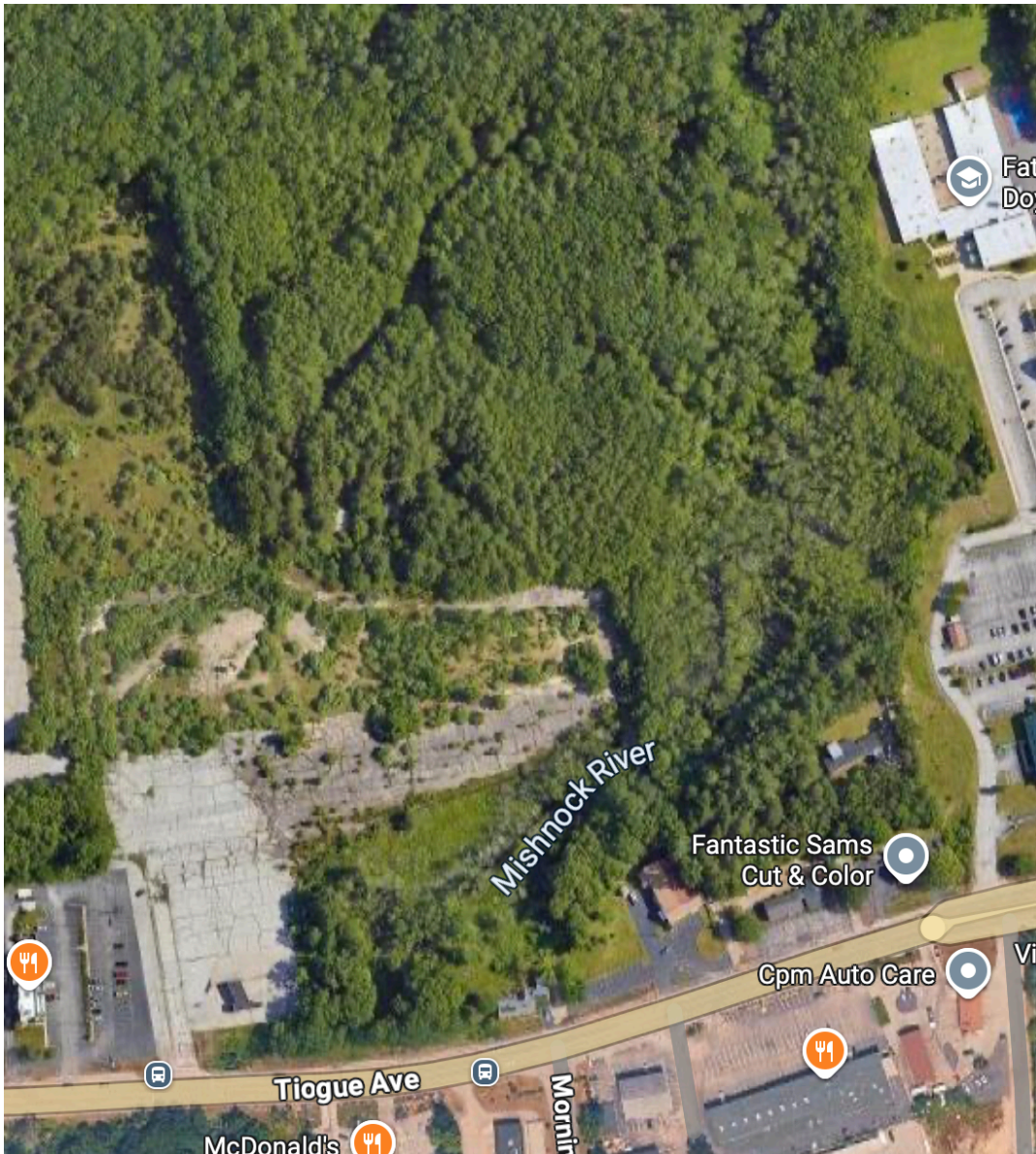


**Town of Coventry, Rhode Island, Planning Board
400 Residential Unit Development**

**Comprehensive Permit (Affordable Housing)
and
Major Land Development Project Application**

**1055 Tiogue Avenue (RI Route 3)
Tax Assessor's Plat 28 - Lot 3**



Prepared for: Benson Essex, LLC

By: Pimentel Consulting, Inc.

2 June 2026

INTRODUCTORY STATEMENT

Benson Essex, LLC ("Applicant") has retained the professional land use planning and zoning consulting services of Pimentel Consulting, Inc. ("Consultant"), in order to evaluate the appropriateness of developing property previously approved for mixed-use planned development, now for much-needed rental 'affordable housing' purposes. The proposed affordable housing development will consist of 400-units, of which an over-whelming 100-units (25%) will be deemed affordable. Although the proposed housing count is in excess of the permitted regulatory 'base density' standard, it is literally in accord with the Comprehensive Plan, which supports such densities when pursued for appropriate multi-family housing development. And more importantly, when said housing will address a variety of under-served affordable housing needs in a neighborhood compatible manner, while simultaneously realizing considerable progress towards affordable housing statutory compliance.

Coventry is composed of three geographic areas - eastern, central, and western Coventry - whose diverse nature is a defined characteristic of Coventry. Each area contains important resources that contribute significantly to Coventry as a whole." [Page D.1-11]

1. Eastern Coventry: *"Eastern Coventry can be characterized as a densely-populated suburban community, housing a large portion of the Town's residents. The landscape is largely defined by mature neighborhoods that developed around various historical mill villages and several bodies of water, including Tiogue Lake, Huron Pond, and the Pawtuxet River. Standardized housing and company-built stores and schools can still be seen in many of the village centers. Residences in this area are principally located on modest parcels of land."* [Page D.1-11]

"Overall, eastern Coventry can be described as a densely-populated suburban community whose history has shaped its development pattern. It is only in this area that public facilities and services are provided or planned." [Page D.1-12]

The referenced development is being pursued via the Comprehensive Permit regulatory procedural process in order to realize much-needed affordable housing, while allowing for the provision of several reasonable 'Adjustments' (otherwise identified as variances and/or waivers). The referenced Adjustments are absolutely reasonable when considering the extent to which the development will achieve affordable housing compliance and in an area that is most appropriate. In addition, the development is defined as a Major Land Development Project ("Major LDP"). This report will also evidence how the community has been proactive in procuring affordable housing, however at the rate of residential development and affordable housing provision it could very well exhaust considerable land resources prior to achieving regulatory compliance. Development density appropriateness should be based on a number of factors, and not merely a subjective regulatory standard. The subject property, as this report will evidence, is absolutely appropriate for vastly greater residential density, which in addition to recently approved projects may very well achieve regulatory compliance. Approval will not only

locate housing density in an area that is absolutely appropriate, but whose outcome may possibly avert, or minimally, limit less appropriate housing development.

The following language, excerpted from the Town's Affordable Housing Plan, Draft Comprehensive Plan, in addition to the Comprehensive Plan, evidences affordable housing compliance objectives - Directing residential development to 'Eastern Coventry' due to the presence of all necessary infrastructure.

Affordable Housing Plan

Housing Issues in Coventry [Issued by the Public] [Page 4]

o Rental Housing is Difficult to Find: *"According to residents, housing is hard to find, and there is little to no vacant rental housing available."*

o Existing Rental Housing is Expensive.

o Desire to Limit Sprawl: *"People appreciate the low-density and rural character of central and western Coventry. As more and more people move to Coventry in search of these qualities, developers build more subdivisions to meet the market demand, sprawl is exacerbated, and open space is lost. There is a need to balance residential development with open space preservation so that Coventry's quality of life is retained as its housing needs are met."*

Developable Land - *"Eastern Coventry is a mix of typical suburban developments and older villages. Public water is available in eastern Coventry, but sewerage is only available in the Route 3 area. Eastern Coventry is generally zoned for 20,000 sq. ft. and 2 acre residential lots, and there is relatively little available, undeveloped land. In contrast, both central and western Coventry are much more rural and undeveloped, and there is a great deal of available land. Land in central Coventry is primarily zoned for three-acre lots, while land in western Coventry is primarily zoned for five-acre lots. Central and western Coventry lacks infrastructure, including public water, roads, and schools."* [Page 30]

Draft Comprehensive Plan

Housing Goal 2 - Align housing growth with infrastructure and designated growth areas: *"Direct new housing development to areas with existing or planned infrastructure, transit access, and village centers while preserving rural character."* [Page 50]

Policies for Decision Making No. 1 - *"Direct new housing development to areas with existing or planned infrastructure capacity."*

Comprehensive Plan

C.4 Housing - Vision: *"Our vision for housing recognizes the diverse needs for housing opportunities in Coventry in order to preserve the old and encourage high quality new development. The variety of housing opportunities must recognize natural limitations and the visual qualities of the community, as well as the desire of residents of all ages to continue to reside in the Town regardless of their economic status."* [Page C.4-1]

Goal 1: *"Provide a wide variety of housing opportunities in Coventry geared to the needs of all residents."*

Objective 1.3: *"Establish and maintain an orderly urban growth pattern to develop high quality neighborhoods geared to the availability of public infrastructure and services."*

In light of the subject proposal, this Consultant has thoroughly reviewed the proposed affordable housing development submission, in addition to the following regulatory documents:

- o Town of Coventry Comprehensive Community Plan - Amended through 19 June 2000 ("Comprehensive Plan");

"Current Zoning provides opportunities for affordable housing to be built. Changes in zoning are not necessary to effectuate housing affordability. The Town currently allows multi-family and mobiles homes as well as half-acre-lot-housing, which with the relatively low cost of land provides many opportunities for affordable housing." [Page D.4-6]

- *"The Town of Coventry should encourage affordable housing development by the private sector targeted to moderate-income groups, particularly first-time homebuyers. Strategies can include."*
- *"Encouraging the use of PUDs and cluster development to provide a variety of housing types, sizes and costs developed in a high quality manner in a planned environment."*
- *"The Town of Coventry should plan and devise an equitable means to finance the orderly extension of infrastructure in the medium and higher density areas of eastern and central Coventry to encourage neighborhood preservation and infill development."*

- o Town of Coventry 'Draft' Comprehensive Community Plan - 2026 Update ("Draft Comprehensive Plan");

Housing Goal 1 - Implementation Action No. 8: **"Establish clear municipal expectations for LMIH inclusion in medium and large-scale residential projects, particularly regarding deeper affordability targeting (60-80% AMI) and unit types aligned with identified needs."** [Page 49]

- o Town of Coventry Subdivision and Land Development Regulations ("Development Regulations");
- o Town of Coventry Zoning Ordinance ("Ordinance");
- o Town of Coventry Affordable Housing Production Plan - Amendment to the Comprehensive Community Plan - Adopted November 2004 - Revised June 2005 ("Housing Plan");

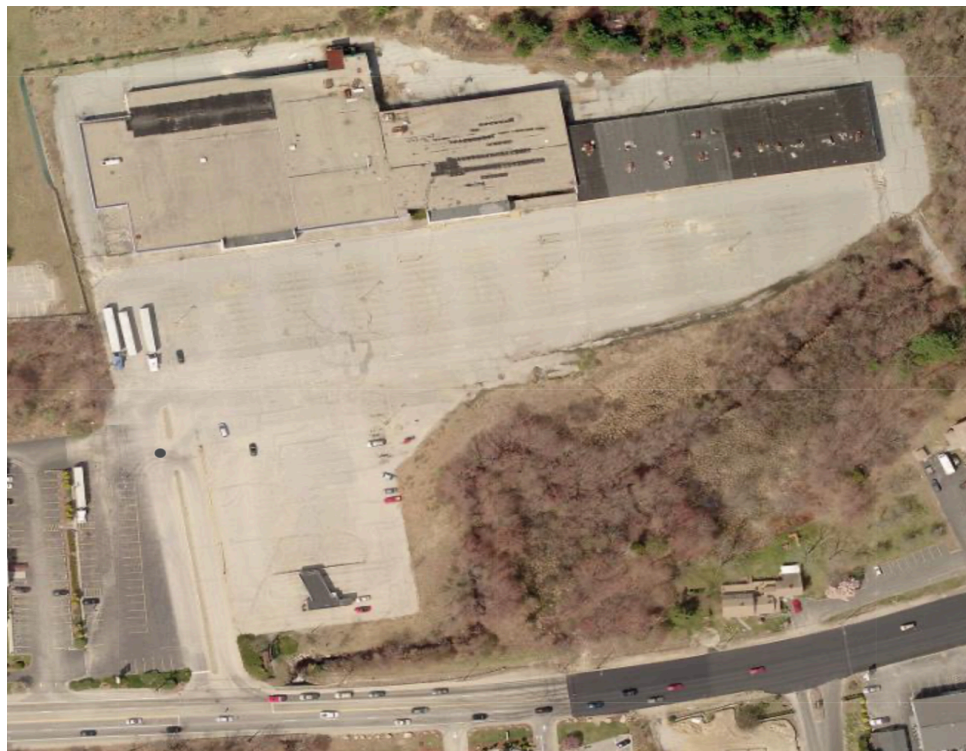
Introduction - *"The Town of Coventry recognizes the importance of providing a diverse range of housing so that Coventry residents of all income levels have access to safe, decent, and affordable housing...this Affordable Housing Study to review the Town's housing policies, determine how the housing needs of the of the population have changed over the past decade, and identify and develop strategies for the Town to ensure that the diverse housing needs of residents are met."* [Page 1]

- o Housing Fact Book(s) - Housing Works RI at Roger Williams University ("Housing Fact Book"); and,
- o Pertinent Rhode Island General Law ("RIGL"), inclusive of recent statutory amendments, and pertinent case law.

Furthermore, this Consultant has conducted a general analysis of the immediate 'primarily commercial oriented' neighborhood, for the express purpose of evidencing neighborhood compatibility. This report will render a determination on the appropriateness of the proposed affordable housing development project, in light of the respective Comprehensive Plan, Draft Comprehensive Plan, Housing Plan, Development Regulations and Ordinance goals and objectives, and respective affordable housing statutory 'standards' of approval.

PRESENT PROPERTY CONDITIONS

The subject property is addressed 1055 Tiogue Avenue (RI Route 3), further identified as Tax Assessor's Plat 28, Lot 3, and is presently unimproved ("Property"). The Property contains an approximate total land area of 27.31-acres, of which the majority, or upwards of 18.6-acres (68%), is free of any on-site wetland constraints. Although presently unimproved, the Property was historically improved with a sizable big-box commercial entity and vast off-street parking, minimally between the period of the early-1980s and 2008. The commercial entity has since been razed, however the area encompassing commercial facility and off-street parking alike remains disturbed, as evidenced by the illustration to the right and on the following page, as excerpted from the



Division of Statewide Planning: 2004 and 2025, respectively. The quantity of disturbed acreage approaches approximately 11.71-acres (42.9%).



The Property is uniquely shaped, being bordered along the entire easterly boundary by the Mishnock River. The Property has two (2) points of physical lot frontage along Tiogue Avenue: the first, having upwards of approximately 140 linear feet, is situated along the far southwest corner; and, the second, having upwards of approximately 19 linear feet, is situated along the far southeast corner. The majority of the Property is comprised of mature treed vegetation, which is a vitally important site feature because it provides natural buffering and wetlands protection; visually screening future development. In fact, the area already disturbed is literally almost suitably sized to accommodate the entire proposed development, limiting the development to approximately 11.83-acres (43.3%). Whereas 15.48-acres (56.7%) of

vegetated land resources will be maintained in a naturally preserved state in perpetuity. The Property has access to both public sewer and water, assuring appropriate and environmentally sound residential development. Another pertinent consideration evidencing multi-unit residential development appropriateness is the presence of an access point that was long designed for more intensive commercial development. The referenced improved access point, having an approximately 24-foot paved travel-way width, is situated along the most southwesterly corner of the Property and sandwiched between two (2) commercial entities. The lot frontage along the far southeasterly corner, likewise moderately improved albeit in a state of disrepair, is similarly sandwiched between two (2) commercial entities. The presence of such multiple points of ingress and egress assures that vehicular traffic is properly integrated into the surrounding neighborhood, while assisting in accommodating residents, guests, and most importantly emergency apparatus. For example, the secondary access point, albeit slight in overall width, could very well be limited to serving emergency apparatus.

Pursuant to the Comprehensive Plan - 'Existing Transportation System Map' [Page B.6-7], Tiogue Avenue (RI Route 3) is functionally classified an 'Urban Principal Arterial' roadway. The referenced roadway classification is defined by the Comprehensive Plan [Page D.2-9], in the following manner:

Principal Arterials - *"The principal arterial system should serve the major center of activity of a metropolitan area, the highest traffic volume corridors and the longest trip desires, and should carry a high proportion of the total urban travel demand on a minimum of roadway mileage."*

Another pertinent area feature, and one that is a recognized by the Comprehensive Plan [Page D.4-9] as being a contributing factor to evidencing denser housing development, is the presence of multi-modal transportation, most notably public transportation.

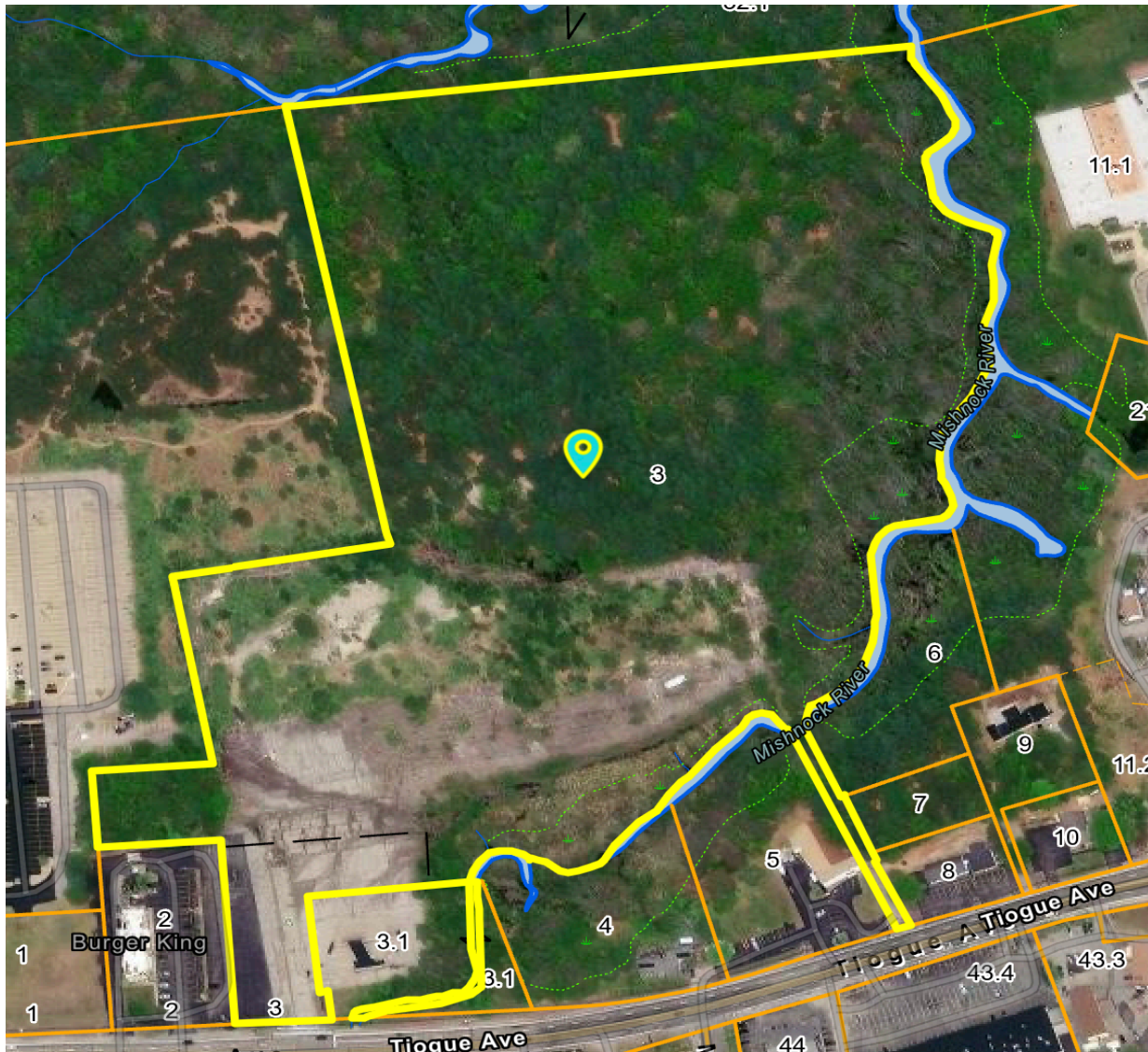
1. Encouraging the development of high density residential areas - *"In mixed use developments and along arterial corridors because of its:"*

- *"Proximity to community services and facilities."*
- **"Access to public transit routes."**
- *"Proximity to employment opportunities."*

The illustration to the right, as excerpted from the Rhode Island Public Transit Authority website, details a bus-line traversing Tiogue Avenue in the location of the Property.

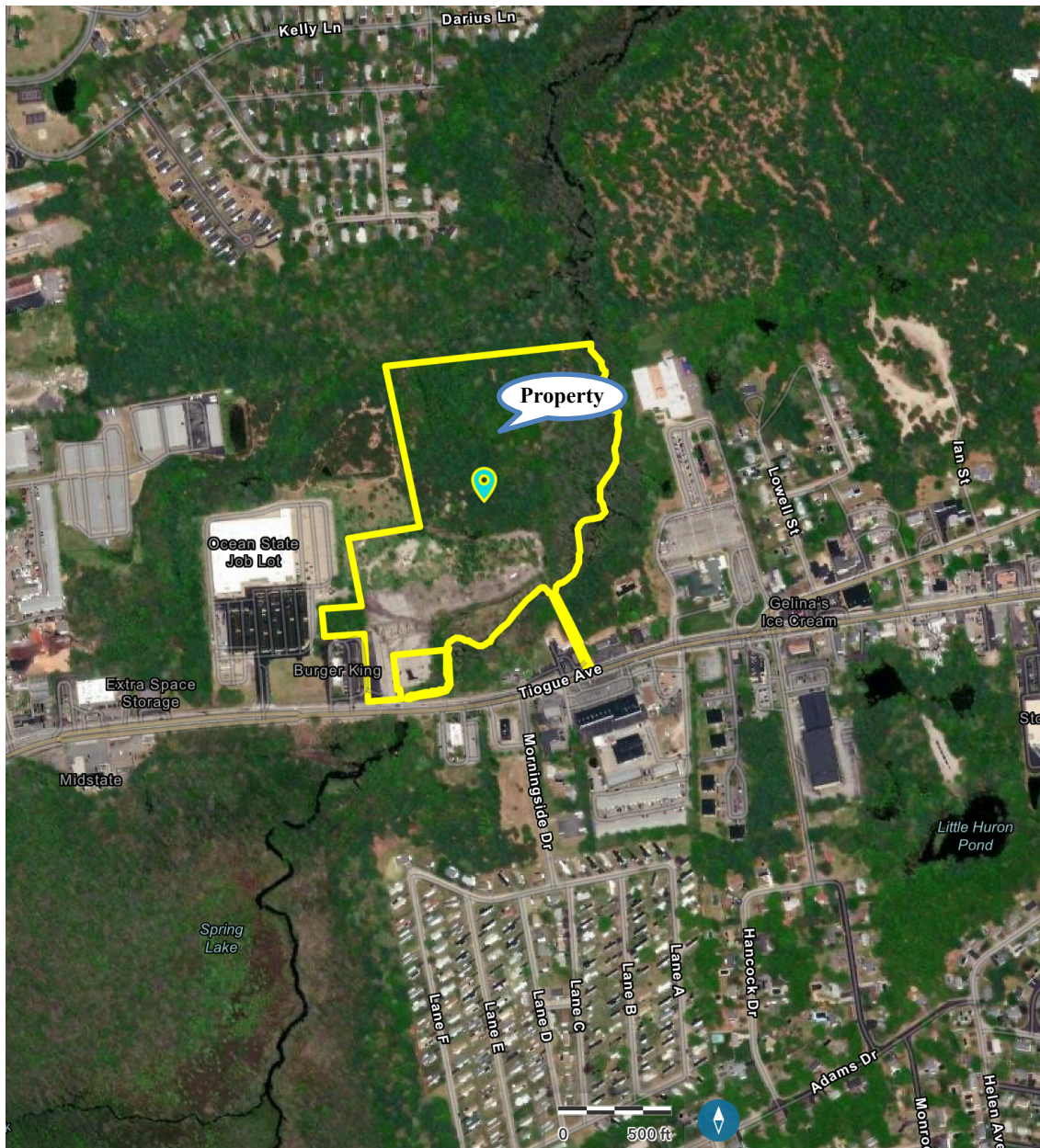


Property and roadway characteristics are illustrated below, as excerpted from the Town's GIS. A final, and equally important consideration supporting multi-unit residential development, is



affirming neighborhood compatibility. The Property is entirely surrounded by commercial businesses, some of which are rather sizable 'big-box' entities. The nearest residential neighborhoods are either buffered and visually screened by vast mature forest, or a combination of the stated vegetation and immediately abutting commercial developments. The nearest residential neighborhood is Ramblewood Estates Mobile Home Park, situated in excess of 650 linear feet to the south, opposite Tiogue Avenue. The second residential neighborhood is situated to the east, and distanced upwards of 900 feet from the proposed development's off-street parking area. And finally, the neighborhood to the north, or rear of the proposed development, is upwards of one-quarter of a mile distance from the proposed residential

facilities proper, and visually screened by both on and off-site vegetation. It necessitates emphasizing that the maturity of the referenced vegetation appears to be of such height and massing that it will in all likelihood obstruct any view of the proposed five-story residential facilities. The following is both an aerial overview of the surrounding neighborhoods, as excerpted from the Town's GIS, and personally obtained photographs illustrating the maturity of surrounding vegetation.

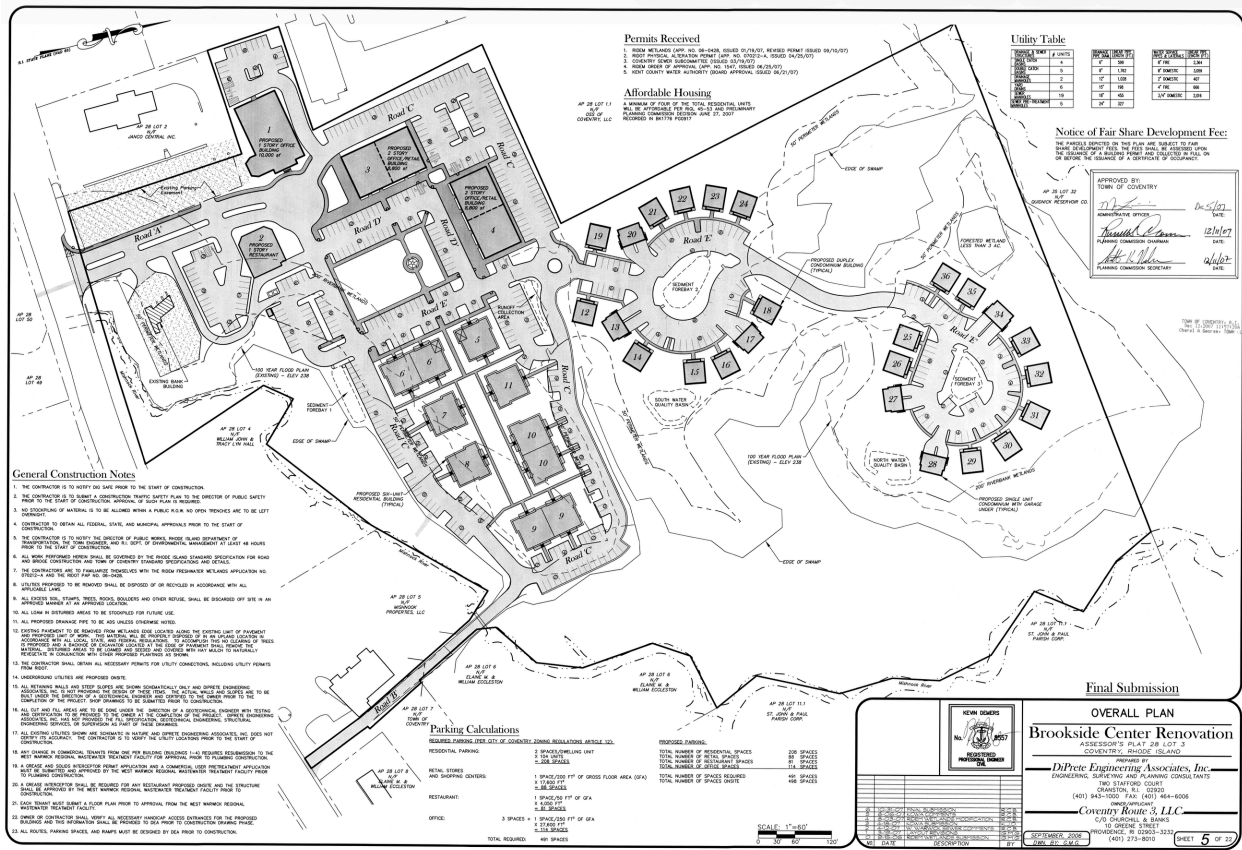


The Property and all parcels to the north are presently zoned Planned Development District ("PD District"). The PD District is defined pursuant to Section 255-500.D(1) 'Zoning Districts - Planned Development' of the Ordinance, in the following manner:

PD District - *"These are floating zones composed of a variety of land uses, including mixed-use, commercial, industrial, and multifamily projects that are created in conformance with Article XIV of this chapter."*

Furthermore, all parcels situated to the east of the Property are zoned Residential R-20 District ("R-20 District"). The R-20 District being the most dense residential zoning designation. And finally, all parcels to the west, southeast, and south across the entire length of Tiogue Avenue, are all zoned in a General Business District ("GB District") manner. There is also a pocket of industrially zoned land resources within proximate distance to the west. These are vitally pertinent neighborhood characteristics, because it evidences neighborhood compatibility. Dense residential development amidst such a mixture of land uses is quite appropriate, the PD District being established for such purposes. In fact, the Property was approved in 2006 for a mixture of commercial entities and array of residential densities, otherwise identified as the Brookside Center Development ("Brookside"). Although dated, one could legitimately argue that Brookside is still a valid development, as evidenced by the continued PD District zoning. Brookside was comprised of a variety of commercial entities and residential densities. The commercial component consisted of a restaurant, retail and office space, dispersed among four (4) buildings, and approaching 50,000 square feet of overall gross floor area. The residential component constituted a density of 104-units, dispersed among 32 independent residential structures, with only a minimum of four (4) units allocated for affordability. This translated to less than 4% of the proposed units, a quantity that was not even sufficient enough to off-set its own contribution to the overall housing stock. This should be contrasted with the current 400-unit proposal, which although somewhat more dense, will realize a considerable 100-unit quantity of affordable housing, off-setting its own contribution while also assisting in achieving affordable housing regulatory compliance. Another pertinent distinction is Property disturbance. Other than the wetlands proper and associated buffers, the Brookside development would have consumed the entire land resources, resulting in the removal of vast mature forest and failing to preserve minimal green space. Alternatively, the present proposal will be concentrated in the area historically disturbed, preserving the majority of naturally forested land resources, amount to approximately 15.48-acres (or 56.7%).

The Brookside development, as furnished to this Consultant by legal counsel, is illustrated on the following page.



The Comprehensive Plan clearly acknowledges and directs development towards the easterly portion of the of the Town where high-density development and supporting infrastructure are already present. In fact, this was one of the reasons for rezoning to PD and approving the Brookside development in 2006. The Town's objective is to support appropriately positioned projects in the easterly portion of the Town, thereby preserving the rural character of the central and westerly portions in which limited infrastructure and constraints to development abound.

B.3.1 'Land Use and Zoning - Existing Land Use Pattern' - "The general pattern of development in Coventry occurred along the major thoroughfares throughout the Town..." [Page B.3-1]

Residential Uses - "Residential uses can be grouped into three categories in Coventry, single-family, multi-family and mobile home. The dominant use is single-family housing... Multi-family housing and mobile homes generally are found in isolated areas in the eastern half of the Town. Most higher density residential uses are located in the former mill villages, or along major arterial roadways." [Pages B.3-1 - B.3-2]

Furthermore, it is the Town's understanding that there are those specific sites that are deemed so appropriate that density should be maximized to the extent possible. Such realization avers exhausting all land resources in order to achieve affordable housing regulatory compliance.

D.1.4.A Land Use Implementation Guidelines - Residential Land Use Guidelines: *"The following guidelines shall aid in governing all land use planning pertaining to the development of land designated as residential in the Land Use Plan."* [Page D.1-20]

Conditions for Allowing Multi-Family Residential Development - *"Multi-family residential use will be allowed provided:"* [Page D.1-23]

- *"The multi-family residential use is proposed as a Planned Development, also known as a Land Development Project."*
- *"Densities for multi-family residential use may range up to 20 dwelling units/acre."*

The Property has already been purposefully rezoned to the PD-District. The PD District equates with the 'HDR - High Density Residential - 1 DU/ 0.05 AC ≤ HDR < 1 DU/ 0.5 AC' ("HDR") land use classification pursuant to the Comprehensive Plan. The 'HDR' land use classification is defined pursuant to the Comprehensive Plan - Land Use Plan Element, in the following manner:

High Density Residential (MDR) - 1 DU/ 0.05 AC ≤ HDR < 1 DU/ 0.5 AC: *"The purpose of the High Density Residential district is to denote areas where multi-family residential development is appropriate. This level of residential use would require public facilities to have sufficient capacity to service the development. It would also require adequate transportation access and impacts on the site and surrounding neighborhoods to be minimized. This district's residential density ranges from one dwelling unit/ 0.05 acre up to, but not including, one dwelling unit/ 0.5 acre (1 DU/ 0.05 AC ≤ HDR < 1 DU/ 0.5 AC). Lower residential density is also permitted. However, residential densities greater than 1 DU/ 0.05 AC may only be allowed if areas of lower density off-set the increase such that an average of no more than 1 DU/ 0.05 AC is maintained (i.e., residential cluster development). High density residential developments are established through the use of Land Development projects, also known as Planned Developments."* [Pages D.1-3 - D.1-4]

With the exception of the Residential Mobile Home District, which is solely for the creation of mobile home parks, there is literally no zoning designation that permits multi-unit residential development as a matter-of-right. The Town of Coventry has well documented throughout the Comprehensive Plan their concern regarding development throughout the central and westerly, more rural portions of the community; areas in which infrastructure is lacking and vastly greater sensitive features are present. It is the desire of the community to preserve a more rural and agricultural atmosphere, a condition that is forever being eroded. In-fill development within the easterly side is clearly preferred, as evidenced throughout the Comprehensive Plan

4. Protection of Coventry's Diversity - *"...Consequently, the main thrust of the Land Use Plan is to preserve the existing diverse character of Coventry, by treating the three areas of Coventry as distinctive. For instance, the Land Use Plan guides growth to the eastern portion of the Town, where Town services and facilities (such as educational facilities, water, sewer, police, and fire) are in adequate supply or planned. The Plan for the eastern portion of the town envisions medium and high density residential use and commercial / business park / office uses within its bounds. In this way, the existing settlement pattern of Coventry is followed...In this way, the Land Use Plan seeks to protect Coventry's diversity, by recognizing Coventry's diverse features and planning for their continuance."* [Page D.1-13]

"Most housing development activity has occurred in the eastern and central portions of Coventry leaving most of western Coventry relatively undeveloped, or developing at a very low density (less than one dwelling unit per acre). The main factors dictating this trend are an aggressive posture on the part of the Town Council and Planning and Zoning Commission."
[Page D.4-5]

1. *"To protect the large areas of environmentally sensitive groundwater aquifers, wildlife habitats and surface water resources in this area."*
2. *"To maintain the rural, low density lifestyle in western Coventry clearly identified by citizens and the CPAC during the comprehensive planning process."*

Pursuant to the Comprehensive Plan - Table D.1-1 'Anticipated Development Potential, Town of Coventry' [Page D.1-20], the lower density land use classifications, areas in which multi-unit housing is both deemed inappropriate and therefore prohibited, comprises in excess of 76% of all town-wide land resources. This does not include commercial and industrial land resources, properties that may be encumbered and preclude mixed-use development, nor recreational, conservation and open space land resources amidst the eastern portion of the Town that have already been permanently protected from development. Therefore, the community must accommodate appropriate denser residential development, to include provision of affordable housing, within those limited remaining land resources. And obviously, much of the remaining stated land acreage has already been developed, further complicating the situation. This corroborates this Consultant's conclusion that accommodating greater residential density in a fairly regulatory compliant manner that is neighborhood compatible, can be a difficult endeavor. Any proposal that realizes in-fill development of under-utilized land area in the eastern-most portion of Town, especially if said area is accessible to all requisite public resources and most assuredly neighborhood compatible, should be well-supported for more intensive residential development. And there are those extremely unique situations in which vastly greater residential density is most appropriate, thereby averting exhausting all land resources in pursuit of regulatory compliance.

It has come to the attention of this Consultant that a survey of Town residents was recently completed. The results literally corroborate this Consultant's conclusions. In general, many of the respondents acknowledged that site characteristics such as presence of infrastructure, to include along a major thoroughfare such as Tiogue Avenue in the eastern portion of the community, was most important. However, even more on point, was recognition that the Property specific was the perfect location for more dense residential development.

DEVELOPMENT PROPOSAL

It is not unusual for the typical affordable housing development proposal to be sought pursuant to a Comprehensive Permit, because it is usually the only viable method of acquiring a market-rate density bonus to offset the considerable cost of realizing 'much-needed' affordable housing. The Comprehensive Permit is well recognized by the community as an appropriate means of achieving affordable regulatory compliance, and is in fact one of several tools detailed in the Housing Plan [Pages 39 - 40]. The associated criteria is directly aligned with the Property, as evidenced below, and should therefore assist the Planning Board in their affirmative deliberation.

Action Item 1.6: Use the Comprehensive Permit as a tool to development affordable housing. *"Comprehensive permitting provides flexibility in places where underlying zoning does not allow for dense affordable housing...In considering such a project, the Planning Commission may consider waivers from any of the underlying zoning and planning requirements in exchange for providing the Town with a minimum of 25% of the project be set aside as affordable housing as defined by the State of Rhode Island General Laws."*

"There are several areas in the Town that are suitable for a comprehensive permit for affordable housing. These sites are located in high density areas of Town that are serviced by either municipal water or sewer, or both, as well as being on or near a RIPTA bus line. These attributes make these sites absolutely vital in our goals to obtain affordable housing in practical locations..."

The Applicant proposes to develop the Property in a manner envisioned by the Comprehensive Plan, realizing regulatory compatible density, and more importantly, provision of much-needed affordable housing. The general site is also well recognized by the Draft Comprehensive Plan, exhibiting all of the pertinent development elements necessary to support greater residential development.

Policy for Decision Making No. 1 - *"Direct new housing development to areas with existing or planned infrastructure capacity."*

Implementation Action No. 1 - **"Identify priority growth areas within Urban Services Boundary, along RIPTA routes (Route 13, Route 23), in village centers (Summit Village, Tiogue Avenue, Sandy Bottom Road), and within sewer corridors."**

As previously noted, the Property has approximately 27.31-acres of total land resources, of which upwards of 18.6-acres (68%), is free of any on-site wetland constraints. The Applicant proposes a total of 400 rental-units, realizing provision of a significant 100-units of affordable housing. Albeit the development will exceed the minimum base-density permitted by law, it is nevertheless most appropriate because the statute allows for far greater residential density, particularly when in agreement with the Comprehensive Plan, and the site specific is so uniquely situated and improved with all requisite elements necessary to support greater residential density. The units will be comprised of a variety of bedroom densities, to include 98

studios, 222 one-bedrooms, and 80 two-bedrooms. Bedroom count is being purposely limited, in order to minimize community impact (e.g., reduced vehicular traffic and the generation of school-aged children). Therefore, given the limited bedroom per dwelling unit count, it can be concluded that the proposed development will in no way impact the character of the community; in all likelihood being a fiscal generator due to the minimal, if any, generated school-aged children.

The project will literally meet the greatest affordable rental housing concerns, inclusive of individuals and couples looking for a starter residence, families, and those seeking to down-size. In fact, many of these units are quite often absorbed by in-town residents who have long-established roots, and yet being priced out of their very community. The Comprehensive Plan and Housing Plan acknowledges that the public sector alone is incapable of achieving provision of much-needed affordable housing.

"The Town of Coventry should encourage affordable housing development by the private sector targeted to moderate-income groups, particularly first-time homebuyers..." [Page D.4-6]

3. Strengthen Partnerships and Build Community Support for Affordable Housing.

Issue - "In order to achieve 10% affordable housing, a foundation of understanding and cooperation is necessary among all stakeholders. The Town, through the Coventry Affordable Housing Advisory Committee, will assist in fostering and maintaining strong, supportive relationships between Town government, the Coventry Housing Authority, the Coventry Housing Associates, and other non-profit and for-profit affordable housing developers. Establishing affordable housing as a priority and addressing the recommendations included in this Plan will set the stage for partnerships and working relationships." [Page 45]

The buildings and all accessory amenities, to include off-street parking, will be almost entirely physically situated within the area already disturbed, historically improved for commercial purposes, with a minimal quantity of additional unimproved land area amounting to an insignificant 5,370 square feet (0.045%). The development, being purposefully limited to historically disturbed pervious surface, will consume less than 12-acres, or 43% of the overall Property. The remaining almost 16-acres (or 57%), will be maintained in its present mature forested condition, serving as natural screening and buffering. The proposed units will be dispersed across four (4) five-story buildings, all of whom will physically located along the easterly property boundary, and purposefully situated behind surrounding commercial entities and the vast mature vegetation thereby visually obscuring them from any proximate residential neighborhood.

More than sufficient off-street parking, accommodating residents and visitors alike, will be furnished throughout the site, amounting to one (1) parking space per unit, or a total of 400-spaces, in accordance with the affordable housing statute. The development will be serviced by both public water and sewer, as well as have proximate access to public transit; factors that contribute to the appropriateness of densifying the Property in the manner so-described. It necessitates reemphasizing that the Property is predominantly comprised of upland resources, a vast portion of which will remain undisturbed in perpetuity. It also necessitates emphasizing that the Property is not comprised of significant resources such as prime agricultural soils, groundwater resources, contamination site, etc., as evidenced by the list of major areas identified via the Comprehensive Plan, all of which are located outside the perimeter of the subject property. The respective maps corroborate this fact, as evidenced by the following list excerpted from said Comprehensive Plan.

Prime Agricultural Lands Map

Illustrates that there are no prime agricultural lands within, surrounding, or in close proximity to the Property.

Natural and Cultural Resources Map

Illustrates that the Property is neither located within or in proximity to any 'Groundwater Reservoir,' 'Groundwater Contamination Site,' 'Site of Unique Landscape Quality,' or 'Historic District.'

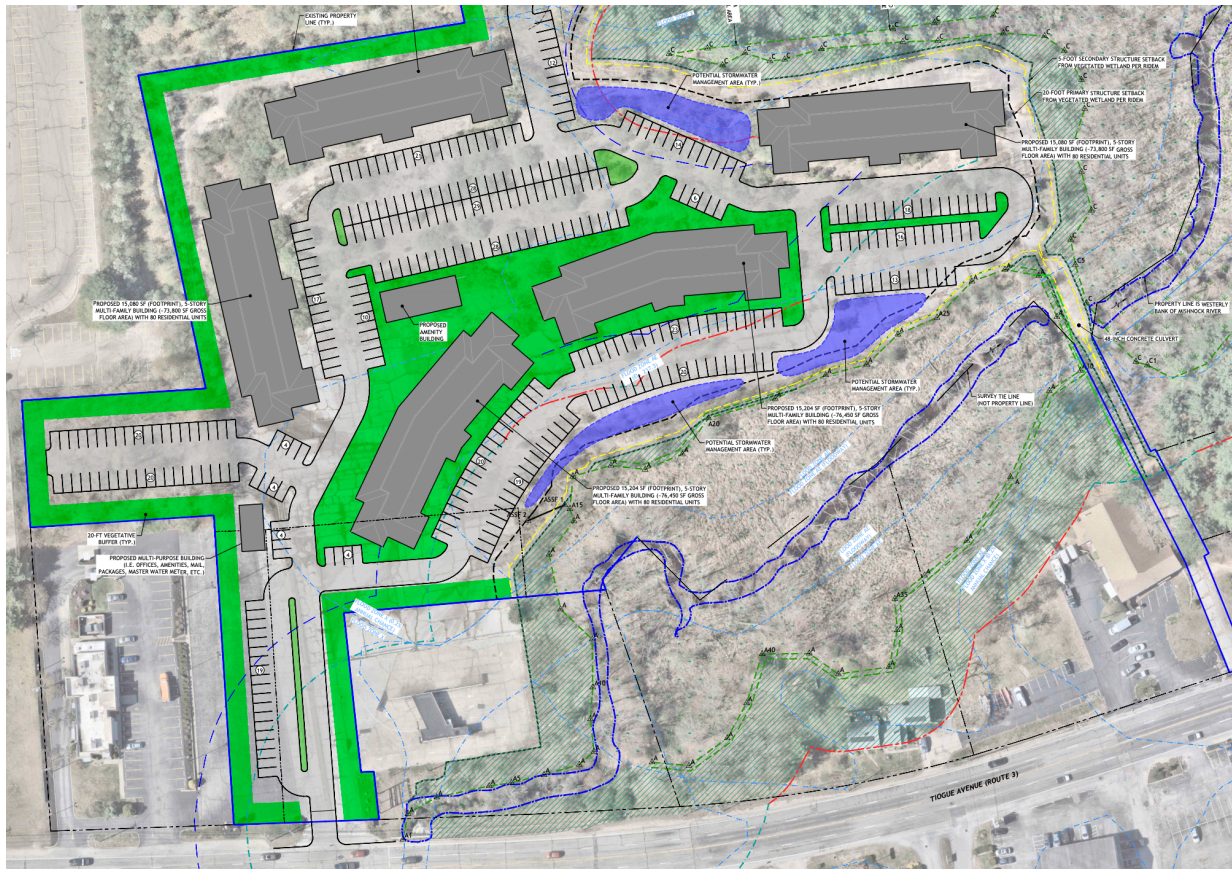
Recreation, Conservation and Open Space Map

Illustrates that neither the Property nor proximate neighborhood are improved with or encumbered by any recreation, conservation or open space resource.

The Town is regulated to meeting its anticipated residential build-out, of which ten-percent must be defined as 'affordable', on those appropriately situated remaining limited land resources. Therefore, opportunities such as that being presented to the Town of Coventry should be well-supported, considering the surrounding commercial and high-density residential character and non-existent property constraints. Supporting affordable housing developments in such appropriately situated areas, will assist in achieving affordable housing goals while averting development in western and central Coventry where infrastructure is lacking and site constraints abound. Furthermore, maximizing Property density will avert exhausting all eastern Coventry land resources; mandating a density reduction necessitating more and more dense developments to achieve regulatory compliance. Although affordable housing developments are at times opposed by community groups for one obvious reason, namely the density increase over that which is permitted by the immediate area's conventional zoning, the Town of Coventry recognizes this misperceived obstacle, as evidenced by the Housing Plan [Page 5]. It must also be reemphasized that a current survey of Town residents concluded otherwise, acknowledging the appropriateness of the Property for dense residential development.

Other Issues - *“Negative Perception of Affordable Housing in Community: “In Coventry, as in many communities, some residents have a negative misconception of affordable housing. “NIMBYism” (Not In My Back Yard-ism) is a major problem that reduces overall community support for the development of affordable housing.”*

A detailed illustration of the subject development is provided on the following page, as excerpted from the Applicant's submission package [Credit: Joe Casali Engineering, Inc.].



EVIDENCING NEED and DENSITY APPROPRIATENESS

Although the Town of Coventry was initially successful in the production of affordable housing, having generated upwards of 663-units in 2005, progress has trickled in ever since. Since 2005 the community has achieved a total of 315-units, or an average of 16-units per year. Pursuant to the 2025 Housing Fact Book, the Town of Coventry has approximately 441-units dedicated to the elderly, 508-units to families, and 29-units to those with special needs. Therefore the resulting total is 978-units, or a 6.65% affordable housing provision. This should be contrasted with the 2005 Housing Fact Book, which detailed that the community had then procured a total affordable housing of 5.16%, or an increase of 1.50% over 20-years. This Consultant acknowledges that the community has been diligently and thoughtfully reviewing and approving

affordable housing developments, several of which this Consultant was professionally involved with. Although they are not technically recognized until the issuance of Certificate of Occupancies, due to the fact that quite often approved projects never come to fruition, it would be professionally misleading not to acknowledge them, and more importantly, consider their contribution to achieving affordable housing compliance. This Consultant does not have an exact count of all of the developments, but can safely assess the two (2) personal projects that anticipated an approximate affordable housing contribution 80-units. Just the two (2) projects in question (were they to be constructed in the manner so-approved) would increase the affordable housing provision by 0.35%, to a total of 7.0%. In turn the proposed development would increase said total by almost one-half a percent, evidencing why supporting greater density where appropriate will realize greater achievements.

The proposed density is most assuredly appropriate, albeit slight greater than the minimum base density allotted by the Affordable Housing Statute, is nevertheless appropriate for all of the reasons expressed throughout this report. The minimum base density is detailed below.

Conventional Yield: Approximate number of units that could be realized by means of a conventional development, as evidenced by the approved Brookside Center Development = 104-units.

+

Bonus Density: 27.31-acres (Total Property Acreage) - 9.0-acres (Wetland Proper and associated private drive infrastructure) = 18.31-acres * 5 (Base density when connected to both public sewer and water and realizing 25% affordability) = 91.55-Units (Base density permitted pursuant to the recently amended affordable housing statute)

= **195.55-units** (Total permissible minimum base-unit density count)

R.I.G.L 45-53-4 – Required Findings

In accordance with R.I.G.L 45-53-4, the applicant is obligated to address the requisite standard provisions. R.I.G.L 45-53-4(d)(2)(iii)(E) expresses the following required findings:

R.I.G.L 45-53-4(d)(2)(iii)(E) Required Findings: *"In voting on an application, the local review board shall make findings, supported by legally competent evidence on the record that discloses the nature and character of the observations upon which the fact finders acted, on each of the following standards, where applicable:"*

(I) *"Whether the proposed development is consistent with local needs as identified in the community's affordable housing plan and/or has satisfactorily addressed the issues where there may be inconsistencies. If the local board finds that the proposed development is inconsistent with the community's affordable housing plan, it must also find that the municipality has made significant progress in implementing its housing plan."*

In regard to overall statutory compliance, achieving 10% of year-round housing will only become more and more difficult, as housing growth continues until reaching full buildout. In preparation

for the Housing Plan [Page 31] a full build-out analysis was completed that concluded that the Town could very well approach 23,500-units. However, it would literally take numerous decades to exhaust all land resources. Considering the Housing Plan was prepared to address need over a shorter 20-year timeframe, achieving statutory compliance by 2025, incremental housing production was likewise concluded. The Housing Plan determined that year-round housing could very well approach 15,196-units by 2025, thereby necessitating 1,520 affordable housing units. This translated to a shortfall of 860-units; which would be realized incrementally, or approximately 43-units per year over the stated 20-years. Provision of affordable housing has been considerably slower, achieving on average 16-units per year, or a shortfall of 542-units. Actual year-round housing count according to the 2025 Housing Fact Book is approximately 14,706-units, or an actual shortfall of 493-units. At the present annual provision rate of affordable housing, it would take upwards of 31-years, exclusive of any new housing construction. It can therefore be categorically concluded that achieving regulatory compliance has been, and will continue to be quite difficult, unless every viable project is supported to the fullest density extent feasible.

In regard to addressing specific need, the Housing Plan expressly notes that greater quantities of both affordable home ownership and rental resources are necessary.

II. Housing Issues in Coventry [Issued by the Public] [Page 4]

- o Rental Housing is Difficult to Find.**

- o Existing Rental Housing is Expensive.**

III. Housing Trends and Inventory - Low-Moderate Income Housing Stock

Affordable Homeownership - "Reaching the 10% goal will require a combination of affordable rental and homeownership units." Given the high prices of newly developed single-family homes, there is a strong demand for affordable homeownership units in Coventry. [Page 12]

IV. Analysis of Housing Needs - Comprehensive Housing Affordability Strategy (CHAS) Data [Page 18]

- o Both low-income homeowners and renters experience housing problems. "On a percentage basis, low-income homeowners (50.4%) and renters (50.4%) are equally likely to experience housing problems..."**

"Therefore, in terms of meeting affordable housing needs, the Town should prioritize both rental and homeownership units, family housing, and housing targeted to those earning less than 50% of median income." [Page 18]

Populations in Need of Affordable Housing [Page 18]

Families - *"...Working class families cannot afford to buy a home in Coventry. It is especially difficult for young families to find starter housing in Coventry. There is also a need for more rental housing in Coventry. With single family home prices so high, rental housing is the only alternative for many families. Family rental housing must have enough bedrooms (3 or 4 bedrooms) to accommodate the needs of families."*

Elderly - *"Coventry's elderly population is growing, which places demands on the housing market...With limited incomes and specific housing needs, it can be a challenge to provide appropriate housing for the elderly. For many elderly homeowners, staying in their large homes is no longer an option, for financial, medical, and/or maintenance reasons. These residents could downsize, but there are not enough appropriate units available."*

This affordability gap has grown exponentially in just the last several years, average home price increasing by \$175,000 (or 74%) since 2018, contrasted with the average median income that has increased by only 51%; evidencing a growing disconcerting discrepancy. To counter this the community proposed a more robust provision of family and elderly housing, amounting to an additional 677-units of family housing and 100-units of elderly housing during the 20-year timeframe to realize statutory compliance. And yet, only 295 additional units of family housing (or 56% shortfall) and 37-units of elderly housing (or 63% shortfall) has been realized. There is therefore clear need, as has been well documented throughout the Housing Plan.

(II) *"Whether the proposed development is in compliance with the standards and provisions of the municipality's zoning ordinance and subdivision regulations, and/or where adjustments are requested by the applicant, whether local concerns that have been affected by the relief granted do not outweigh the state and local need for low and moderate income housing."*

Several Adjustments will be sought pursuant to the Affordable Housing Statute, however this is too be anticipated considering unit density is always in disagreement with a community's zoning regulations. Adjustments are considerations that are very typical of affordable housing developments, and traditionally granted. However, what renders them even more appropriate is the literal recognition by the community as to their appropriateness, as evidenced by both Housing Plan and Comprehensive Plan. Affordable housing development opportunities are severely constrained by present zoning unit-density regulations, limited 'developable' land resources, and lack of requisite infrastructure town-wide, other than in the eastern portion.

Other Issues [Housing Plan - Page 5]

o Lack of Public Infrastructure: *"The lack of sewers in some parts of Coventry is also an issue with regard to affordable housing development, as this limits project density."*

"The lack of a public water supply in some parts of Coventry, together with an uncertain supply potential of Kent County Water Authority, may be a limiting factor to dense developments. Before Final approval is given, applicants will be required to demonstrate that there is sufficient water supply to service the proposed development."

Developable Land - *"Eastern Coventry is a mix of typical suburban developments and older villages. Public water is available in eastern Coventry...In contrast, both central and western Coventry are much more rural and undeveloped, and there is a great deal of available land. Land in central Coventry is primarily zoned for three-acre lots, while land in western Coventry is primarily zoned for five-acre lots. Central and western Coventry lacks infrastructure, including public water, roads, and schools."* [Housing Plan - Page 30]

Furthermore, the Housing Plan and Comprehensive Plan acknowledge that many of the detailed Adjustments are in fact hindrances to realizing provision of affordable housing, thereby affirming this Consultant's argument that they are both appropriate and reasonable.

REGULATORY ISSUES

Minimum Lot Sizes are Too Large for Affordable Housing Production: *"Coventry has land available for new development, but most of the land is zoned in a way that makes building affordable housing difficult. The densest zoning category (R-20) has a minimum lot size of 20,000 s.f. (roughly one dwelling unit per one-half acre). Much of the land in this zoning category is already built out. Minimum lot sizes increase to 2 acres, 3 acres, and 5 acres in other zones."* [Page 4]

Current Zoning Designations Limit Multi-family Unit Production: *"The current Zoning designations limit the production of multi-family units, since this type of development is only allowed in the R-20, the Village Residential Commercial, and Village Main Street Commercial zones. There is little available land in these zones, especially for larger developments."* [Page 5]

Subdivision and Land Development Regulations are Strict, Adding to Cost of Housing Production: *"According to developers, Coventry has rather extensive subdivision requirements, adding to the costs of housing development. Road requirements were specifically cited as an impediment to affordable housing development."* [Page 5]

AFFECT OF MUNICIPAL REGULATIONS ON THE COST OF HOUSING

Land Costs and Zoning - *"The principal cost of any home is the cost of the land it is built on. As such, zoning plays an important role in determining housing costs, because it dictates the minimum lot size per unit. Higher density residential zoning and smaller minimum lot sizes decrease the land costs per unit, making it less costly to develop housing. The availability of land in high-density zoning districts directly affects the feasibility of affordable housing production..."* [Page 26]

(III) *"Whether the low- and moderate-income housing units proposed are integrated throughout the development; are compatible in scale, meaning that: (1) The size of the low- and moderate-income units shall not be less than seventy-five percent (75%) of the size of the market rate units, unless otherwise allowed by the local board; (2) The affordable units are of similar architectural style to the market rate units within the project so that the exterior of the units look like an integrated neighborhood with similar rooflines, window patterns, materials and colors; and (3) The affordable units will be built and occupied in a proportional manner with the construction and occupancy of the market rate units. Except that for housing units that are intended to be occupied by persons fifty-five (55) years of age or older, or sixty-two (62) years of*

age or older, as permitted by the federal Fair Housing Act pursuant to 42 U.S.C.A. Section 3607(b) and 24 CFR Section 100.300-308 and the Rhode Island fair housing practices act pursuant to Section 34-37-4.1, such units need not be integrated in any building or phase within the development that contains housing units that are not age-restricted, and neither age-restricted housing units nor any building or phase containing age-restricted housing units must be compatible in scale and architectural style to other housing unit types to the extent the age-restricted housing units are designed to meet the physical or social needs of older persons or necessary to provide housing opportunities for older persons."

The affordable units will be constructed of somewhat similar materials and architectural styles, and purposefully distributed, such that they will be properly integrated. Finally, the 100 affordable units will be introduced in a proportionate manner with construction of the market-rate units.

(IV) *"Whether there will be significant negative impacts on the health and safety of current or future residents of the community, in areas including, but not limited to, safe circulation of pedestrian and vehicular traffic, provision of emergency services, sewerage disposal, availability of potable water, adequate surface water run-off, and the preservation of natural, historical or cultural features."*

There are no valuable agricultural soils, historical and/or cultural resources, or groundwater resources within proximate distance of the Property. The Property is entirely appropriate for more dense development, being predominantly comprised of upland area. As will be addressed in both plan and oral testimony by respective experts, the Property can be safely engineered for multi-structure, multi-unit residential purposes.

(V) *"Whether the proposed land developments or subdivisions lots will have adequate and permanent physical access to a public street in accordance with the requirements of Section 45-23-60(a)(5), or the local review board has approved other access, such as a private road."*

All proposed residences will have permanent and physical access from Tiogue Avenue.

(VI) *"Whether the proposed development will result in the creation of individual lots with any physical constraints to development that building on those lots according to pertinent regulations and building standards would be impracticable, unless created only as permanent open space or permanently reserved for a public purpose on the approved, recorded plans."*

No actual subdivision is proposed. Regardless, there does not appear to be any constraints to developing the Property in the manner so proposed, considering it will be concentrated in the area already historically disturbed. Furthermore, all requisite public infrastructure is present and will be accordingly connected, to include the presence of an appropriate roadway network. And finally, is the appropriateness of surrounding land uses, realizing true neighborhood compatibility.

CONCLUSION

It is the professional opinion of this Consultant that the proposed development, in the manner so-described, is consistent with both the Housing Plan and Comprehensive Plan; setting forth the respective Policies, Goals and Objectives. My professional opinion is based upon the manner in which the development will be appropriately integrated into the surrounding mixture of Commercial and High-Density residential neighborhood(s). The Planning Board should carefully consider the many benefits posed by the applicant's development, not the least of which is the provision of a significant quantity of much-needed affordable rental housing.

AFFORDABLE HOUSING ANALYSIS										
Coventry										
Housing Fact Book										
Housing Works RI										
2005 - 2025										
Year	Total Year Round Housing Units	Affordable Housing Unit Count	Affordable Housing Unit (Percentage)	Change Change	Family / Special Needs Count	Family Special Needs (Percentage)	Change (Percentage)	Elderly Count	Elderly (Percentage)	Change Change
2005	12,861	663	5.16%		260	39.22%		403	60.78%	
2006	12,861	672	5.23%	0.07%	269	40.03%	0.81%	403	59.97%	-0.81%
2007	12,861	680	5.29%	0.06%	277	40.74%	0.71%	403	59.26%	-0.71%
2008	12,861	682	5.30%	0.02%	279	40.91%	0.17%	403	59.09%	-0.17%
2009	12,861	682	5.30%	0.00%	279	40.91%	0.00%	403	59.09%	0.00%
2010	12,861	685	5.33%	0.02%	282	41.17%	0.26%	403	58.83%	-0.26%
2011	12,861	679	5.28%	-0.05%	277	40.80%	-0.37%	402	59.20%	0.37%
2012	14,082	691	4.91%	-0.37%	289	41.82%	1.03%	402	58.18%	-1.03%
2013	14,082	758	5.38%	0.48%	322	42.48%	0.66%	436	57.52%	-0.66%
2014	14,082	758	5.38%	0.00%	322	42.48%	0.00%	436	57.52%	0.00%
2015	14,082	760	5.40%	0.01%						
2016	14,082	760	5.40%	0.00%						
2017	14,082	760	5.40%	0.00%						
2018	13,944	753	5.40%	0.00%	316	41.97%	-0.51%	437	58.03%	0.51%
2019	14,082	759	5.39%	-0.01%						
2020	14,093	754	5.35%	-0.04%	317	42.04%	0.08%	437	57.96%	-0.08%
2021	14,079	749	5.32%	-0.03%	315	42.06%	0.01%	434	57.94%	-0.01%
2022	14,069	733	5.21%	-0.11%	301	41.06%	-0.99%	432	58.94%	0.99%
2023	14,704	744	5.06%	-0.15%	305	40.99%	-0.07%	439	59.01%	0.07%
2024	14,723	745	5.06%	0.00%	305	40.94%	-0.06%	440	59.06%	0.06%
2025	14,706	978	6.65%	1.59%	538	55.01%	14.07%	440	44.99%	-14.07%
	Difference									
	2005 - 2025:	315	1.50%		278	15.79%		37	-15.79%	
	Average Units									
	Per Year:	15.75								
	Req. to Meet									
	Compliance:	492.6	3.35%							
	Years Req									
	Based on Avg:	31.27619								

AFFORDABLE HOUSING ANALYSIS

COVENTRY

Housing Fact Book

Housing Works RI

2018 - 2025

Year	Total Year Round Housing Units	Affordable Housing Unit Count	Affordable Housing Unit (Percentage)	Median Single-Family Home Price	Change (Percentage)	Monthly Single-Family Housing Payment	Change (Percentage)	Median Household Income	Change (Percentage)
2018	13,944	753	5.40%	\$235,000		\$1,756		\$65,507	
2019	14,082	759	5.39%	\$244,000	3.83%	\$1,931	9.97%	\$68,633	4.77%
2020	14,093	754	5.35%	\$245,000	0.41%	\$1,874	-2.95%	\$72,264	5.29%
2021	14,079	749	5.32%	\$297,500	21.43%	\$2,035	8.59%	\$73,392	1.56%
2022	14,069	733	5.21%	\$328,500	10.42%	\$2,235	9.83%	\$84,623	15.30%
2023	14,704	744	5.06%	\$345,000	5.02%	\$2,832	26.71%	\$88,779	4.91%
2024	14,723	745	5.06%	\$390,000	13.04%	\$3,329	17.55%	\$94,800	6.78%
2025	14,707	978	6.65%	\$410,000	5.13%	\$3,507	5.35%	\$99,177	4.62%
	Difference								
	2018 - 2025:	225	1.25%	\$175,000	74.47%	1,751	99.72%	33,670	51.40%
	Average Units								
	Per Year:	32.14							
	Required to Meet								
	Regulatory Compliance:	493	3.35%						
	Years required								
	Based on Average:	15							