



# DiPrete Engineering

February 16, 2022

Tom Kravitz, Director  
City of Warwick Planning Department  
3275 Post Road  
Warwick, RI 02886

**RE: 175 Post Road – Master Plan Application  
Warwick, Rhode Island  
Project #: 2733-001-A02**

Dear Mr. Kravitz:

DiPrete Engineering has received your comments dated January 13, 2022. We have reviewed these comments and offer the following in response. The original comments are provided in italics with responses in bold.

**Master Plan Checklist:**

- 1. Completed application form signed by all property owners. – One property owner is missing.*

**The applicant has provided a revised application form signed by both property owners under separate cover.**

- 11. Location and dimensions of existing easements and rights-of-way, including, buildings, water courses, railroads, utilities, and other similar features. – The existing conditions plan is no longer accurate, as the site has been significantly altered since January 17, 2020.*

**The Existing Conditions Survey has been edited to remove the annotation of a 1-story building and add a note to represent the foundation remains limits. This is the only significant change from our previously submitted Existing Conditions Survey.**

- 27. A conceptual landscaping plan.*

**We have modified Sheet 3 (Site Layout & Conceptual Landscape Plan) to add in legend items for grassed areas and proposed street trees.**

- 48. Letter from Rhode Island Historic Preservation & Heritage Commission for an archeological assessment of the property.*

**This letter has been received and is attached as part of this resubmission package.**

**Pre-application Review Recommendations:**

- 1. Please identify how the applicant has addressed the certain aspects of the project that were identified as in conflict with the City's Comprehensive Plan, including Chapter 4, Section E, Item D cited in the pre-application recommendation.*

The pre-application recommendations and our responses are included below in red:

1. ***Certain aspects of the project may be in conflict with the City's Comprehensive Plan. The Board is required to make a finding that the proposed development is consistent with the comprehensive community plan and/or has satisfactorily addressed the issues where there may be inconsistencies as prescribed in the City's Development Review Regulations, and the Standard Provisions of RIGL §45-23-60. The Applicants attention is called to Chapter 4, Section E, Item D which recommends that the City:***
  - a. ***"Support the programs of the Pawtuxet River Authority and Watershed Council that mitigate flood damage to low lying areas of the City."***
  - b. ***"Carefully review proposed developments within the Pawtuxet River flood zone to mitigate or eliminate potential additional future flood damage. Any new development or construction within the flood zone should be vetted by both the City and the Authority, with proper measures taken to protect the property as well as the natural resources associated with the river."***

***In addition Chapter 4, Section A recommends that decision makers "Support continued initiatives to improve water quality and habitat quality in the Pawtuxet River and its watershed. The City remains committed to achieving the Goals and Policies outlined in the City of Warwick Comprehensive Plan and recommends the applicant additional steps to mitigate the effects of flood damage to the subject property and surrounding areas.***

***The proposed development as shown per the latest Site Layout Plan, shows all buildings outside of FEMA-mapped Floodway area associated with the Pawtuxet River. The total building area occupying any floodplain areas (Zone AE) of 70,000 square feet is significantly less than the former 145,000 square foot building footprint.***

***In addition, the applicant is proposing the removal of greater than one acre of impervious parking area in favor of grassed cover. This area will be available for storage volume to offset any fill required to locate buildings in the AE zone.***

***Finally, this new proposal will deed 7.2 acres of Open Space ("Lot 3") in order to keep the resources of this portion of the Pawtuxet River watershed preserved, and flood storage maintained.***

2. ***The scale of development within the AE and X flood zone, floodway, and jurisdictional riverbank and wetland areas appears to be contrary to the goals and policies outlined in Chapter 11 of the City's Comprehensive Plan which promotes efforts to make Warwick more resilient along coastal and riverine environments.***

***See response to above comment #1.***

3. ***The Applicant's narrative cites the proposed use as a "multi-building storage facility with accessory office building." However, in previous discussions the Applicants advised Building and Planning Department representatives that one of the primary reasons for purchasing the property was to house their respective trade businesses and lease the remaining spaces for warehouse, trades, and other similar uses. While the Applicant's intended use of the facility may have changed, the current description of the proposed use appears intentionally vague. More specifically our concerns are as follows:***
  - a. ***As presented any use of the office space would be restricted to a use supportive of the principal use of multiple large warehouse/ storage structures. This implies that the spaces would be utilized as a rental office or similar use for warehouse or mini-storage***

*facility. While this may be the intent, the stated use of the site is vague and the Department remains concerned about the potential for principal use of office building in the future.*

- b. The project narrative and application do not identify specific use codes or a thorough description of intended uses proposed at the site in accordance with Table 1, Use Regulations of the City's Zoning Ordinance. The description of the use as a "multi-building storage facility" is subject to broad interpretation by the Building Official. Typical storage uses within a light industrial district are outlined in use codes 807 through 812. A combination of storage uses under different use codes would require a special use permit in accordance with provisions outlined in Section 304.5 of the City's Zoning Ordinance. Such action would require a recommendation from the Planning Board to the Zoning Board at the Master Plan Phase of Development Plan Review.*
- c. Based on the narrative provided by the applicant, the City's Building Official currently interprets the described use as "multi-building storage facility with accessory office building" as ministorage and mini-warehouse under use Code 807 of the City's Zoning Ordinance. Therefore the project would require a recommendation from the Planning Board to the Zoning Board at the Master Plan Phase of Development Plan Review for a special use permit.*
- d. The Department remains concerned about potential use of outdoor areas for open lot storage of new building materials, machinery, and metals due to the proximity of the development to sensitive environmental features that are subject to flooding. Items stored within the floodway would be subject to velocity waters and could result in contamination of riverine and coastal waters.*

*The applicant proposes to develop this site under use code 424: Building trades contractor, oil and fuel services, or similar establishment. The buildings will be used specifically for building trades and not broadly as a storage-only use. This use is allowed as primary in the Light Industrial Zone per Table 1.*

- 4. The original proposal of 15 buildings and 130,000 +/- gross square feet (GSF) of floor area to 9 buildings and 82, 450 +/- GSF in order to meet required parking and dimensional regulations. However, the overall footprint of the project remains largely the same as the plans originally presented to planning staff and appears to match the existing developed area. We remain concerned about the size of the overall project footprint in consideration of the developments direct location within jurisdictional wetland and riverbank areas.*

*As partially described in response #1 above, the footprint has been reduced further to 70,000 square feet of building area and removal of greater than one acre of existing parking area. This allows flexibility for additional floodplain management. The outer limits of development are limited to those areas already disturbed under existing conditions.*

*Elevations onsite will remain at or below existing grades with the exception of limited areas of fill in order to provide slab elevations above the Zone AE floodplain elevations.*

*In addition, as shown on the Site Layout Plan, the applicant is proposed stormwater quality practices along the perimeter of the site prior to outfall to the Pawtuxet River and tributary stream.*

- 5. A majority of the proposed pavement and buildings are located well within the AE and X flood zone (i.e. flood plain) and floodway. Floodways are regulated to ensure there are no increases in upstream flood elevations. Staff remain concerned about the scale of development within flood zone and floodway areas in consideration of the following:*

- a. *Meeting notes obtained from the Rhode Island Department of Environment Management (RIDEM) dated September 6, 2019 note the following: "The FEMA floodway will need to be depicted on the site plan. All proposed buildings and fill will need to avoid being sited in the FEMA floodway." We remain concerned about the close proximity of the buildings to vulnerable floodway and the future impacts of climate change and documented increases in flood events that could negatively impact the environment and built features in the future.*
- b. *A majority of the parking area pavement is shown within the FEMA floodway, while a large portion of the building footprint is located within the flood zone. In the project narrative, the applicant has not suitably addressed if compensatory storage will be required at the site due to fill within floodway areas. Adding compensatory storage on site could materially alter the site plan if required.*
- c. *It is unclear whether the Applicants are proposing outdoor storage in the parking areas located within the floodway or flood zones. We are concerned that any elements stored outside the facilities could contaminate the river in a flood event similar to the one that occurred in 2010.*

*All buildings will be located outside the FEMA Floodway area per the latest Site Layout Plan. Some building area and a large portion of the parking area will be located in Zone AE of the floodplain. The parking area is not proposed to be filled above existing elevations, and the buildings and surrounding areas will be filled only to the extent to locate slabs above the floodplain elevation.*

*Floodplain compensation will need to be provided and will be accomplished with the aid of surrounding existing parking areas proposed to be removed. This includes over one acre of parking area to be converted to grass area north of the development parking area.*

*All outdoor storage will be removed from the site as shown in General Note #7.*

2. *Identify the efforts made to reduce the scale of development within the AE and X flood zones, floodway, and jurisdictional riverbank and wetland areas.*

The footprint has been reduced from a previous building of 145,000 +/- square feet to 70,000 square feet under proposed conditions. The applicant also proposes to remove greater than one acre of existing parking area. This allows flexibility for additional floodplain volume management. The outer limits of development are limited to those areas already disturbed under existing conditions.

Elevations onsite will remain at or below existing grades with the exception of limited areas of fill in order to provide slab elevations above the Zone AE floodplain elevations.

In addition, as shown on the Site Layout Plan, the applicant is proposed stormwater quality practices along the perimeter of the site prior to outfall to the Pawtuxet River and tributary stream.

3. *Identify the proposed principal use of the property, including specific zoning use codes, so the City staff can determine if any (additional) zoning relief will be required for the proposed development. Please include the proposed future use of Lot 2 and if the project will have multiple phases of development.*

As noted within the pre-application comment responses above, the applicant proposes to develop this site under use code 424: Building trades contractor, oil and fuel services, or similar establishment. The buildings will be used specifically for building trades and not broadly as a storage-only use. This use is allowed as primary in the Light Industrial Zone per Table 1.

5. *Identify how the applicant has addressed the concerns raised by City staff and by RIDEM staff with respect to the location of the pavement and buildings location within the AE and X flood zones. Please also identify whether any outdoor storage or compensatory flood storage are proposed as part of the December 27, 2021 Master Plan submission.*

The proposed development as shown per the latest Site Layout Plan, shows all buildings outside of FEMA-mapped Floodway area associated with the Pawtuxet River. The total building area occupying any floodplain areas (Zone AE) of 70,000 square feet is significantly less than the former 145,000 square foot building footprint.

In addition, the applicant is proposing the removal of greater than one acre of impervious parking area in favor of grassed cover. This area will be available for storage volume to offset any fill required to locate buildings in the AE zone.

We have enclosed five (5) copies of the revised plans and narratives for your review. Please feel free to contact me if you have any further questions regarding this matter, or once we are confirmed for a Planning Board agenda.

Sincerely,  
DiPrete Engineering Associates, Inc.



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