

100 Westminster Street, 16<sup>th</sup> Floor Providence, RI 02903 Telephone 401.274.7200 Fax 401.751.0604 / 351.4607 apslaw.com jrochae@apslaw.com

November 5, 2025

### VIA EMAIL

Town of Coventry
Planning Commission
c/o Douglas McLean
Director of Planning and Development
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 Mr. McLean,

As you know, this office represents 232 Realty Associates, LLC in its Comprehensive Permit Application for the development known as the Village at Tiogue ("Project"). The Project proposes to construct 176 residential units with 25% of those units being designated as low and moderate income at the Property. The Application was submitted on September 15, 2025. The Project was before the Technical Review Committee ("TRC") on October 14, 2025, where comments were received at that meeting, and is scheduled for a second TRC Meeting on November 10, 2025, which will focus on roadway and traffic after receipt of the Pare Corporation peer review report completed on behalf of the Town. We are in the process of preparing a complete response to comments on the Project in an effort to submit to the Planning Commission, but wanted to provide our responses as to the Peer Review Report received on Monday for the TRC's consideration.

## A. Traffic Counts (refer to Appendix A – Automatic Traffic Recorder Counts)

To clarify, record and project specific automatic traffic counts were utilized as follows:

Old North Road – Friday, December 4, 2015 through Friday, December 11, 2015; Tiogue Avenue – Friday, December 6, 2019 through Friday, December 13, 2019; New London Turnpike – Tuesday, January 14, 2025 through Saturday, January 18, 2025; and Tiogue Avenue – Monday, March 3, 2025 through Friday, March 7, 2025.



The project-specific manual turning movement count data was obtained for the two-hour afternoon peak periods determined through the record ATR data that evidenced that the two hours between 3:00 and 5:00 are representative of the peak traffic conditions experience along both Tiogue Avenue and New London Turnpike in the project area during the daily afternoon hours.

# B. Manual Count Data (refer to Appendix A - Intersection Turning Movement Counts)

Intersection turning movement counts (manual) were performed on <u>Tuesday</u>, March 4, 2025.

### Improvements to Tiffany Road

Pare's report proposes three areas of improvements on Tiffany Drive, Area 1 outlined in orange below, Area 2 outlined in pink below, and Area 3 outlined in yellow below:



Each section is discussed in turn.



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

Pare agrees with Crossman's suggestion that this section of Tiffany Road, much of which is owned by the applicant (as shown on the Town's GIS is absorbed into Lot 150), be widened to 22 feet with vegetation cleared for safe passage. The applicant agrees to extend improvements as proposed on the plans to include the section between the site entrance and Trafford Park Drive.

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

Pare suggests that this area be widened to 22 feet and vegetation cleared, similar to Area 1. The Applicant agrees to widen this Area to the extent possible subject to surveying of this Area as to impediments and the size of the platted right of way, which is unknown.

### Area 3, Old North Road to New London Avenue

Pare suggests that this portion of Tiffany Road also be improved. It is a one-way, westbound roadway. Pare notes that this section is narrow, averaging between 10 and 12 feet for the one-way width and that the pavement is in poor condition. Pare also notes that widening would require takings of private property. Pare suggests that this section of roadway "should at a minimum be improved with new asphalt and widened to the maximum width possible to better accommodate vehicular traffic and emergency vehicles ....." and that "Vegetation should be cleared on the sides of this section of the road to improve site distances."

In response, the Applicant will agree to grind the roadway down to the base, grade and repave the current width. The Applicant will not guarantee a maintenance period or bond given the existing and unknown conditions of the roadway and will not agree to widen the roadway given the significant site constraints, drainage and wetlands implications. A review of this section of Tiffany Road reveals that there is not sufficient width for any widening, that there are wetlands implicated as well as a significant drop off of topography, private improvements including those depicted as follows, in addition to telephone poles and mailboxes which would not allow any widening of the roadway.



To note, this eastern section of the roadway is inbound to the site only (one way) and would only service Area 3 of the development. The estimated traffic utilizing the one-way road is nominal.

### D. <u>Connection of Areas 2 and 3</u>

While *not* pointed out to be a safety or traffic necessity by Pare, as suggested by some TRC members, Pare does suggest a benefit to connecting a roadway between Areas 2 and 3. The Applicant is not opposed to the connection of a roadway between Areas 2 and 3 in light of Pare's determination that such connection will *not* detrimentally impact traffic or safety.

However, given the findings that such connection will allow other traffic in the area to utilize the connected roadway to navigate through the neighborhood, the Applicant will not agree that this connected through road be private, a request of several members of the TRC Committee to avoid Town maintenance obligations. The Applicant is willing to revise the plans and show the roadway connected so long as it is a public roadway, as proposed. That said, it is the Applicant's preference that the current roadway configuration, with no connection of Areas 2 and 3, be retained.



#### E. Sidewalks in Area 1

Pare suggests that Area 1 include sidewalks along the private roadway. As Pare points out, these sidewalks do not connect to any additional sidewalk along Tiogue Avenue. This is a small residential area—as Pare notes, 600 feet--and neither Applicant, nor its professionals see the need, safety, circulation or otherwise to provide sidewalks to nowhere and the inclusion of such will detrimentally impact circulation in the site.

Joelle C. Rocha

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