

# Millstone LLC

ENGINEERING • SURVEYING • PERMITTING

March 27, 2026

Dennis Haggerty  
Town of Coventry  
1675 Flat River Road  
Coventry, RI 02816

**Re: Response to Comments**  
**Willow Lakes Independent Living**  
**A.P. 16, Lot 3**  
**New London Turnpike**  
**Coventry, RI**  
*Project File: 17.276.403*

Dear Mr. Haggerty

Below are responses to comments raised in two emails from you dated February 25 & February 26, 2026.

**Comment 1:**

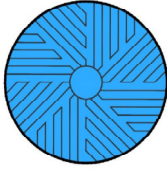
As discussed with Doug over the phone, the architectural drawings show that the height of the buildings will exceed the maximum of 35' per code. Please provide exact measurements. Neither the Master Plan or Preliminary Plan decisions (including the 2024 reinstatement) list building height as one of the variances/ adjustments. Further, none of the project materials (including narratives, site plans, engineering documents, etc.) or the Town staff reports identify height as a variance/ adjustment. An earlier narrative (Master or Prelim) requested variances for the height of fences and walls. As a result, this application may need to be brought before the Planning Commission, either as Final Plan (no notice) or another Prelim Plan reinstatement (public hearing required).

Response

The applicant has requested a Final Plan hearing to discuss the height of the building. Please see correspondence from KSPR Law dated March 13, 2026 (attached). It is now our understanding that the Town prefers that an Amended Preliminary application be filed for the development. This application shall be provided under separate cover.

**Comment 2:**

Please provide a signed contract with an affordable housing monitoring agent. The Preliminary Plan submission included a 2017 letter from Julie Leddy/ Coventry Housing Authority stating she will serve as the monitoring agent. CHA no longer provides affordable housing monitoring services, and



has given her portfolio to Melina Lodge/ Housing Network of RI. Do you still plan to hire HNRI for Willow Lakes?

Response

The Applicant has contacted SWAP, Inc. who will be providing the monitoring services. Please see attached letter dated March 20, 2026.

**Comment 3:**

Amade astate and local permits are required for Final Plan submission. The RIDEM Wetland Edge Verification for this project expired in 2013. This document was issued in 2009 and states it was only valid for 4 years. In addition, this document states that the RIDEM Wetlands Act applies to the property, and that a permit will be required. Planning has no such Wetlands permit in our records - please confirm whether or not additional wetlands permitting is required and if so provide the necessary documentation.

Response

The project has an active RIPDES permit from RIDEM, no re-delineation of the wetland edge is necessary.

**Comment 4:**

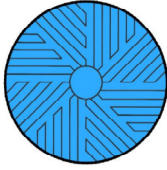
The Preliminary Plan reinstatement decision for Willow Lakes from 2024 included a number of stipulations for site plan edits requested by the Town Engineer. Please provide a brief response to the stipulations numbered 6 through 12 in the Prelim decision (email or brief letter is sufficient). These items will need to be addressed prior to final endorsement and recording, to ensure that the Final Plan decision resolves any outstanding issues from prior review stages.

Response

Condition 6: Basin-A, Sand Filter-A1 and Sand Filter-A2 should be protected from silty runoff during construction by surrounding each structure with silt fence (or equal) until the upland areas are stabilized. Please show the silt fence enclosure on the SESC Plan, Sheet 6 of 12.

*This silt fence is shown on Sheet 6 of 12.*

Condition 7: On the SESC Plan, Sheet 6 of 12, the existing catch basins within New London Turnpike shall be protected with silt sack inserts. The proposed straw bale inlet protection and filter fabric protection is not appropriate for use on that roadway. Please show this detail on Sheet 7 of 12 in lieu of the straw bale detail. Please add a note to the plans stating all of the proposed silt sack inserts on New London Turnpike shall remain in place until all disturbed areas associated with the sidewalk construction and site construction are complete.



*A Silt Sack detail with the recommended notes is shown on Sheet 7 of 12 as well as the Offsite Improvement Plan Sheet 2 of 2.*

Condition 8: The Applicant should clarify if the two small courtyards within the new building will have drainage systems and what types of surface covers will be proposed.

*The proposed courtyards consist of a combination of concrete, grass, and landscaped areas. The pool courtyard is proposed to be connected to the site drainage system through a network of yard drains. These yard drains are shown on Sheet 6 of 12 with a detail on Sheet 10 of 12. This courtyard drainage system can also be found on the attached Sheet L3.01 "Drainage Plan Pool Courtyard" by HPLA Studio. The remaining courtyards are connected to the internal building stormwater system. This is the system that conveys the runoff collected by the roof drains. These courtyard systems can be found on Sheet L3.01 "Grading & Drainage Plan – Courtyards" by HPLA Studio (attached).*

Condition 9: Add a note to the Sewer Notes stating all manholes, gravity sewer lines and force mains shall be tested according to the procedures specified in the West Warwick Standard Sanitary Sewer Requirements. A representative from the Town of Coventry shall be present for all of testing.

*Please see Sewer Note 6 on Sheet 8 of 12.*

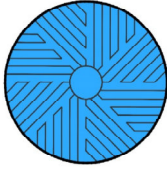
Condition 10: On the Offsite Sidewalk Plans, please add a note stating "Any damage to the existing roadway, existing roadway drainage system, right-of-way areas, driveways and walkways caused by construction of the new sidewalk must be repaired by the Developer/Contractor at no cost to the Town. Driveway pavement that is within the sidewalk pathway which is in poor condition must be replaced." Also, I recommend a pre-construction survey be conducted with the Contractor and the DPW prior to construction to document pre-construction conditions.

*This note has been added to the Offsite Improvements Plan Sheet 2 of 2 (see note 13 and note 14).*

Condition 11: Proposed grading design must be added to the Offsite Sidewalk Plans. It appears retaining walls may be necessary to keep the limit of work within the New London Turnpike right-of-way.

*Proposed grading is shown on Sheet 1 of 2 of the Offsite Improvements Plan.*

Condition 12: A Coventry Sewer Connection Permit Application, West Warwick Sewer



Pretreatment Application and a Coventry Soil Erosion Permit Application still need to be submitted for the project.

*The sewer applications have been submitted, see response to Comment 13 below.  
The Soil Erosion Permit Application shall be submitted under separate cover.*

**Comment 5:**

All legal documentation is be required with Final Plan submission. Will this development have an HOA for the independent living section? Please provide HOA provisions, deed restrictions for LMI units, and any other relevant legal documents for this project.

Response

The proposed development is for rental units only. There will be no HOA.

**Comment 6:**

Minor plan edit - The zoning data table on the proposed conditions plan states that there is no dimensional standard (“none”) for maximum lot coverage for multi-family uses. This is incorrect. Multi-family would fall under “Other permitted uses”, for which the maximum lot coverage is 20%. This project still received an adjustment/ variance for lot coverage regardless, so this is just a minor plan edit to ensure dimensional accuracy.

Response

Plans have been revised to correct this, see Sheet 3 of 12.

**Comment 7:**

Please add a brief note about the driveway/ roadway material to the proposed conditions plan. This information is a submission requirement, please review the Final Plan checklist.

Response

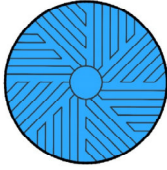
Plans have been revised to include driveway material, see Sheet 3 of 12.

**Comment 8:**

The proposed conditions plan does not show the total area/ square footage of the subdivision parcel. This info is required per checklist item #31.

Response

Plans have been revised to correct this, see Sheet 3 of 12.



**Comment 9:**

The proposed conditions plan does not depict proposed permanent bounds and corner markers. This info is required per checklist item #32 and the existing conditions plan showed iron rods.

Response

The project received a waiver of this requirement.

**Comment 10:**

Can you demonstrate that one dumpster for a 202-unit development is sufficient? The site plan only shows one dumpster at present, near the eastern portion of the site.

Response

Plans have been revised to describe the area in more detail, see Sheet 3 of 12. The trash enclosure is 25' by 10' with a compacting dumpster and is sufficient for the development.

**Comment 11:**

The checklist requires "special conditions of approval imposed by the Planning Commission" but I think those can be addressed in a letter/ email as I stated in my previous communication - just address the Prelim Plan decision stipulations #6-12 in writing.

Response

See response to Comment 4 above.

**Comment 12:**

The proposed conditions plan does not include a certification by Registered Land Surveyor. This certification was added to existing conditions sheet, but it's also still required for the proposed conditions sheet per checklist item #49 and should eventually be added to the final record plan.

Response

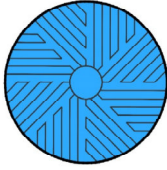
Plans have been revised to correct this, see Sheet 3 of 12.

**Comment 13:**

Can you confirm that the 2012 Town resolution granting sewer access is still valid at this time?

Response

As you are aware, the Town has recently performed studies of sanitary sewer capacity in the area of this development. Applications have been filed with the Town, which provided a



letter finding no comment, and the West Warwick Regional Wastewater Treatment Facility. The Applicant respectfully requests the final sewer approvals be made a condition of approval that may be enforced when applying for a Certificate of Occupancy.

**Comment 14:**

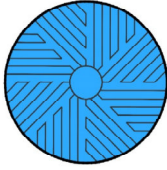
Please submit tax certificates from the applicable fire district for the subject parcel.

Response

The tax summaries from the Central Coventry Fire District are enclosed.

Enclosed herewith, please find one copy of the following for the above referenced project:

1. One (1) copy of a letter from Michael D. Resnick, Esq. to Douglas McLean dated March 20, 2026 Re: Final Plan Application – Willow Lakes Independent Living;
2. One (1) copy of a letter from Marilyn Carlson to Doug McLean dated March 20, 2026 Re: Willow Lakes Continuing Care Facility;
3. One (1) full sized and one (1) reduced (11”x17”) copy of plans entitled, “Construction Drawings for Willow Lakes Independent Living; A.P. 16, Lot 3; New London Turnpike; Coventry, Rhode Island” prepared by Millstone LLC; dated May 2025 and revised through 3/24/26; Sheets 1 – 12 of 12;
4. One (1) full sized and one (1) reduced (11”x17”) copy of plans entitled, “Willow Lakes Offsite Improvements; A.P. 16, Lot 3; New London Turnpike; Coventry, Rhode Island Prepared for Willow Lakes Independent Living;” prepared by Millstone Engineering, P.C.; dated March 2021 and revised through 3/24/26; Sheets 1 – 2 of 2;
5. One (1) full sized and one (1) reduced (11”x17”) copy of a plan entitled, “Drainage Plan Pool Courtyard” by HPLA Studio, Sheet L3.01, dated 2025.04.25
6. One (1) full sized and one (1) reduced (11”x17”) copy of a plan entitled, “Grading& Drainage Plan - Courtyards” by HPLA Studio, Sheet L3.01, dated 2025.04.25
7. One (1) copy of the Central Coventry Fire District tax collection summary (New London Turnpike Realty LLC).
8. One (1) copy of the Central Coventry Fire District tax collection summary (LRT New London Ave Development LLC).



Please feel free to contact my office should you have any questions or require additional information.

Sincerely,

**MILLSTONE LLC**

Benjamin J. Caito, P.E.  
Principal

Cc: Willow Lake Properties, LLC  
Michael D. Resnick, Esq.

17.276.403 Response to comments 2026-3-27.docx