

City Planning Department



Memo –

To: Cranston City Plan Commission
From: City Planning Department
Date: November 25, 2020
Re: **Ordinance #7-20-04** – Change of Zone – 1000 New London Ave – “Cranston Crossing”

Staff is still receiving supplemental documents and comments. This memo is staff's best effort to summarize our review of the ordinance proposal as of 11.25.20. It is anticipated that staff may have to provide additional information after the December 1 meeting based on discussion, testimony and/or new information.

I. INTRODUCTION

Pursuant to City Code Section 17.100 *MPD Mixed Use Planned Districts*, the Ordinance #7-20-04 is a major amendment to the existing Mixed Use Plan District (MPD) at 1000 New London Avenue, AP 15-1, Lots 8 & 9, where Mulligan's Island Golf & Entertainment is currently located. The proposal has been amended from its original version to exclude the State Land, AP 15-4 Lot 1706, and to remove the residential component. The applicant is Coastal Partners, LLC, represented by Managing Partner Michael DiGiuseppe.

Application documents and comments on this application are available [here](#).

The ordinance seeks zoning approval for the Overall Development Plan (ODP), which proposes:

1. A large-scale retail facility (Costco) and associated gas/fueling station;
2. A new signalized intersection on New London Ave located across from but not connecting to Brayton Ave;
3. Three “commercial/retail/restaurant” uses near the proposed site entrances along New London Avenue (Route 2) and Howard Avenue;
4. A C-4 zoning designation for a 2.46- acre lot identified as ‘Parcel 3’ on the ODP;
5. The onsite relocation of an existing communications tower to “Parcel 5” on the ODP;
6. The onsite relocation of an existing historic cemetery to “Parcel 4” on the ODP;
7. An 18-acre land dedication of “Parcel 4” on the ODP to the City;
8. A 3.28-acre of “Parcel 1” on the ODP to be designated as open space; and
9. A minimum 50' buffer abutting all abutting residentially zoned properties.

There was a pre-application conference held on June 30, 2020, and a public site-walk / joint City Plan Commission & City Council meeting held on site on August 11, 2020. The Planning Department's memo following the pre-app conference and the meeting minutes for the site-walk / meeting are also available at [this link](#).

Notice of the ordinance was published according to legal requirements. The ordinance request has been continued multiple times since its original docketed position on the September Plan Commission agenda at the request/consent of the applicant.

II. EXECUTIVE SUMMARY

Ordinance #7-20-04 is a complex application, with numerous parts and issues to be carefully addressed and analyzed.

First, staff will provide some context and general framework to adequately evaluate the proposal by outlining the process and zoning issues germane to the application in the section titled "*Ordinance Process and Zoning Framework.*"

Then, in order to stay organized and concise, staff will then break down the proposal into each of the proposed five (5) individual parcels, while identifying key items for discussion related specifically each in the section titled "Analysis by Parcel."

Once each parcel has been outlined and discussed, staff will touch on some of the larger issues which apply to the proposal as a whole in the section titled "Analysis by Topic."

Staff is *NOT* going to provide a recommendation in this memo. Due to the complex nature of the proposal, the ongoing review of traffic impacts, and the sheer amount of materials, public comment and testimony that are to be considered, **staff recommends that the Plan Commission, at the consent of the applicant, *CONTINUE* the matter to a date certain** to allow for adequate time to review, consider, and discuss all of the relevant information. This will alleviate any pressure to rush a recommendation and will allow opportunity for the Plan Commission to request further information from staff and/or the applicant. Staff anticipates that it can provide the crux of its analysis at the second meeting, leaving as much space as possible for the applicant and public at the December 1 meeting.

III. ORDINANCE PROCESS AND ZONING FRAMEWORK

A. PROCESS

Staff wants to emphasize that the proposal is NOT a Major Land Development (MLD) application, it is a MPD Ordinance application pursuant to City Code Section 17.100 *MPD Mixed Use Planned Districts*, or in other words, it is seeking approval of the *zone change* connected to an overall development plan, but does not have the detail or required findings that a MLD application entails. There are distinct findings for the MPD detailed in the following section.

B. ZONING

The subject site is designated as a Mixed Use Planned District (MPD) zone. City Code defines this district as "*a development undertaken by a single owner or group of owners and planned as a single entity, within which uses shall be multiple in nature and may include uses not otherwise permitted within the same zoning district. The mix and orientation of these uses are required to be compatible within the proposed development and also in relationship to the surrounding area.*" The proposed uses are compatible within the proposed development now that the single-family residential component has been revised to become open space. The important question that remains is whether the uses are in relationship to the surrounding area. Staff will analyze this issue under the "Land Use Compatibility" section on page 14.

ZONING MAP



This map/data/geospatial product is not the product of a Professional Land Survey. It was created for general reference, informational, planning and guidance use and is not a legally authoritative source as to location of natural or manmade features. Proper interpretation of this data may require the assistance of appropriate professional services. The City of Cranston makes no warranty, expressed or implied related to the spatial accuracy, reliability, completeness or currentness of this map/data.



City of Cranston

Beyond merely meeting the definition of MPD, the proposal must demonstrate that it meets the requirements for planned districts as prescribed in Code Section 17.96.070:

All planned district proposals shall demonstrate that there is a general public benefit to be gained by deviation from the requirements of the existing zoning classification. These benefits may include but are not limited to:

- A. *Preservation of unique or sensitive natural areas or significant historic sites;*
- B. *Preservation of architecturally significant buildings;*
- C. *Ecologically sensitive building orientation, utility placement, roadway pattern and/or construction methods.*

Should the city council, in reviewing an MPD or the planning commission in reviewing an RPD, conclude no general public benefit is to be gained in approving a particular application, they may reject said proposal.

Furthermore, Section 17.120.030 requires the review by the Plan Commission. This section specifically requires:

Among its findings and recommendation to the city council with respect to a proposal for adoption, amendment or repeal of a zoning ordinance or zoning map, the planning commission shall:

- A. *Include a statement on the general consistency of the proposal with the comprehensive plan of the city, including the goals and policies statement, the implementation program and all other applicable elements of the comprehensive plan; and*
- B. *Include a demonstration of recognition and consideration of each of the applicable purposes of zoning as presented in [Section 17.04.010](#) of this title.*

This memo seeks to assist in evaluating the application based on the codified requirements.

Staff has noted that public concern that the proposal is inconsistent with zoning, or at least inconsistent with the *current* approved MPD. The applicant is seeking permission to amend exactly that - the current MPD ordinance. If the proposal was consistent with the existing approved MPD zone, it would not require a zoning application. Issues such as frontage, setbacks, lot coverage and parking (among others) shall be established in the Final Overall Development Plan (FODP).

The intent of the MPD is to provide a vehicle for proposals which seek a combination of uses that are not allowed under the standard zoning districts, and it could therefore be brought into question whether the proposal is a true MPD application. The crux of the argument is that the C-4 designation would allow for all of the proposed uses (except for the open space which should be S-1), and therefore the request should be specifically that, including a Comprehensive Plan amendment to change the Future Land Use allocation from "MPD" to "Highway Commercial/Services." Staff does not disagree with the argument that there could be a more precise vehicle for the application, however, this does NOT invalidate the application nor does it necessarily provide grounds to deny the application. There are other MPDs that have been approved in Cranston which are guilty of the same criticism, for example, Brewery Parkade. Applicants often take the path of least resistance, for example, the City has entertained use variance applications where a rezone to allow such use may have been the preferred vehicle for the request. The city is obligated by law to entertain the request and either approve or deny it based on the criteria allocated to that vehicle.

III. PROPOSAL ANALYSIS BY PARCEL

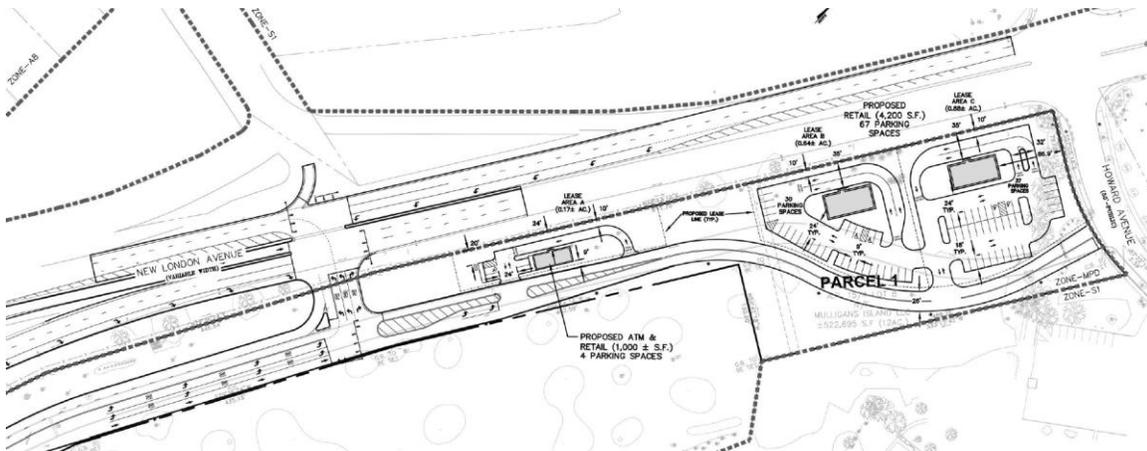
A. PARCEL 1 (ENTRANCE ROADS, 3 DRIVE-IN RESTAURANTS, ATM & RETAIL & OPEN SPACE)

Proposed Parcel 1 constitutes the land fronting on Howard Avenue and New London Avenue, abutting the State Land, and extending along the proposed private road all the way where the width opens up to 3.28-acre open space area as seen on the site plan zoom-ins below.

Although the new roads will largely be on Parcel 1, traffic will be discussed on page 18 of this memo. The analysis of the compatibility of the land uses is addressed separately, beginning on page 14 of this memo.

There are three (3) proposed commercial/retail/restaurant uses, at least one of which has been identified as a fast food establishment with drive thru service, and another is identified as “ATM & Retail.”

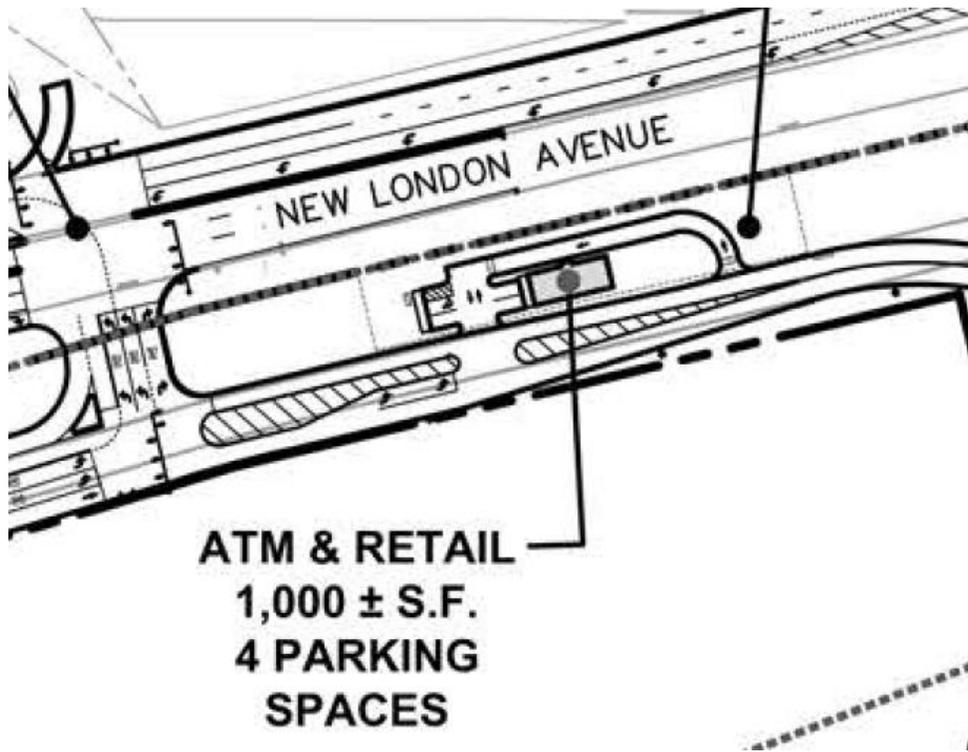
SITE PLAN ZOOM-IN OF PARCEL 1 COMMERCIAL AREA (SHEET C-203)



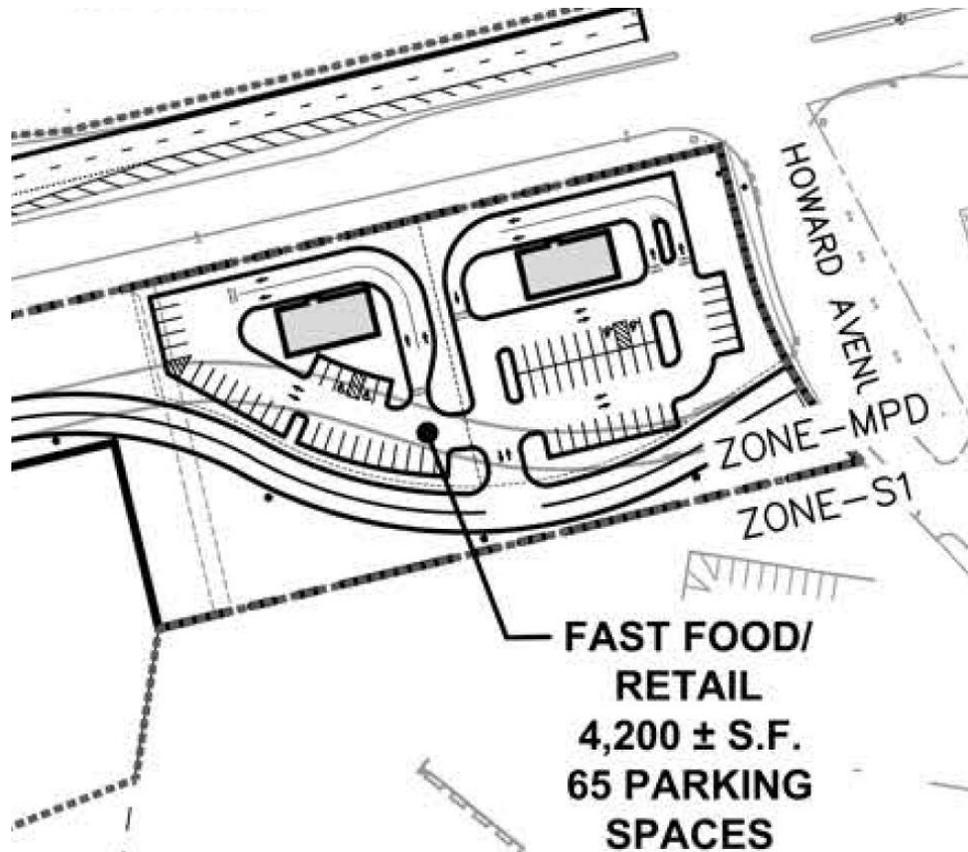
The site plan labels the business closest to the intersection on New London Ave as “ATM & Retail.” The plan indicates that the building will be 1,000+/- ft² with four (4) parking spaces and appears to have a drive thru. The specific details of this portion of the development would be handled at the Major Land Development (MLD) preliminary plan phase in concert with the Development Plan Review Committee (DPRC), however, so staff will not yet dive too deeply into review of the layout. It’s only concern at this point is that there is no bypass lane in the proposed drive-thru lane due to the slender amount of land area for this use at this location.

The other two proposed uses at the corner of Howard Avenue and New London Avenue labelled as “Fast Food/Retail” combine for a total of 4,200 ft² and 65 parking spaces. As stated for the “ATM & Retail” use discussed above, the two uses will also be reviewed in detail at the MLD master & preliminary plan phases in concert with the Development Plan Review Committee (DPRC). Each use shows drive-thru infrastructure.

COMMERCIAL USE ZOOM-IN (SHEET C-203)

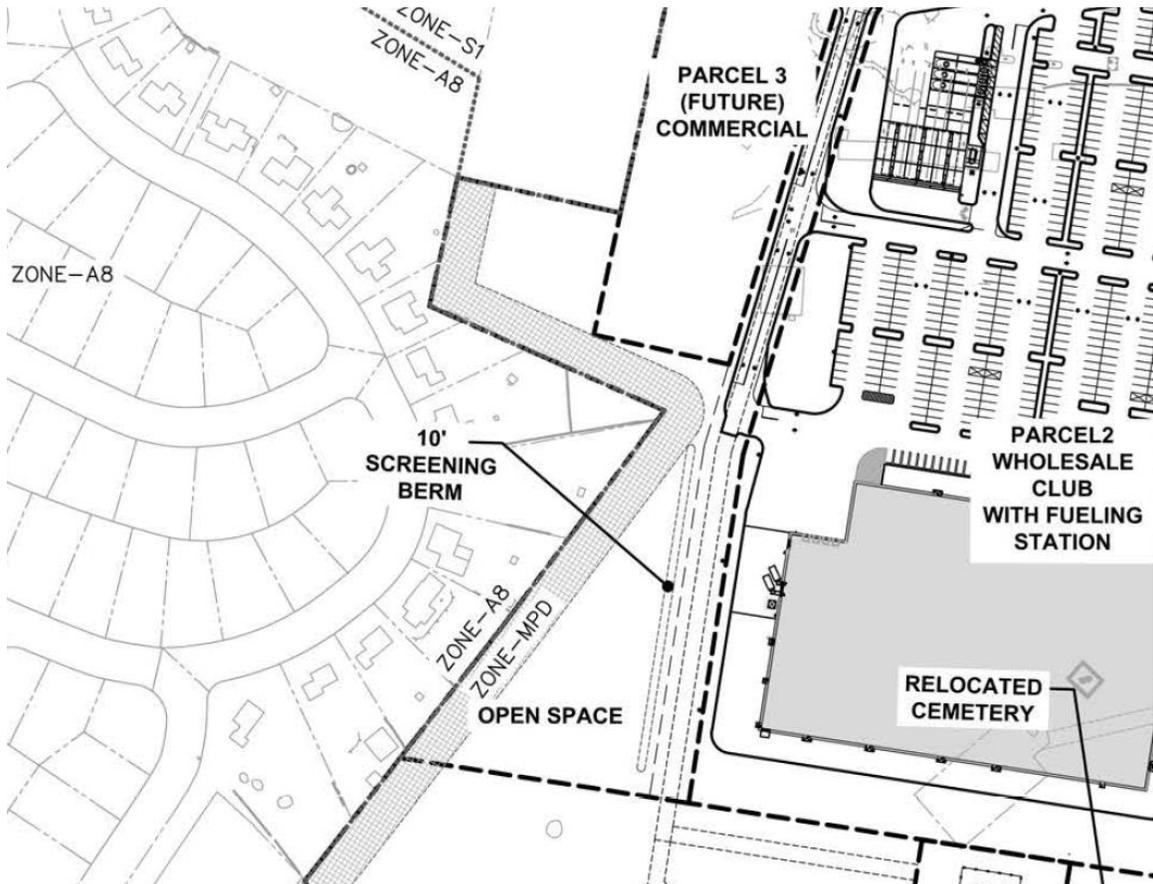


COMMERCIAL USES ZOOM-IN (SHEET C-203)



A 3.28-acre portion of the site has been designated as open space in an effort to provide a buffer between the Costco development and nearby residential properties as shown on the following page. There is a 10' screening berm proposed adjacent to the southern side of the Costco building, which is in addition to the 50' buffer proposed adjacent to the residential properties to the south. Further information has not been submitted about the berm or landscaping plans, this information would be reviewed in detail as part of the MLD and DPRC processes.

OPEN SPACE AREA (SHEET C-101)



B. PARCEL 2 (COSTCO AND GAS STATION)

The major component of the MPD proposal is the Costco wholesale club facility and associated gas station. The Costco building would be 163,763 ft² and would not exceed 35' in height.

The **hours of operation** for the Costco and associated gas station are as follows, which staff finds to be modest in comparison to other establishments:

Main Store	
Monday – Friday	10:00 AM – 8:30 PM
Saturday	9:30 AM – 6:00PM
Sunday	10:00 AM – 6:00 PM
Gas Station	
Monday – Friday	6:00 AM – 9:00 PM
Saturday	7:00 AM – 8:00PM
Sunday	7:00 AM – 7:00 PM

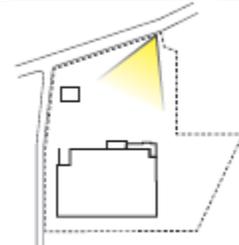
COSTCO RENDERING



The applicant has stated that Costco's **trash compactors/dumpsters are all interior to the building**, therefore any noise, odor or rodent issues relating to trash should be mitigated. This information can be found by clicking the "Noise" link on [this webpage](#).

The applicant is requesting 747 parking spaces for the Costco, which is the equivalent of 1 space per 219 ft² of floor area. City Code requires 1 space for every 200 ft² of gross floor area, which would be 819 spaces. Staff is comfortable with Costco's assessment of their own parking needs, and is encouraged that their calculation is not in excess of what the City would require.

PARKING LOT RENDERING



The applicant provided additional information regarding Costco's policies regarding noise from delivery trucks and rooftop units, which is available by clicking the "Noise" link on [this webpage](#). The document states that trucks do not remain idle but are shut off for loading/unloading, and that rooftop units are shielded and will not emit noise beyond the building footprint.

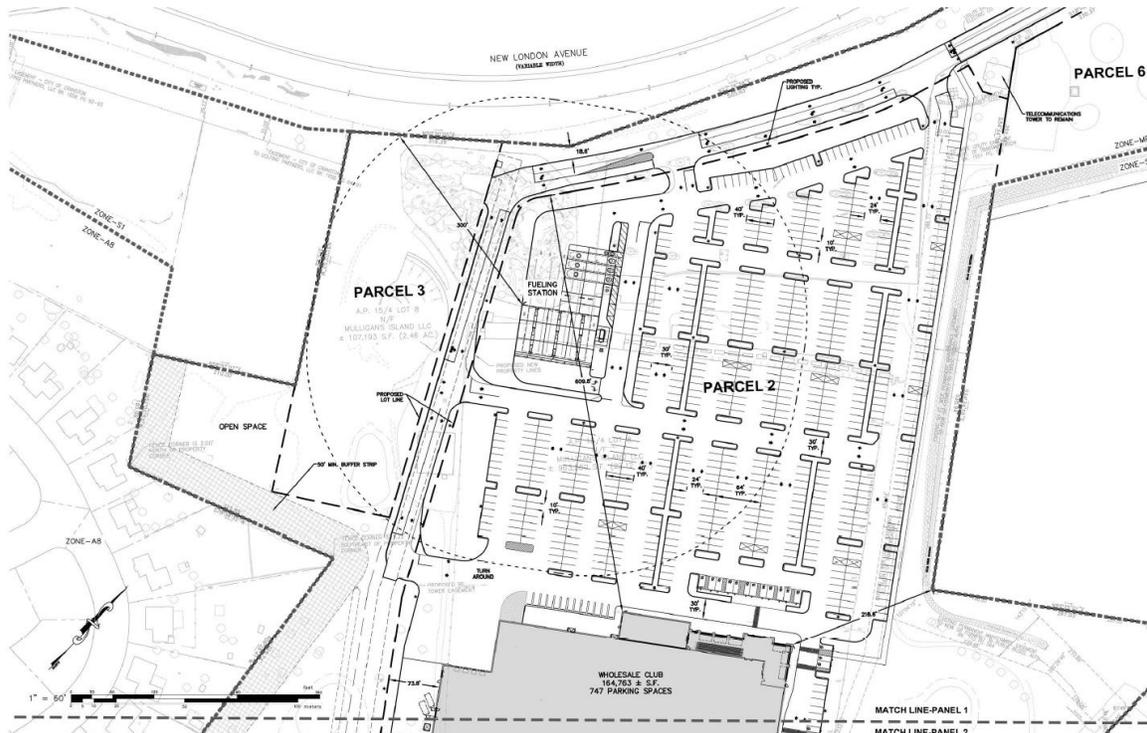
Staff recommended that the loading area be relocated to the other side of the Costco to mitigate any potential for issues with the residential uses. The applicant did *not* amend the proposal to accommodate staff's request.

The applicant provided technical information regarding Costco's Fueling Facility Program, which is available by clicking the "Gas" link on [this webpage](#). Notable information includes but is not limited to vapor recovery air pollution control equipment and standards for sealing control joints to prevent leakage/spills.

The applicant claimed that the proposed fuel tanks are setback **610'** from the nearest *residence*. Staff contacted the applicant to clarify the exact location of the tanks and to make sure that the measurement is calculated consistent with City Code Section 8.08.041 *Flammable or Explosive Storage Tanks*, which states that the setback is to be measured from the tanks *to the residential property*, not the residence itself. The applicant worked with staff to recalculate the dimension according to the codified standard, and it has been determined that the tanks are roughly **530'** from the nearest residential property line. Although this is 80' less than previously thought, it is 230' in excess of the 300' minimum.

Considering the large amount of land area of the project site, staff had recommended that the applicant relocate the gas station to be as far away from the residential neighborhood as possible. Staff wants to be clear that this was corresponded as a recommendation, not a requirement, as the distance of the tanks exceeds the codified 300' minimum. The applicant did *not* amend the proposal to accommodate staff's request.

SITE PLAN EXCERPT FROM SHEET C-201



GAS STATION RENDERING



C. PARCEL 3 (FUTURE C-4 COMMERCIAL)

The ordinance proposal includes a request for C-4 zoning for “Future Commercial” development. Staff is concerned with the lack of information regarding Parcel 3. As currently proposed, the applicant seeks permission for all permitted uses under C-4 zoning for this particular portion of the site. There are uses allowed in C-4 (C-4 (night club, car wash/detailing, etc.) that could be potentially incompatible with the nearby residential community. Considering the proximity of Parcel 3 to residential properties (50’ at its closest point), and due to staff’s opinion that the lack of detail undermines the MPD process via omission of Overall District Plan Contents required in Code Section 17.100.040.B., staff recommended that the applicant revise the plan to either propose open space for this parcel, or alternatively, to amend the application to include plans at a similar level of detail as that for the Costco, gas station and restaurants along New London Avenue. The applicant has chosen not to comply with staff’s recommendation.

PARCEL # ZOOM-IN (SHEET 103)



D. PARCEL 4 (OPEN SPACE GIFT TO THE CITY)

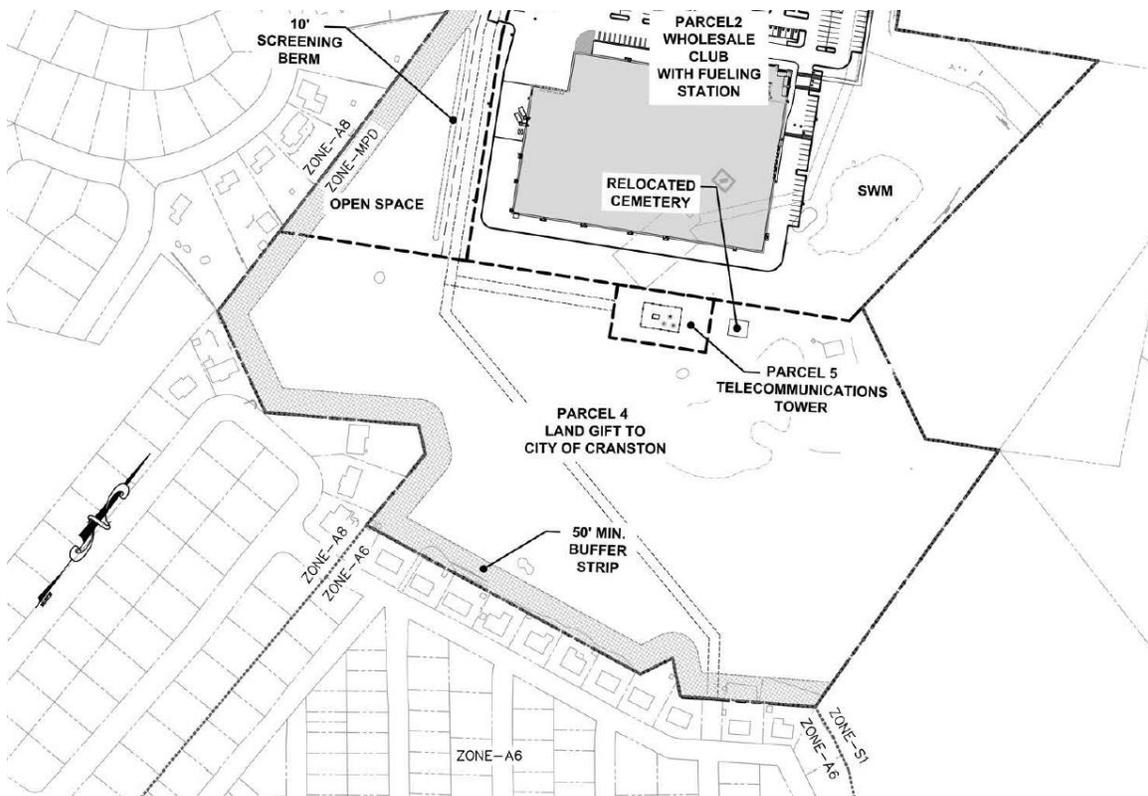
The original proposal included a future single-family subdivision in this area of the site. Staff (and others) had made the recommendation to remove the site. Staff's basis for this recommendation was that the proposed mix of uses were incompatible. The applicant has complied with this request and is now offering Parcel 4 as an 18-acre gift to the City. This change eliminated a fatal flaw of the original proposal, and now offers a significant benefit to the City in terms of environmental preservation/conservation as well as providing a buffer to the residents to the east and southeast. There is a 50' proposed buffer adjacent to the residential property lines, so details of the landscaping and maintenance would have to be vetted before the land transfer could be approved.

This gift, and the designation of the open space portion of Parcel 1 just south of the Costco building, would result in 40% of the land area of the project being undeveloped. To offer a measuring stick, the City Code generally requires commercial developments to have 15% of the site's land area as landscaping and does not require any other space to be designated as open space.

The historic cemetery currently located on Parcel 2 is proposed to be relocated to Parcel 4, just north of the proposed relocated cell tower. The relocation of the historic cemetery is discussed separately on page 13.

It's still early in the overall process for the potential land transfer, but details such as site access and maintenance of the 50' buffer associated to the Costco project will have to be sorted out.

PARCEL 4 (SHEET C-101)

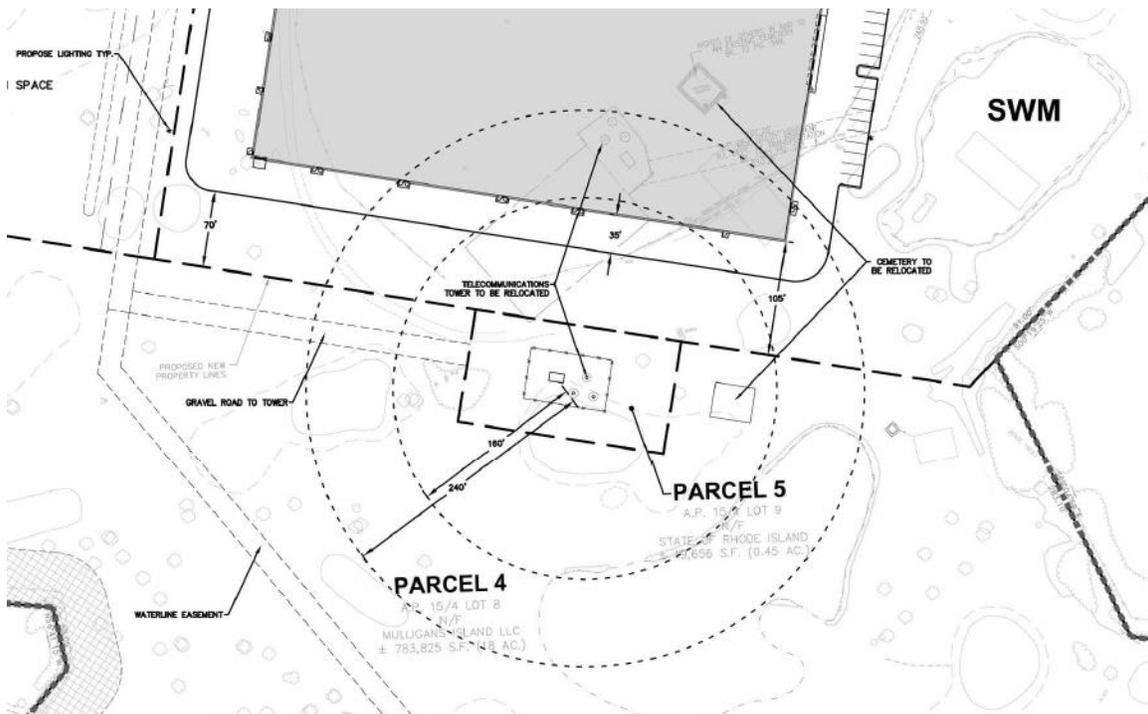


E. PARCEL 5 (TELECOMMUNICATIONS TOWER)

Two (2) telecommunications towers exist on the site. As depicted on the site plan, one (1) such tower will be relocated to Parcel 5, and one (1) such tower will remain in its current location. The tower that is being relocated will be subject to applicable performance standards within Zoning Code Sec 17.76 "TELECOMMUNICATIONS FACILITIES" to ensure the tower will be built in a safe and efficient manner. It is assumed that all standards from this section of code will remain in effect unless the applicant proposes specific alternative standards in their proposed MPD ordinance narrative. Of note, the applicant's ordinance states: "Frontage and setback requirements shall be as set forth on the FODP." With specific regard to the new cell tower location, which is proposed to be approximately 38 feet from the property line of Parcel 5, there is a notable difference between the proposed setback distance on the FODP (38 feet) and the setback distance that would normally be required per Sec 17.76 (160 feet – equivalent to the height of the tower). From planning staff perspective, the applicant's ordinance narrative does allow for a reduced setback of 38 feet as it relates to the proposed cell towers relocation on this site, however this item may require further consideration by city officials and legal staff to ensure consistency with the safety-related protections intended in Sec 17.76.

Based on planning staff review, it appears the applicant does not need to meet the minimum separation distance to other cell towers in the City per Sec 17.76.010(C)(3)(n). However, it is unclear if the act of relocating a cell tower will require a subsequent Special Use Permit application to the Cranston Zoning Board of Review. Should the MPD ordinance petition be approved, it will be up to the determination of the City Building Official during the Major Land Development process to establish the required permitting path for the cell tower relocation component of the project. Such a permit would likely be subject to one or more licenses from the Federal Communications Commission (FCC) and may require review by the Rhode Island Historical Preservation and Heritage Commission (RIHPHC) and federally-recognized Native American tribes in accordance with Section 106 of the National Historic Preservation Act.

SITE PLAN EXCERPT FROM SHEET C-202



IV. ANALYSIS BY TOPIC

A. HISTORIC CEMETERY RELOCATION

The applicant has proposed to relocate an existing historic cemetery (Cranston Historical Cemetery # 058) on the property due to a conflict with the planned location of the Cosco retail building. The cemetery would be relocated to Parcel 4, which is the portion of land proposed as a gift to the City of Cranston. The City has received public comments on this matter from the Cranston Historical Cemeteries Commission (CHCC), the Rhode Island Advisory Commission on Historical Cemeteries (RIACHC), and the Rhode Island Historical Preservation and Heritage Commission (RIHPHC). The entirety of these comments is provided on the City website, along with all other application materials, and are briefly summarized below:

- CHCC opposes relocating the cemetery based on new correspondence submitted to the City on 11/25/2020. This is a change from its initial correspondence dated 7/17/2020 in which the CHCC did not oppose the relocation.
- RIACHC opposes relocating the cemetery but if the City chooses to move forward they recommend the cemetery be kept in close proximity to current location on the property.
- RIHPHC opposes relocating the cemetery but if the City chooses to move forward they recommend the cemetery remain on property and work be carried out by professional archaeologists and additional details be worked out with the next-of-kin of the deceased.

The authority to allow for the relocation of a historic cemetery rests with the Cranston City Council per city code Sec. 15.20 – “HISTORICAL AND ARCHEOLOGICAL BURIAL SITES.” If the immediate ordinance application is approved by the City Council, the property owner and applicant must then seek a subsequent permit from the City Council to relocate the cemetery through a required public hearing process consistent with Sec 15.20.010 (E). This permit request has traditionally included a proposed Scope of Work prepared by an historic preservation professional that would allow for the City Council to review the details of the reinterment process as a stand-alone request.

I should note that staff previously requested to see an alternative site plan showing the historic cemetery undisturbed, and in lieu of this, staff would also accept a statement addressing this issue explaining why alternative site designs are not possible or preferred which would preserve the historic cemetery in its current location. At this point, no such alternative site plan or statement similar to above has been provided by the applicant. Although this information is not required as part of the MPD ordinance amendment, it will eventually be required as part of the cemetery relocation permit per Sec 15.20.010 (E)(3) as follows:

“3. Burden of Proof. At the hearing, the applicant shall prove to the satisfaction of the city council that:

- a. The applicant has examined all alternatives and conclusively demonstrated that no prudent or feasible alternative to the proposed alteration is possible; or*
- b. That the proposed alteration serves only the interests of health, welfare and safety of the public.”*

HISTORIC CEMETERY



B. LAND USE COMPATIBILITY

This is a critical component in the evaluation of the application. Staff will only briefly address this topic at this time, anticipating that it may need to supplement its analysis on this issue after the December 1 meeting.

Single-family residential uses are not compatible with big box retail, yet they can coexist in some instances with adequate buffering. The question is, how much buffer is sufficient between two incompatible land uses, particularly, this proposed use to this very neighborhood? This is a sensitive issue in which the Plan Commission's discretion is required. There is substantial public comment on this issue, suggesting that the proposed buffer is not sufficient.

Importantly, there is no direct vehicular access from the project to the residential neighborhoods, so there is no threat of increased traffic on the residential streets.

The applicant hired Real Estate Consultant William E. Coyle, Jr. & Associates to analyze the potential impact on property values in the surrounding area. The report can be found by clicking the "Coyle Report (Real Estate Consultant)" link on [this webpage](#). Mr. Coyle's findings can be summarized by his statement on the 2nd page of his report:

"Based upon my research and analysis, I have formed the opinion that the proposed changes to the existing MPD zone, taking into consideration the substantial proposed buffering and open space, will not have an adverse effect

on any property located in and around the subject location. It is my further opinion that the value of the homes within the area will be unaffected in any way by the changes proposed, including the proposed wholesale club, fueling station, and the small retail units located on New London Avenue. It is also my opinion that the proposed development will have no adverse effect on the state owned property located to the east or have any adverse effect on the properties located across New London Avenue to the north, and I would encourage the Plan Commission's and the City Council's approval of this proposal."

Staff is not able to comment on Mr. Coyle's findings at this time.

Upon request by the Plan Commission staff is willing to look at other examples where Costco's are located within the region and further explore the land compatibility issue.

C. AESTHETIC IMPACTS / BUFFERING

The project proposes a 50' buffer adjacent to all residential properties in concert with open space in sum of over 21-acres and a 10' screening berm proposed between Parcel 2 and the property to the south, intended to mitigate the visual impacts from the closest residential properties.

The depth of the open space varies from approximately 75' at the pinch-point between the nearest residential property and Parcel 2, then increases gradually due to the diagonal orientation between Parcel 2 and the residential properties. The open space is roughly 750' at its widest point to the east. Measuring from residential property to the Costco *building* (not the edge of Parcel 2) the distance varies from 850' at its widest to 210' at its narrowest point. The topography assists with the visual screening to the east, but is not anticipated to eliminate the view of the rear of the building altogether. The 10' berm will add additional screening, but is also not anticipated to completely block the view of the big box structure. It is not staff's expectation that the improvements would be 100% screened, but that reasonable visual mitigation would be provided.

Fully engineered landscaping plans are not required as part of the MPD process, but would be reviewed in detail during the MLD and DPRC review processes. Without such details, staff can only comment on the distance between the uses and the existing topography, as it has done above.

That being said, staff acknowledges the high level of public concern regarding visual impacts and the potential relationship to property values that may result. After hearing the concerns during the site walk, staff recommended that the applicant provide evidence and/or cross sections demonstrating site lines from various vantage points along the property line. The applicant did not comply with this recommendation.

The following pictures were taken by staff to understand the existing conditions. Please note that these pictures were taken during summertime.

VIEW NEAR COSTCO EDGE FACING SOUTH



VIEW FACING EAST



VIEW FROM BEECKMAN AVENUE



The applicant has provided a rendering showing the anticipated viewshed from New London Avenue, below. The combination of topography, plantings and distance appear to mitigate the views from New London Avenue.

RENDERING FROM NEW LONDON AVENUE



Staff is happy to look buffering further upon request. Should the Plan Commission consider recommending approval, staff would be happy to draft language regarding buffering of the project for consideration.

D. LIGHTING

Lighting plans are not required as part of the MPD application, but would be reviewed during the Major Land Development (MLD) and Development Plan Review (DPRC) phases. The City standard is that there will be zero lumens measured at the property boundary.

E. SIGNAGE

Signage details have not been provided, nor are they necessarily required, as part of the MPD submittal package. The applicant's narrative states, "Signage requirements for each Parcel shall be approved by the City Plan Commission in the event an applicant seeks Major Land Development approval for such Parcel" (p. 5). However, staff is concerned with this approach as staff recognizes the likely possibility, based on the rendering provided and observing existing Costco's, that the signage may exceed what is allowed in C-4 and therefore signage allowances should be explicitly be incorporated into the MPD ordinance. Should the applicant request a variance from their own MPD, the City Council is the authority to grant such relief, not the Zoning Board of Review. Staff is hoping to avoid, in the event that the ordinance receive approval, that the applicant would NOT have to return to city Council to amend the ordinance for signage. Staff made this clear to the applicant, but the applicant has not revised to the ordinance request regarding this particular issue.

F. PUBLIC UTILITIES

There are existing public sewer, gas, electric and water services on site. Veolia Water and the Cranston DPW have confirmed availability of sewer services for the proposed uses. Plans to connect to the utilities would be required at the preliminary plan phase of the Major Land Development (MLD) application, should the ordinance receive approval.

G. STORMWATER/DRAINAGE & SOIL EROSION

The applicant's consulting engineers, Garafalo & Associates, Inc., have provided a statement regarding stormwater, soil erosion and sediment control which is available by clicking the "Stormwater 11 20 20" button on [this webpage](#).

To summarize, the engineers are assuring that the project will be designed to "fully mitigate the impacts to stormwater runoff from the proposed development, and comply with the City of Cranston Stormwater Ordinances and the Stormwater Management Standard and Performance Criteria of the RI Stormwater Design and Installation Standards Manual [sic] (RISDISM). The applicant proposes a combination of above-ground and subsurface measures and will require a Rhode Island Discharge Elimination System (RIPDES) permit through the Rhode Island Department of Environmental Management (RIDEM). The engineering memo states that a Soil Erosion and Sediment Control (SESC) Plan to meet RIPDES and City requirements.

The applicant will have to provide civil engineering plans and analysis during the land development phase. City staff cannot comment on these issues until such engineering information is provided during Major Land Development process, should the MPD ordinance be approved. There are standards that are required by law and state (RIDEM) approvals are required prior to preliminary plan submittal to the City.

H. TRAFFIC

The Traffic Impact Study provided by the applicant's traffic consultant, BETA Group, Inc., was peer reviewed by Fuss & O'Neil at the request of the City. BETA Group, Inc. has issued also issued a response to the peer review, all of which are available [here](#). Staff largely leans on the expertise of the peer reviewer, and acknowledges that Fuss & O'Neil has not yet had the opportunity to review or respond to the latest memo from BETA Group, as it was received by staff on 11/23/20.

In addition to the peer reviewer, Planning staff also defers on this issue to the Cranston Bureau of Traffic Safety, who provided the following comments:

While the City recognizes that alterations to New London Avenue are subject to RIDOT approval, this office offers the following comments for consideration relative to the proposed Costco development:

- 1. Concerns relative to adequate capacity within the proposed signalized access road intersection on New London Avenue.*
- 2. Concerns for the potential of Route 2 NB traffic coming from Oaklawn Avenue attempting to turn right onto the proposed signalized access road intersection on New London Avenue.*
- 3. Concerns relative to the potential volume of crossover traffic between the proposed signalized access road intersection on New London Avenue and the intersection of New London/Garden Hills Pkwy/Howard Ave.*
- 4. Has consideration been given to alternatives relative to site layout; site access points; roundabout in lieu of signalized entry; etc. that may optimize safe and efficient operation?*

Please be aware that a Physical Alteration Permit and state approval for the intersection will be needed before the applicant can file for the Major Land Development (MLD) preliminary plan.

I. ECONOMIC IMPACTS

When looking at the potential economic impacts of the proposal, staff looks to the number of permanent & temporary jobs, the quality of the jobs created, and the potential impact on other businesses. Tax revenue will be reviewed separately on page 20.

The applicant has provided a document with projections regarding job creation which can be found by clicking the “Jobs” button on [this webpage](#). Here is a summary:

Costco:	250-300 Full & part time jobs (strive for 50% full-time)
Construction:	300-350 (Union: Local 271)
Restaurants:	75-100
Parcel 3:	75-100

The applicant estimates a total of **400-450 permanent (post-construction) jobs**, which raises to **700-50 jobs** including construction jobs generated by the proposal.

In addition to the *quantity* of jobs, the applicant has provided information speaking to the *quality* of the Costco jobs as well as other positive impacts the company brings to its communities, which can be found by clicking the “About Costco” button on [this webpage](#). Staff encourages the review of the document in full, but has pulled the following highlights which it believes are most pertinent when considering the ordinance application:

“Warehouses are designed to help small- to medium-size businesses reduce costs in purchasing for resale and for everyday business use” (p. 1);

Founded in 1983, “Costco has grown to become, in terms of sales, the second-largest Global retailer and the largest operator of membership clubs worldwide” (p. 1);

Costco employs 249,540 people, 161,160 in the USA with low turnover rates, 14.1% for first year employees and 7.2% after one year (p. 3);

Costco “recruits primarily from the community in which it is located” with the objective “to hire promotable employees with enthusiasm and a desire to build a career” (p. 3);

Costco has robust benefits packages and pays relatively high wages, ranging from \$15 - \$28.25 per hour, claiming a full-time cashier’s annual salary after 5-years is \$58,352 (p. 3);

Part-time (min 24 hours/week) employees are eligible for medical, dental and vacation benefits after 6 months (p. 3);

Costco commits 1% of pretax profit to charitable organizations (p. 5);

Costco supports numerous charitable programs, funds and campaigns (p. 5).

It is self-evident that the City would benefit from these jobs, especially given the quality of the jobs and the track-record of the employer.

What is less clear is how other businesses may be impacted. Anecdotally speaking, Costco could have negative impacts on its competitors, but is anticipated to have positive economic impacts by both generating economic activity in the surrounding areas (Garden City & Chapel View) as well as acting as a supply warehouse for local businesses. In order to evaluate the potential negative impacts, it must be determined who is considered Costco’s ‘competitors.’ Costco’s competitors are widely understood as other large scale retailers, such as BJ’s Wholesale club, Walmart, Amazon, Sam’s Club, Target, and even possibly home improvement retailers like The Home

Depot and Lowe's. the majority of the listed company's do not reside in Cranston. There is a Walmart on Plainfield Pike in the northwestern portion of the City and a Lowe's on Garfield Avenue near the Cranston/Providence border, but staff is unaware of any other perceived competitors. Additionally, the City has not historically taken measures to reduce competition in the private sector.

J. BUDGET IMPACTS

The applicant has provided an itemized breakdown of estimated property tax revenue:

Costco	\$600,000
Restaurants (3)	\$100,000
Parcel 3 Retail	\$100,000
Total New Revenue	\$800,000

The applicant's assessment acknowledges that Mulligan's Island currently generates \$75,000, for a total **net positive of \$725,000** per year in revenue to the City. Staff recognizes the importance of bringing in new revenue, especially in light of the impacts that many local municipalities are facing due to COVID-19 and/or other budget shortfalls.

K. CONSISTENCY WITH THE COMPREHENSIVE PLAN

Staff has both positive and negative findings regarding the proposal's consistency with the Comprehensive Plan. On one hand, the project satisfies many of the goals and policies of the Economic Development Element. On the other, there could be questions raised regarding the compatibility with the neighborhood, the loss of recreational amenities, site design,

In terms of the Future Land Use Map (FLUM), the property is allocated as "Mixed Plan Development" consistent with its zoning. As stated earlier in this memo, C-4 could may be a more tailor-fit zoning designation, and therefore Highway Commercial could be considered to be a better tailor-fit FLU designation, but this does not mean that the proposal is in conflict with the designation. If the proposal is not considered in direct conflict, staff deems it *not* inconsistent, not to be confused with affirmation of consistency.

Ultimately, like land use compatibility, this a complex issue and requires the discretion of the Plan Commission. Staff would like to hear the comments and testimony during the December 1 meeting and then provide the Plan Commission with supplemental analysis on this topic.

L. COMMENTS

Staff has received and compiled numerous comments, the vast majority are in opposition to the proposal. All of the comments, along with any comments received from outside agencies, can be found on [this webpage](#). Please know that any comments received after 11/24/20 will be compiled by staff and sent to the Plan Commission separately.

V. RECOMMENDATION

Due to the complex nature of the proposal, and anticipating the public comment and testimony that will be provided during the meeting, staff recommends that the City Plan Commission, with the consent of the applicant, **CONTINUE** the matter to a date certain.