

**Cranston Planning Commission**  
**Comstock Parkway Major Land Development Master Plan**  
**Expert Witness Statement of Peter Friedrichs, AICP**

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**Contact information:**

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**Qualifications and experience:**

Until recently resigning civil service to attend law school full-time, I served as the City Planner for the City of Newport, Rhode Island. This work built upon a decade of progressive responsibility in the planning field and development industry, where I have worked for local government, real estate developers, contractors, architects, preservationists, and community advocates. This includes three years as the Director of Planning and Economic Development for the City of Central Falls, where I staffed the Planning Board and Zoning Board of Review and performed a myriad of other planning and economic development-related issues. In this capacity, I was the recipient of several awards, including Neighborhood Plan of the Year from the Rhode Island Chapter of the American Planning Association and policy awards from Grow Smart Rhode Island and the Congress for the New Urbanism for serving as the chief architect of the Central Falls Green and Complete Streets Ordinance. My resume is attached as Exhibit A for reference.

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**Introduction of the Issue:**

My professional analysis is intended as public testimony regarding the Cranston Planning Commission's Master Plan review of Comstock Industrial LLC's Major Land Development application for a 270,000 square foot warehouse development at 0 Comstock Parkway, AP 36 Lot 46. The applicant intends to maximize development of this industrially zoned parcel. The below analysis is based on my review of the Cranston Comprehensive Plan, Zoning Ordinance, and Subdivision Regulations, as well as other pertinent information, including a review of publicly available information related to the applicant's request.

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**Analysis:**

My analysis focuses on the findings of fact required to be made by the Commission prior to granting of Master Plan approval, as described in the Rhode Island Land Development and Subdivision Review Enabling Act of 1992, as amended (RIGL 45-23).

Those required findings are enumerated in RIGL 45-23-60:

- (1) *The proposed development is consistent with the comprehensive community plan and/or has satisfactorily addressed the issues where there may be inconsistencies;*
- (2) *The proposed development is in compliance with the standards and provisions of the municipality's zoning ordinance;*
- (3) *There will be no significant negative environmental impacts from the proposed development as shown on the final plan, with all required conditions for approval;*
- (4) *The subdivision, as proposed, will not result in the creation of individual lots with any physical constraints to development that building on those lots according to pertinent regulations and building standards would be impracticable. (See definition of Buildable lot). Lots with physical constraints to development may be created only if identified as permanent open space or permanently reserved for a public purpose on the approved, recorded plans; and*
- (5) *All proposed land developments and all subdivision lots have adequate and permanent physical access to a public street. Lot frontage on a public street without physical access shall not be considered in compliance with this requirement.*

Finding 4 only applies to subdivisions, which is not applicable to this development. The remaining required findings are analyzed in numerical order below.

It must be noted that these required findings apply to the proposed plan for development, as specified in the master plan application, and that the planning commission may not approve any plan unless it is able to render a “positive finding” in every instance set forth above.

- (1) *The proposed development is consistent with the comprehensive community plan and/or has satisfactorily addressed the issues where there may be inconsistencies;*

The expert witness statement of applicant’s planning expert, Ed Pimentel, highlights the aspects of the proposed development that are consistent with the proposed development but does not holistically analyze the proposed development’s consistency with the Cranston Comprehensive Plan.

The exact proposed use has not been identified, but the plans clearly show a warehouse. This use is consistent with the future land use designation of “industrial” in the Cranston Comprehensive Plan. As is noted in Mr. Pimentel’s report, this area is immediately bordered by residentially

used, zoning, and designated land to its south. In the interest of good planning, this confluence should be of special concern to the Planning Commission in determining consistency with the Comprehensive Plan and other aspects of the Commission's review.

The first component of the Plan important in addressing this issue is Land Use Goal 1: "Preserve the rural quality and critical resources of Western Cranston through appropriate land use controls." The proposed development is outside of an urban area and sufficient buffering is needed to prevent visual and noise impacts on adjacent properties. This process is detailed in Land Use Policy 2.6: "Implement policies that protect residential neighborhoods from commercial encroachment through regulation, appropriate buffers, development design standards, traffic planning, and site plan review." Cranston has many of these tools in its zoning ordinance, subdivision regulations, development plan review, and land development approval process. It is critical that these tools be utilized cohesively in order for this policy to be implemented with regard to this project. Comstock Condominiums and the two abutting properties on Scituate Avenue are in a residential neighborhood. Appropriate buffers, site design, and traffic planning is needed to prevent commercial encroachment. The Cranston Planning Commission's Master Plan review of this development is the first step in ensuring the development satisfies this policy. If the developer is not willing to modify its design to meet this policy, the project must be denied for comprehensive plan inconsistency.

The second relevant component of the Plan is Land Use Policy 4.2: "Protect the capacity and integrity of roads, sewers and water systems serving the Howard and Western Cranston Industrial Parks, in order to preserve these areas as resources for long-term industrial development." I look forward to reviewing the peer review and staff comments on the applicant's traffic study, which proposes signal optimization to mediate impacts. An appropriate solution would be to require site access for this development from Sailor Way to limit curb cuts on stressed Comstock Parkway. In fact, the Circulation Element of the Comprehensive Plan devotes an entire section to controlling curb cuts on arterial routes, noting "access to new adjacent development should be restricted by consolidating curb cuts...The construction of collector driveways or a service road will limit the number of access points." This is further detailed in Circulation Policies 3.1-3.4. This is supported by Circulation Goal 1A: "Improve and maintain efficient flow of traffic, particularly in commercial centers and along major arterials" and Policy 1.1: "Maintain the functional integrity of existing and planned roadways through appropriate land use and design standards."

Next comes Land Use Goal 5: "Ensure the redevelopment of major sites for economic development incorporates the protection of environment and neighborhood character." The proposed development does not disturb wetlands. As mentioned previously, it must protect neighborhood character by limiting traffic impacts on Comstock Parkway and being a good

neighbor to the residential neighborhood to the southeast. This is reinforced by Land Use Goal 9: “Protect and stabilize existing residential neighborhoods.”

This thought is reinforced by Economic Development Goal 3: “Add to the City’s taxable property base by constructing industrial and commercial structures which are properly designed and sited in keeping with environmental, planning and design considerations” and Policy 3.1: “Strengthen the standards for industrially zoned land to prevent the erosion of the City’s supply of land suitable for these purposes.”

Tangentially, Natural Resources Policy 3.2: “Require construction practices that minimize runoff, soil erosion, and sedimentation” should be of concern to the Cranston Planning Commission. Much of the site slopes to the southeast, so offsite runoff could impact neighboring residential properties.

There are several elements of the Comprehensive Plan that appear to support this project, such as NRP-3.3 and EDG-2.

In summary, there are inconsistencies between the proposed development and Cranston’s Comprehensive Plan. The Commission should require, as a condition of Master Plan approval, that the developer work with neighbors and staff to address these inconsistencies prior to submitting for Preliminary Plan approval. At a minimum, the buffer between the proposed development and the neighboring condominium complex should be increased to mitigate visual and noise impacts. This could include installation of additional landscaping on the subject property and/or the abutting property, as well as the installation of a sound wall.

- (2) *The proposed development is in compliance with the standards and provisions of the municipality's zoning ordinance;*

The future use appears to be in compliance with the Cranston zoning ordinance. One of the critical provisions to review in determining dimensional requirements is subsection 17.20.090(K), which reads:

*Property and buildings to be used for industrial purposes shall be designed and laid out as to minimize disturbance to adjacent property by such features as buffer fences, planting, suitably located points of traffic ingress and egress and areas for loading and parking. They shall comply in addition to the requirements applicable to the district in which they are located. All industrial operations shall be carried on in conformity with the requirements of Section 17.36.010.*

The Planning Commission must find that the proposed development is in compliance with this provision. Additional landscaping is required to meet this provision and therefore be in compliance with the Cranston zoning ordinance.

- (3) *There are no significant negative environmental impacts from the proposed development as shown on the final plan, with all required conditions for approval;*

This finding should be further explored at a future review stage. Environmental impacts include noise, air, and light pollution.

- (5) *All proposed land developments and all subdivision lots must have adequate and permanent physical access to a public street. Lot frontage on a public street without physical access shall not be considered in compliance with this requirement.*

Adequate and permanent physical access to a public street should be achieved through Sailor Way only to limit impacts on Comstock Parkway.

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**Recommendation:**

The application is sufficiently (but not fully) consistent with the required findings to warrant a conditional approval. Compliance with subsection 17.20.090(K) of the zoning ordinance is particularly concerning. Therefore, assuming traffic concerns are satisfied through peer review, the applicant should work with neighbors to ensure sufficient mitigation is included in the proposed development prior to the Cranston Planning Commission commencing Preliminary Plan review. At a minimum, conditions should be placed upon the master plan approval to ensure that the development will not negatively impact the abutting property to the south. Such conditions could include requiring the development to push the proposed 'Building 1' further north so as to mitigate visual and noise impacts on the abutting residential property owners. In addition to moving the building further north, additional landscaping features, as well as the installation of a sound wall, would assist in tempering the impact of this development on the condominium complex property.

## PETER S. FRIEDRICHS, AICP

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### PROFESSIONAL EXPERIENCE

- Associate, **Gobis & Co.**, Newport, Rhode Island 2021-Present
- Provide technical assistance to a boutique transportation consulting firm
  - Clients include some of the largest transit operators in the United States
- Director of Innovative Initiatives, **The Policastro Group**, Providence, Rhode Island 2018-Present
- Provide municipal leadership perspective to boutique consulting firm
  - Increasing project management experience of the firm
- City Planner, **City of Newport**, Newport, Rhode Island 2019-2021
- Primary staff for planning activities for a 383-year-old city with diverse land patterns, world class tourism destinations, complex demographics, and a significant US Navy presence
- Director of Planning and Economic Development, **City of Central Falls**, Rhode Island 2015 - 2018
- Permitted over 300,000 square feet of development projects through Planning and Zoning Boards
  - Greatly increased departmental capacity through successful pursuit of additional funds and staffing
  - Led municipal capital project program during time of significant investment
  - Developed and oversaw comprehensive strategy for community advancement
- Planner/Data Analyst, **Shepley Bulfinch**, Boston, Massachusetts 2012 - 2014
- Participated in master plans and strategic planning efforts for several educational institutions
  - Helped create a pipeline of architectural projects to bolster the firm's bottom line
  - Awarded increasing project responsibility based on demonstrated ability
- Lead Design/Carpenter, **SCHR**, Massachusetts 2011 - 2012
- Learned the carpenter trade
  - Led design decisions on several projects
- Development Assistant, **Providence Preservation Society**, Providence, Rhode Island 2011
- Increased membership outreach efforts
  - Participated in an apogee of preservation organizations and environments
  - Managed membership database

### EDUCATION

- New York Law School**, New York, New York 2021-2024 (projected)
- Projected Degree: Juris Doctorate
- Connecticut College**, New London, Connecticut 2006 - 2010
- Degree Awarded: Bachelor of Arts in Architectural Studies with Minor in German Studies
- Honors: *Magna cum Laude*, Overall GPA 3.7
- Independent Project: Responses to the Automobile in Urban Form in Germany and the United States
- Harvard University, Kennedy School of Government**, Cambridge, Massachusetts
- Executive Education Certificate Course: Comparative Tax Policy and Administration 2017

### CERTIFICATIONS

- Professional Designation, American Institute of Certified Planners (AICP)* 2019-present

### LEADERSHIP

- Co-Chair* **Technical Assistance Panel**, CNU New England 2015
- Founder* **2p Design**, Providence, Rhode Island 2010-2011
- President* **Student Government Association**, Connecticut College 2009 – 2010

**SERVICE**

*Member*

**American Planning Association (APA)**

2016-Present

*Member*

*Diversity, Equity, and Inclusion Committee, APA-Rhode Island*

2020-present

*Member*

**Congress for the New Urbanism – New England Chapter**

2011 - Present

### **Key Professional Accomplishments**

- Elevated urban architecture to the fore—where it belongs—for zoning considerations
- Brought equity into the institutional conversation in one of the United States’ wealthiest cities
- Identified real estate opportunity to transform a \$2 million state investment into \$80 million in private investment and a new central gathering place for Central Falls residents and visitors
- Working closely with other city leadership, successfully “shopped” an infill train station to state and federal officials
- Actively participated in the successful submission of a \$13 million TIGER grant to fund the train station
- Authored the northeastern United States’ first and third Green and Complete Streets Ordinances
  - Received the Grow Smart RI Policy Award (2018)
  - Received the Congress for the New Urbanism - New England Policy Award (2018)
- Secured \$100,000 in foundation funds to develop an area plan to complete a sprawl retrofit in one of America’s most analyzed communities
- Co-authored the plan and the adopted zoning ordinance to implement the sprawl retrofit, bringing twenty-first century zoning to a Euclidean pattern superimposed on one of America’s most historic cities
- Conceived, wrote, advocated for, and oversaw initial design stages of a Transportation Improvement Plan project to completely reconstruct the principal thoroughfare through three communities, transforming a \$4.5 million repaving project into a \$15 million complete streets physical manifestation of a multi-community regeneration effort
  - Received the American Planning Association - Rhode Island Chapter Neighborhood Plan of the Year Award (2017)
- Awarded the largest grant from Commerce RI’s Main Street Business Improvement Fund (\$300,000), and leveraged with \$100,000 in city funds, \$80,000 in FTA funds, and \$100,000 in private monies to transform a major thoroughfare
- Performed analysis and made recommendations to alterations to a several-hundred-year-old course schedule at one of America’s oldest and most prestigious universities
- Secured passage of an amendment to enabling legislation for tax stabilization agreements through the Rhode Island legislature
- Reconstituted a redevelopment agency, secured a \$664,000 budget, and passed a Resolution of Need, Redevelopment Area, and Redevelopment Plan through City Council, overcoming concerns about the use of eminent domain
- Successfully hired and managed a diverse team of individuals, including those with several decades of advanced experience in a diversity of disciplines
- Permitted over 300,000 square feet of economic development projects through Planning and Zoning Boards
- Successfully redeveloped a 2.5 acre vacant former manufacturing site, including addition to the National Register of Historic Places and award of over \$1 million in grants, to divest and return to tax generation a property that had been held by the city for twenty-five years
- Orchestrated a procedural overhaul of one of America’s oldest Planning Boards
- Successfully completed the \$2 million renovation of a dilapidated drug house into a tutoring center for city youth through grant dollars
- Oversaw construction of a 1.5 acre city park to honor veterans
- Secured \$180,000 in FHWA funds to develop a municipal transportation master plan in a small city that sees over 3 million tourists annually

- Oversaw municipal projects that participated in the transformation of a semi-active industrial area to a vibrant mixed-use neighborhood
- Constructed Rhode Island's first contra-flow bike lane
- Launched and oversaw homebuyer and tenant education programs, a closing cost assistance program, and a home repair program
- Gathered data from diverse teams and sources to submit firm's first reporting on AIA's 2030 Challenge after several years of inaction
- Participated in the creation of Rhode Island's first regulatory Joint Planning Commission and Joint Hazard Mitigation Plan
- Oversaw the development of a community choice aggregation plan for electric generation
- Successfully steered owner-occupied properties away from speculator purchase through tax sale
- Successfully adjudicated competing departments for alteration to the division of physical space
- Lead a municipal LEAN initiative
- Performed significant advancement on institutional master plan, including reducing traffic in the campus core, while a student in college
- Presented at several regional professional-development conferences, including CNU's biannual New England summit and Grow Smart RI's Power of Place summit
- Chaired regional technical assistance panel for street revitalization