



FUSS & O'NEILL

December 8, 2022

Ms. Diane Williamson  
Director of Community Development  
Town of Bristol  
9 Court Street  
Bristol, RI 02809

RE: Bristol Yarn Mill Redevelopment  
Preliminary Plan Application  
A.P. 10 Lots 41, 42, 43, 44, 49, 50, 60, 61, 62, 68, 71, 73, 74, and 76  
Thames and Hope Street  
Bristol, RI

Dear Ms. Williamson:

Fuss & O'Neill has prepared the accompanying Preliminary Plan application on behalf of the applicant, Brady Sullivan Properties (Brady Sullivan), for the redevelopment of the Robin Rug mill complex on Thames Street and some additional parcels with frontage on Thames Street and Hope Street. The project includes 127 residential apartment units and approximately 6,300 square feet of leasable space for commercial uses.

The Bristol Planning Board approved the Master Plan for the project, with conditions, on May 12, 2022 (Bristol Land Evidence Book 2172 Page 297). The Bristol Town Council subsequently approved Zoning Modifications and a Zoning Map Change for the project on August 3, 2022 (Bristol Land Evidence Book 2183 Page 272) that adopted the Planning Board's decision with changes to the provision of affordable housing. Those changes include the requirement for 20% of the residential units (i.e., 26 units based on a total unit count of 127 units) shall be designated as affordable (Bristol Zoning Ordinance Section 28-370), three of the units will be located at Lots 49 and 50 on Assessor's Plat 10, ten units will be located within the mill complex on Lots 42, 60, 61, 62, and 73 on Assessor's Plat 10, and 13 units will be provided through a fee-in-lieu of building or designating units within the development.

## Project Overview

The mill buildings will be renovated for the proposed residential and commercial spaces. The modifications to the building will provide interior parking spaces for vehicles, motorcycles, and bicycles on the basement level and amenity space on the first floor. Seven commercial suites will also be located on the first floor. The commercial uses are exclusively for retail and office spaces, which will share common restrooms on the first floor and will not require pretreatment for any

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wastewater discharges. The area between the historic mill complex and Bristol Harbor will include a public access route, landscaping, retrofitted rain garden, area drains and discharge outlets, exterior amenity space, and emergency vehicle access from Constitution Street to the west side of the building. Additional surface parking will be provided for commercial uses on the mill site and parking for the residences will be provided on the project's properties located on the east side of Thames Street.

Brady Sullivan requests deferring an application for a Certificate of Appropriateness to the Bristol Historic District Commission (BHDC) until after the Preliminary Plan approval. This request is made to allow the engineering and design review to proceed with the Planning Board, CRMC, and RIDEM without delay. The Rhode Island Historical Preservation & Heritage Commission (RIHPHC) will review the project for its compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties to obtain federal historic rehabilitation tax credits for the historic Mill's redevelopment or through the CRMC assent application if tax credits are not pursued. None of the historic buildings are planned to be removed, and only the non-contributing concrete masonry block building located near the Bristol Maritime Center is planned to be razed.

The site redevelopment will create a public access easement and walkway from the Bristol Yarn Mill site's southern property line abutting the Bristol County Elks property, along the Bristol Harbor shoreline, and through the town-owned Bristol Maritime Center, which was a condition of the Master Plan decision. Brady Sullivan will continue to collaborate with the Town on the final design and permitting of the walkway through the Maritime Center property. Brady Sullivan is in the process of negotiating a potential connection of a public access route through the privately-owned Elks property to Constitution Street, which commenced during a meeting with representatives from the Elks and the Town of Bristol on October 21, 2022. The proposed connections do not propose or require any disturbance of the riprap revetment coastal feature. Public access easements will be provided for the access corridor.

The project will require approval from the Rhode Island Department of Environmental Management (RIDEM) and Coastal Resources Management Council (CRMC). The project site is regulated under RIDEM's Office of Land Revitalization and Sustainable Materials Management (OLRSMM) under the brownfields program and Office of Water Resources for Stormwater Construction and Water Quality Certification program. These applications will be submitted during the Preliminary Plan review and will be a condition of Preliminary Plan approval.

## **Utilities**

Any existing storm drain connections from the mill complex's roof to Bristol's sanitary sewer will be disconnected as required by the Bristol Water Pollution Control Department and as a condition

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in the Master Plan Decision. The roof runoff will be directed to stormwater treatment and a separate storm drainage system.

New utility services will be connected to existing public utility infrastructure in Thames Street owned or operated by Bristol County Water Authority, National Grid Gas and Electric, Verizon, Cox Communications, and the Bristol Water Pollution Control Department. Although Fuss & O'Neill has been in contact with all the utility service providers, service contracts may not be obtained until the mechanical, electrical, and plumbing engineering is completed for the building after planning, zoning, and state permits are issued. According to Bristol County Water Authority, the water main capacity in Thames Street is 2,900 gpm at 20 psi residual pressure based on hydrant flow data collected in August 2006 at the intersection of Thames and State Street. Future flow testing will be performed on the water main for the building's plumbing and fire protection design.

### **Parking & Traffic**

The proposed off-site surface parking lots for the residential units will be located on Lots 41, 43, 44, 49, 50, 68, 71, 74, and 76. As an assemblage, these lots have frontage on Thames Street and Hope Street. There are no proposed changes to the uses of the building fronting Hope Street or to the existing homes fronting Thames Street. The existing driveway from Hope Street to Lot 76 will be retained but will only be available as a pedestrian entrance to the parking lot.

The parking lot has been designed to maximize the number of parking spaces and proposes tandem assigned parking to minimize the potential demand for on-street parking associated with the proposed redevelopment. The parking lot will be paved with bituminous concrete and comply with the Town's lighting and stormwater management ordinances. Subsurface filter systems, oil/water separators, and tree filters will provide pretreatment and treatment of stormwater runoff, which will be conveyed south in a proposed storm drain system to a reconstructed outfall at the west end of Constitution Street and out to Bristol Harbor.

During the Master Plan, Brady Sullivan offered to convey to the Town an existing parcel of land identified as Assessor's Plat 10, Lot 32, at the corner of Thames Street and Church Street which is used for vehicle parking. This conveyance was proposed to comply with the Master Plan Decision condition of approval and the Bristol Zoning Ordinance requirement for 10% of project's land area to be allocated for public or institutional uses.

A Traffic Impact Study has been performed and is enclosed for the Planning Board's review in accordance with Master Plan Decision condition of approval.

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## **Stormwater Management**

The redevelopment was designed to comply with CRMC's, RIDEM's, and Bristol's regulations for stormwater management. The design objective is to comply with the Rhode Island Stormwater Manual Minimum Standards for redevelopment projects through a low-impact development (LID): minimizing site clearing and using the site's existing topography; minimizing impervious cover by reducing parking space and driveway aisle size; providing landscape buffers and shade trees around the parking lot perimeter; and planting native, low-maintenance vegetation, including restoration areas along Bristol Harbor shoreline.

In addition to the LID approach, the project includes an array of stormwater treatment practices that includes collection and conveyance storm drain system, subsurface filters, a rain garden, stone channels, and tree filters. Runoff from the parking lots on the east side of Thames Street will be treated by subsurface sand filters and tree filters. A portion of the mill complex's roof runoff will receive treatment through tree filters on the south side of the building and a retrofitted rain garden on the west side of the building. The remaining roof area will be discharged through a separate storm drain system in Thames Street to the Constitution Street outfall to Bristol Harbor. Since there is no existing storm drain system in Thames Street along the project's frontage, a new storm drain will be installed. The existing storm drain in Constitution Street from the intersection of Thames Street to the outfall will be replaced.

Detailed information and calculations are provided in the Stormwater Management Report included in the application.

## **Landscaping & Lighting**

Landscaping, buffering, and solid fencing is proposed throughout the project site to mitigate heat island effect, minimize and avoid impacts to neighbors, and provide an attractive project. A combination of stockage fencing and new and existing vegetation will provide screening to the development from adjacent residences. Technical justifications to Bristol's landscaping requirements in the Zoning Ordinance are provided in this section and illustrated on the enclosed Landscaping Zoning Figures 1 through 4. Fuss & O'Neill attended a teleconference with Diane Williamson, Bristol Director of Community Development, and Ed Tanner, Bristol Principal Planner & Zoning Officer, on September 2, 2022 to review the technical justifications to the landscaping requirements. The landscaping design uses a combination of native trees, shrubs, and other plantings. The enclosed Landscaping Zoning Compliance figures illustrate the existing and proposed vegetation within the residential parking lot area.

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Figure 1 of the enclosed Landscaping Zoning figures relates to Bristol's Zoning Ordinance Article VIII, Section 28-251(11)A. This figure shows proposed trees along the northern entrance into the parking lot. Four trees are strategically located along the frontage in landscaped areas to maximize shading the parking lot, optimize the tree filter layout, provide safe sight-distance, and turn radii to the parking lot, and provides ample room for root growth. The trees are spaced greater than 40feet in two instances based on the design justifications previously mentioned. Figure 2 relates to Bristol's Zoning Ordinance Article VIII, Section 28-251(11)B, and illustrates the existing canopy provided by mature trees on abutting properties. The existing vegetation currently provides shading and screening to adjacent properties and new plantings may not flourish in such close proximity to existing, mature vegetation. Images A through E on Figure 3 present the scale and density of the existing vegetation along the proposed parking lot perimeter. Figure 4 relates to Bristol's Zoning Ordinance Article VIII, Section 28-251(11)C, which requires the parking lot to be 20% shaded by deciduous trees. The zoning ordinance restricts the shading potential by presuming all trees provide a 15-foot radius of shade. In conjunction with the recommended spacing from the edge of pavement and required 180 square feet of unpaved area under the tree, the calculated shade provided per tree is significantly limited. The proposed alternate method to calculate the shade requirement utilizes a value of 75% of the full growth for the specific species instead of a blanketed 15-foot radius for all trees. As noted on the Tree Canopy Summary on Figure 4, the Town's 20% shading requirement can be met by utilizing this alternative method to calculate canopy from the proposed trees plus the existing on-site tree canopy.

Lighting is provided around both the parking lot off of Thames Street and small parking lot for commercial uses. Bollard lights are provided along the public access on the west side of the mill building. A photometrics plan prepared by Illuminate along with cut sheets of the proposed lighting fixtures are included with the application.

### **Additional Items**

Architectural plans, elevations, and renderings for the redevelopment project are included in the application. No building additions or significant modifications to the existing buildings are proposed. Any changes to the building will be required to be in accordance with the RIHPHC and the BHDC.

As noted previously, the project will require approval from RIDEM's OLRSM as a brownfield. According to Nobis, the environmental consultant for the project, the redevelopment requires a Soil Management Plan (SMP) and Environmental Land Usage Restriction (ELUR), which will be prepared as part of a future Remedial Action Work Plan (RAWP) submittal to RIDEM. The project is anticipated to require an engineered soil cap, which may include: two feet of clean fill, one foot of clean fill over geotextile liner (or marker barrier), asphalt/concrete paving (minimum six

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inches of clean fill and four inches of pavement) or building foundation(s); fencing; restricted access; and an impermeable cap (to prevent infiltration, if required).

Several items are requested to be provided at Final Plan:

1. The applicant requests that any legal documents required for the development be submitted during the Final Plan review due to the scale and complexity of the project.
2. The applicant requests that the Attorney certified Title Certificate be submitted during the Final Plan review. Additionally, specific easements, rights-of-way, etc. that will be required pursuant to feedback obtained during the Master Plan review by the Planning Board and coordination with the abutters for public access have not yet been finalized.
3. The applicant requests that confirmation from BCWA to serve the development shall be submitted during the Final Plan review. A full mechanical and plumbing design including recent hydrant flow testing is required prior to applying for a service contract with BCWA.
4. The applicant requests that confirmation from BWPC to serve the development shall be submitted during the Final Plan review. A full mechanical and plumbing design is required prior to applying for a service contract with BCWA.
5. The applicant requests that approvals from state agencies and other Town Boards and commissions be submitted during the Final Plan review. The applicant is applying for a CRMC Assent, RIDEM Stormwater Construction Permit and Water Quality Certification, Historic District Commission Certificate of Appropriateness (see page 2 of this letter), and RIDEM RAWP approval concurrently with the Preliminary Plan submission to the Town. An archeological study may be required by RISHPO.



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Accompanying this letter are paper copies of all documents listed as enclosures, unless otherwise noted, and a PDF copy of the complete application, which will be provided through electronic transmittal. The required application fee for \$32,250.00 will be provided under separate cover by the applicant. If you have any questions about the documents included in this Preliminary Plan application, please contact me at [smartin@fando.com](mailto:smartin@fando.com) or (401) 787-8322.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Shawn M. Martin'.

Shawn M. Martin, PE

Senior Vice President | Regional Manager

Enclosures:

Volume I:

- Preliminary Plan Application and Checklist (1 copy)
- Application Fee – Check #11289 (1 copy)
- Abutters List Labels (1 copy)
- Local and State Review Comments (1 copy)
- Property Deeds, Title Commitment, and Owner Affidavit Letter (1 copy)
- Lighting Layouts and Fixtures (1 copy)
- Landscaping Zoning Figures (1 copy)
- Traffic Impact Study, Robin Rug Mixed-Use Development, 8/9/2022 (1 copy)

Volume II:

- Bristol Yarn Mill Preliminary Plan, 26 sheets, 12/2/2022 (5 full-size, 12 reduced copies)
- Architectural Drawings, Brady Sullivan, 9 sheets, 8/8/2022 (5 full-size, 12 reduced copies)

Volume III:

- Phase I Environmental Site Assessment, 4/16/2021 (1 copy)
- Phase II Limited Subsurface Investigation, 10/22/21 (1 copy)
- Site Investigation Report Addendum, 8/1/22 (1 copy)

Volume IV:

- Stormwater Analysis Report, 12/2/2022 (1 copy)
- Soil Erosion & Sediment Control Report, 12/2/2022 (1 copy)
- Long-Term Operations & Maintenance Report, 12/2/2022 (1 copy)

Separate Cover

- Fiscal Impact Statement (1 copy)

c: Chris Reynolds, Brady Sullivan