

# CITY PLANNING DEPARTMENT



## Memorandum

To: Cranston City Plan Commission  
From: Beth Ashman, AICP | Assistant Planning Director  
Date: January 3, 2025  
Re: **1381 Cranston St. Variances from Ch. 17.16 Special Flood Hazard District**

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**Owner / Applicant:** CPW True Storage LLC and CPW Apartments LLC  
**Location:** 1381 Cranston Street  
**Parcels:** Assessors Plat 8, Lots 195, 1617, and 2711  
**Zoning:** M-1 Restricted Industry with Conditions  
**FLUM Designation:** Special Redevelopment Area

### Subject Property:

The subject property is located at 1381 Cranston Street, identified as Plat 8, Lots 195, 1617, and 2711, with a land area of  $\pm$  42.1 acres. The property is part of the Cranston Print Works, the oldest major industrial complex in the City of Cranston.

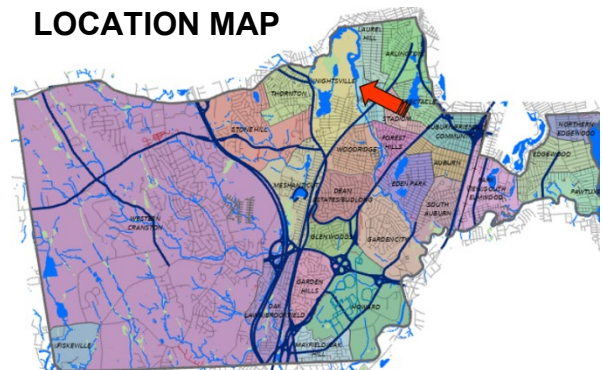
### Request:

The applicant seeks to renovate Cranston Print Works Buildings B and D into multi-family apartments and self-storage and remove building C, as shown on the plan. In Buildings B and D, the lower levels are proposed to be used for commercial storage space and ancillary support use for residential use on second floor. The applicant seeks a variance from **Section 17.16.100 8. b.** to "have the lowest floor including basement and utilities **elevated three feet higher than the flood depth number specified on the FIRM** above the highest adjacent grade. If no flood depth is specified, the lowest floor including basement and utilities shall be elevated no less than three feet above the highest adjacent grade."

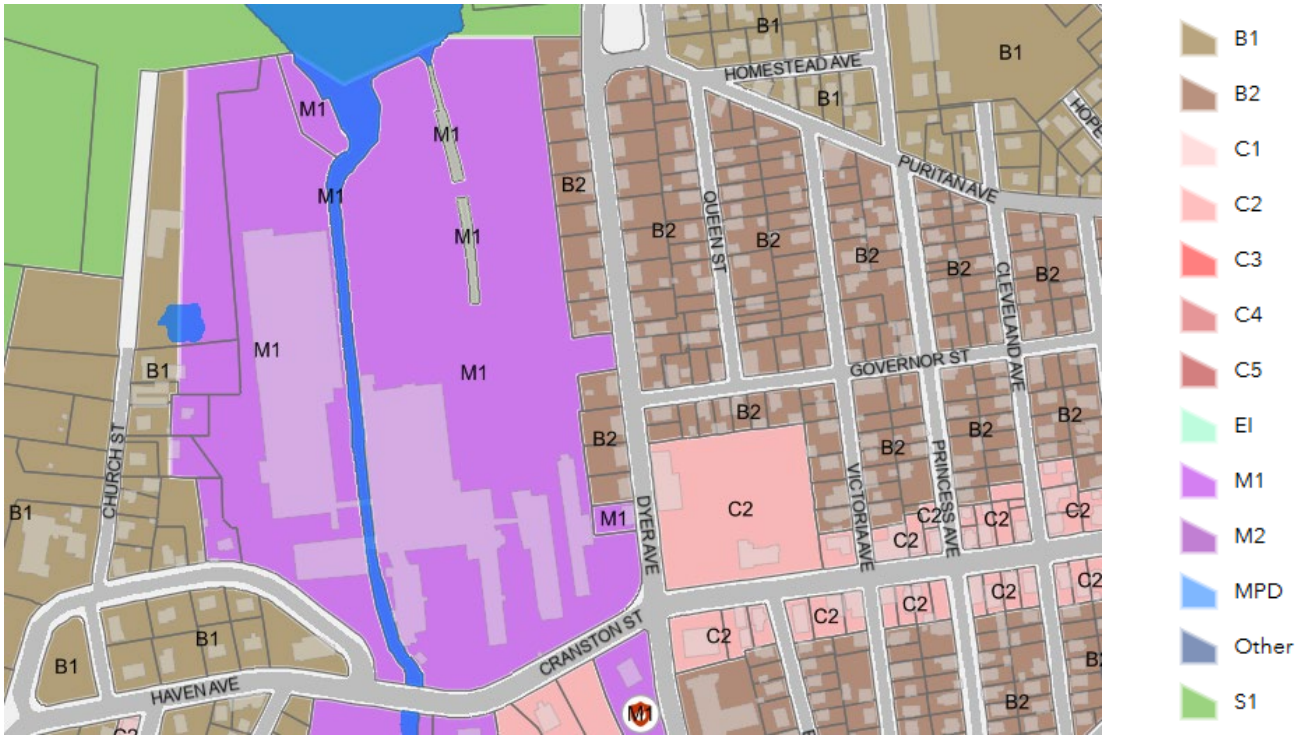
### Relief from Chapter 17.16 Special Flood Hazard Districts:

*Request for variance to Chapter 17.16 Special Flood Hazard Districts;  
17.16.100 (Specific Standards);  
17.16.120 (Variance);  
17.92.010 (Variance and all other applicable sections of the zoning code*

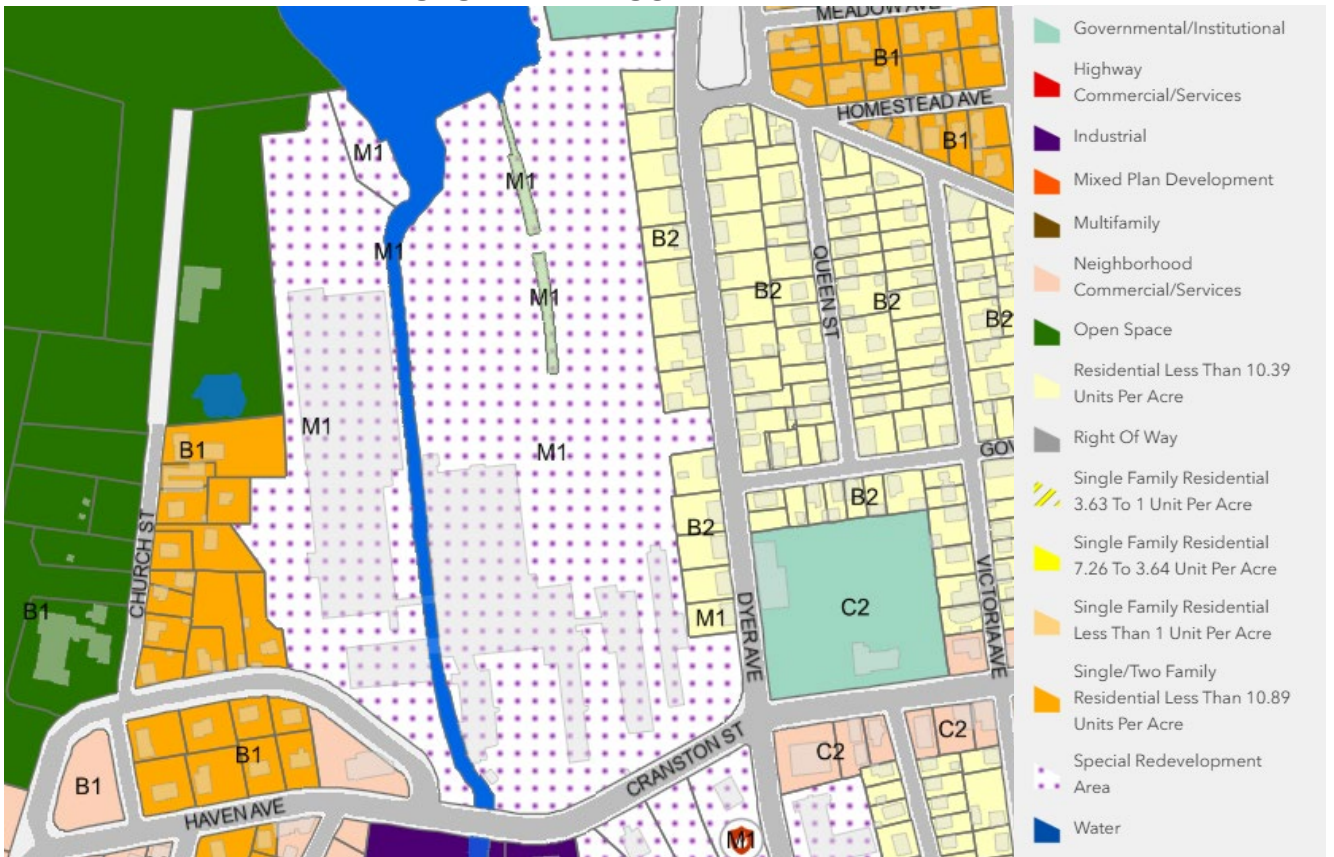
### LOCATION MAP



## ZONING MAP



## FUTURE LAND USE MAP





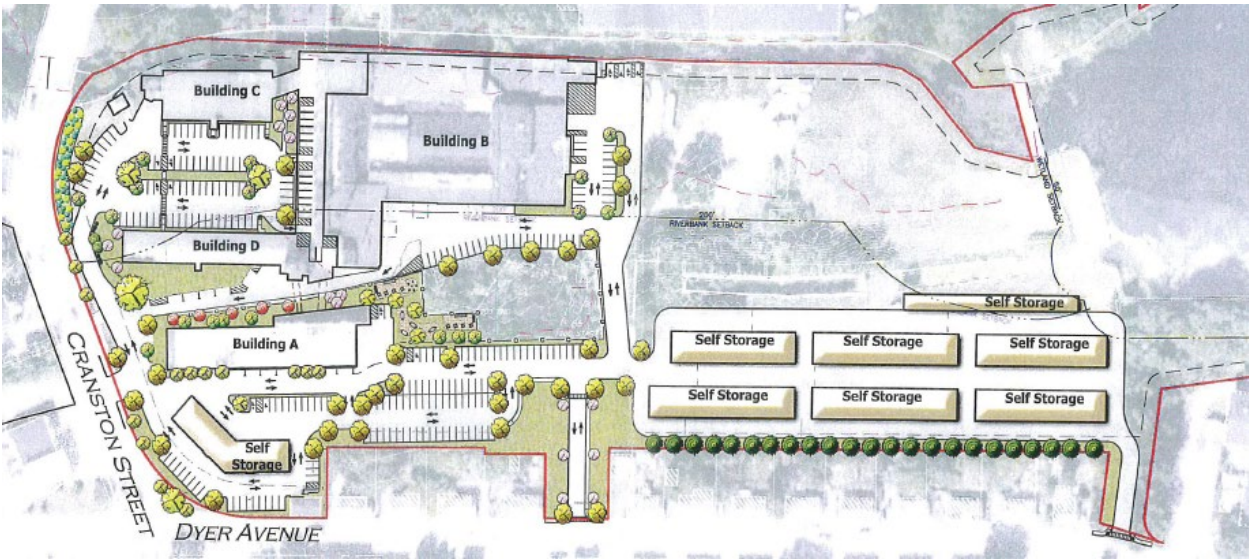
**OBLIQUE AERIAL VIEW** Source: Google Earth viewed 12/17/2024



**STREET VIEW** Source: Google Street View viewed 12/17/2024

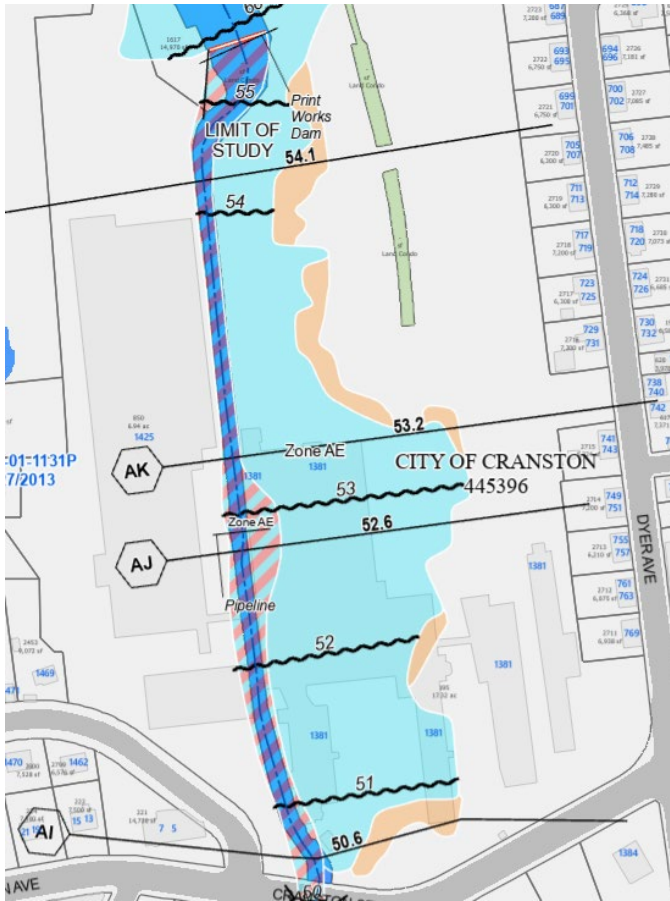


**SITE PLAN**





## FEMA FLOOD MAP



Source: Cranston GIS: FEMA Firmette 2015

## RIDEM DAM SAFETY MAP



RIDEM RI Dam Safety Map shows where there would likely be substantial damage were the dam to fail.

## FINDINGS OF FACT

1. The Future Land Use Map (FLUM) designates the subject parcel as a Special Development District.
2. The zoning was changed to M-1 with conditions by Ordinance 2023-6. This ordinance made the following findings and explicitly allowed multi-family residential in addition to industrial uses such as self-storage.
  - a. The City of Cranston recognizes that the Cranston Print Works property and structures (the "Print Works") is part of a valuable and historic industrial complex with great potential for reuse and redevelopment, including housing opportunities.
  - b. The City of Cranston finds that it is in the best interest of the city's economic welfare and community interest to support the redevelopment, revitalization and growth of the Print Works property in order so that it can again make a significant contribution to the city's industrial and commercial tax revenue base.

3. The Comprehensive Plan outlines goals, policies, and action items pertaining to this proposal.
  - **Housing Goal 2:** *Permit a variety of residential development types to achieve multiple community objectives.*
  - **Housing Goal 3:** *Achieve a balance between economic development and housing in the City.*
  - **Housing Goal 4:** *Promote housing opportunity for a wide range of household types and income levels.*
    - *Housing Policy H-6: Maintain a varied housing stock, with units of different age, size, and type that are affordable to a wide range of incomes.*
    - *Housing Action H-4: Encourage housing that is mixed into commercial projects.*
  - **ED Goal-2:** *Attract capital into Cranston and expand the City's economic base.*
  - **Historic and Cultural Resources Goal 2:** *Promote development policies which are sensitive to preservation concerns and goals.*
  - **Natural Hazards Goal 1:** *Make Cranston increasingly resilient to the natural hazards with the highest risks and levels of concern: storms, hurricanes, flooding, high winds, and extreme heat.*
    - *Action NH-2: Renew regulations for new development such as flood hazard overlay districts and building codes to ensure they are up to date with the latest best practices.*
4. "Watercourse" means a lake, river, creek, stream, wash, channel or other topographic feature on or over which waters flow at least periodically. Watercourse includes specifically designated areas in which substantial flood damage may occur.
5. Portions of Building B and C are shown as within the watercourse on the FEMA Flood Insurance Rate Map (FIRM).
6. The proposal qualifies as a "substantial improvement" within the regulatory floodway.
7. The application includes calculations to show that it will not create any increase in base flood elevation (BFE) as required by CFR 44.1.B.part 60. Subpart A § 60.3 (d) (3) The City of Cranston shall "Prohibit encroachments, including fill, new construction, substantial improvements, and other development within the adopted regulatory floodway **unless it has been demonstrated through hydrologic and hydraulic analyses** performed in accordance with standard engineering practice that the proposed encroachment would **not result in any increase in flood levels** within the community during the occurrence of the base flood discharge;"
8. "Lowest floor" means the lowest floor of the lowest enclosed area (including a basement). An unfinished or flood-resistant enclosure, usable solely for parking of vehicles, building access or storage in an area other than a basement area, is not considered a building's lowest floor provided that such

enclosure is not built so as to render the structure in violation of applicable non-elevation design requirements.

9. The subject parcel is at risk from dam failure. The Cranston Print Works Pond (State ID 172) on the Pocasset River is rated as “High Hazard” by RIDEM because failure or misoperation will result in a probable loss of human life. RIDEM inspects every two years and is responsible for ensuring that all dams are maintained in a safe condition. In March 2024 RIDEM issued a Notice of Violation because the dam found to be unsafe (OCI-DAMS-24-3). The owners of the dam, CPW True Storage, LLC and CPW Apartments, LLC are responsible for responding to this violation. Unsafe means the condition of a regulated dam, as determined by RIDEM is such that an unreasonable risk of failure exists that will result in a probable loss of human life or major economic loss.

### **STAFF ANALYSIS**

This analysis focuses on consistency with zoning, the comprehensive plan and the surrounding neighborhood. However, applications for relief from special flood hazard district regulations are especially complex and such requests are unusual.

This proposal is consistent with zoning. The proposed redevelopment of mixed-use housing and self-storage at Cranston Print Works is consistent with the Comprehensive Plan in so far as it done in a way that follows state requirements for development in a regulatory floodway and does not increase exposure to flood risk.

Buildings B and C are in a deteriorated state and located in a 1% flood area and partially in the floodway. With the proposed demolition of Building C, the project is calculated to have a net increase of approximately 95,000 cubic feet of additional flood storage within the project limits. This calculation is key to determining if the City may permit the substantial improvements. **An engineering peer review and consultation with RIEMA is recommended** to confirm the applicant’s conclusion that construction in the floodway is allowed under Rhode Island regulations.

**Section 17.16.120 B** states that the ZBR shall not grant a variance unless the applicant demonstrates (among other things) that the development is not in the floodway. The development is in a floodway.

**Section 17.16.120 C** allows for variances for the rehabilitation of an historic structure. While Building B in the Proposal is part of the historic Cranston Print Works, it does not meet the definition of “Historic structure” as set out in **17.16.050 - Definitions**.

The historic nature of Building B is precisely why staff find that the rehabilitation of Building B is desirable given its deteriorated state, history of flooding, and risk of future floods. The Cranston Print Works is located on the Pocasset River to take advantage of waterpower. Dyer Pond was created as the Cranston Print Works mill pond and the floodway itself has been substantially altered so that Cranston Print Works could harness waterpower from this modest size river.

The unsafe condition of the dam is relevant to permitting new residential units in the dam inundation area, and staff recommends **coordination with RIDEM** on this matter prior to issuing any approvals.

In the Comprehensive Plan the City recognizes the need to examine the city flood hazard overlay districts “to ensure that they are up to date with the latest best practices” (Action NH-2). The need for this variance may arise from a difference between Cranston and state requirements.

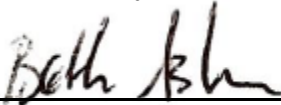
**RECOMMENDATION**

Staff finds that the development proposal for 1381 Cranston Street is generally consistent with the Comprehensive Plan and compatible with the general character of the surrounding neighborhood.

Based on this finding, we make a **POSITIVE RECOMMENDATION** for waiving the specific Cranston requirement in Section 17.16.100 8. b. to “have the lowest floor including basement and utilities **elevated three feet higher than the flood depth number specified on the FIRM** above the highest adjacent grade. If no flood depth is specified, the lowest floor including basement and utilities shall be elevated no less than three feet above the highest adjacent grade.”

No variance to the Cranston code exempts the applicant with complying with federal and state requirements including the requirement that the first floor of Building B must be dry flood-proofed to the Design Flood Elevation (DFE) or be usable solely for parking of vehicles, building access or storage so as not meet the definition of “lowest floor.”

Respectfully Submitted,



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Beth Ashman, AICP  
Assistant Planning Director / Administrative Officer

**Cc:** City Planning Director  
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