

Appendix-2
Master Plan Report prepared by Nancy E. Letendre, Esq.
Professional Planner and Land Use Consultant

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June 20, 2023

Members of the Planning Commission
Office of Planning and Economic Development
City of East Providence
145 Taunton Avenue
East Providence, RI 02914

RE: Major Land Development Application Master Plan (with Lot Merger)
Assessors Plat 306, Block 1, Lots 12.1, 13 & 14| 330, 350 & 354 Taunton Avenue
applicant: ONE Neighborhood Builders, Developer & Owner; in
collaboration with Crossroads RI, Family Service of RI, & Foster Forward

Dear Commission Members:

My name is Nancy E. Letendre. I am a professional planner, with certification from the American Institute of Certified Planners (AICP) since 2007. As a planning and zoning consultant my practice combines the skills of a professional planner with 20 years of experience as a municipal land-use attorney in the State of Rhode Island. I have been involved in all aspects of the land development, subdivision and zoning approval processes and the writing and implementation of Comprehensive Community Plans and affordable housing production strategies as part of the comprehensive planning process. I am currently the Town Planner and Administrative Officer for the Town of Westerly, Rhode Island. A full resume detailing my experience is enclosed for your information.

INTRODUCTION

I have been engaged by ONE Neighborhood Builders (ONE-NB), to review this land development application for the combination of multi-family rental units and community services. This mix of complementary uses is allowed as-of-right under current zoning district regulations. ONE-NB's mission is to develop affordable housing and engage neighbors across Greater Providence to cultivate healthy, vibrant, and safe communities. ONE-NB is working in collaboration with Crossroads Rhode Island, Family Service of Rhode Island, and Foster Forward to provide 160 units of affordable housing with 6,000 sq.ft. daycare facility and approximately 16,000 sq.ft. of service provider and amenity space, over a 120,886 s.f. parcel.

I have conducted my own research regarding the City of East Providence's Zoning Ordinance and Comprehensive Community Plan and the history of the City's land-use policies

as they relate to the Taunton Avenue commercial corridor. I have made my own observations of the subject property and its environs. I have also participated in the preparation of the application and in the discussions regarding site design as a member of the Planning Team and will continue to do so through the Planning and Zoning approval process.

It is my professional opinion that this development will provide needed affordable housing to the East Providence community. This in accordance with the purpose and intent of the Main Street Taunton Avenue Overlay District and the guidance of the City's Comprehensive Plan.

ZONING RELIEF to be REQUESTED.

This application requires relief of the zoning provision for an increase in the number of stories and the height of the buildings proposed, and an increase in impervious surface. A special use permit is also required for a reduction in the ratio of parking spaces per unit (from 1 per unit to .75 per unit). ONE-NB recognizes that the Planning Commission's Master Plan approval will be conditioned upon receipt of relief and approval from the Zoning Board. Each zoning request is briefly described here.

1. Building height relief | Proposed 4 stories at maximum height of 49'6 "

The subject property is in the Taunton Avenue Overlay District; one of the Neighborhood Center Overlay Districts, described in Sec. 19-322(a)(1) of the zoning code which provides: "All properties located within the Taunton Avenue Overlay District may choose either to develop or redevelop subject to the provisions of [this section] or may choose to develop or redevelop under the current underlying zoning of the property (C-1, C-2, C-3, and (Taunton Avenue) TA)." The property is zoned C-2 and C-3 and in this section "Taunton Avenue" refers to a separate special area district NOT the overlay.

The provisions of 19-322(g) specifically reference "*Dimensional criteria pursuant to section 19-145.*" The relevant portion states: "Development within the Main Street Overlay Districts will be given great flexibility and allowed to pursue the most lenient dimensional standard(s) prescribed in either the C-1, C-2, C-3, [] districts, in accordance with Section(s) 19-145 [], unless the subject Main Street Overlay Districts regulations permit even greater latitude, then they may take precedence." Although flexibility in dimensional requirements is the intent, Section 19-145 establishes the same height limitation for the C-1, C-2 and C-3 districts - 3 stories and 40 feet maximum. The Taunton Avenue Overlay provides no specific alternative height limit, but, yet again, the intent is clear:

"(1) To promote flexibility in the siting and design of new development to allow a mixture of complimentary land uses on a parcel(s) that may include, but not be limited to, commercial, housing, retail, offices, and *personal convenience services to create economic and social vitality* that otherwise might not be possible under conventional zoning regulations that separate land uses.

(2) To provide a desirable mix of land uses, including commercial and residential,

that will serve the community interest in job creation, housing and economic development, including uses related to the (sic) art and culture." 19-145(g).

Based on the special zoning provisions that apply to the parcel, a strict application of the height restrictions is contrary to the public interest and the intent of the Overlay District. The existing building (#350) is roughly 47'-0" tall and 4-stories - exceeding the restriction. The new buildings are both proposed to be 4-stories and roughly 49'6". The intent is to match the size and bulk of the existing building as closely as possible. However, floor-to-floor heights of the existing building, built decades ago, are very low compared to new construction. It is difficult to match the height exactly. A dimensional variance is requested and the architects will provide testimony in support.

The City, having provided multiple options for dimensional requirements, has done so with a purpose. Analyzing siting and design of new development in the context of the commercial corridor rather than mechanically applying dimensional requirements allows for more flexibility in decision making. Flexibility in site design allows a development to go beyond fitting in with the general character of the surrounding area by improving that character as anticipated. Building flexibility in decision making requires that you be receptive to these changes and shift priorities as the need arises. The objective of the Main Street Overlay Districts is not uniform development but mixed-use pedestrian and community friendly development throughout.

2. Parking relief | Reduction in the ratio of parking spaces from 1 per unit to .75 per unit

The proposed development includes 160 units and 16,000 sq.ft. of amenities/services/office space and a 5,500 sq.ft. daycare. Parking requirements are first provided in accordance with Section 19-284 but are reduced in the Main Street (Taunton Avenue) Overlay (19-322) as follows.

- Reuse of existing (16,000 sq.ft) building for amenities/services/office space. Under 19-284, one parking space per 500 sq.ft. of GFA is required. However, 19-322(a)(5) exempts non-residential uses of existing structures from off-street parking requirements. (0 spaces required.)
- Section 19-284 requires six spaces for the daycare center (30 students) and three drop-off spaces for daytime use only. Section 19-322 has no provision to reduce this requirement nor is a "shared parking arrangement" authorized. a dimensional variance for 6 day-time parking spaces and 3 day-time dropoff spaces is requested.
- Section 19-284 of the Zoning Ordinance requires "Two spaces for each household or dwelling unit, plus one (parking) space for each bedroom in excess of two bedrooms" for a multi-family development, for a total of 344 spaces inclusive of ADA. However, Section 19-322(c)(3)b. allows a reduction to 1 parking space per unit, regardless of bedroom count, or 160 spaces. *"Off street parking that fails to meet the referenced one to one ratio, but does not exceed a 25 percent deficiency, or a minimum of .75 spaces per residential unit, may still be permitted by special use permit pursuant to section 19-39."* 160 units at .75 spaces per unit results in a

requirement of 120 spaces.

In compliance with the above, ONE-NB proposes a total of 120 off-street parking spaces for the residential units. The 6 day-time parking spaces and 3 day-time dropoff spaces will be reserved for the daycare and after hours will be available for overnight parking by residents. Returning to the objective of "flexibility in the siting and design of new development" in the Overlay District, expert testimony on "actual parking demand" will support the request for a special use permit and a dimensional variance. Based on the assessment of actual need and the ability to set terms and conditions regarding off-street parking, the actual parking demand is 114 spaces at a ratio of ~ .65 per unit.

Actual Parking Demand based on Tenants				
Partner Organization	Total No. Units	No. Units with autos	% Units with autos	bedroom mix
Foster Forward	20	6	30	Studio & 1
Family Services of RI	20	10	50	2 & 3
Crossroads RI	25	18	75	Studio, 1 & 2
Partners Demand ratio	65	34	> .5 parking ratio	
ONE NB	95	80	89	1, 2 & 3
ONE NB Demand ratio	95	80	~ .8 parking ratio	
Total Demand Ratio	160	114	~ .65 per unit	

3. Impervious surface relief | Exceed the impervious surface requirement by 3.7%. The amount of impervious surface within the new parcel is designed at 83.7%. This figure exceeds the limitation of 80% but is considerably less than the current condition. An additional reduction in parking spaces would allow for more landscape areas and perhaps full compliance with this standard.

CONSISTENCY with PURPOSES of ZONING

In 2016, the City adopted a "Main Street" Overlay District for the Taunton Avenue Main Street corridor with the intent of opening opportunities for mixed land uses in the area. The overlay district allows for flexible development with higher density (such as the proposed multifamily and mixed-use buildings) by expanding allowable uses, reducing onsite parking requirements, and offering more lenient dimensional requirements to accommodate more residential units.

This redevelopment is clearly consistent with the purposes of Zoning (Section 19-2) and will implement the purposes of the Main Street and Neighborhood Center Overlay Districts. Section 19-322(e)7(f).

- The proposed mix of uses - multi-family residential, daycare and other social and medical services - will create a strong and active community center for the families served, bring jobs to the area, needed housing, and economic development that is vital to the City.
- Flexibility in the siting and design of the development, and understanding of the actual needs of the residents versus generally applicable zoning provisions, make this redevelopment possible.
 - The applicant will provide testimony regarding the physical requirements of the mixed-use development describing actual parking demands and minimizing the amount of land needed for surface parking.
 - Expert testimony will also show that vehicular and pedestrian traffic within the site and in relation to Taunton Avenue and Edmund Street will be safe and convenient.
 - And all utilities, infrastructure, walkways and other improvements will satisfy the City's standards.
- The use of innovative development regulations and techniques, described as flexible and consistent with local character in the Main Street Overlay District, provides this opportunity for needed low- and moderate-income housing.
- This report and my testimony will discuss the proposed redevelopment's consistency with the goals of the City Comprehensive Plan.

COMPREHENSIVE PLAN CONSISTENCY

This multi-family, mixed-use application requires a discussion of the proposed development's consistency with the Comprehensive Community Plan and affordable housing production plan. In redevelopment of this parcel, meeting the purposes and intent of the Comprehensive Plan means:

Meeting the Objectives (Pg5.):

- Land Use - "Preserve the character of existing "downtown" type commercial corridors, e.g. Taunton Avenue, [] utilizing build-to lines and locating off-street parking to the rear of structures."
- Housing - "Continue to provide affordable housing units for low- and moderate-income households in order to ensure safe, decent, and affordable housing to families, seniors, and people with special needs."
- Sustainability - "Promote the retrofitting of buildings and new construction to include "green" building standards resulting in structures that are energy and resource efficient."

The East Providence City Council adopted the current Comprehensive Plan in January of 2010. Although that document is no longer recognized by the State, it provides significant guidance in the application of the Main Street (Taunton Avenue) Overlay District. Although the 2010 version of the Future Land Use Map designates this area a Commercial, the recent history of land-use policy in East Providence points to a different future for this section of Taunton Avenue - a future district designation of Mixed Use.¹

Taunton Avenue revitalization has been a topic of City consideration for almost 20 years and this history is reflected in the Comprehensive Plan. The first study was contracted by the City in 2003. Implementation of the resulting 2004 Taunton Avenue Revitalization Plan (completed by Gates, Leighton in partnership with Vanasse, Hangen and Brustlin Inc.) included improvement in the appearance of the street, with new street signs, planters, trash receptacles and benches for pedestrian and transit user comfort.

In 2007, technical assistance was also provided by the Urban Land Institute. The results of the collaboration provided a report on the opportunities and recommended strategies for the redevelopment challenge of the Bomes Theatre and the Taunton Avenue corridor. Specific recommendations were:

- ★ Re-invent "the Avenue". - slow down traffic to encourage people to stop.
- ★ "Capture the Commuters" - Bus Route 33 and biking draw interest to the area

¹ An early draft of the current update to the 2010 Comprehensive Plan, does in fact label Taunton Avenue properties as Mixed Use. "Mixed Use areas have businesses, diverse housing types, public spaces, and civic institutions situated together, either in the same building or next to each other. The character may vary from location to location, but overall, these areas resemble "traditional neighborhood design" where development is compact and pedestrian-oriented, offers amenities for biking safely, and supports access to public transportation." Revisions to the 2010 Plan continue to encourage mixed use development that supports traditional "Main Streets" with diverse housing options.

- ★ Repopulate the service base. Attract small businesses that offer amenities and services to residents.
- ★ Continue the existing streetscape improvement program.
- ★ “Densify” both residential and commercial for critical mass.
- ★ Review the regulatory environment.
- ★ Create an “overlay” district for the Taunton Avenue Corridor to add residential uses.
- ★ Explore Institutional uses for the Bomes Theatre site.
- ★ Determine strategic public investment to leverage/drive private investment.

Recognizing that “Residents = Consumers”, ULI suggested “[i]ncentives for residential development will help bring in customers for local business; and “[e]nlivened streets bring a sense of safety and vivacity that will increase pedestrian traffic...”.

Circulation and image are the two main issues identified in the 2010 Comprehensive Plan as affecting the Taunton Avenue commercial corridor. The 2010 Plan describes impeded traffic flow along Taunton Avenue because of the many driveway access points and local street crossings; and trucks, buses and heavy commercial vehicles adding to the volume of traffic that pose problems in relation to noise, perception of safety for pedestrians, and wear and tear on the road. The Taunton Avenue corridor also lacks an appealing visual identity. Vacant buildings, empty lots, numerous driveway accesses, and the need for additional street beautification are affecting this image.

The following Goals and objectives of the 2010 Comprehensive Plan are advanced through this redevelopment on Taunton Avenue.

LAND USE

Goal 1.0: 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.

Objective 1.4 Preserve the existing scale and character of developed areas of the community.

Goal 3.0: Continue to improve the image of the City's existing commercial development.

Objective 3.5: Continue to encourage a mix of land uses throughout the City.

HOUSING

Vision Statement - Ensure a diversity of housing that provides residents with a range of decent, safe, and affordable choices while maintaining the existing housing stock and increasing housing

opportunities for the low to moderate income, senior citizens, and those with special needs." Pg93

Goal 1.0: Ensure that a diversity of housing exists in the city providing residents with a range of decent, safe, and affordable choices.

Objective 1.1 Continue to coordinate with federal, state, local, and non-profit housing organizations to encourage low to moderate income housing opportunities for the elderly, families, and persons with special needs. Pg 97

Goal 2.0: Increase the supply of affordable housing for the various household income groups in the City.

Objective 2.1: Continue to coordinate with non-profit affordable housing developers, state and federal agencies, and the East Providence Housing Authority for the development of additional affordable housing units.

Objective 2.2: Encourage and provide incentives to developers to increase the number of affordable housing units. Pg97

REQUIRED FINDINGS TO GRANT APPROVAL

To approve Major Land Development, the Planning Board is required to affirmatively determine that several standards have been met. These findings are discussed here.

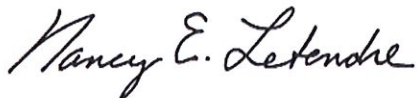
- (1) The proposed development is consistent with the local comprehensive community plan. As described. In addition, the units provided will help address the LMI supply needed for households of low- to moderate-income.
- (2) The proposed development follows the standards and provisions of the municipality's zoning ordinance and subdivision regulations, except where expressly defined. Master Plan approval will be conditioned on receipt of a dimensional variance (height extension of 6'x9" and impervious surface extension of 3.7%) and a special use permit and dimensional variance (parking reduction) from the East Providence Zoning Board, before returning for Preliminary Plan review.
- (3) No negative environmental impacts from the proposed development have been identified and with all required conditions for approval, the development will pose no future risk of negative environmental impact.
- (4) The merger of three (3) lots will be accomplished through an administrative subdivision at the time of Final Plan submission. The resulting lot will have no physical constraints to development that construction according to pertinent regulations and building standards would be impracticable.

(5) All users of the redevelopment will have adequate and permanent physical access to two (2) public streets, namely Taunton Avenue and Edmund Street in accordance with the requirements of RIGL § 45-23-60(5).

CONCLUSION

Based on the foregoing discussion regarding zoning and comprehensive plan consistency, it is my professional opinion that the proposed ONE-NB redevelopment is consistent with the City of East Providence's comprehensive community plan. Further, I am of the opinion that the proposed redevelopment on Taunton Avenue will advance the City's effort to address the state and local need for low and moderate income housing.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Nancy E. Letendre".

Nancy E. Letendre, Esq. AICP

Attachment: Resume of Nancy E. Letendre, Esq., AICP

Appendix-3
Abutter's List and 200' Radius Map

MAP-BLOCK-PARCEL	PROPERTY ADDRESS	OWNERS NAME
305-15-001.00	40 IRVING AVE	UNITED METHODIST HEALTH CARE CENTER
305-15-001.10	30 ALEXANDER AVE	UNITED METHODIST HEALTH CARE CENTER
306-01-003.00	738-750 N BROADWAY	EIGHTEEN SAC SELF-STORAGE CORP
306-01-005.00	0 EDMUND ST	EDMUND LLC
306-01-006.00	22 EDMUND ST	EDMUND LLC
306-01-007.00	36-38 EDMUND ST	EDMUND LLC
306-01-008.00	50 EDMUND ST	EDMUND LLC
306-01-008.10	60 EDMUND ST	EDMUND LLC
306-01-010.00	314 TAUNTON AVE	EAST PROVIDENCE RENALTY ASSOCIATES LLC
306-01-011.00	320 TAUNTON AVE	EDMUND LLC
306-01-012.00	328 TAUNTON AVE	HOLY ROSARY BAND SOCIETY
306-01-012.10	330 TAUNTON AVE	OLNEYVILLE HOUSING CORP
306-01-013.00	350 TAUNTON AVE	OLNEYVILLE HOUSING CORP
306-01-014.00	354 TAUNTON AVE	OLNEYVILLE HOUSING CORP
306-01-016.00	360-362 TAUNTON AVE	CARRABASETT HOLDINGS LLC
306-01-016.10	0 IRVING AVE	435 WEST AVENUE LLC
306-01-016.20	0 IRVING AVE	435 WEST AVENUE LLC
306-01-016-30	0 TAUNTON AVE	RUGGIERO, JOSEPH
306-02-001.00	378-380 TAUNTON AVE	JRM HOLDINGS LLC
306-04-002.00	325 TAUNTON AVE	ADVANCE STORES COMPANY INCORPORATED
306-04-005.00	330 WATERMAN AVE	CARRABASETT HOLDINGS LLC
306-04-006.00	353 TAUNTON AVE	353 TAUNTON LLC
306-04-007.00	345 TAUNTON AVE	RAYE REALTY LLC
306-04-008.00	335 TAUNTON AVE	GCVR HOLDINGS LLC
306-05-003.00	21 CARLTON AVE	ROSE, AVELINO J-TR
306-05-004.00	373 TAUNTON AVE	373 TAUNTON LLC
306-05-005.00	0 TAUNTON AVE	373 TAUNTON LLC
306-05-006.00	6 CORA AVE	KRASNIANSKI, SETH J
306-05-007.00	10-12 CORA AVE	CORA STOWE AVENUE REALTY INVESTMENTS LLC
306-06-007.00	377 TAUNTON AVE	NDS REALTY LLC

OWNER ADDRESS	OWNER CITY	OWNER STATE	OWNER ZIP CODE
40 IRVING AVE	EAST PROVIDENCE	RI	02914
40 IRVING AVE	EAST PROVIDENCE	RI	02914
207 E CLARENDON	PHOENIX	AZ	85012
435 NARRAGANSETT PARK DR	PAWTUCKET	RI	02861
435 NARRAGANSETT PARK DR	PAWTUCKET	RI	02861
435 NARRAGANSETT PARK DR	PAWTUCKET	RI	02861
435 NARRAGANSETT PARK DR	PAWTUCKET	RI	02861
60 EDMUND ST	EAST PROVIDENCE	RI	02914
314 TAUNTON AVE	East Providence	RI	02914
435 NARRAGANSETT PARK DR	PAWTUCKET	RI	02861
19 GANO STREET	PROVIDENCE	RI	02906
66 CHAFFEE STREET	PROVIDENCE	RI	02909
66 CHAFFEE STREET	PROVIDENCE	RI	02909
66 CHAFFEE STREET	PROVIDENCE	RI	02909
1080 MAIN ST	PAWTUCKET	RI	02860
1080 MAIN ST	PAWTUCKET	RI	02860
1080 MAIN ST	PAWTUCKET	RI	02860
115 NAYATT RD	BARRINGTON	RI	02806
380 TAUNTON AVE	E PROVIDENCE	RI	02914
PO BOX 2440	SPOKANE	WA	99210
1080 MAIN ST	PAWTUCKET	RI	02860
258 WINTHROP ST	REHOBOTH	MA	02769
345 TAUNTON AVE	E PROVIDENCE	RI	02914
335 TAUNTON AVE	E PROVIDENCE	RI	02914
21 CARLTON AVE	EAST PROVIDENCE	RI	02914
373 TAUNTON AVE	EAST PROVIDENCE	RI	02914
373 TAUNTON AVE	EAST PROVIDENCE	RI	02914
6 CORA AVE	East Providence	RI	02914
276 PROVIDENCE ST	REHOBOTH	MA	02769
377 TAUNTON AVE	E PROVIDENCE	RI	02914