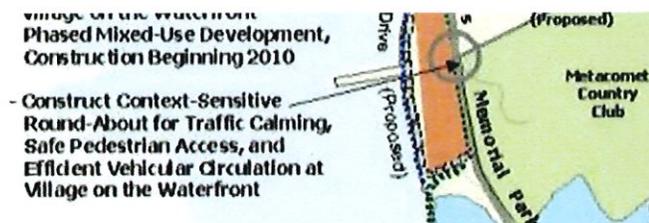


Figure 7. Inset of Recommended Roundabout Location
 Source: East Providence Comprehensive Plan Update 2010-2015

the Waterfront” (see the red box in Figure 6). This project proposes to install the roundabout identified in the comprehensive plan at this important intersection. The construction of this roundabout is entirely consistent with the comprehensive plan goals for this area of the waterfront district. See the map inset represented in Figure 7.

Consistency with the Waterfront Special Development District Plan

The East Providence Waterfront Commission was created by the RI State Legislature in 2003 and is a quasi-governmental organization charged with helping private and public developers transform the city's coastline, while striving to achieve environmental improvements, public access to the water, economic development, a positive fiscal impact, and mixed-use development all while being sensitive to the needs and desires of the community.

In 2003 the city initiated the drafting of the East Providence Waterfront Special Development District Plan (Waterfront Plan). The plan was developed to articulate and frame a plan, vision, and strategies to transform over 300 acres of the city's underutilized waterfront along the Providence and Seekonk Rivers. According to the Waterfront Plan, this transformation was envisioned to include a mix of land uses including commercial, office, medium and high density residential, entertainment and hospitality, restaurants, marinas, and civic and recreational uses.

The Waterfront Plan has abundant references to the importance of the city's waterfront resource and how appropriate development of this resource offers a unique opportunity to significantly expand the city's tax base while bringing a distinct identity to East Providence. The Waterfront Plan contemplated a mix of uses and the associated infrastructure to support those uses.

The redevelopment envisioned for the waterfront entails a number of activities including: road construction and associated public improvements, extension of utilities; undergrounding utilities; acquisition of properties; parcel assembly; rehabilitation of these, of land, buildings, or other the provision of streets, utilities, recreational areas, and other open spaces consistent with the needs of sound community growth in accordance with the City's Comprehensive Plan; and carrying out of plans for a program of voluntary repair and rehabilitation of buildings and other improvements (East Providence Special Development District Plan, page 2)

The Waterfront Plan identified five distinct principles. Those principles are outline below, each followed by a brief summary of how this proposed project helps the city to achieve them.

- *Expand the Tax Base – Waterfront development should provide positive fiscal impact to the city while expanding the tax base. Waterfront development should either generate substantial revenue and/or reduce the tax burden on residents.*

According to a report by 4Ward Planning, the proposed development will generate a gross tax revenue of \$5.4 million and a net revenue of \$4.9 million. The proposed development achieves this goal by providing a positive fiscal impact to the city by expanding the tax base well beyond the cost of servicing the development.

- *Generate New Jobs – Implementation of the waterfront development as envisioned by this Plan will generate a substantial number of new employment opportunities, potentially adding 3,000 to 4,000 jobs to the State's economy.*

According to the report by 4Ward Planning, the proposed development will generate 3,640 short-term jobs during construction and 630 permanent jobs within the county in the first year of stabilized occupancy. The proposed development achieves approximately 21 to 15 percent respectively, of the original goal of 3,000 to 4,000 jobs, when considering only the permanent jobs that would be created.

- *Implement a Mixed-Use Vision and Sustainability – Through land use regulations, promote a mix of commercial, office, housing, institutional, civic, and recreational uses that should remain self-sustaining over time.*

The development is proposed to include commercial space, housing, open space, and recreational space within a single development within the waterfront.

- *Create a Regional Destination – Encourage development that will create a “destination” for East Providence residents and that will draw visitors, businesses, and investors from beyond East Providence. The waterfront must provide jobs, residences, products and services that command a regional interest so as to ensure a stable market demand.*

The same report by 4Ward Planning found that there was a health regional retail market likely to attract potential retailers. Similarly, when looking at the regional housing market, report that the demand is relatively strong for multi-family housing units within East Providence. This data suggests that the project will have a regional draw, while also serving the needs of local residents and adjacent communities.

- *Expand Opportunities Equally for all Persons – Assist in creating an environment of market-driven redevelopment opportunities that will create new opportunities for higher-wage employment, and for housing, recreational, cultural, and waterfront public access opportunities for all persons, especially those with low to moderate incomes and to minority persons.*

This project proposes to repurpose what was once a private golf club into a modern mixed-use development that will provide a range of housing options including for those of low to moderate income, permanent jobs at a variety of pay scales, permanently protected open space, publicly accessible recreation opportunities, and convenient access to goods and services.

Chapter 3 outlines the overall goals and objectives of the Waterfront Plan. Table 4 provides select text contained within those goals and objectives along with a description of how this proposed project helps meet them.

Table 4. Waterfront Special Development District Plan Consistency		
Citation	Page/Location	Comment
Goal 1. General Land Use Goals		
Foster a mix of commercial, residential, and recreational uses along the waterfront, giving priority to public access and recreation, and water related activities	Chapter 3 Goal 1, #2 Page 14	The proposed project achieves this goal by developing mixed-use commercial, residential, and recreational uses. The previously

Table 4. Waterfront Special Development District Plan Consistency

Citation	Page/Location	Comment
along the water's edge.		private golf course will be operated as a public course.
Maintain scenic viewshed corridors by placing lower-scale buildings at the water's edge and adjacent to established residential neighborhoods and its viewsheds.	Chapter 3 Goal 1, #3 Page 14	The project has been designed to locate the taller residential structures towards the center of the site, placing smaller and shorter buildings along Veteran's Memorial Parkway and the adjacent residential neighborhood.
Improve transportation and traffic circulation throughout the Project Area through the construction of a new roadway (Waterfront Drive); a new roundabout, improved intersections, and new ramps from Interstate 195; bicycle routes, and new bus transit routes.	Chapter 3 Goal 1, #7 Page 14	The proposed project intends to install a roundabout at the intersection of Veteran's Memorial Parkway and Lyon Avenue. Roundabouts are called out in the Waterfront Plan as an acceptable method of traffic mitigation on Veteran's Memorial Parkway and within the waterfront district.
Create safe and convenient pedestrian and bicycle circulation.	Chapter 3 Goal 1, #8 Page 14	The proposed project intends to provide bicycle and pedestrian access across Veteran's Memorial Parkway connecting a network of shared paths within the development to the East Bay Bike Path. The bike path is easily accessible on the west side of Veteran's Memorial Parkway creating a connection between the development and the bike path.
Preserve and create civic and cultural facilities and amenities as a catalyst for area revitalization.	Chapter 3 Goal 1, #10 Page 14	The proposed project has reconfigured a portion of the previous golf course into an updated 9-hole course open to the public. This preserves a portion of the former Metacomet Golf Club. The redesign of the new course retained as much of the original course as possible to retain the historic and cultural significance.
Maintain and expand public access, recreation opportunities, and open space.	Chapter 3 Goal 1, #12 Page 14	The proposed project has already established and opened a public 9-hole golf course on a portion of the original course. This provides for the continued use of the property for recreation purposes, now open to the general public. The project donates almost 10 acres of open space to the

Table 4. Waterfront Special Development District Plan Consistency

Citation	Page/Location	Comment
		city ensuring open space is available to the residents in the surrounding neighborhoods.
Expand and improve the city's supply of affordable housing through a program of inclusionary zoning.	Chapter 3 Goal 1, #13 Page 14	The proposed project will include 10% of the units as affordable to those of low and moderate income. This will result in approximately 89 affordable units in the city.
Goal 2. Expand and Enhance Waterfront Public Access and Transportation		
Develop transportation connections to other areas of East Providence and the greater Providence metropolitan area, including by pedestrian and bikeway trails.	Chapter 3 Goal 2, #9 Page 15	The proposed project intends to install a roundabout at the intersection of Veteran's Memorial Parkway and Lyon Avenue. This will permit a future connection down to the waterfront. Additionally, the project proposes to connect a system of shared paths within the development to the East Bay Bike Path.
Goal 3. Enhance Waterfront Special Development District Economic Development Opportunities		
Encourage new businesses and activities to locate on the East Providence waterfront to form a stimulating and inviting mix of waterfront uses.	Chapter 3 Goal 3, #1 Page 15	The proposed project mixes commercial, residential, open space, and recreation uses.
Encourage opportunities in and around the waterfront for both large- and small-scale development efforts.	Chapter 3 Goal 3, #3 Page 15	The proposed project will develop a portion of the site for residential and commercial while preserving open space and providing a recreational amenity for the community.
Encourage a mix of uses to create year-round activity, as well as evening and weekend activities along the waterfront.	Chapter 3 Goal 3, #4 Page 15	The proposed project intends to develop a project that will provide for year-round activity with a mixed of commercial, residential, and recreational uses. The previously private golf course will be operated as a public course, providing three season recreational opportunities.
Goal 4. Enhance the Attractiveness of the Project Area		
Limit large surface parking lots through the use of structured parking facilities.	Chapter 3 Goal 4, #1 Page 15	The proposed project uses a mix of surface parking and structured parking to achieve the amount of parking needed to service the development. Surface parking areas are interrupted by walkways,

Table 4. Waterfront Special Development District Plan Consistency

Citation	Page/Location	Comment
		greenspace, designed landscape space, and other public amenities, avoiding large spans of asphalt.
Create a strong sense of place, with gateways and public spaces, and streetscapes clearly defined.	Chapter 3 Goal 4, #3 Page 15	The proposed project will create a gateway with the installation of a roundabout at the intersection of Lyon Avenue and Veteran's Memorial Parkway. This gateway can eventually serve as an access point to the properties directly adjacent to the water. The project will be adjacent to almost 10 acres of city owned open space and provide a direct connection between the development, the adjacent residential neighborhoods, and the East Bay Bike Path.
Enhance entryways to neighborhoods at definable intersections.	Chapter 3 Goal 4, #5 Page 15	The proposed project intends to install a roundabout at the intersection of Veteran's Memorial Parkway and Lyon Avenue providing a gateway from the waterfront into the city.
Balance the needs of automobiles, pedestrians, and bicyclists with wide sidewalks and continuous bicycle and pedestrian routes.	Chapter 3 Goal 4, #7 Page 15	The proposed project intends to install a roundabout at the intersection of Veteran's Memorial Parkway and Lyon Avenue. This will help to appropriately manage existing and future traffic and permit a future connection down to the waterfront. Additionally, the project proposes to connect a system of shared paths within the development to the East Bay Bike Path.
Goal 5. Protect and Enhance the Natural Waterfront Environment		
Protect select natural areas from development and preserve some natural areas for habitat.	Chapter 3 Goal 5, #3 Page 16	The project has already redeveloped a portion of the golf course as a new 9-hole public course. This area is adjacent to Watchemoket Cove. Additionally, almost 10 acres of open space will be donated to the city for permanent protection.
Protect, preserve, and enhance resources that are agreed to be significant to the historical, archeological, and cultural legacy of East Providence	Chapter 3 Goal 5, #7 Page 16	The project proposes to re-energize a portion of the original Metacomet Golf Club that played a significant role in the cultural history of the area dating back to its inception in the 1920s.

Table 4. Waterfront Special Development District Plan Consistency

Citation	Page/Location	Comment
Goal 6. Revitalize Existing Commercial Areas		
Improve and enhance the appearance and function of the commercial corridors in the Project Area.	Chapter 3 Goal 6, #2 Page 15	The proposed project intends to install a roundabout at the intersection of Veteran's Memorial Parkway and Lyon Avenue providing a gateway from the waterfront into the city.
Improve vehicular and pedestrian access to commercial areas and enhance gateway entrances.	Chapter 3 Goal 6, #6 Page 16	The proposed project intends to install a roundabout at the intersection of Veteran's Memorial Parkway and Lyon Avenue providing a gateway from the waterfront into the city.
Goal 7. Protect Existing Residential Land Uses on Roger Williams Avenue and Veterans Memorial Parkway		
Improve the public open space and infrastructure that serve the Project Area's residents.	Chapter 3 Goal 7, #1 Page 17	The project will donate almost 10 acres of open space to the city for permanent protection. The installation of a roundabout at the intersection of Veteran's Memorial Parkway and Lyon Avenue will improve current and future traffic flows as well as future access to properties directly adjacent to the water.
Design transportation improvements and/or modifications with the objective of providing efficient and safer access to major thoroughfares and reducing vehicular traffic short-cuts through residential neighborhoods.	Chapter 3 Goal 7, #5 Page 17	The installation of a roundabout at the intersection of Veteran's Memorial Parkway and Lyon Avenue will improve current and future traffic flows as well as future access to properties directly adjacent to the water. The creation of a gateway at Lyon Avenue will encourage traffic to use the main route to other portions of the city, as opposed to smaller residential streets.

Source: Adapted from the East Providence Waterfront Special Development District Plan, 2003

Veteran's Memorial Parkway

The Waterfront Plan identifies Veteran's Memorial Parkway as a unique and special roadway that historic origins and connections. It is a major corridor that carries regional and local traffic. The Waterfront Plan dedicates significant real estate to outlining critical issues for the Parkway as they relate to development of the waterfront. Those critical issues are summarized in this section along with a summary of how the proposed development is sensitive to those issues and is compatible with the overall Waterfront Plan.

Buffers

The Waterfront Plan identifies buffers as a critical component to preserving the scenic and historic character of the Parkway. The Waterfront Plan identifies the need to require ample natural buffers and vegetative screening on private properties adjoining the Parkway that are developed or redeveloped. The proposed development sets development back a minimum of 100 feet from the Parkway and utilizes that space for landscaping, keeping the area directly abutting the parkway protected green space.

Access, Curb Cuts, Signalization, and Related Roadway Issues

The Waterfront Plan recognizes that redevelopment along the waterfront could negatively impact the Parkway if not properly designed. The Waterfront Plan calls for development that is proportional to the existing roadway function and capacity. Limiting of curb cuts in their size and location is encouraged and signage limited in amount and scale. The Waterfront Plan identifies traffic signalization as not in keeping with the character of the Parkway and that development that warrants either signalization or widening of the Parkway should be prohibited.

The proposed development achieves compliance with these recommended standards through the installation of a roundabout to mitigate traffic impacts from the proposed development. The Waterfront Plan clearly contemplates that in order to realize the full potential of the waterfront district, improvements to the Parkway will be necessary. The Waterfront Plan mitigates these impacts by requiring that the techniques employed be in keeping with the character of the existing roadway and specifically calls out the installation of roundabouts as an acceptable method to do so. The traffic study submitted as part of this project determined that the proposed development will not decrease the level of service and that with the proposed improvements to the Parkway, traffic conditions will remain as they are presently. The installation of a roundabout at Lyon Avenue ensures that they proposed redevelopment along the Parkway is proportional to the existing roadway function and capacity through an approved mitigation technique.

Impacts on the Parkway are further mitigated by placing smaller scale buildings, both in massing and in height, adjacent to the Parkway, with larger buildings located towards the center of the development to minimize the impact on the Parkway and on adjacent residential uses.

Landscaping and Protection of Views

This section of the Waterfront Plan identifies Lyon Avenue as a gateway to the Chevron property. An additional gateway is identified further north of this area at the terminus of Veteran's Memorial Parkway where it is proposed to enter into a roundabout. The installation of a roundabout at Lyon Avenue is clearly in keeping with this strategy.

The Veteran's Memorial Parkway Special Development District

The Waterfront Plan identifies several subdistricts within the overall Waterfront District. One of these is the Veteran's Memorial Parkway Special Development District (Veteran's Memorial Subdistrict). This subdistrict extends from Teofila Braga Way to Watchemoket Cove and includes the subject parcel.

Although this section of the Waterfront Plan does not specifically identify this property for redevelopment within the subdistrict, it does specifically call out that the Lyon Avenue approach (to Veteran's Memorial Parkway) will become a gateway point to the redevelopment of the Chevron/Gulf Oil property. This project proposes to install a roundabout at the intersection of the Parkway and Lyon Avenue, essentially creating that gateway and future access to the direct waterfront area of the Chevron property.

Neighborhood Context

A project of this size must always consider the potential impacts on the immediate neighborhood. There is always the possibility that while a development project may have a positive impact on the city as a whole, it can have negative impacts more locally at the neighborhood level if not properly mitigated. A project of this nature must be considered in the broader context of the zoning ordinance and comprehensive plan, but also with regard to the surrounding neighborhood.

Northeast

To the north of the proposed project the dominating land use is medium density residential development. The two northern boundary lines are flanked by Fort Street and Lyon Avenue. The north side of Fort Street is developed with residential homes that look towards the existing golf course. This dynamic will not change significantly as the portion of the sub-district that faces Fort Street is significantly occupied by the section of the parcel that will be deeded to the City of East Providence for use as open space. The northern section of the parcel that borders Lyon Avenue contains recreation complex known as Pierce Memorial Stadium and contains several recreational play fields, buildings, and associated parking and other amenities. This section of the sub-district is proposed to be developed in the future and it is not anticipated to have any negative impacts on the existing recreation areas as it will be buffered by landscaping and Lyon Avenue.

Southwest

The southern end of the site is bordered by Veteran's Memorial Parkway and Watchemoket Cove. There is not expected to be any negative impacts from the development in this area. The cove will be protected from any future development impacts as the portion of the site that borders the cove will remain in use as a golf course, essentially preserving the existing status. North of that in the area bordering Veteran's Memorial Parkway contains the proposed main entrance to the site. This roadway is a relatively wide two-lane roadway identified in the comprehensive plan as a "major arterial" that experiences consistent traffic volumes. The development proposes to mitigate traffic concerns through the installation of a round about at the intersection of Veterans Memorial Parkway and Lyon Avenue. This will ensure a consistent flow of traffic through this area. There are two additional proposed ingress/egress to the site, which will help ensure that the flow of traffic in and out of the site is dispersed in different directions and locations.

East

The eastern site boundary abuts residential homes and occasional non-residential uses that front on S. Broadway and several other small side streets. This portion of the site is the location of the renovated 9-hole golf course and there is expected to be little to no change or impact to those properties abutting this portion of the site.

West

The area to the west of the site is presently developed as an office park which consists of 15 single story buildings and associated parking. The entrance to this office park is located on Veteran's Memorial Parkway, with a second ingress/egress on Lyon Avenue. The portion of the site that abuts this area is the area of the site where several commercial uses are proposed, including the largest at an 85,000 square foot grocery store. It is not anticipated that the proposed development of this portion of the site will have any impacts on the existing office park. The uses proposed are compatible with the adjacent uses and will likely enhance the convenience of the office park by adding new complimentary uses in such close proximity. Additionally, Lyon Avenue is between the site boundary and the office park property, providing separation between the two.

Based on the assessments above of each of the areas adjacent to the proposed development it is my professional opinion, that the approval of the proposed development will not have a significant impact on the surrounding neighborhood. In some instances, little to no change from the present use will be experienced and in the case of the northeast and west adjacent areas, an improvement will likely be experienced. The properties fronting on Fort Street will enjoy permanently protected open space owned by the city for use by city residents, the adjacent office park will enjoy complimentary uses, and the eastern adjoining properties will experience little to no change from what they currently enjoy. Adjacent to the west side of the site, Veterans Memorial Parkway will benefit from a 100-foot landscaped buffer along the entire length of the property.

Conclusion

The City of East Providence has presented a clear and realistic vision for land development through its zoning ordinance and comprehensive plan. In these documents, the city has laid a foundation with the understanding that circumstances can change, and policies and regulatory tools must be able to adapt to these changes. The current comprehensive plan language establishes an acceptance of the need to change zoning, update regulations, and alter policy direction when new opportunities present themselves, so long as they can be demonstrated to have an overall positive impact on the immediate neighborhood and city as a whole. The Waterfront District was designed and created over 15 years ago to express a clear vision for redevelopment opportunities for the city. Since then, circumstances have changed slightly and the opportunity to add to the vitality of the district, gain donated open space, while maintaining and improving upon one of the city's golf courses presented itself, and the city responded by approving a zone change to add the subject parcel to the Waterfront District. The city's zoning ordinance and comprehensive plan were designed in such a way to allow the flexibility to seize such an opportunity and capitalize on the possibility of increasing the city's tax base and access to open space simultaneously. The zoning and comprehensive plan amendments approved by the city to expanded and improved the Waterfront District. This was done with the intent of realizing increased economic activity, additional open space within the city's ownership and control, needed housing, and the opportunity to provide resident access to a well-known golf facility, all while remaining consistent with the provisions and policies identified in the East Providence Zoning Ordinance, Comprehensive Plan, and Waterfront Special Development District Plan as outlined in this report.

The applicant is now before the Waterfront District Commission with a development proposal to achieve the intent set forth by the city when they approved the zone change and comprehensive plan amendment. They have designed a plan that checks as many boxes as one development can when it comes to being consistent with the overall intent and specific direction set forth in the city's

comprehensive plan. This project will be a focal point in East Providence. Bringing together a mix of uses from residential housing to open space. Commercial and retail amenities will generate a positive tax revenue estimated at \$5.3 million, create around 3,640 full- and part-time jobs during construction, and provide approximately 630 permanent full- and part-time jobs in the first year of stabilized operation in the county. In addition, the project will re-energize a portion of the original golf course, creating a 9-hole course that will be open to the public and the city will realize almost 10 acres of open space.

In conclusion, it is my professional opinion that the proposed development of this site is entirely consistent with the standards set forth in the City of East Providence Zoning Ordinance, Waterfront Special Development District Plan and Comprehensive Plan.