

Nov 22, 2021

City of Cranston Planning Commission
869 Park Avenue
Cranston, RI 02910

RE: Comstock Industrial Development on Comstock Parkway

Dear Members of the Planning Commission,

This letter is presented as a follow up to the presentation made on the Master Plan application of Comstock Industrial, LLC. It is intended to share some additional information, data and insights on several topics raised at the hearing on November 2, 2021. Overall, our goal is to continue to show that the site has been designed thoughtfully and in a way as to minimize disturbance to adjacent properties, especially the residential abutters to the south.

Topic 1: Traditional Warehouse & Site Considerations

We are pursuing a speculative (no tenant in place) traditional warehouse build-out. There are many permitted uses in the M-1 Industrial zone, and while this is not the only permitted use for the site or buildings, it is our focus. Traditional warehouse should be a favored site use for anyone who realizes that the site will not remain in its natural state and prefers a low and dispersed traffic profile.

Traditional warehouses are established to take in, store, and eventually redistribute goods. They have simple interiors with aisles of shelving that are accessed by forklifts. While some automation is being utilized in warehouses, technology (software) driven efficiency is more notable in optimizing storage and re-distribution; logistics. Inventory that is removed from a truck and placed on a shelf usually spends at least several days and more likely a few months on the shelf before being sent out to a nearby retailer (not directly to a home) and therefore the same truck bays are utilized for both incoming shipments and outgoing shipments. Warehouses are still manned by small office staffs and sparse forklift operators. As the delivery end of the warehouses function is generally tied to a retail outlet that has retail hours of operation, traditional warehouses tend to be busier during the day, and not very busy at night- the traffic flow data presented in this letter as “Topic 2: Anticipated Traffic Flows” shows as much using empirical data. And while logistics companies are most noted for enhanced scheduling of goods, they also excel at scheduling staff; flex hours are a common in the industry, as working in shifts is not an important consideration. Flex scheduling is offered as a job perk, but the secondary benefit is traffic dispersion; shown empirically hereafter.

An example traditional warehouse tenant would be a hardware store with several nearby retail locations. That chain might start accumulating snow shovels and driveway salt from June – November, to be sent out to stores in December and January.

The design we have presented is cognizant of market expectations (which must be met in order to ensure that we create a long-term viable asset), but is also well designed to fit in with its surroundings:



Site Features:

- The ingress/egress appropriately lines up with Western Industrial Way, creating a “4-Way” intersection.
- Car parking lots are segregated from active truck locations, and all truck traffic is confined to areas north of the large building thereby providing a noise and distance buffer to residential abutters to the south.
 - ➔ To address an apparent misunderstanding of our plan, there will be no large trucks on the south side of the large building. Those parking spaces are for cars only. We have shown a truck circling the building to show that a truck (or firetruck) could reasonably circle the site in an emergency.
- Southern abutters, shielded from truck noise. The building has been placed between the southern residential abutters and the active truck area – providing both distance and physical barrier. The building will serve as the most effective mitigation for sound on the site.
- Building distance from Southern border. Since initial plans, which cross-loaded the building and sited it closer to the property boundary, the building has been moved further away from

John Walsh
(203) 292-1850
jwalsh@west-passage.com

the southern property border. Placing the car parking area to the south of the large building allows distance from the border, and once the substantial, existing landscaping buffer is further enhanced any minimal noise or light emitted should be mitigated.

- Truck Bays. The larger building has 56 truck bays and the smaller building has 13. The number of truck bays isn't necessarily indicative of increased traffic (as is shown hereafter using empirical data). Truck bays, lay-out area and trailer parking space together enhance optionality for tenants- how quickly they need to load or unload – and thereby decrease rushed and/or congested on-site truck movements.
- It's not surprising that this product would feel dissimilar to other product in Cranston or even Rhode Island. There is not a lot of traditional warehouses in our state or city. It is an increasingly crucial component of a local economy, but Rhode Island's history of taxing warehouse inventory through the 1980's caused under-development of warehousing (which is over-developed in southern Massachusetts) and overuse of industrial land for small manufacturing uses.

Topic 2: Anticipated Traffic Flows

Paul Bannon's traffic study and subsequent follow-up stand on their own as expert evidence and have been submitted separately.

However, there are ways to interpret Mr. Bannon's data to illustrate the traffic flows we would expect to generate from this site.

Generally, this intended use provides overall low traffic trips generated, and a smooth ramp up and ramp down of traffic flows over the course of the day, such that not many of the trips generated by the site would be expected to occur at "rush hour."

- Mr. Bannon uses ITE's formula for Comstock's building size to conclude that the site will generate 468 trips per day. (ITE = Institute of Transportation Engineers. Trips = all trips, "in's" + "outs", cars and trucks.)

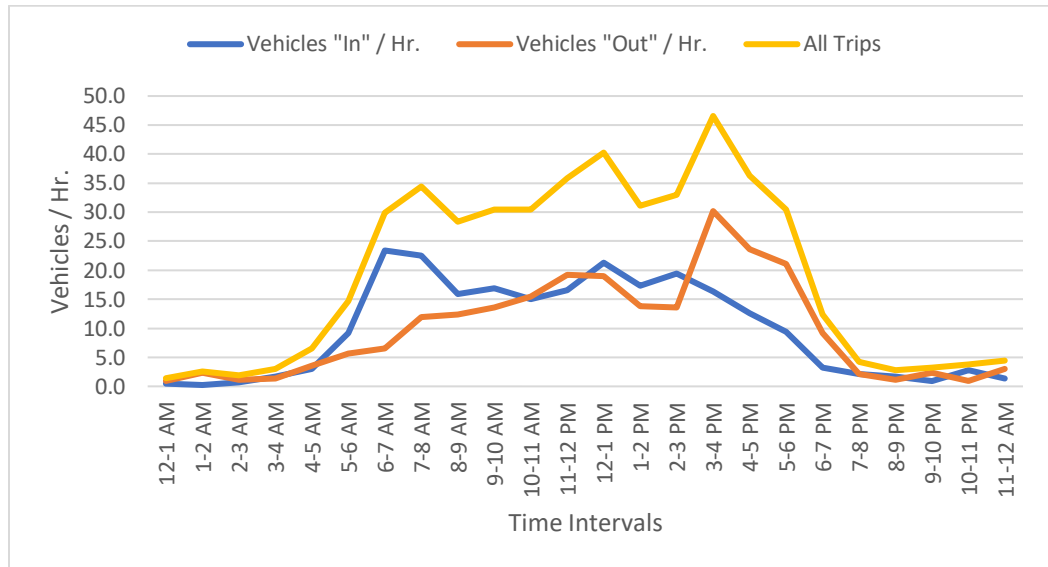
- Source:

Source: ITE <i>Trip Generation Manual</i> , 10th Edition	
Land Use Code	150
Land Use	Warehousing
Setting	General Urban/Suburban
Time Period	Weekday

- He then uses ITE’s projection for the percentage of hourly trips (below: “% of 24-Hour Traffic”) and applies this site’s total trips, which renders the following chart:

Time	% of 24-Hour Traffic		COMSTOCK DAILY TRIPS - ALL		
	Entering	Exiting	ENTER	EXIT	TOTAL
12-1 AM	0.2	0.4	0	1	1
1-2 AM	0.1	1.0	0	2	3
2-3 AM	0.3	0.5	1	1	2
3-4 AM	0.7	0.6	2	1	3
4-5 AM	1.3	1.5	3	4	7
5-6 AM	3.9	2.4	9	6	15
6-7 AM	10.0	2.8	23	7	30
7-8 AM	9.6	5.1	22	12	34
8-9 AM	6.8	5.3	16	12	28
9-10 AM	7.2	5.8	17	14	30
10-11 AM	6.4	6.6	15	15	30
11-12 PM	7.1	8.2	17	19	36
12-1 PM	9.1	8.1	21	19	40
1-2 PM	7.4	5.9	17	14	31
2-3 PM	8.3	5.8	19	14	33
3-4 PM	7.0	12.9	16	30	47
4-5 PM	5.4	10.1	13	24	36
5-6 PM	4.0	9.0	9	21	30
6-7 PM	1.4	3.9	3	9	12
7-8 PM	0.9	0.9	2	2	4
8-9 PM	0.7	0.5	2	1	3
9-10 PM	0.4	1.0	1	2	3
10-11 PM	1.2	0.4	3	1	4
11-12 AM	0.6	1.3	1	3	4
	TOTAL:		234	234	468

- Or, in chart form, showing trips per hour:



➔ Mr. Bannon’s conclusion, as above, shows that at peak traffic - near the PM rush hour - the site is only expected to produce 47 trips; and of the 47, only 30 of those trips are “outs.” The AM peak is similarly muted with 34 total trips at peak hour, only 22 of which are “ins.”

Topic 3: Expected Employee Count at Site

There are several “rules of thumb” regarding the parking levels for employees at industrial warehouses. The table below shows the minimum and maximum expected employees for a given build-out type:

Asset Type	Max Emps / SF*	Min Emps / SF*	Notes - JW
Traditional Warehouse	1 per: 1,500 sf	1 per: 3,000 sf	The trend in this space points towards slightly less employees, more automation, and increase in 3rd party service person trips during the day
-> & Office Portion of Traditional	4 per: 1,000 sf		Office consideration is relevant for Traditional, but not applicable for eCommerce
eCommerce	1 per: 700 sf	1 per: 1,000 sf	not a traditional Office Worker / Floor Worker set-up

*Source: JLL, 2017 Report: <https://blog.naiop.org/2017/05/e-commerce-is-growing-and-so-is-demand-for-warehouse-labor/>

With this information, we can reasonably build an “Expected Case” for how many employees will be employed across the site.

- We assume the average of the ranges (so if the range max/min are 1 per 1,500sf / 1 per 3,000 sf... we assume 1 per 2,250 sf.)

John Walsh
 (203) 292-1850
 jwalsh@west-passage.com

- We assume the smaller building is built with 10% office (more likely to be a regional HQ), and that the large building is built with 5% office (standard for a national tenant with HQ elsewhere).
- So, our **expected number of employees on site is 140**, as follows:

Expected Scenario:

	SF	Max Office	Industrial	Max Office Emp	Max Industrial Emp	Max Emps
Small Building: max office % + dense Ind. Staffing	70,000	10% 7,000	90% 63,000	4 per: 1,000 sf 28	1 per: 2,250 sf 28	56
Big Building - at traditional warehouse	200,000	5% 10,000	95% 190,000	4 per: 1,000 sf 40	1 per: 2,250 sf 84	84
Total Employees - Site:	270,000	7,000		68	112	140

To stress test the employee analysis, we can create a “Worst Case Scenario” where:

- The small building still has 10% office and its industrial component is staffed at the maximum end of the range.
- The larger building is rented to an eCommerce tenant (ironically this would only happen if the building size decreased).
- Our **“Worst Case Scenario” is 356 employees**, as follows:

Worst Case Scenario:

	SF	Max Office	Industrial	Max Office Emp	Max Industrial Emp	Max Emps
Small Building - Max Office + Dense Industrial	70,000	10% 7,000	90% 63,000	4 per: 1,000 sf 28	1 per: 1,500 sf 42	70
Big Building - Maxed eCommerce	200,000	0% -	100% 200,000		1 per: 700 sf 286	286
Total Employees - Site:	270,000	7,000	263,000	28	328	356

- ➔ On a related note, we utilized a count of 400 on-site employees to stress test the traffic study results. [See Mr. Bannon’s traffic study.]
- ➔ In reality- we’d never expect a scenario where site employees reach 356 or 400- to get an eCommerce tenant interested in the site, the building would need to be smaller in favor of more access points. If the building did shrink, and we were to attract an

John Walsh
(203) 292-1850
jwalsh@west-passage.com

eCommerce tenant, the site would handle the volume as discussed in Mr. Bannon's traffic study-> but more traffic is more traffic. It's counter-intuitive, but the best traffic outcome for anyone living west of Plainfield Pike (other than the site remaining in its current state) would be large buildings with truck bays in order to attract a Traditional Warehouse tenant, and thereby the Traditional Warehouse traffic profile.

Topic 4: Ingress/Egress Concerns:

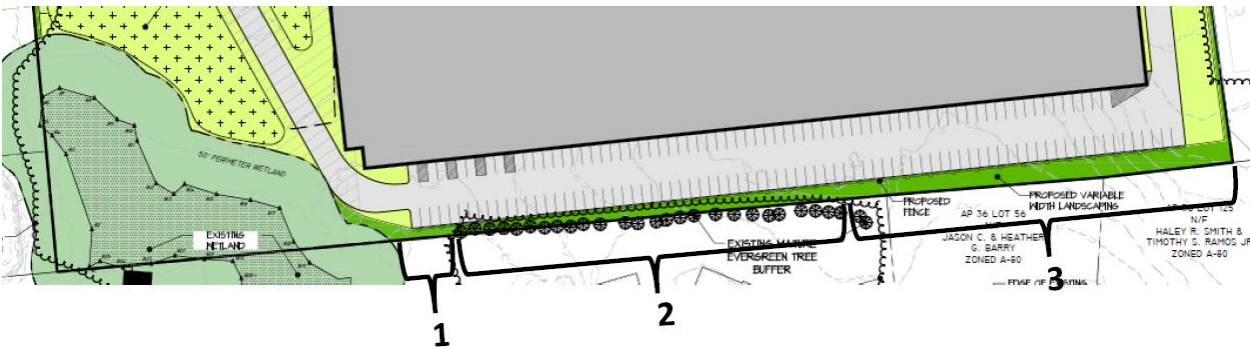
On November 2, feedback was given regarding the width of the ingress/egress at Comstock Parkway; 30' vs. 40'. We are receptive to this feedback, but believe this is simply a matter of utilizing the proper turning radius for the intended end user vehicles. This final design element detail will be provided during the engineering design phase which is completed as part of the Preliminary Approval review.

Topic 5: Landscaping Buffer

This section has been reviewed and discussed amongst John Carter (Landscape Architect), and Dana Nisbet (Civil Engineer), as well as Applicant.

At this time, prior to DiPrete Engineering providing full civil engineering plans for the site (which commence upon conceptual approval), it is difficult to provide a more detailed Landscaping Plan than has been provided. However, since November 2 our team has considered feedback and John Carter has met with one abutter Jason Barry, and based upon this additional outreach, discussions, and professional thought, we can discuss a potential outlook for the southern border of Comstock Industrial.

The Landscaping Border can be discussed in three sections, from west to east:



- 1) Area #1 is currently not planted with significant buffer. Here, it will be possible to consider a small berm and plant trees along the top of the berm. Until more detailed engineering is

John Walsh
(203) 292-1850
jwalsh@west-passage.com

completed, berm height would need to be considered (as reasonably possible without damaging existing trees), and tree plantings shall provide additional buffering.

- 2) Area #2 is currently planted with a significant existing buffer. In this area it will be possible to selectively plant supplemental trees to the north of the existing tree line to fill any soft spots in the existing buffer.
- 3) Area #3 is currently abutting a heavily vegetated area between the residences and the property line. Grading activities will occur in the southeast corner of the Comstock Industrial lot. In this area it might be possible to create a berm with tree plantings along the top of the berm. This plan has generally been discussed with Jason Barry, abutter.

Topic 6: Zoning Concerns

This project: (i) is by-right and in compliance with zoning, (ii) is in-line with the Comprehensive Plan (guidance from which has been consistent and clear for a long time), and (iii) has or is on track to meet all of the City's Subdivision and Land Development Regulations.

- ➔ Mr. Pimentel has prepared a detailed zoning study and spoken on the record, confirming as much in great detail- and for brevity, we need not revisit.

However, on November 2nd, Attorney Goins cited Zoning Code 17.20.090 (K) as a reason that the CPC should consider (i) reducing the size of the project, (ii) limiting business activity between 11PM and 7AM, (iii) requiring a landscape buffer, and (iv) requiring a noise wall.

As background, section 17.20.090 (K) 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.

[Note: Section Section 17.36.010 is more instructive for the preliminary and building permit phases and is skewed to protect against intrusive heavy industrial uses. It does provide guidance on a range of permissible noise levels, which are applicable here.]

With respect to Section 17.20.090 (K), we have designed the site to minimize disturbance to adjacent properties, and will reasonably comply with all facets of this section.

John Walsh
(203) 292-1850
jwalsh@west-passage.com

With respect to Attorney Goins specific requests:

- 1) Re: Size/Scope. Zoning Code provides no justification for reducing the size of the project.
- 2) Re: Business Hours. Zoning Code (Section 17.36.010) is already instructive in regulating business activities based upon noise levels. There is no need for additional impositions. The Applicant is aware of the existing regulations, and intends to meet them.
- 3) Re: Landscaping Buffer. At this conceptual phase of the process, the Applicant is doing as much as can be expected to work with abutters towards a suitable landscaping buffer (see prior section of this letter), at Applicant's expense.
- 4) Re: Sound Wall. We do not think a wall will be an aesthetic or reasonable solution.

We hope that this additional context and data is helpful and look forward to seeing everyone in person on December 7, 2021.

Regards,



John T. Walsh III
Comstock Industrial LLC