

January 13, 2026

VIA EMAIL

Town of Coventry Planning Commission
c/o Doug McLean, Director of Planning and Development
Town of Coventry
1675 Flat River Road
Coventry, RI 02816
dmclean@coventryri.gov

Re: Comprehensive Permit for Preliminary Plan Review – Village at Tiogue located at Tiogue Ave., and Tiffany Rd., Assessor’s Plat 32, Lots 149, 150, 151, and 153 (“Property”)

Dear Hon. Planning Commission Members,

As you know, this office represents 232 Realty Associates, LLC (“Applicant”) in its Comprehensive Permit Application for the development known as the Village at Tiogue (“Project”). This correspondence is to provide contextual background of the Project’s travel and address additional feedback from the November Planning meeting on this Project.

A. Contextual Background

The Project was submitted on September 15, 2025. After several TRC meetings, the Planning Commission held a public hearing on November 19, 2025. Various submission waivers were granted at the November 19, 2025 public hearing and the application was certified complete, effective at the time of the vote on such waivers. The public comments did not finish at the November hearing, and the public hearing was continued to the December 18, 2025 meeting. On December 11, 2025, the Applicant submitted a response letter to the November 2025 Staff Report. Unfortunately, the December 18, 2025 Planning Commission Meeting was canceled due to lack of quorum. The Applicant has since met with the Planning Staff to coordinate supplemental responses and plan revisions for the January 28, 2026 Planning Commission Meeting. A comprehensive index of the Project’s record as of the date of this letter is attached as **TAB S¹**.

¹ Lettering has been continued from what was previously provided for the original Preliminary Plan Submission dated September 15, 2025.

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B. Responses and revisions

In order to address all staff, TRC and Planning Board comments to date on the Project, the applicant includes several items attached to this correspondence in advance of the next TRC and Planning Board meetings:

List of enclosures are as follows:

TAB S: The Project Record

TAB T: The Revised Plan Set

TAB U: The Planning Expert Report

TAB V: The Bald Eagle Report

TAB W: The Affordable Housing Units Proportionality Correspondence from the Applicant

TAB X: The List of HOA Provisions

TAB Y: The Draft Open Space Covenant,

TAB Z: The RIPDES RIDEM Approval dated December 3, 2025

TAB AA: The Bond Estimates for Public Infrastructure

TAB BB: The Supplemental Traffic Letter

1. Plan revisions

Several plan revisions were made and are shown on the revised plan set attached at **TAB T**. The changes are as follows:

a. Connection of areas 2 and 3

At the suggestion of staff and the Commission, the Applicant connected areas 2 and 3 to remove the cul-de-sacs and create a through-road. The roadway is proposed as public, with the adjustments sought as detailed in the project cover letter and narrative for pavement and right-of-way width reductions, berms instead of concrete curb, and sidewalks on one side of the street, consistent with both the roads in the surrounding area, and prior waivers granted on non-affordable projects by the Town. Specifically, the adjustments requested as related to the public roadway are as follows:

1. Right of way width to be 50' (60' required – 10' of relief from Subdivision and Land Development Regulations Article XII – Design and Public Improvement Standards, 3. Street Rights of Way, Table 1)
2. Pavement width to be 26' total (with 12' wide travel lanes and 1' berm each side) (30' required- 4' of relief from Subdivision and Land Development Regulations, Figure 2 Street Cross Section – R-20 Zone)

3. Bituminous berm in lieu of concrete curb (relief from Subdivision and Land Development Regulations, Figure 2 Street Cross Section – R-20 Zone)
4. Asphalt sidewalks are proposed on one side (Relief from Subdivision and Land Development Regulations Article XII – Design and Public Improvement Standards, 17. Sidewalks)

b. Reduction in Density

The Applicant has reduced the proposed density from 176 units to 162 units, consistent with the minimum density bonuses allowed at the Project site, by right, under R.I. Gen. Laws § 45-53-4. Forty-one (41) out of the 162 units will be low-to-moderate income units. The reduction in units is shown in former area 3 and coupled with the connectivity of former areas 2 and 3 created a slight change in former area 2's type and placement of homesites, spacing, and their relationship to the open space areas. The project continues to propose single family detached and single family attached dwelling units, with townhome style units in Area 1 and house lots and cottages in combined areas 2 and 3. The new orientation is shown at Sheet 8 of the plan set and the integration of the affordable units is shown on Sheet 8 with a ~ over the unit number.

c. Mailboxes

Estimated locations for mailboxes are shown on the plans, with the final location to be determined and approved by the USPS during construction. *See* Sheets 8-10.

d. Streetlights and Hydrants

Streetlights have been added to the plans at every approximate 100', and fire hydrants have been conceptually added to the plan set. *See* Sheets 8-11. The exact location of the streetlights and fire hydrants will be subject to the final approval of the Fire Chief.

e. Street Trees

A landscaping plan showing the proposed location of street trees are shown on the revised plan set on Sheet 25. The landscaping plan fully complies with the Subdivision and Land Development Regulations. As a result, the Applicant no longer requires and hereby withdraws the previous adjustment request for spacing of street trees, replicated below for ease of reference:

Street trees will be as per a detailed landscape plan versus a minimum spacing (relief from the recommended spacing limits outlined in Subdivision and Land Development Regulations Article XII – Design and Public Improvement Standards, 13. Street Trees)

f. Cemetery 5' Gravel Access

A 5' gravel path for walking access has been added along the existing sewer easement from East Shore Drive, along the proposed sewer force man, and to the cemetery. *See Sheet 9.*

g. Sidewalks in Area 1

Asphalt sidewalks have been added to the eastern side of the roadway for Area 1 of the Project. Area 1 is proposed as a private street. *See Sheet 9.*

h. Checklist Item #35 – Proposed Permanent Bounds

The Applicant received a submission waiver of Checklist item #35 which requires “proposed location of proposed permanent bounds and corner markers, if applicable” to be provided prior to a vote on preliminary plan review. As promised, the proposed locations of monuments (granite bound markers) is shown on Sheet 8. Iron rods will be installed at each angle point of the proposed subdivision lots. *See detail on Sheet 8.* Monuments (granite bound markers) are to be provided as per record plan, no less than one monument every 500' along proposed right of ways at points of curvature or intersection of proposed property lines. Monumentation (iron rods or drill holes in existing stone walls) are to be provided as per record plan, at every angle point on the exterior boundary of the subdivision. The Applicant's requested adjustments relating to monumentation still remain and are replicated below for ease of reference:

Monuments (granite bound markers) to be provided as per record plan, no less than one monument every 500' along proposed right of ways at points of curvature or intersection of proposed property lines (relief from the requirement that monuments be placed at every angle point of curvature on the proposed street right of way, Article XII – Design and Public Improvement Standards, 15. Monuments)

Monumentation (iron rods or drill holes in existing stone walls) to be provided as per record plan, at every angle point on the exterior boundary of the subdivision (relief from the requirement that granite boundary markers be installed at every corner and angle point, Article XII – Design and Public Improvement Standards, 15. Monuments)

i. Checklist Item 39 – Proposed improvements

The Applicant received a submission waiver of Checklist item #39 which requires: “proposed improvements including streets, lots, lot lines setback lines and curb cuts, with lot areas and dimensions. Proposed lot lines shall be drawn so as to distinguish them from existing property lines” to be provided prior to a vote on preliminary plan review.

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As part of the revised plan set, the Applicant has provided detailed information regarding the proposed improvements with the exception of a detailed record plan denoting the lot area and dimensions of each lot. A Typical Lot Plan detail has been added to the plan set. *See Sheet 8.*

The Applicant requests to modify the submission waiver in order to provide exact lot dimensions as part of the final and record plan at final plan submission. The setbacks for the lots, attached single family units and cottage areas will be consistent with, and not smaller than, that shown on the typical lot plan detail shown on the plans and as set forth in the adjustment requests. For the subdivision lots specifically, we have provided 50' min frontage, 20' front and rear setbacks, and 5' side setbacks.

The updated submission waiver request is in Section D of this correspondence.

j. UIS E Overflow Pipe

The Town Engineer's comments from the October 14, 2025 Technical Review Committee Meeting Report requested integration of an overflow pipe from UIS E. DiPrete Engineering reviewed this request. The UIS-E bottom elevation is 230.0. The top of the Infiltration Pond D which this would need to tie to is 234.00. Tying this infiltration system to the pond would cause stormwater to back up into the infiltration system. In addition, it should be noted that this area has been designed to reduce flow and volume or runoff to the abutting parcels.

k. Construction State and Completion Dates

The revised plan set has been updated to reflect the proposed construction start and completion dates. *See Sheet 3.*

j. Proposed improvements to Tiffany

Proposed improvements to Tiffany Drive, consistent with the recommendations of the Town's traffic expert are shown at Sheet 28 of the revised plan set and are discussed in further detail at Section 2(h) of this letter.

2. Additional Reports and Documents

a. Affordable Housing Plan – Planning Expert Report

The staff report states that the applicant “has not presented staff with findings or evidence to demonstrate that the proposed development is consistent with local needs as identified in the Town of Coventry Affordable Housing Production Plan of June 2005 or satisfactorily addressed the issues where there may be inconsistencies.” The applicant has engaged the planning expert, Ed Pimentel, to provide an analysis of the Project's consistency with the Town's affordable housing

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plan and goals, even if the same are expired, as well a detailed analysis regarding the need for affordable housing as it relates to the application and adjustment requests. A copy of the planning expert report is attached as **TAB U**.

b. Bald Eagle Concern

Members of the public raised a concern over a bald eagle nest “in the area.” The applicant engaged a wildlife specialist from Ecosystem Solutions and determined that the Property is not within the jurisdiction of a bald eagle nest, nor is it within the jurisdictional area which requires a permit for any of the development proposed as part of this Project. The Bald and Golden Eagle Protection Act requires a permit when engaging in activity within a buffer from an active nest. The wildlife specialist encountered a bald eagle nest near the Town beach, approximately 950’ away from the closest property line of the Project, in the vicinity of the Overlook Circle cul-de-sac. A copy of the bald eagle report is attached as **TAB V**.²

c. Proportionality of the Construction of the Affordable Housing Units

There is a note in the staff report that the applicant has not provided sufficient information to demonstrate that the low- and moderate-income housing units will be built and occupied in a proportional manner with the construction and occupancy of the market rate units, referencing one of the standards for review of a comprehensive permit project in state law. There is no “information to provide.” This is always a condition of approval, which the applicant understands and agrees with, which needs to be complied with during the building process of the units. The applicant agrees with this condition. Please find the attached correspondence from the applicant relaying the same, attached as **TAB W**.

d. Concerns regarding certain provisions of the proposed Homeowner’s Association

While the full draft of HOA documents is not due at preliminary plan, the applicant has provided a list of items to be incorporated into the documents to address concerns raised at the November hearing. Those items are attached hereto at **TAB X**. The final HOA documents will attach and incorporate the operations and maintenance plan approved by RIDEM for stormwater systems as submitted previously with the original application submission at **TAB J**.

e. Open Space Covenant and Plan

The revised plan set specifically calls out the Open Space areas. A *concept draft* Open Space Covenant, as discussed during the grant of the waiver, is attached at **TAB Y**, and the open space areas are shown on the plan at Sheet 8 and 28.

² Final TAB V was not ready at the time of this submission and will be supplemented within the next day.

f. RIDEM Permit

Various public comments, both at the meeting and in writing, call into question why the Planning Commission is proceeding without approval from the Rhode Island Department of Environmental Management (RIDEM). As this Commission is aware, state permits are not required for this Project until final plan submission. However, on December 3, 2025, we received RIDEM approval of our wetlands and drainage (RIPDES) applications. See attached approval as **TAB Z**, which was also previously provided in our December 11, 2025 correspondence.

g. Bond Calculations

Bond estimates for public infrastructure are provided at **TAB AA**.³

h. Supplemental Traffic Letter

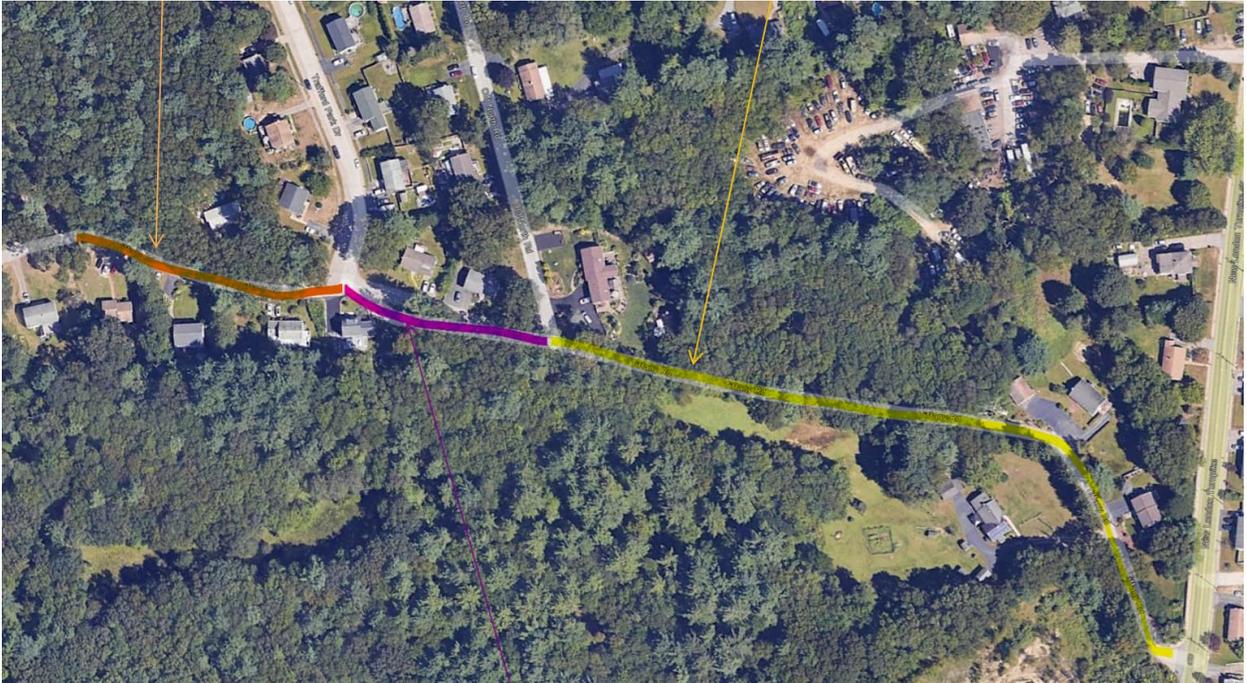
Attached is a supplemental traffic letter addressing the connection of Areas 2 and 3 and the proposed improvements to Tiffany Drive at various sections. See **TAB BB**. The newly proposed connection removes the proposed cul-de-sacs and creates a through-road which also resulted in a reconfiguration of the area, and the reduction of fourteen (14) units, yielding 162 total units for the Project. The supplemental traffic letter confirms that the revised proposal does not change the original findings of the previously provided traffic study (**TAB L**) and the revisions generate an estimated seven (7) fewer trips during both the morning and afternoon peak hours. As anticipated in the Town's peer review report, the connection did not result in additional traffic volumes which would decrease safety in the area.

The Town's Peer Review Traffic report suggested various mitigation measures: 1) connection of areas 2 and 3 (which has been done); 2) installation of sidewalks in Area 1 (which has been done); 2) the widening of Tiffany Road depending on the section and available width. As set forth below and on the plans, the Applicant is in agreement with these proposals.

As set forth in our last correspondence, the area of Tiffany Road can be broken down into three portions.

Section 1 outlined in orange below, Section 2 outlined in pink below, and Section 3 outlined in yellow below:

³ Per the Town Engineer's request, DiPrete is reviewing and will provide an opinion regarding the bond estimates, which will be supplemented.



Each section is discussed in turn.

Section 1, Western section of Tiffany Road from the site access road to Area 3, to Trafford Park Drive.

The Plans are in agreement with the proposed mitigation in both expert reports whereby this area will be widened to 22 feet of pavement width with impacting vegetation cleared for safe passage.

Section 2, section of Tiffany Road between Trafford Drive and Old North Road

The Plans reflect the applicant's agreement with the expert reports that that this area be widened to 22 feet and impacting vegetation cleared, similar to Area 1.

Section 3, Old North Road to New London Avenue

This area of Tiffany is one-way westbound, with the width below 12' in areas and the pavement in poor condition. As noted in the Town's peer review report, the actual width of the right of way does not allow the roadway to be reconfigured for two-way traffic. After

the last hearing, the applicant has done significant due diligence on this area of Tiffany, including surveying the same.

The revised plans commit to the widening of Tiffany Road in this section to 12 feet to ensure safe one-way passage in accordance with fire code standards, the repaving of the asphalt and the clearing of select vegetation.

i. Tiffany Road Sewer Capacity and Possibility of Future Sewer Connection by the Town

While not required as part of this application, the issue regarding the Town's potential further expansion of the sewer lines post-construction of the Village at Tiogue Project in areas adjacent and currently serviced by private septic systems was raised as a query. In good faith, our engineers will take a preliminary review of the capacity remaining in our sewer lines prior to the next meeting if possible. As proposed, the pump station and all sewer infrastructure outside the right of way will not be Town maintained. Subject to available capacity confirmed by the Town, the Applicant is agreeable to installation of a 2" FM line to Tiffany Rd for future usage as a condition of approval so long as the Town maintains all sewer upon the first connection to this line.

C. Updated List of Adjustments

Due to the recent revisions to the design of the Project, an updated list of adjustments is below. The applicant submits this updated adjustment list. In addition, the applicant intends to go before the Town Council for the: 1) waiver of impact fees on the affordable units and 2) reduction of the sewer assessments on any units located on a private road and these are therefore no longer part of the adjustment request before the Planning Commission.

Zoning Ordinance

- j. Single family attached units to be allowed (relief from Zoning Schedule of District Use Regulations Table 6-1)
- k. Minimum lot area for single family lots to be 5,000 sf (relief from Zoning R-20 Dimensional Regulations Table 6-7)
- l. Minimum frontage, setback, and coverage requirements to be reduced (relief from Zoning R-20 Dimensional Regulations Table 6-7)

| Residential R20 | Zoning Requirement | Proposed | Relief |
|-----------------------|--------------------|----------|-----------|
| Minimum lot area | 20,000 sf | 5,000 sf | 15,000 sf |
| Minimum Lot frontage | 120' | 50' | 70' |
| Minimum front setback | 35' | 20' | 15' |
| Minimum side setback | 20' | 5' | 15' |
| Minimum rear setback | 40' | 20' | 20' |
| Maximum lot coverage | 20% | 50% | 30% |

Land Development and Subdivision Regulations

- m. Right of way width to be 50' (60' required – 10' of relief from Subdivision and Land Development Regulations Article XII – Design and Public Improvement Standards, 3. Street Rights of Way, Table 1)
- n. Pavement width to be 26' total (with 12' wide travel lanes and 1' berm each side) (30' required- 4' of relief from Subdivision and Land Development Regulations, Figure 2 Street Cross Section – R-20 Zone)
- o. Bituminous berm in lieu of concrete curb (relief from Subdivision and Land Development Regulations, Figure 2 Street Cross Section – R-20 Zone)
- p. Sidewalks are proposed on one side (Sidewalks on both sides required - relief from Subdivision and Land Development Regulations Article XII – Design and Public Improvement Standards, 17. Sidewalks)
- q. Cul-de-sac proposed in Area 1 (No cul-de-sacs are allowed in Major Subdivisions per Subdivision and Land Development Regulations Article XII – Design and Public Improvement Standards, 8. Dead-End Streets (Cul-de-sacs)
- r. Monuments (granite bound markers) to be provided as per record plan, no less than one monument every 500' along proposed right of ways at points of curvature or intersection of proposed property lines (relief from the requirement that monuments be placed at every angle point of curvature on the proposed street right of way, Article XII – Design and Public Improvement Standards, 15. Monuments)
- s. Monumentation (iron rods or drill holes in existing stone walls to be provided as per record plan, at every angle point on the exterior boundary of the subdivision (relief from the requirement that granite boundary markers be installed at every corner and angle point, Article XII – Design and Public Improvement Standards, 15. Monuments)

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- t. No curbing at intersection fillet curves, bituminous berm is proposed (relief from Subdivision and Land Development Regulations Article XII – Design and Public Improvement Standards, 19. Curbing at Intersection Fillet Curves)

D. Updated Submission Waivers

The following waivers were granted by the Planning Commission on November 19, 2025.

- a. *Approved and Deferred to Prior a Vote on Preliminary Plan: Checklist Item #35: Requirement for proposed location of proposed permanent bounds and corner markers (related to adjustment request).*
- b. *Approved and Deferred to Prior a Vote on Preliminary Plan: Checklist Item #39: Requirement for proposed improvements including streets, lots, lot lines setback lines and curb cuts, with lot areas and dimensions.*
- c. *Approved and Deferred to Final Plan Submission: Checklist Item #49: Requirement for the open space plan, but concept draft plan included with this correspondence.*
- d. *Approved Complete waiver: Checklist Item #15: Requirement for notations of existing ground cover, any trees over 50 years old.*

As set forth above, the Applicant now requests that a portion of the information in Checklist Item Checklist Item #39 be deferred until final plan submission as the Applicant will provide the detailed record plans at that time.

The Applicant looks forward to continuing to present before the Commission on January 28, 2026.

Sincerely,

/s/ Joelle C. Rocha

Joelle C. Rocha

Enclosures

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