

**Comfort Inn & Suites - 80-Room Hotel Development  
Major Land Development Project**

**Comprehensive Plan 'Consistency' Analysis**

**Gooding Avenue  
Assessor's Plat Map 111 - Lot 1**



Prepared For: D & M Boca Development, LLC

Prepared By: Pimentel Consulting, Inc.

Date: 28 January 2025

### **INTRODUCTORY STATEMENT**

D & M Boca Development, LLC ("Applicant") has retained the professional land use planning and zoning consulting services of Pimentel Consulting, Inc. ("Consultant"), in order to evaluate the proposed development of property situated along Gooding Avenue for 'Hotel' purposes. The subject development proposal is not only as a matter-of-right (introducing a 'by-right' land use), but also solely necessitating Major Land Development Project review and approval ("Major LDP"). The proposed 'Hotel' development, as this report will evidence in a most comprehensive and conclusive manner, is a much-desired land use that fulfills many Comprehensive Plan goals and objectives. Furthermore, pursuant to recent statutory amendments, the community thoroughly revised their zoning regulations reemphasizing the appropriateness of the referenced 'Hotel' development; continuing to render it as a matter-of-right. Whereas certain massing and scale regulations have been somewhat altered (e.g. maximum three-stories in overall height), the community's aspiration remains intact. The community has neither imposed the need for a special use permit, invoking the need to meet certain 'specific' and 'objective' criteria, nor restrictive dimensional criteria that would otherwise preclude development of the subject property. What can be most assured is the sensitive manner in which the subject development has been engineered; particular attention afforded certain site characteristics as evidenced by obtained regulatory permits, most notably the Wetlands Permit.

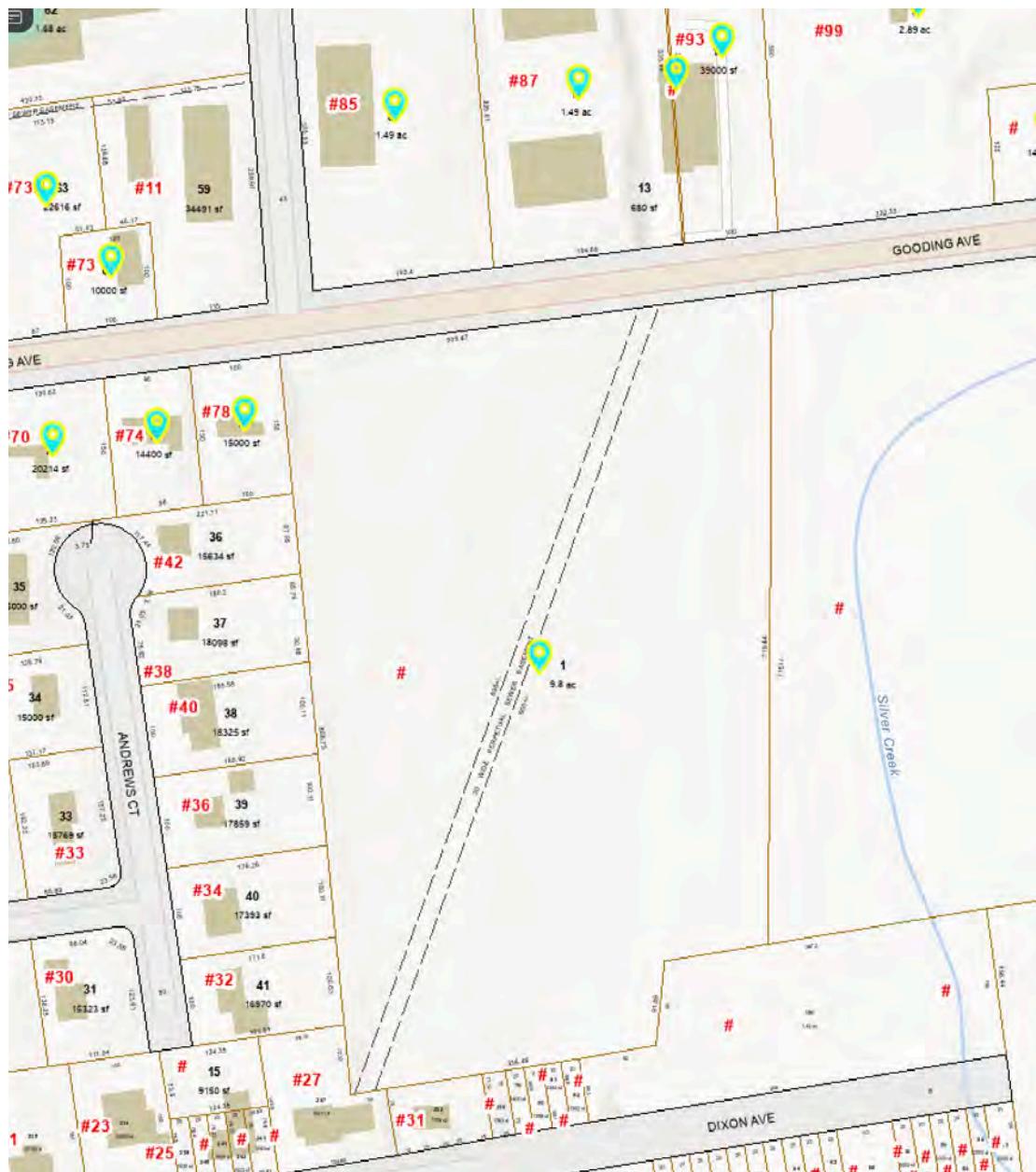
In light of the subject hotel development proposal, this land use consultant has thoroughly reviewed all submission materials and associated plans, in addition to the following regulatory documents:

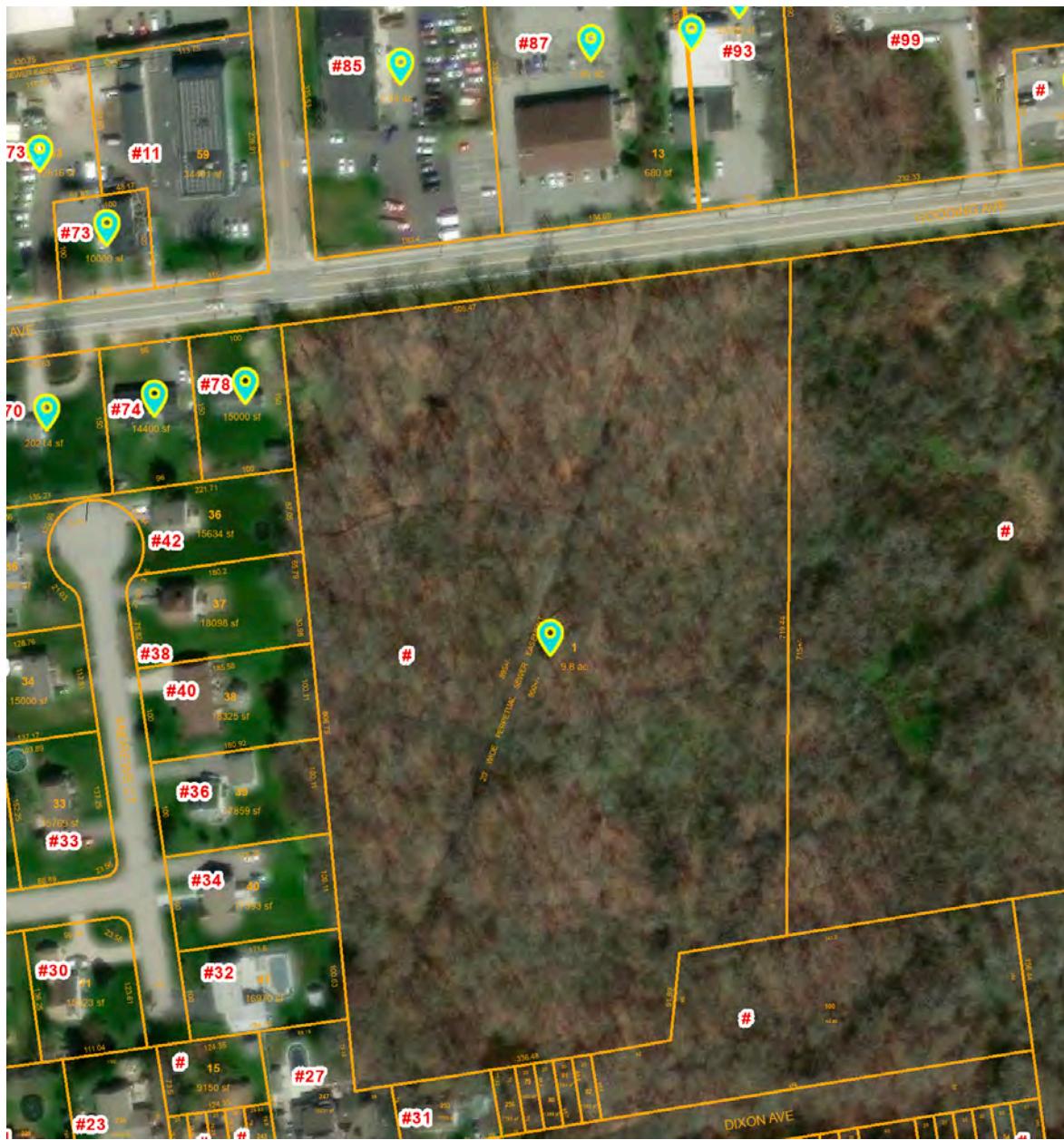
- Town of Bristol 2016 Comprehensive Community Plan - Adopted by Town Council: 25 January 2017 - Approved by the State of Rhode Island: 2 February 2017 ("Comprehensive Plan");
- Town of Bristol, Rhode Island, Zoning Ordinance ("Ordinance");
- Town of Bristol, Rhode Island, Subdivision & Development Review Regulations - As Amended Through 14 March 2024 ("Development Regulations"); and,
- Pertinent Rhode Island General Law ("RIGL"), to include recent statutory amendments.

Finally, a thorough analysis of the subject property and general surrounding neighborhood has been personally prepared, for the express purpose of evidencing neighborhood compatibility. My analysis entails rendering a determination as to the appropriateness of the proposed hotel development, in light of the respective Comprehensive Plan, Development Regulations and Ordinance goals and objectives.

## **PRESENT PROPERTY CONDITIONS**

The subject property is addressed 0 Gooding Avenue, further identified as Assessor's Plat Map 111, Lot 1, and containing approximately 9.78-acres, or 426,017 square feet, is presently unimproved ("Property"). The Property is configured in typical rectangular fashion, having in excess of 500 linear feet of lot frontage along Gooding Avenue. Although there are some on-site wetlands constraints, development has been sensitive to said features, preserving the vast quantity of natural vegetation in perpetuity. In fact, the present mature vegetation, along with stated wetlands, will serve as natural buffers to the sole immediately abutting residential neighborhood. However, as this report will fully detail, the predominant land use(s) along Gooding Avenue, are general commercial and light industrial. Lot configuration and present site conditions are illustrated below and on the following page, as excerpted from the Town's GIS.





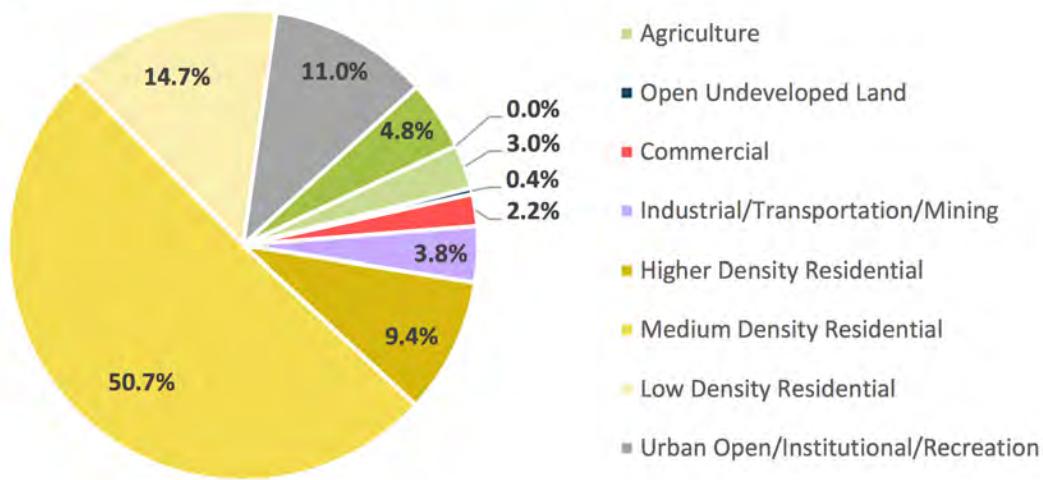
Pursuant to the Comprehensive Plan - Map 13 'Circulation' [Page 159], Gooding Avenue is classified a 'Major Collector' roadway, recognizing its importance for vehicular movement serving nearby business entities. The Rhode Island Department of Transportation defines a Major Collector in the following manner:

**Major and Minor Collectors** - Collectors serve a critical role in the roadway network by gathering traffic from Local Roads and funneling them to the Arterial network.... The distinctions between Major Collectors and Minor Collectors are often subtle. Generally, Major Collector routes are longer in length; have lower connecting driveway densities; have higher speed limits; are spaced at greater intervals; have higher annual average traffic volumes;

*and may have more travel lanes than their Minor Collector counterparts...Since **Major Collectors offer more mobility...**"*

The Property is presently zoned in a General Business District ("GB District") manner, as are all of the properties along the same side of Gooding Avenue and extending throughout Metacom Avenue, with the exception of a small pocket of Residential-15 District ("R-15 District") to the immediate west, reflecting their existing historical land usage, and Open Space District ("OS District") property directly abutting to the west. The referenced approximately 15-acre OS District property must have been recently rezoned, considering the Comprehensive Plan illustrates that it was zoned in a similar GB District manner. Therefore, now being zoned OS District not only serves as permanent vegetative buffering, but also evidences the dire need to realize full and reasonable development of the Property. The Comprehensive Plan [Pages 23 - 24] details that approximately 75% of all land resources are residentially oriented with an additional 10% allocated to open space and institutional land uses, as contrasted with a mere 6% utilized for a combination commercial and industrial usage.

**Figure 2.1: Existing Land Use in Bristol, RI**



*Source: Town of Bristol GIS data*

Such a drastic disparity realizes serious fiscal concerns, necessitating all commercial land resources be developed to their fullest extent.

**Goal 1.** *"The sustained, viable growth of business to provide for improved standard of living and economic health of Bristol, the pursuit of which should be built upon Bristol Values and Attributes, as follows:"* [Page 102]

**Policy B. Section B:** *"Streamlining regulations permitting and approvals that."* [Page 103]

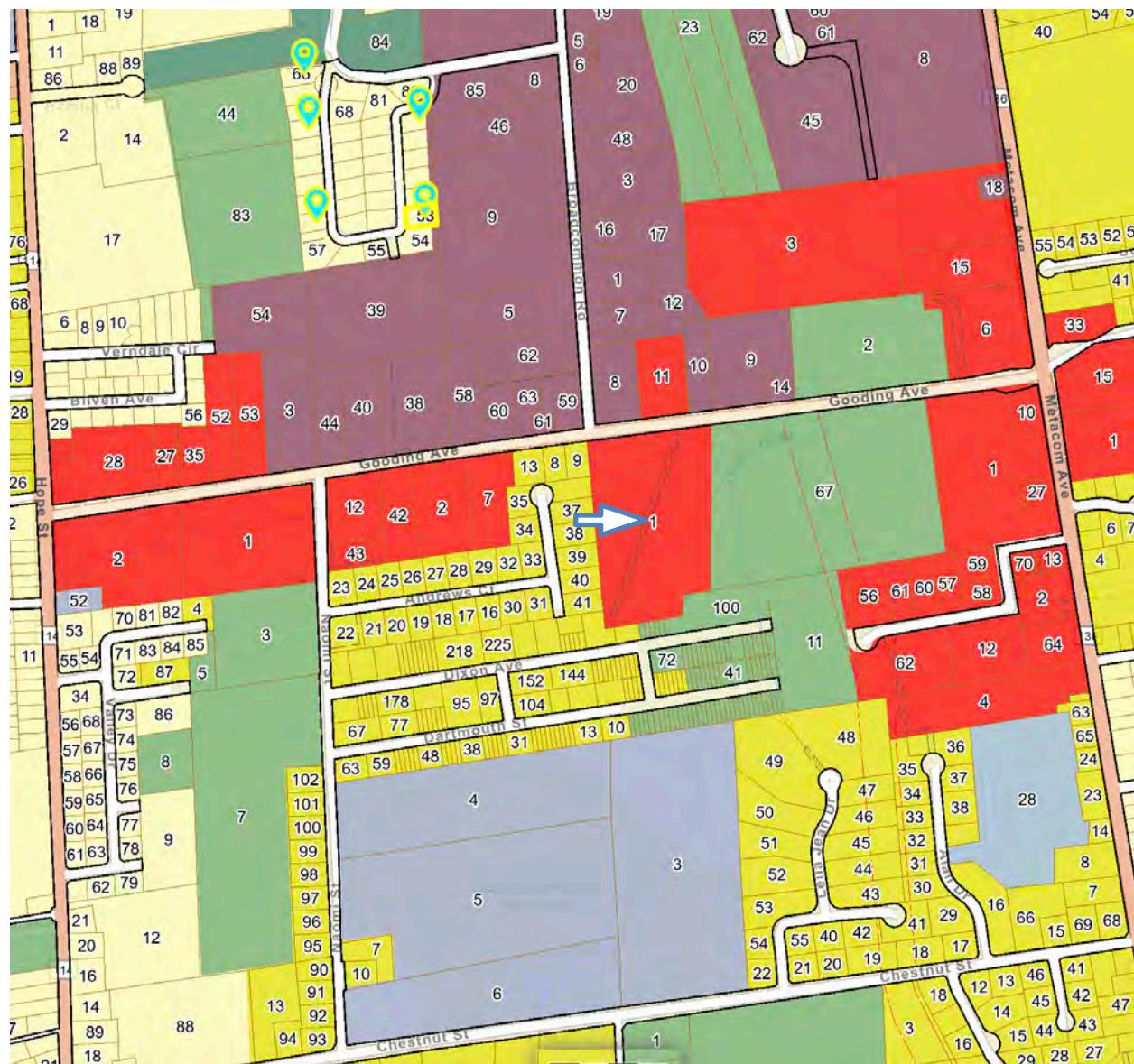
**2. Optimizing the use of scarce manufacturing/commercial zoned land - only 6% of Bristol land is zoned for commercial/industrial use...**

**Goal 4.** "Maintain a favorable tax base." [Page 19]

**Policy A.** "Encourage balanced growth."

**Policy B.** "Manage growth in concert with the fiscal capacities of the community."

Opposite Gooding Avenue, properties are zoned a mixture of GB District and Manufacturing District ("M District"), with the latter having a much more profound presence. The referenced zoning districts are respectively defined below. In addition the Town's official zoning map, as excerpted from the Town's GIS, is provided to illustrate the appropriateness of development for 'Hotel' purposes from a zoning regulatory perspective.



**Section 28-3. - Establishment of Zoning Districts:** "For the purposes of this chapter, the following zoning districts shall be designated:"

**(2)** "Commercial zoning districts shall be as follows."

**GB Zone:** "General business. This zoning district is intended for commercial areas that serve town-wide and regional commercial needs for retail services, and professional office establishments."

**(3)** "Industrial zoning districts shall be as follows."

**M Zone:** "Manufacturing. This zone is intended for general industrial uses that accommodate a variety of manufacturing, assembly, storage of durable goods and related activities, provided that they do not pose toxic, explosive or environmental hazard in the town."

As this report will clearly evidence, careful attention to development has been undertaken, thus the reasoning for attaining Department of Environmental Management ("DEM") review and approval, even before proceeding onto the Pre-Application Phase of Major LDP, particularly in regard to the respective Wetlands Permit. It is without question that introduction of a 'Hotel' will follow the commercial and industrial pattern of development along Gooding Avenue and extending out towards Metacom Avenue. Only a minute portion of the Property will be utilized for the express purpose of protecting and preserving the vast on-site land resources. The overwhelming majority of the Property, upwards of 88%, will remain in a naturally pervious state, thereby affording extensive natural screening and buffering. Finally, all drainage will be engineered to assure site and neighborhood improvement. The development will in fact further many respective Comprehensive Plan - Goals and Objectives, as evidenced below:

**Statement of Goals and Policies** - "Land use planning and management, in a sustainable manner that respects Bristol's environment and unique character for present and future generations, is paramount and is intended to support all other comprehensive planning goals of the Town of Bristol. Based on the critical issues described in the Introduction and the overarching goal stated above, this section presents the goal and policies developed by the Town of Bristol to guide its land use planning. This goal encompasses goals expressed in the other elements of this plan." [Page 57]

**Goal 1.** "Promote land use patterns that are sensitive to the Town's character and assets, recognize the Town's resource constraints, are economically sound, and facilitate smart growth to build capacity in sustainability and climate resiliency in Bristol." [Page 57]

**Policy E.** "Maintain the character of Bristol and make sure that new development does not adversely impact the integrity of the Town."

**Policy F.** "Embrace Smart Growth principles, conservation development zoning and encourage sustainability of our resources in all land use decisions made by the Town of Bristol."

The referenced zoning districts can also be shown to be consistent with the Comprehensive Plan. Consistency is corroborated by evidencing agreement with the corresponding land use classification in the Future Land Use Map ("FLUM") [Map 5B - Page 64]. Consistency further evidences agreement with the Zoning Ordinance and permissibility of land usage. The FLUM classifies the Property for General Business purposes. It also recommends a Mixed-Use Overlay, although it does not appear that this has ever been effectuated. Regardless, the underlying zoning designation dictates, pursuant to the Ordinance, what is deemed 'appropriate' usage of one's property.

### **DEVELOPMENT PROPOSAL**

The present development proposal entails construction of an 80-room, three-story hotel, referenced facility to be situated along the northwesterly corner of the Property. The only other visible improvement(s) are all accessory, to include off-street parking, loading, etc. A multi-storyed facility minimizes usage of land resources, and yet realizes regulatory compliance; commercial facilities being limited to a maximum of three-stories. The Comprehensive Plan recognizes the value of supporting height over sprawling footprint coverage. This can be evidenced via the recommendation that alternate development regulatory tools, such as 'Form-Based Zoning,' be pursued. This type of development tool actually affords greater neighborhood protection.

**Goal 2.** *"Ensure that neighborhoods are livable places."* [Page 4]

**Policy B.** *"The Town is encouraged to investigate new urbanism techniques such as form based vs. use based zoning regulations to maintain characteristics of existing neighborhoods."*

Comprehensive Plans do not typically provide commentary on any specified land use, unless it is well-desired and deemed much-needed. Both the community and public-at-large voiced this sentiment within the Town's Comprehensive Plan [Pages 96 - 99], as evidenced below.

#### **Economic Development Element - Our Process**

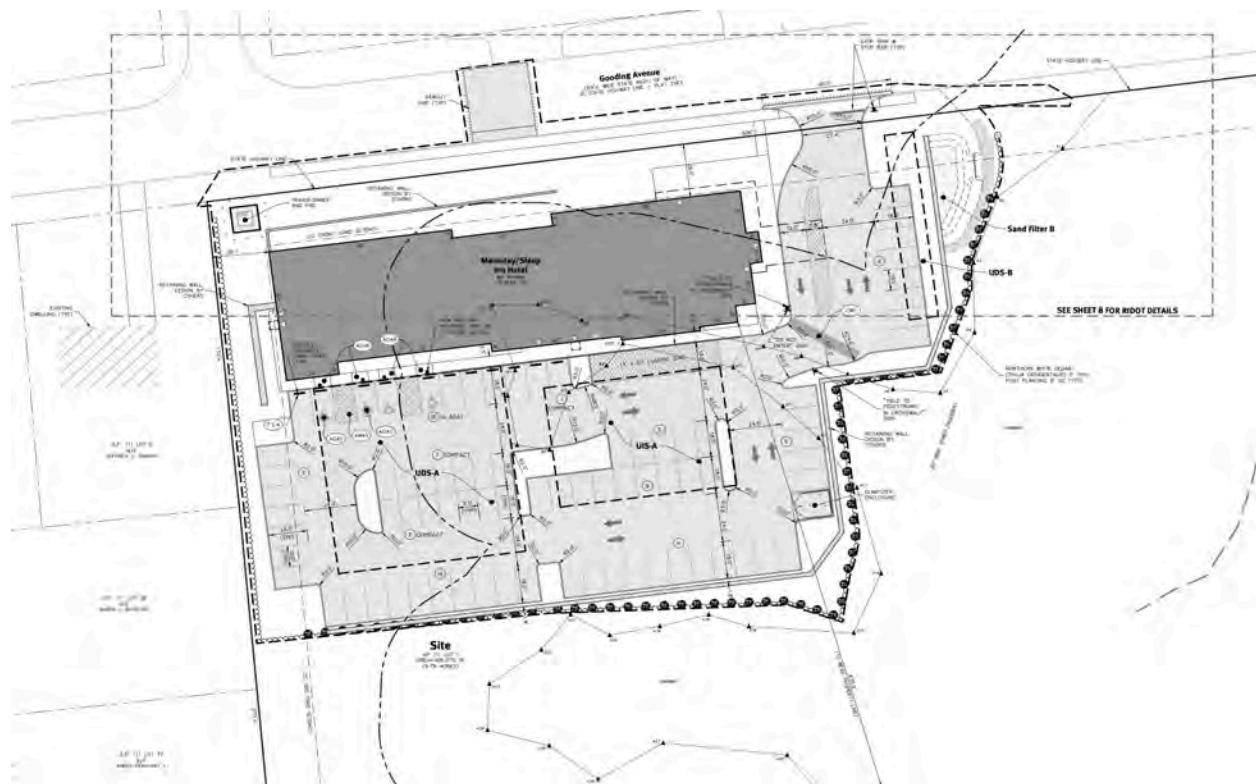
*"About a dozen of the 48 action items from the 2009 Comprehensive Plan survive in this Plan and several are more on-going "Policy Items."*

*"The Steering Committee conducted interviews with businesses to better understand business needs and competitive pressures that manifest themselves in government/business relations. Interviews were organized by business groupings/ segments as follows."*

o **Destination businesses.**

**Included in Destination businesses were** cultural events, museums, other arts and crafts, regionally-known restaurants, **hotels**, and recreational water sports."

Another pertinent consideration, is the limited town-wide zoned land resources that would otherwise permit introduction of a Hotel as a matter-of-right. This is further rendered problematic by the presence of appropriately sized parcels with limited constraints to development. Therefore, a property that is properly zoned and contains sufficient constraint-free land area to accommodate a viable hotel development, should be carefully considered and supported by all regulatory bodies. The referenced development is illustrated below, as excerpted from the Applicant's submission package [Credit: DiPrete Engineering].



In regard to the specified 'Hotel' land use, the Comprehensive Plan identifies it as a 'destination business'. It the determination of the Comprehensive Plan [Pages 99 - 100], in great part due to the results of the requisite regulatory in-depth public participation process, that destination business, inclusive of 'Hotels,' be supported because they contribute to the economic health of Bristol, *"Each of the Business Segments is an important element for improved standard of living and economic health of Bristol, but with different roles."*

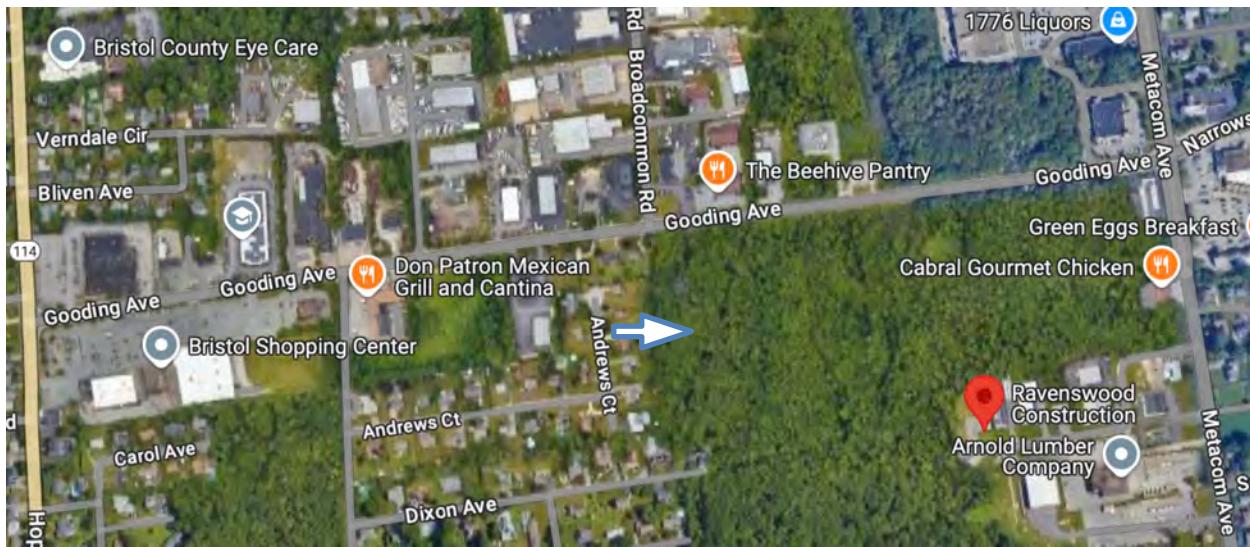
**"The Town must focus on growing destination and external-facing businesses. These are the basic, core building blocks for our future. They are the growth engines and provide synergistic growth to other segments.** External-facing businesses are particularly important because for each new job created it supports 3-4 local jobs. These tend to be well-paying jobs."

**Based on interviews conducted, destination businesses bring annually about 35,000 wedding guests and 300-400,000 events visitors to our Town. But, the Town has not optimized the economic growth potential of this market, which requires concerted effort amongst all the constituents to broaden the season and diversify/ broaden the opportunities."**

Finally, it cannot be emphasized enough that the proposed 'Hotel' is permitted as a matter-of-right land use within the GB District. Furthermore, development is reviewed pursuant to the by-right Major LDP regulatory procedural process.

### **NEIGHBORHOOD ANALYSIS**

Gooding Avenue is predominantly improved by a variety of commercial and industrial land uses. There are also a smattering of residences and Town-owned properties that are now zoned in an OS District manner. A comprehensive assessment of all properties lining Gooding Avenue was prepared. In total, 30-properties were detailed, but only 19-properties fully analyzed because they reflected the true commercial and industrial character of the immediate Gooding Avenue neighborhood. The excluded properties represented a limited assortment of residences and those that are presently unimproved. A much more comprehensive analysis would have realized a much greater quantity, considering the industrial character across Gooding Avenue extends some distance in a northerly direction. The aerial photo below, excerpted from Google Earth, illustrates both the intensity and parameters of the referenced neighborhood analysis.



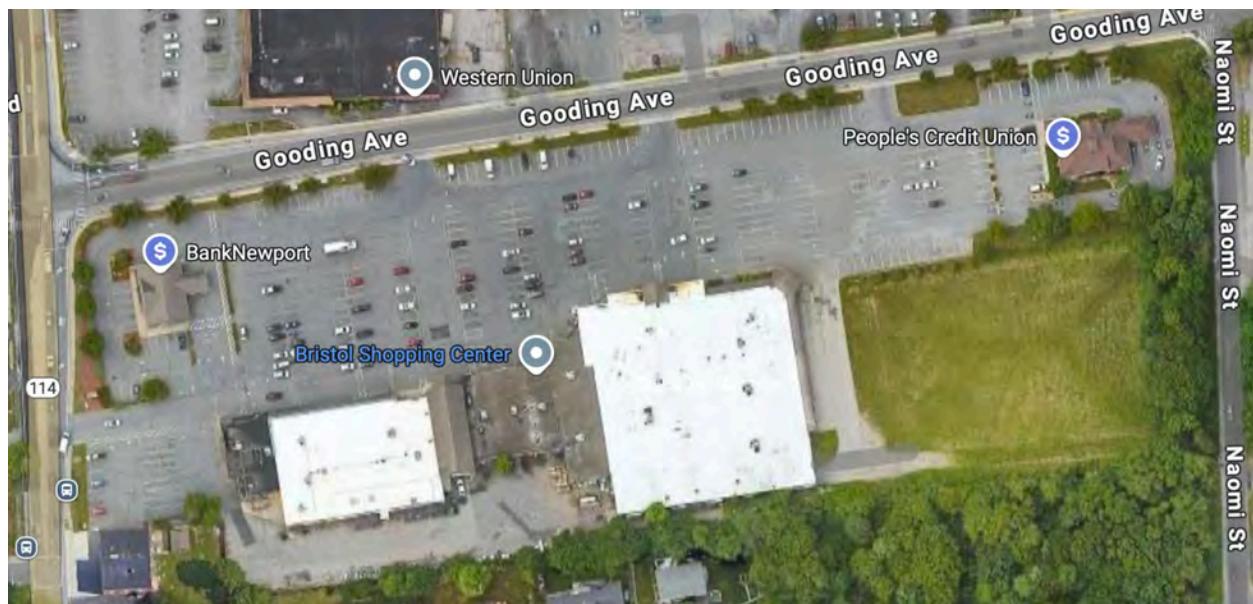
The Gooding Avenue corridor, extending out onto Metacom Avenue, is presently improved with nine (9) general commercial businesses (retail sales, restaurants, etc.), seven (7) more intensive commercial entities (services garages, car washes, gas stations, etc.), and three (3) industrial operations. Pursuant to the data collected from the Town's Tax Assessment Records,

the average building coverage is 18.3%, or a six-fold increase over proposed development conditions. In regard to impervious lot coverage, the collected data is a bit more circumspect. Detailed data appears to severely undercount existing conditions. Nevertheless, were one to simply consider record data, average impervious coverage is 24.2%, or greater than a two-fold increase over proposed development conditions. However, this Consultant would contend that existing impervious lot conditions are woefully more drastic, with certain properties appearing to be close to 100% covered. The following aerial photos [Credit: Google Earth], provide a sample of true on-site development conditions.

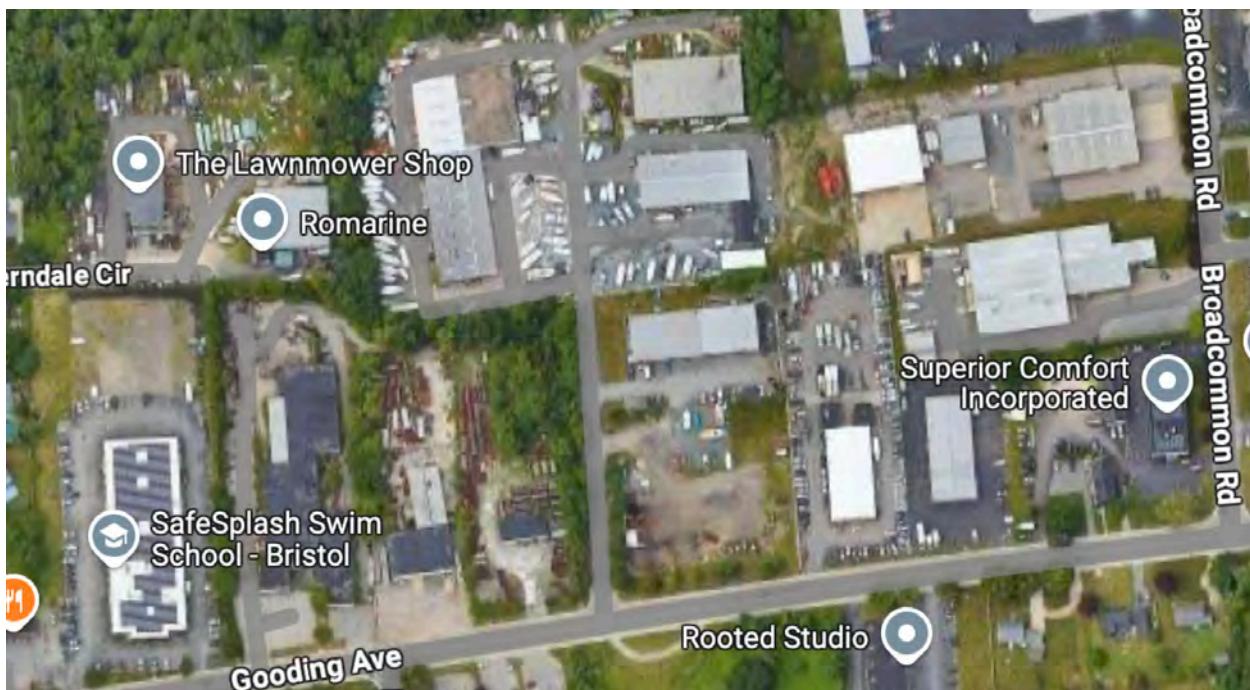
**Looking north, directly across Gooding Avenue from Property.**



**Looking west, at the intersection of Gooding Avenue and Hope Street.**



Looking northwest, across Gooding Avenue from the subject property.



Another pertinent consideration is the presence of extensive town-owned open space resources. Directly abutting the Property along the entire easterly boundary is a 14.7-acre parcel that was previously zoned in a GB District, but now in an OS District manner, thereby serving as natural buffer in perpetuity. This also corroborates this Consultant's assertion that commercial land resources are forever becoming more scarce, as evidenced by the loss of another sizable parcel. The second point is in regard to the immediately abutting residences to both the west and south. Once again, their presence has been carefully considered in development of the Property, and thus the reasoning for overall massing and scale (atypical three-story proposal), as well as facility placement. The vast majority of the property, upwards of 88%, will be maintained in a naturally forested state.

#### GENERAL REGULATORY ANALYSIS

Considering a 'Hotel' is permitted as a matter-of-right within the GB District, pursuant to the Ordinance's 'Use Schedule', and there are only a smattering of properties that are appropriately sized and suitably developable for such purposes, as corroborated by both the Comprehensive Plan and Zoning Map, it is self-evident that development of the Property in the manner so-proposed is most appropriate. Once again, this Consultant reemphasizes that there are little to no remaining viable land resources, as evidenced by the Comprehensive Plan [Pages 23 - 24]. There is a major disparity between residential and commercial / industrial land usage; with

approximately 75% of overall land resources dedicated to residential land usage, as compared to a mere 6% dedicated to a combination of commercial and industrial land usage. The limited appropriately zoned land resources not only renders it difficult to realize a viable location, but also places a great strain on the community from a fiscal perspective. A heavy reliance on a residential tax base is unsustainable, without corresponding sufficient commercial and industrial revenue streams. It is therefore imperative that appropriately sited, by-right commercial development that is ‘consistent’ with the respective goals and objectives of the Comprehensive Plan, be supported whenever it avails itself.

**Land Use Goal 1.** *“Promote land use patterns that are sensitive to the Town’s character and assets, recognize the Town’s resource constraints, are economically sound, and facilitate smart growth to build capacity in sustainability and climate resiliency in Bristol.”* [Page 3]

**Policy D.** *“Maintain a strong tax base, favorable tax rate and identify alternative revenue sources.”*

**Policy E.** *“Maintain the character of Bristol and make sure that new development does not adversely impact the integrity of the Town.”*

**Policy F.** *“Embrace Smart Growth principles, conservation development zoning and encourage sustainability of our resources in all land use decisions made by the Town of Bristol.”*

**Services and Facilities Goal 3.** *“Manage growth so as not to overtax the sewer system.”* [Page 18]

**Policy A.** *“Plan for growth in areas that are, or can be, served by the sewer system.”*

Therefore, after careful review of all pertinent regulations, to include the Ordinance and Development Regulations, this Consultant has concluded that the sole review necessary is attaining Major LDP approval

### **MAJOR LAND DEVELOPMENT PROJECT REVIEW - REGULATORY ANALYSIS**

As detailed in this report, a ‘Hotel’ is permitted by-right within the GB District, in accordance with the Ordinances’ - Use Schedule.

**Article III. Permitted Uses - Table A. Permitted Use Table - Section 28-82. - Use regulations.**

**Residential - Hotel: Permitted-by-Right within the GB District**

Furthermore, pursuant to Article I. ‘Definitions’ of the Development Regulations [Pages 59 - 60], the subject development proposal, the subject development proposal is defined as a Major LDP.

**Major land development plan** - *“A land development project which exceeds the thresholds for a minor land development project as set forth in this section.”*

**Minor land development project** - . A land development project involving any one of the following:

**H.** *“Seven thousand five hundred (7,500) gross square feet of floor area of new commercial, manufacturing or industrial development; or less.”*

This Consultant has already categorically evidenced regulatory compliance. This Consultant, in conjunction with the design team, have also evidenced Comprehensive Plan ‘consistency’. A Comprehensive Plan is not prepared in a vacuum, but encompasses a global view that entails many disciplines in order to render a definitive determination on appropriate land usage. It is for this very reason why experts in their respective fields review and provide independent conclusions on a development’s appropriateness, to include civil engineering, traffic engineering, architecture, wetlands (if necessary), etc, just to mention a few disciplines. The following is a compilation of this Consultant’s and respective experts (as applicable) responses in satisfactorily addressing both the Ordinance’s ‘General LDP Standards’ and Development Regulation’s more specific ‘Required Findings’

#### **Zoning Ordinance - LDP - General Standards for Development**

The requisite Ordinance ‘General Standards’ for the granting of the Major LDP approval are detailed in Section 28-282(c) ‘General Standards for Development’. The referenced standards are individually addressed below.

**(1) Relation to Transportation** - *“Principal vehicular access shall not be from arterial highways. Access points shall be designed to encourage smooth traffic flow with controlled turning movements and minimum hazards to vehicles and pedestrians. Where the development is located on an arterial highway, a service road should be utilized, together with common driveways. Merging, turnout lanes and traffic dividers shall be provided where existing or anticipated heavy flows indicate need.”*

Gooding Avenue is classified a ‘Major Collector’, thereby realizing regulatory compliance. Furthermore, the Hotel development will be accessed via a singular curb-cut, thereby minimizing ingress and egress points as preferred by both the Ordinance and Comprehensive Plan. Finally, interior vehicular travel has been designed to meet all design standards, to include interaction with pedestrians. Regardless, a traffic analysis has been prepared and will be presented by the respective expert.

**Circulation and Transportation Goal 1.** *“Increase the ability to travel about town with ease.”* [Page 14]

**Policy C.** *“Reduce and/or eliminate the curb cuts along regional street systems. Only consider new curb cuts if there is no other way to access a property.”* [Page 15]

**(2) Relation to Surrounding Property** - “Site planning shall provide protection from potentially adverse surrounding influences, and protection of surrounding areas from potentially adverse influences from within the development.”

The vast majority of the Property will be maintained in a naturally vegetated state, upwards of 88% of the overall land resources, thereby serving to preserve and protect both property and immediate neighborhood. The Hotel development proper, facility and all accessory improvements, will be concentrated along the northwesterly corner. The referenced development has been sensitively designed, being carefully considerate of the sparse abutting residences. Thus the reasoning for integrating such considerable separation, realizing appropriate distancing and visual screening. The referenced improvements are well detailed in both the engineered site plan and landscape plan, both of which have been prepared by licensed professionals in their respective fields. It necessitates reemphasizing that the Property is zoned in a GB District manner and continues to permit the proposed Hotel land use as a matter-of-right. In fact, most, if not all, commercially zoned properties are aligned with residential land uses; a very typical commercial corridor condition.

**(3) Buffer Zone** - “Landscaped buffers shall be required for certain land development projects, and are set forth in the requirements for each type of land development project. The buffer shall not be paved, nor be used for parking or driveway, nor contain any structure, nor be used for leaching or absorption fields. However, underground water, sewer or drainage lines with appropriate easements thereto may be permitted in a buffer.”

Once again, the vast majority of the Property will be maintained in a naturally vegetated state, upwards of 88% of the overall land resources, and the Hotel development proper, facility and all accessory improvements concentrated along the northwesterly corner. Therefore, far in excess of the minimum requisite buffers will be preserved and protected in perpetuity in their current natural state. Not a single site feature or activity associated with the development will encroach into the requisite buffers. This is not only evidenced by the professionally prepared plans and associated documents, but will also be testified to respective experts.

**(4) Screening** - “Fences, walls or vegetative screening shall be provided along the perimeter of the development where needed to provide a buffer, to preserve public viewsheds and to minimize incompatibility with surroundings. In particular, the following uses and areas within the development shall be screened from adjacent residential district or public streets.”

**a.** “Off-street parking areas containing more than ten spaces. When nearest portions of noncontiguous parking areas are separated by less than 50 feet of landscaped space, as measured from their nearest points, they shall be considered as combined for computing the above minimum number of spaces.”

**b.** “Service areas for loading and unloading vehicles other than passenger; and for storage and collection of trash and garbage.”

**c.** *“Utility areas such as pumping station, electric utility substations and the like.”*

Appropriate vegetative buffering will encompass the entire development, in addition to being internally integrated throughout the off-street parking, loading, trash refuse, and other site amenities, for the express purpose of properly screening the development. The professionally prepared landscape plan will evidence requisite regulatory compliance.

**(5) Maximum Height** - *“No structure shall exceed three stories or 35 feet above grade, as defined in this chapter.”*

Full compliance, as illustrated in the submitted engineered site plan.

**(6) Procedural and Design Standards** - *“Unless otherwise indicated, the procedural and design standards for improvements in a land development project shall be the same as those set forth in the town subdivision and development review regulations in effect at the time of the application insofar as such regulations are applicable. Waivers may be provided in accordance with the requirements of the town subdivision and development review regulations.”*

Full compliance, as individually addressed in the next section of this report.

### **Development Regulations - Required Findings**

The requisite standards for the granting of the Major LDP approval are detailed in Section 8.6 ‘Required Findings’ of the Development Regulations. The referenced standards are individually addressed below.

**Section 8.6. Required Findings.** *“For all subdivision or development project applications, the approving authority, whether Administrative Officer or Board, shall address each of the general purposes stated in Article 1 of these Regulations and R.I.G.L. Section 45-23-30, and shall make positive findings on each of the following provisions as they apply to the application under review, as part of the proposed project’s record prior to approval. Where all findings are positive, approval may not be withheld by the Board. The requirement to address the purposes of these Regulations and make written findings on each of the following provisions shall also apply in the case of a vote to deny an application.”*

**A. Consistency** - *“The proposed development is consistent with the comprehensive community plan and/or has satisfactorily addressed the issues where there may be inconsistencies.”*

As has been well detailed throughout this report, a thorough review of the Comprehensive Plan has concluded absolute ‘consistency’. The proposed development will not alter the general character of the surrounding area or impair the intent or purpose of either the Ordinance or Comprehensive Plan. The proposed hotel development will not only further a plethora of goals and objectives, but it is also in accordance with the FLUM.

**B. Compliance with Zoning Ordinance** - *"The proposed development is in compliance with the standards and provisions of the Town's zoning ordinance."*

The proposed land use is permitted as a matter-of-right and realizes full dimensional compliance. It also comports with all requisite LDP standards of review, as evidenced above.

**C. Environmental Impact** - *"There will be no significant negative environmental impacts from the proposed development as shown on the final plan, with all required conditions for approval."*

**D. Buildable Lot** - *"The subdivision or development project, as proposed, will not result in the creation of individual lots with such physical constraints to development that building on those lots according to pertinent regulations and building standards would be impracticable."*

The referenced development project will be thoroughly served by requisite public infrastructure and reflect the massing and scale of the Gooding Avenue neighborhood, as evidenced by the results of the personally prepared Neighborhood Analysis. This Consultant is well aware of certain unique site characteristics, and that generally speaking such characteristics are referenced in the Comprehensive Plan. Such site considerations are not unusual, merely necessitating reflection by the respective experts. The following are a summary of applicable site considerations, as excerpted from the Comprehensive Plan, and respective expert responses.

**Goal 2.** *"Ensure that neighborhoods are livable places."* [Page 4]

**Policy C.** *"Sidewalks are encouraged for safety and sustainability purposes in new developments."*

Sidewalks are designed along the frontage of Gooding Ave and within the proposed Hotel site to provide for safe pedestrian access to the facility. [Engineering Repose]

**Policy E.** *"Address the issue of exterior lighting for public and private development, balancing the need for adequate lighting with the need to avoid excessive lighting on nearby residences."* [Page 5]

Lighting is proposed for safe pedestrian access within the parking lot and within the structure entrance areas to provide for safe pedestrian access. [Engineering Repose]

**Policy G.** *"Buffer neighborhoods from incompatible land uses."* [Page 5]

Vegetated buffer to the westerly residential property is provided as required by the zoning ordinance. [Engineering Repose]

**Goal 1.** *"Protect Bristol's natural landscape and resources for present and future generations."* [Page 8]

**Policy A.** *"Protect Bristol's water, air, soil, plant, and wildlife resources, especially all resources that are identified as being threatened or endangered. Protect and encourage biological diversity. Conserve and manage natural resources in a manner that consistent with the contemporary vision of the town."* [Page 8]

The project design has complied with RIDEM OWR Wetland division regulations. The stormwater management system is designed to improve stormwater quality discharge, and to mitigate stormwater discharge rate and volume to pre development levels. The site development is designed so as to have no adverse impact to the existing flood plain. Soil Erosion and Sediment Control measures are specified to protect wetland resource areas during construction. A stormwater management system operation and maintenance plan is specified for long term performance and permit compliance. The impact to area wetlands is therefore mitigated by the project design, [Engineering Repose]

**Goal 4.** *"Educate and motivate the public to encourage involvement and increased awareness of every person's responsibility to preserve and protect the natural, historical and cultural character of the town."* [Page 9]

**Policy A.** *"Regulate growth and development so as to protect natural, historical, and cultural resources for future generations."* [Page 10]

The project site is located in an area zoned as general business where the hotel and associated parking is a permitted use. The project is proposed with frontage on the RIDOT State Right of Way Gooding Avenue. The area of disturbance is limited to 4.5 acres more or less over the 9 acre parcel. The remaining undeveloped area of the parcel are to remain in the natural state. [Engineering Repose]

**E. Street Access** - *"All proposed development projects and all subdivision lots shall have adequate and permanent physical access to a public street. Lot frontage on a public street without physical access shall not be considered compliance with this requirement."*

The proposed Hotel will have direct and permanent physical access to and from Gooding Avenue.

## **CONCLUSION**

It is this Consultant's professional opinion that the proposed development is consistent with the Comprehensive Plan and furthers the respective Policies, Goals and Objectives of said Plan, and can therefore be fully supported by the Bristol Planning Board. My professional opinion is

based upon the manner in which the development can be incorporated into the overall fabric of the general area. The Planning Board must carefully consider the many benefits posed by the Applicant’s development, to include a new economic revenue stream and much-needed Hotel space.