

JUL 06 2022

CITY OF PROVIDENCE
ZONING BOARD OF REVIEW

APPLICATION FOR VARIANCE OR SPECIAL USE PERMIT

Check Each Type Zoning Relief Sought:

<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>

Variance – Use *
Variance – Dimensional*
Special Use Permit **

* Attach Appendix A to apply for a Use or Dimensional Variances

**Attach Appendix B to apply for a Special Use Permit

Applicant: Aref Shehadeh

Address 81 Gentian Ave

E-mail ari@mododevelop.com

Zip Code 02908

Phone 401-573-5553

Home/Office

Mobile (Cell)

Owner: Aref Shehadeh - 215 Broadway L

Address 81 Gentian Ave

E-mail ari@mododevelop.com

Zip Code 02908

Phone 401-573-5553

Home/Office

Mobile (Cell)

Lessee: _____

Address _____

E-mail _____

Zip Code _____

Phone: _____

Home/Office

Mobile (Cell)

Does the proposal require review by any of the following (check each):

- n/a Downtown Design Review Committee
- n/a I-195 Redevelopment District Commission
- n/a Capital Center Commission
- n/a Historic District Commission

1. **Location of Property:** 215 Broadway Providence, RI
Street Address

R-P

2. **Zoning District(s):** _____
Special purpose or overlay district(s): Historic Overlay - Broadway

3a. **Date owner purchased the Property:** 12/24/2020

3b. **Month/year of lessee's occupancy:** n/a

3. Dimensions of each lot:

Lot # <u>260</u>	Frontage <u>92</u>	depth <u>100</u>	Total area <u>9200</u>	sq. ft.
Lot # _____	Frontage _____	depth _____	Total area _____	sq. ft.
Lot # _____	Frontage _____	depth _____	Total area _____	sq. ft.

4. Size of each structure located on the Property:

Principal Structure: Total gross square footage 8,215 sq/ft
Footprint 2458 Height 30 Floors 3

Accessory Structure: Total gross square footage n/a
Footprint _____ Height _____ Floors _____

5. Size of proposed structure(s): Total gross square footage: n/a
Footprint _____ Height _____ Floors _____

6a. Existing Lot coverage: (include all buildings, decks, etc.) 26.7%

6b. Proposed Lot coverage: (include new construction) 26.7%

7a. Present Use of Property (each lot/structure):
See memoranfum attached hereto.

7b. Legal Use of Property (each lot/structure) as recorded in Dept. of Inspection & Standards:
See Memorandum attached hereto

8. Proposed Use of Property (each lot/structure):
Dwelling - Multifamily

9. Number of Current Parking Spaces: 13

10. Describe the proposed construction or alterations (each lot/structure):
Interior alteration to first floor office. No change in building envelop. No change in total units. Use change of sole remaining commercial unit into residential.

11. Are there outstanding violations concerning the Property under any of the following:
n/a Zoning Ordinance
n/a RI State Building Code
n/a Providence Housing Code

12. List all Sections of the Zoning Ordinance from which relief is sought and description of each section:
402. tbl 4-1 Minimum Lot Area -8 units@1650. Need 13,200, have 9,045.Variance- 4,155
402. tbl 4-1 Lot Width- 12' per unit rqd. Need 96'- have 90.23'. Variance - 5.77'

13. Explain the changes proposed for the Property.

Change commercial space to residential for a total of eight (8) residential units

The undersigned acknowledge(s) and agree(s) that members of the Zoning Board of Review and its staff may enter upon the exterior of the Property in order to view the Property prior to any hearing on the application.

The undersigned further acknowledge(s) that the statements herein and in any attachments or appendices are true and accurate, and that providing a false statement in this application may be subject to criminal and/or civil penalties as provided by law, including prosecution under the State and Municipal False Claims Acts. Owner(s)/Applicant(s) are jointly responsible with their attorneys for any false statements.

Owner(s):

Aref Shehadeh
Type Name


Signature

Type Name

Signature

Applicant(s):

Aref Shehadeh
Type Name


Signature

Type Name

Signature

All requirements listed and described in the Instruction Sheet must be met or this application will not be considered complete.

APPENDIX A

APPLICATION FOR VARIANCE(S)

Rhode Island General Laws § 45-24-41(c) requires that the Applicant for a variance demonstrate:

- (1) That the hardship from which the applicant seeks relief is due to the unique characteristics of the subject land or structure and not to the general characteristics of the surrounding area; and is not due to a physical or economic disability of the applicant, excepting those physical disabilities addressed in § 45-24-30(16);
- (2) That the hardship is not the result of any prior action of the applicant and does not result primarily from the desire of the applicant to realize greater financial gain;
- (3) That the granting of the requested variance will not alter the general character of the surrounding area or impair the intent or purpose of the zoning ordinance or the comprehensive plan upon which the ordinance is based;
- (4) That the relief to be granted is the least relief necessary; and
- (5) (a) For a **use variance**: That the land or structure cannot yield any beneficial use if it is required to conform to the provisions of the zoning ordinance;
(b) For a **dimensional variance**, that the hardship suffered by the owner of the subject property if the dimensional variance is not granted amounts to more than a mere inconvenience.

Please provide the following information:

1. What is the specific hardship from which the applicant seeks relief?

- First floor has been marketed for a substantial period without a successful tenant. After last denial at zoning board- owner completely changed plans to try to get tenant without success.
- Sizing and massing of existing structure on small, 5,043 sq/ft lot, causes an abundance of usable square footage, but not enough land area or parking to be compliant with the density calcs.

2. Specify any and all unique characteristics of the land or structure that cause the hardship?

The large building is of residential quality with a staircase to enter and several entrances not suitable for a business setting, it's clearly a residential property that was used to conduct business.

3. (a) Is the hardship caused by an economic disability? Yes _____ No X _____

(b) Is the hardship caused by a physical disability? Yes _____ No X _____

(c) If the response to subsection (b) is "yes," is the physical disability covered by the Americans with Disabilities Act of 1990 (ADA), 42 U.S.C. § 12101 et seq.?

Yes _____ No X _____

4. Did the owner/applicant take any prior action with respect to the Property that resulted in the need for the variance requested? (Examples include, but are not limited to, any changes the owner/applicant made to the structure(s), lot lines, or land, or changes in use of the Property)?

Yes _____ No X _____

If "yes," describe any and all such prior action(s), and state the month/year taken.

5. State any and all facts to support your position that the applicant is not seeking the variance(s) primarily in order to obtain greater financial gain.

Converting an office space to residential units does not provide a gain in rentable income for owner. Due to not being able to rent the space in a 1 year period, it makes the building a negative operation. Goal is to fully occupy the building. First floor office space is currently unusable due to the nature of the building and lack of demand for the office space.

In addition, please see attached hereto memorandum of law.

6. State any and all facts that support your position that you are seeking the least relief necessary to lessen or eliminate the hardship (for example, why there are no viable alternatives to your proposed plan).

Proposing converting the 2,300 sq/ft first floor space into 3 sizable apartments. Apartments on Broadway are typically around 700- 1000 sq/ft of space. Less apartments would supply an unmarketable size apartment for the area. Keeping the office building will continue to leave the building partially vacant. The layout of first floor befits 2 units side by side, and 1 apartment in the rear addition.

In addition, please see attached hereto memorandum of law.

7. If you are seeking a USE VARIANCE, set forth all facts that demonstrate that the Property cannot have any beneficial use if you are required to use it in a manner allowed in the zoning district.

8. If you are seeking a DIMENSIONAL VARIANCE, set forth all facts that indicate that if the variance is not granted, the hardship the owner/applicant will suffer is more than a mere inconvenience.

Owner will continue to suffer a vacant office space in the building due to not being able to rent and due to undesirable characteristics of building for a business – tall front steps for example. Owner cannot enjoy highest and best use of building. Building is positioned well for residential use. There are multiple bus lines and public transit, overnight permits are provided all over streets.

In addition, please see attached hereto memorandum of law.

RECOMMENDATION TO THE ZONING BOARD OF REVIEW

JUNE 9, 2021

Application Type

Dimensional Variance

Neighborhood

Federal Hill

Applicant

Arif Shehadeh, Applicant and Owner

Parcel

AP 28 Lot 260

Address

215 Broadway

Parcel Size

± 9,200 SF

Zoning District

R-P; HD overlay

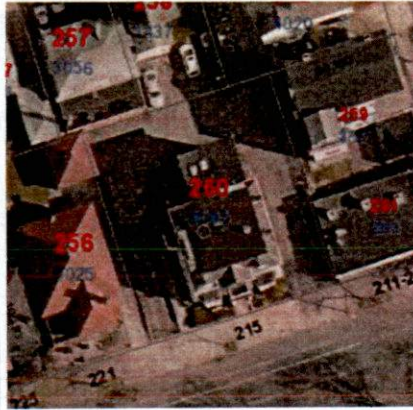
Variance Requested

1. Dimensional variance for minimum lot area
2. Dimensional variance for minimum lot width

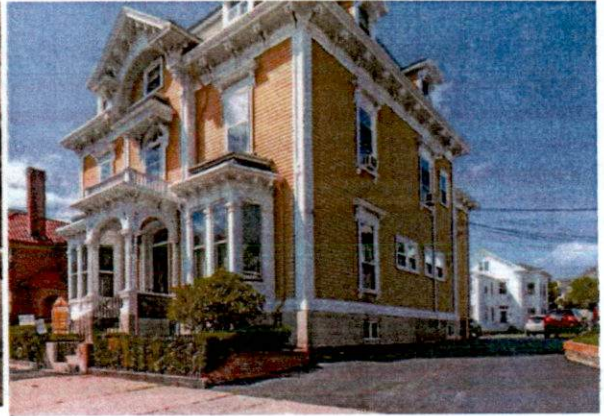


Updated: June 4, 2021

215 BROADWAY



Location Map



View of the building

SUMMARY

Project Description

The applicant is seeking dimensional variances from the requirements of Table 4-1 of the Providence Zoning Ordinance for lot area and lot width per dwelling unit. The Applicant proposes to convert the existing mixed-use building from 7 dwelling units and law offices to 10 residential units on a lot with 9,045 sq.ft. and 90.23 feet of width, where 1,650 sq.ft. of lot area and 12 ft. of lot width per dwelling unit are required.

Discussion

Based on plans provided and a review of the site's configuration, it appears that the relief requested is due to the unique character of the property. The building is currently being used as a law office with seven residences and is proposed for complete residential use with 10 residential units.

The R-P zone requires 1,650 SF of lot area per dwelling unit. With a lot area of 9,200 SF, only six units would be permitted which would be significantly larger than the average apartment. A mix of one and two bedroom units will be provided from the basement to the third story. With conversion of the law office to residential uses, plans show that the building's size and massing are appropriate for accommodating ten units which will be closer in size to an average

apartment. Provision of housing would conform to objective H-2 of the comprehensive plan which encourages creation of new housing. The change does not affect conformance with other issues like parking or impervious surface coverage.

If the number of units were to be reduced to conform to the lot size and width requirements of the zone, it could result in more than a mere inconvenience as the existing structure would be underutilized relative to the number of units that can be accommodated. Denial of the variances could result in a hardship as it would prevent reuse of the building based on the lot's configuration.

Recommendation

Based on the foregoing discussion, the DPD recommends that the requested relief be granted.

WEST BROADWAY NEIGHBORHOOD ASSOCIATION



Rebecca Atwood
President

24 May 2022

Alozie Nwosu
Vice President

Zoning Board of Review
City of Providence
444 Westminster Street
Providence, RI 02903

Noel Sanchez
Vice President

Alexandra Lancey
Secretary

Re: 215 Broadway

Jenica Reed Conley
Treasurer

Dear Members of the Zoning Board of Review,

Board

Angel Corprew-
Brown
Eugenio Fernandez
Yvonne Graf
Stephanie Larrieux
Obed Papp
Kai Salem
Leigh Ann Razza
Nic Canning
Brian Oakley
Kayla Campbell

In April 2021 the West Broadway Neighborhood Association (WBNA) wrote to this board to express concern about an application for dimensional variances from the applicant for 215 Broadway. The WBNA had questions about the project and requested the matter be continued to allow time for the applicant to come to the neighborhood and share their plans and answer questions through the WBNA Community Development Committee's (CDC) Project Review process.

The applicant, Ari Shehadeh, has since adopted, by-right five apartments on second and third and an office on first floor, which, despite being marketed for over 10 months, has sat vacant. The CDC met with Mr. Shehadeh to discuss new plans to seek dimensional relief to allow the first floor, which is around 2250 square feet, to be split up into three apartments.

The charge of the CDC is to help maintain this neighborhood as a place where residents and businesses want to live, work, play, **and importantly, stay**. We encourage vibrant main streets with restaurants, shops, and different types of amenities. We aim to foster a well-maintained and attractive urban environment integrated with green building practices, historic preservation, and affordability.

The WBNA's CDC supports Mr. Shehadeh's plans. His new approach considers concerns communicated previously and will add housing units to a market desperately in need, and without modification to the historic exterior of the building. The WBNA supports multiuse spaces on main streets like Broadway, however no concerns were raised in regard to this historically fully residential property. The WBNA encourages Mr. Shehadeh to consider a scheme which would incorporate units below market rate. We appreciate the plan will build out units with more than one bedroom.

Sincerely,

Siobhan Callahan
Interim Executive Director

Nic Canning
Co-Chair, Community Development Committee

Standards for Relief

Although helpful and insightful, the question-and-answer style organization of the Application and its Appendix does not in fact directly reflect the legal standards. While the application may help inform the Zoning Board of Review, the standards that the Zoning Board of Review must apply are the standards set forth in State Law and PVD Zoning Code. If the Board relies on the standards of its application as opposed to the standard of the controlling law, that would amount to a clear error of law.

Specific to the interpretation of the controlling law, the rules of statutory interpretation are well settled, and well worth setting forth herein:

“When the language of a statute is clear and unambiguous, we must enforce the statute as written by giving the words of the statute their plain and ordinary meaning.” *Harvard Pilgrim Health Care of New England, Inc. v. Gelati*, 865 A.2d 1028, 1037 (R.I.2004). “But when the statute is ambiguous, we must apply the rules of statutory construction and examine the statute in its entirety to determine the intent and purpose of the Legislature.” *Id.* In addition, “**where the statute is remedial, one which affords a remedy, or improves or facilitates remedies already existing for the enforcement of rights or redress of wrongs, it is to be construed liberally.**” *Ayers-Schaffner v. Solomon*, 461 A.2d 396, 399 (R.I.1983).

Gem Plumbing & Heating Co., Inc. v. Rossi, 867 A.2d 796, 811. (**emphasis added**). In sum, as a variance is a statutory power that facilitates remedies, **it is to be construed liberally.**

Please see attached hereto **Exhibit A**, where said controlling law is broken down into its component parts and annotated to highlight the required liberal construction of the rights to relief. In accordance with the rules of statutory interpretation and Rhode Island General Laws §45-24-41:

- The **hardship** is the fact that the structure is a 6,040 square foot historic Victorian structure in an RP zone on an large lot with commercial office space that is no longer in demand

- Additionally, the efforts of the applicant and lack of interest from the market prove that the space is unrentable as commercial space.
- The **relief** is requested is to allow for the conversion of two (2) law offices into three (3) residential units through two (2) distinct dimensional variances:
 - (1) A **dimensional variance** decreasing the required square feet per dwelling unit from 1,650sqft/du to 1,150sqft/du
 - (2) A **dimensional variance** decreasing the required lot width per dwelling unit from 12'/du to 11.25'/du (less than 10% change)

The Facts as Applied to the Controlling Law

The following is each element of the standards as broken out in **Exhibit A – Annotated Controlling Law**. We have applied the facts of the application in red Verdana font.

I. RHODE ISLAND GENERAL LAWS §45-24-41

[...]

(d) In granting a variance, the zoning board of review, ~~or, where unified development review is enabled pursuant to § 45-24-46.4, the planning board or commission,~~ shall require that evidence to the satisfaction of the following standards is entered into the record of the proceedings:

(1) That the **hardship** (the fact that the structure is a 6,040 square foot historic Victorian structure in an RP zone on an large lot with commercial office space that is no longer in demand) from which the applicant seeks relief is:

(i) due to the unique characteristics of the subject **land or structure** and

Unique Structure Characteristics: 6,040 square foot historic Victorian structure in a historic district overlay

Unique Land Characteristics: Large lot in a historic district overlay

(ii) not to the general characteristics of the surrounding area;

No evidence has been submitted that the hardship is due to the general characteristics of the surrounding area. To the contrary, please see Resolution PP 7, attached hereto as Exhibit B.

(iii) and is not due to a physical or economic disability of the applicant,

a. excepting those physical disabilities addressed in § 45-24-30(a)(16);

No evidence has been submitted that the hardship is due to the physical or economic disability of the applicant. To the contrary, please see Resolution PP 7.

215 Broadway LLC Request for Dimensional Relief
1,150sqft of lot area per dwelling unit
11.25' feet of lot width per dwelling unit

II. RHODE ISLAND GENERAL LAWS §45-24-41(D)

- (2) That the **hardship** is not the result of any prior action of the applicant and

See Resolution PP. 8.

- (i) [that the **hardship**] does not result primarily from the desire of the applicant to realize greater financial gain;

The hardship itself, the fact that the structure is a 6,040 square foot historic Victorian structure in an RP zone on an large lot with commercial office space that is no longer in demand, has nothing to do with the finances of the property or anything related to desire for greater financial gain.

In addition to the application of the facts to the controlling law regarding Rhode Island General Laws §45-24-41(d)(2), the following analysis hones in on a potential gap between the controlling law and the questions of the Zoning Board of Review. Based on the questions within the Providence Zoning Board of Review's application and the questions presented during the preceding application requesting ten (10) units, the standard regarding greater financial gain may benefit from additional professional and legal context and analysis.

Contextually, in real estate, there two well-established contrasting principals known as "Economic Obsolescence" and "Functional Obsolescence." Economic Obsolescence is the phenomenon whereby a property loses value due to factors that are external to the property (such as changes in aircraft flight patterns, crime rates, construction on adjacent lots etc.) as opposed to characteristics of the property itself. Conversely, Functional Obsolescence is where features of the property itself cause the loss in value (such as an unfunctional floor plan or abnormal square footage).

The first two parts of R.I. Gen. Laws §45-24-41(d)(1) (“*That the hardship from which the applicant seeks relief is due to the unique characteristics of the subject land or structure and not to the general characteristics of the surrounding area*”) are a perfect test to determine if the argument for relief is derived from Economic Obsolescence or Functional Obsolescence. Accordingly, this is an apparent legislative intent.

There is no evidence in the record that factors external to the property are the drivers behind the request for relief, and there is an abundance of evidence on the record that the hardship is driven by the lack of function of the existing law office space.

The hardship is not a desire for greater financial gain as a result of Economic Obsolescence, but instead is the natural result of a historic structure’s office space becoming functionally obsolescent over time. The fact that the structure is a 6,040 square foot historic Victorian structure in an RP zone on an large lot with commercial office space that is no longer is clearly Functional Obsolescence. Financial statements and written cost data are not the only types of evidence considered regarding economic unfeasibility. Tobin v. Carlson 1998 WL 388351, RI Super. at 5, *Citing Gaglione v. DiMuro*, 478 A.2d 573 (R.I.1984):

In fact, in Tobin v. Carlson (an appeal from a decision by the Providence Zoning Board where the matter before the zoning board was a nursing home where the applicant argued that the nursing facility was functionally obsolete due to the number of units it was allowed to maintain and that the hardship was due to “functional obsolescence.” Id. 5-6.) Justice Sheehan upheld the Providence Zoning Board’s finding that a limit on unit count was sufficient functional obsolescence to support a use variance. Id. 6.

In this case, on or about June 9, 2021, the Zoning Board of Review focused its analysis regarding a ten (10) units proposal to the financial projections related to the requested relief.¹ This request was or is apparently related to some interpretation that blends the standards related to greater financial gain and least relief necessary. In response the applicant submitted financial data and responded to a line of questioning apparently related thereto.

Although such financial data is not related to the **hardship** as required by the element of the controlling law, the applicant, *assuming in arguendo*, that the Zoning Board of Review wishes to consider whether the **relief** (reduced lot width per dwelling unit and reduced lot square footage per dwelling unit) is primarily for greater financial gain, the applicant is also addressing that question.

Specifically, all of the evidence submitted into the record in regard to finances is that the proposed relief is necessary for economic viability. In other words, the permissible use of law offices is not viable **either** structurally (there is no demand for such uses) or financially (revenue from five residential units cannot sustain the structure). The relief being requested to convert two (2) commercial spaces into two (2) residential spaces changes the structure from impossible to maintain to economically viable. It does not change the structure from somewhat profitable to more profitable. The proposed dimensional variances corrects for Functional Obsolescence, not Economic Obsolescence.

¹ Of note, financial analysis is not required by the PVD ZBR Variance Application nor the Controlling Law. It is also not necessary for a finding of relief. See Tobin v. Carlson 1998 WL 388351, RI Super. at 5, Citing Gaglione v. DiMuro, 478 A.2d 573 (R.I.1984).

This is not a situation where there is “greater” financial gain. The term greater, under the rules of statutory interpretation, must be given its plain and ordinary meaning. Greater is legally defined as “of an extent, amount, or intensity considerably above the normal or average” or “of ability, quality, or eminence considerably above the normal or average.”² All of the evidence on the record shows that the proposal is not “of an extent, amount, or intensity considerably above average.

This is absolutely critical. The term “greater” does not mean “more.” The rules of statutory interpretation require that the standard applied by the zoning board of review is interpreted as follows:

[that the hardship] does not result primarily from the desire of the applicant to realize **considerably more than average** financial gain

See R.I. Gen. Laws §45-24-41(d)(2), Harvard Pilgrim Health Care of New England, Inc. v. Gelati, 865 A.2d 1028, 1037 (R.I.2004).³ The question is not whether the project will have *more* financial gain, **but** whether that financial gain *amounts to an abnormal windfall*.

All of the evidence on the record amounts to proof that:

1. The hardship is the result the unique characteristics of the structure and land
2. The relief requested is to correct for the unique characteristics of the structure and land
3. The finances related to the project, *even including all the requested relief for the full eight (8) units* amounts to a **an average to below market** projected financial gain.

² Google Dictionary

³ “When the language of a statute is clear and unambiguous, we must enforce the statute as written by giving the words of the statute their plain and ordinary meaning.”

Even if the Board wishes to inappropriately apply a standard which reviews whether or not the requested *relief* results primarily from a desire to realize considerably more than average financial gain, there is nothing in the record to support such an assertion.

Bottomline, nothing in the evidence on the record in any way indicates that the hardship, or even the relief, is driven by or would result in, “greater” financial gain.

In conclusion, strict adherence to the controlling law applied to the evidence on the record renders any finding that the *hardship* results *primarily* from the desire of the applicant to realize “greater” or ‘*considerably more than average*’ financial gain to be clearly erroneous in view of the reliable, probative, and substantial evidence on the whole of the record and arbitrary and capricious pursuant to R.I. Gen. Laws §45-24-69(d)(5-6).⁴

⁴ In terms of municipal liability, such a finding would invoke R.I. Gen. Laws §42-92-1 *et seq* “Equal Access to Justice for Small Businesses and Individuals” including but not limited to R.I. Gen. Laws §42-92-3 “Award of reasonable litigation expenses.” See Tarbox v. Zoning Bd. of Review of Town of Jamestown, 142 A.3d 191 (2016).

III. RHODE ISLAND GENERAL LAWS §45-24-41(D)

- (3) That the granting of the requested variance will not alter the general character of the surrounding area or impair the intent or purpose of the zoning ordinance or the comprehensive plan upon which the ordinance is based; and

See Resolution PP. 8.

IV. RHODE ISLAND GENERAL LAWS §45-24-41(D)

(4) That the relief to be granted is the least relief necessary.

Dimensional Variance: The least relief necessary within the context a dimensional variance is what area relief is the least necessary to alleviate the hardship. In this case, the reduction in lot width per dwelling unit is a less than 10% modification and the reduction in lot area per dwelling unit to 1,150sqft/du creates a density identical to that of row house units in an R4 zone, an ostensibly less intense zoning than RP.⁵

Moreover, the square footage to be converted from commercial uses to residential uses is approximately 2,300 sqft and the proposed units are comparable to the common apartment size in the area of approximately 700-1,000 sqft.

In addition, the demand for units with many bedrooms is largely driven by the student population. The Providence City Council has introduced an ordinance that would prevent such persons from being able to live together. This is indicative that at least some members of the Providence City Council, and indeed the Providence City Plan Commission, appear to be of the opinion that student housing has a distinct impact on the character of the neighborhood. In addition, the passage of such an ordinance would eliminate the demand for such many-bedroom style units and thus maintain the current problem of the lack of demand for the current habitable square footage.

Similar to the above analysis regarding Rhode Island General Laws §45-24-41(d)(2), in addition to the application of the facts to the controlling law regarding Rhode Island General Laws §45-24-41(d)(4), the following analysis hones in on a potential gap between the controlling law and the questions of the Zoning Board of Review. Based on the questions within the Providence

⁵ Of interest, if the current building was zoned C-1 in the same manner as two abutting parcels, the current habitable square footage of the existing building would legally permit approximately forty (40) units.

Zoning Board of Review's application and the questions presented during the preceding distinct but relevant hearing regarding ten (10) units, the standard regarding least relief necessary may benefit from additional professional and legal context and analysis.

There are two types of variances under Rhode Island Law, a Use Variance and a Dimensional Variance. They are distinct. In the precedence of land use law and land use theory, they are generally understood as follows:

A use or "true variance" defines the relief sought when an owner seeks to employ land for a use not permitted in that zoning district under the applicable zoning ordinance. A dimensional or area variance-also known as a "deviation"-provides relief from one or more of the dimensional restrictions that govern a permitted use of a lot of land, such as area, height, or setback restrictions.

Sciacca v. Caruso, 769 A.2d 578, 583 Note 5 (R.I. 2001), *citing* Sako v. DelSesto, 688 A.2d 1296, 1298 (R.I.1997); Sawyer v. Cozzolino, 595 A.2d 242, 244 n. 4 (R.I.1991).

R.I. Gen. Laws §45-24-31 (65) defines a "Use" as, "The purpose or activity for which land or buildings are designed, arranged, or intended, or for which land or buildings are occupied or maintained." and §§66(i) defines a use variance as, "Permission to depart from the use requirements of a zoning ordinance [...]."

In contrast, R.I. Gen. Laws §45-24-31 (66)(ii) defines a dimensional variance as, "Permission to depart from the dimensional requirements of a zoning ordinance [...]" While the term dimensional is not expressly defined, R.I. Gen. Laws §52(ii) "Nonconforming by dimension" states in pertinent part that, "[...] Dimensional regulations include all regulations of the zoning ordinance, other than those pertaining to the permitted uses [...]."

While the math shows that the eight (8) unit proposal is an average to below market return, the “least relief necessary” standard is *not* a financial standard. The financial standard exists only in R.I. Gen. Laws §45-24-41(d)(2) which is related to **hardship**, not relief. Even if the §45-24-41(d)(2) hardship standards were applied to relief, the term “greater” means “considerably more than average.” Therefore, even if the Zoning Board of Review were to inappropriately apply R.I. Gen. Laws §45-24-41(d)(2) hardship limitation on greater financial gain to relief, and then further inappropriately blended the “least relief necessary” standard with the “greater financial gain” standard, the inappropriate blended standard would be the:

“least relief necessary to be less than considerably more than average financial gain.”

Here the obvious impossibility of this inappropriate blended financial standard becomes clear. How can anyone determine on a per-unit basis what amounts to financial gain less than considerably more than average? That standard does not allow for a meaningful or quantifiable upper threshold. However, it does allow for a clear minimum threshold: Average. An average financial gain is by definition less than a considerably more than average (a/k/a “greater”) financial gain. Even under this twice over inappropriate conflating of the applicable standards which creates an unknowable upper threshold for least relief, the application before this board comfortable meets the least relief necessary because the financial evidence before this board proves that the proposal amounts to a less-than-average financial gain.

In conclusion, the fact that the financial evidence before the board shows eight (8) units projects as a financial gain that is average or worse, therefore any finding that the relief requested

is not the least relief necessary would trigger R.I. Gen. Laws §45-24-69(d)(1-6) and §§42-92-1 *et seq.*

V. RHODE ISLAND GENERAL LAWS §45-24-41(E)

(2) In granting a dimensional variance, that the hardship suffered by the owner of the subject property if the dimensional variance is not granted amounts to more than a mere inconvenience. The fact that a use may be more profitable or that a structure may be more valuable after the relief is granted is not grounds for relief. ~~The zoning board of review, or, where unified development review is enabled pursuant to § 45-24-46.1, the planning board or commission has the power to grant dimensional variances where the use is permitted by special use permit if provided for in the special use permit sections of the zoning ordinance.~~

“More than a mere inconvenience” means that the applicant must show that the relief he is seeking is reasonably necessary for the full enjoyment of his permitted use. DiDonato v. Coning Bd. Of Review of Town of Johnston, 104 R.I. 158 (1968) at 164. Multifamily use is the permitted use in the zone. The current lot size would allow for approximately 5.5 dwelling units. There are approximately 6,040 gross square feet of above ground square footage in the building. At the time of acquisition, there were at least five (5) legal residential units in the space. Five (5) above ground residential units remain in place today. There is approximately 2,300sqft of remaining commercial space which the applicant has been unable to rent for a period of one (1) year. Since the time of acquisition, the demand for residential housing has increased sharply and the demand for commercial office space has dropped sharply. The average apartment size already in existence in the building and the average apartment size in the area generally is approximately 700-1,000 square feet. The proposal would allow for 2.5 additional units, in practice this results in three new residential units of the same approximate 700-1,000 square feet in size that is consistent with the pre-existing units and units in the area.

Full enjoyment of a permitted use includes the ability to have apartments that are comparable in size to the area generally. The same full enjoyment of a multi-family use the neighbors already enjoy. Forcing the applicant to maintain a commercial space when there is no demand for a commercial space is more than a mere inconvenience because it denies the applicant the full enjoyment of the existing square footage in the existing building within the Historic District overlay.

Materially Distinct and Administrative Finality

The doctrine of administrative finality within the context of zoning bars successive applications for substantially similar relief unless substantial or material change in circumstances has occurred in interval between two proceedings is operative only if relief sought in each case is substantially similar. May-day Realty Corp. v. Board of Appeals of City of Pawtucket 107 R.I. 235, 237 (1970). The doctrine of administrative finality requires either (1) a request for materially different relief, or (2) the applicant to show a material change in circumstances in the time intervening between the two applications. Audette v. Colletti 539 A.2d 520 at 521-522 (1988) *citing* Marks v. Zoning Board of Review of Providence, 98 R.I. 405, 203 A.2d 761 (1964). In this case, the applicant has proven both that the relief requested is materially distinct and that the circumstances have materially changed.

In the original application, the applicant suspected but had not provided proof that there would not be a market for the commercial space. Since that time the applicant attempted to lease out the commercial space and was unable to do so. Moreover, the general public has become well aware of the pandemic's impact on the real estate market and the national and local increase in demand for housing and plummeting demand for commercial office space.

The original application was for 10 units which required dimensional relief related to parking, minimum lot area and minimum frontage. As you can see from the table below, this reduced 8-unit application eliminates the need for a parking variance, cuts the minimum lot relief by almost 50% and cuts the minimum frontage relief by almost 70% to within the 10% administrative modification range of relief.

Proposed Plan - 2021	Proposed Plan - 2022
From 5 + office to 12 units. Full reorientation of interior	First Floor Commercial conversion to 3 - Apartments
Specific Relief	Specific Relief
Minimum Lot Area: 10 Units @ 1,650 sq/ft per unit required. 215 Broadway - Has 9,045 sq/ft. Needed 16,500 sqft. Relief sought - 7,455	Minimum Lot Area: 8 units @ 1,650 sq/ft per unit required. Need 13,200 sq/ft, have 9,045 sq/ft. Relief Sought- 4,155.
904.5sqft/du (Approximately 55% relief requested)	1,150sqft/du (Approximately 30% relief) Amounts to an almost 50% reduction in relief requested
Lot Width: 12' per unit required. 215 Broadway- Has 92'. Needed 144', Relief Sought- 28' feet	Lot Width: 12' per unit required. 215 Broadway- Has 90.23'. Need 96', Relief Sought- 5.77 feet.
9.2'/du (approximately 33% relief requested)	11.25'/du (less than 10% relief) Amounts to an almost 70% reduction in relief requested
Parking: Have 13 spots. Eliminate: 5 parking spots for greenspace. Relief Sought- 2 parking spaces (1 per unit required for 10, proposed was to have 8)	none - amounts to a complete elimination of the relief being requested

As a result of the material change in circumstances and in relief being requested, the doctrine of administrative finality does not apply and the applicant is eligible for the relief being requested.

215 Broadway LLC Request for Dimensional Relief
1,150sqft of lot area per dwelling unit
11.25' feet of lot width per dwelling unit

Exhibit A
Annotated Controlling Law

No language has been altered or added, however there are annotations to aid in interpretation. Specifically:

- Immaterial language is struck and grayed.
- Where there is a breaking out of the controlling law, that break out is in red.
- The words hardship and relief have been **bolded and underlined** to call out their distinct roles.

Rhode Island General Laws §45-24-41

[...]

(d) In granting a variance, the zoning board of review, ~~or, where unified development review is enabled pursuant to § 45-24-46.4, the planning board or commission,~~ shall require that evidence to the satisfaction of the following standards is entered into the record of the proceedings:

- (1) That the **hardship** [DC1][DC2] from which the applicant seeks relief is:
 - (i) due to the unique characteristics of the subject land or structure and
 - (ii) not to the general characteristics of the surrounding area;
 - (iii) and is not due to a physical or economic disability of the applicant,
 - a. excepting those physical disabilities addressed in § 45-24-30(a)(16);
- (2) That the **hardship**:
 - (i) is not the result of any prior action of the applicant and
 - (ii) ~~does not result primarily from the desire of the applicant to realize~~ **greater** [DC3] financial gain [DC4][DC5];
- (3) That the granting of the requested variance:
 - (i) will not alter the general character of the surrounding area or
 - (ii) impair the intent or purpose of the zoning ordinance or the comprehensive plan upon which the ordinance is based; and
- (4) That the **relief** [DC6][DC7] to be granted is the least relief necessary.

(e) The zoning board of review, ~~or, where unified development review is enabled pursuant to § 45-24-46.4, the planning board or commission,~~ shall, in addition to the above standards, require that evidence is entered into the record of the proceedings showing that:

Exhibit A
Annotated Controlling Law

- (1) In granting a use variance,:
- (i) the subject land or structure cannot yield any beneficial use if it is required to conform to the provisions of the zoning ordinance. ~~Noneconforming use of neighboring land or structures in the same district and permitted use of lands or structures in an adjacent district shall not be considered in granting a use variance; and~~
- (2) In granting a dimensional variance, that the hardship suffered by the owner of the subject property if the dimensional variance is not granted amounts to more than a mere inconvenience. The fact that a use may be more profitable or that a structure may be more valuable after the relief is granted is not grounds for relief. ~~The zoning board of review, or, where unified development review is enabled pursuant to § 45-24-46.4, the planning board or commission has the power to grant dimensional variances where the use is permitted by special use permit if provided for in the special use permit sections of the zoning ordinance.~~

The City of Providence Zoning Ordinance's standards for granting a variance, set forth in PVD Code §1902(B) mirror the State Statutory standards except they add the following requirement:

5. In addition to the above, the Zoning Board of Review, or the City Plan Commission, as part of unified development review, will consider [DCS] the written opinion of the Department of Planning and Development prior to making a decision on a variance petition.

Jorge O. Elorza
Mayor

Marc Greenfield
Chair



Zoning Board of Review

RESOLUTION NO. 2021-23

October 7, 2021

IN RE: Application for Dimensional Variances
(Minimum Lot Area Per Dwelling Unit; Lot Width)

PROPERTY: Tax Assessor's Plat 39, Lot 450
215 Broadway
(R-P Residential-Professional Zoning District)

OWNER/
APPLICANT: Mr. Aref Shehadeh
81 Gentian Avenue
Providence, RI 02908

COUNSEL: For Applicant/Owner:
John J. Garrahy, Esq.
2088 Broad Street
Cranston, RI

For Abutter Merrill Freidmann:
Christopher D'Ovidio, Esq.
469 Centreville Road, Suite 204
Warwick, RI 02886

2021 OCT 12 P 12:46
DEPT. OF CITY CLERK
PROVIDENCE, RI.

FILED

On June 9, 2021, the within matter came before the Zoning Board of Review (the "Board") for a duly noticed public hearing¹ on the request by the Owner-Applicant, Aref Shehadeh, for

¹ The June 9, 2021 public meeting and hearing was conducted via the online platform "Zoom" as a virtual public hearing authorized by the Governor's Executive Order 20-05 dated March 16, 2020, as extended.

dimensional variances for the above-designated Property. The following members of the Board were present throughout the hearing: Chair Greenfield, Mr. Wolf, Ms. Maniotes, Ms. Rodriguez, and Mr. Strother. Mr. Scott and Mr. Mitchell sat as non-voting alternates.

WHEREAS, the Applicant sought dimensional relief from Article 4, Section 402, Table 4-1 of the Providence Zoning Ordinance of November 24, 2014, as amended (the "Ordinance") with respect to the number of dwelling units allowed for lot area and lot width; and

WHEREAS, prior to the hearing, the members of the Board individually made inspections of the Property and of the surrounding neighborhood; and

WHEREAS, Attorney John Garrahy presented the Application and the testimony of the Mr. Peter Casale, zoning and building code consultant, Mr. Douglas Jeffrey, an expert witness on sales and brokerage of real estate in the Broadway area, Mr. George Valentine, a certified residential and commercial real estate appraiser, and the Owner/Applicant; and

WHEREAS, Attorney Christopher D'Ovidio, on behalf of objectors, presented argument in opposition to the Application as well as the testimony of Mr. Ramzi Loqa, a zoning and building code consultant, and abutter Ms. Merrill Freidmann; and

WHEREAS, Mr. Robert ("BJ") Dupre, a neighbor and an owner of developer Armory Properties, testified against the Application; and

WHEREAS, the Board received, and the Chair read into the record, the June 9, 2021 recommendation of the Department of Planning and Development ("DPD") recommending approval of the requests for dimensional relief, and Staff Planner Manjrekar explained the DPD's recommendation.

NOW, THEREFORE, after consideration of the Application, the testimony, Exhibits A, B and C,² and all the evidence of record, three members of the Board voted in favor of a motion to grant the application; two members voted against. R.I. Gen. Laws § 45-24-57(2)iii requires four votes in favor of granting a variance. Accordingly, the Application was DENIED.

**THE BOARD HEREBY MAKES THE FOLLOWING
FINDINGS OF FACT AND CONCLUSIONS OF LAW:**

1. The Applicant filed a prior application for 12 residential units, which was heard by the Board on May 12, 2021. Prior to a vote, the Applicant withdrew the application. At the June 9, 2021 hearing, the Applicant asked to mark the May 12, 2021 transcript as an Exhibit. Upon advice of counsel, the transcript was not included because Mr. Greenfield was not present at the May 12, 2021 hearing, and the current application was for different

² The Exhibits were the curriculum vitae of Mr. Jeffrey and Mr. Valentine, and Mr. Valentine's 3-page report.

relief. The Board was advised not to consider the testimony from May 12, but to consider the instant Application de novo.

2. The Property is located in an R-P Residential-Professional Zoning District, and consists of a lot of 9,200 sq. ft., improved with a structure with a footprint of 2,458 sq. ft. The Victorian structure has three floors above grade, totaling of 6,040 gross square feet. The basement has approximately 2,175 gross square feet. The current legal use of the Property is 5 apartments and 2 law offices.³
3. The Applicant purchased the Property on December 24, 2020 and proposes to convert the structure to a fully residential property, with 10 dwelling units. The proposed use is permitted in the R-P Zone.
4. Section 402, Table 4-1 provides that multi-family dwellings in the R-P zone require 1,650 sq. ft. of land area per dwelling unit. The lot is 9,200 sq. ft., which would permit 5.5 dwelling units. The Applicant proposes 10 dwelling units, which would require a lot size of 16,500 sq. ft. The Applicant seeks relief from 7,300 sq. ft. for the additional 4.5 apartments.⁴
5. Section 402, Table 4-1 of the Ordinance requires 12 ft. of lot width per dwelling unit. The Property is approximately 90 feet wide. Ten (10) dwelling units would require 120 feet of lot width. The Applicant seeks relief for approximately 30 feet in width.
6. The proposed plans reflect a mix of 1- and 2-bedroom dwelling units. There are a total of ten (10) such units: two (2) apartments in the basement, three (3) on the first floor, three (3) on the second floor, and two (2) on the third floor. There are a total of 15 bedrooms (and a den).
7. The Applicant seeks relief based on the unique characteristics of the Property and not due to the general characteristics of the neighborhood, specifically the relationship between the size of the lot and that of the structure. There was no claim or evidence presented that the relief sought is due to a physical or economic disability of the applicant.
8. The hardship is not the result of any prior action of the Applicant, who bought the Property in its current condition.
9. The Board finds that the granting of the dimensional variance will not alter the general character of the surrounding area or impair the intent or purposes of the Ordinance or the

³ The Application inaccurately reflects that the legal use of the Property is 7 apartments and law office(s). There are two apartments in the basement that were constructed by the prior owner without building permits or certificates of occupancy. Those apartments and their use are therefore illegal. The Board was instructed to consider the basement dwelling units as empty or blank space for purposes of this application.

⁴ There is an inconsistency within the Application. Item 3 of the Application and the DPD recommendation indicate the total lot area is 9,200 sq. ft. Item 12 of the Application states the Property has 9,050 sq. ft. and that the Applicant requires relief of 7,455 sq. ft.

Comprehensive Plan. The DPD and the qualified experts all indicated that the use of the structure for residences is appropriate, and that the Comprehensive Plan identifies its general location as one for increased growth or density. The Board accepts and agrees with the testimony.

10. The Board was unable to conclude that the Applicant had met his burden of demonstrating that the proposal for ten (10) dwelling units, almost double the number allowed:
- a. did not result primarily from the desire of the applicant to realize greater financial gain; or
 - b. was the least relief necessary for reasonable enjoyment of the property for a legally permitted use; or
 - c. would, if denied, amount to more than a mere inconvenience, noting that relief may not be granted on the grounds that a use may be more profitable or that a structure may be more valuable after relief is granted.

There was considerable questioning by the Board and discussion with the expert witnesses and the owner concerning these issues.

Mr. Jeffrey, the expert in real estate brokerage on Broadway testified that the proposed use is appropriate for the neighborhood because it adds residential density without using on-street parking which is in high demand. In response to why it would be more than an inconvenience if the variance were not granted, Mr. Jeffrey indicated that the owner would have to go back to the drawing board. However, this is not the standard for "more than an inconvenience." In response to the Chair's question about "least relief necessary. Mr. Jeffrey was unable to confirm that the existing office space was unmarketable, and indicated he had not himself tried to market it.

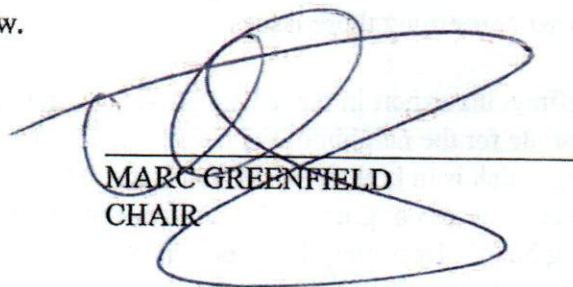
Mr. Valentine, the certified appraiser, presented his report and testified that in his opinion, ten residential units was the minimum number required to achieve a reasonable rate of return on investment – a rate of 7-7.5%. He indicated that any fewer units would not attract typical investors on the East Coast. The proposed 10 units would provide a return of 7.09%; however, 8 units would result in a return in the range of only 2.5%. When asked the basis of his calculations, he cited the Applicant's own projections that rental income on 10 units would be \$166,000, but fewer units would generate only \$141,000. When asked if fewer units with more bedrooms would affect the analysis, Mr. Valentine did not reply. Mr. Valentine testified that at the same time, the "fixed costs" or expenses provided by the Applicant and reflected on his report (Exhibit C) would not change.

While this testimony was not directly rebutted by objectors, Chairman Greenfield, Ms. Maniotes, and Mr. Mitchell questioned the credibility of portions of Mr. Valentines assumptions and testimony. Mr. Greenfield has 40 years of experience and knowledge as an attorney in real estate development and financing. Ms. Maniotes is an architect who also considers the financial aspects of projects.

The Chair noted that his own calculations did not match those offered by Mr. Valentine, and questioned the for The Chair and Ms. Maniotes questioned, and did not accept the credibility of, some of the assumptions developed by Mr. Valentine, who relied on figures provided by the Applicant himself. They Board was presented with a report that said ten (10) was the acceptable number, but no financial analysis of fewer units. Mr. Valentine testified that going from ten (10) to fewer units would result in a drop of the purported 7.09% annual profit down to an unacceptable 2% margin, but again did no analysis for nine units or eight units or fewer units with more bedrooms. In addition, the categories of expenses were summarized and not detailed. For example, there was no analysis of what income would be generated by a 1-bedroom, 2-bedroom, smaller or larger unit. In summary, they believed the estimates and summary fashion of the financial presentation was insufficient to meet the Applicant's burden.⁵

WHEREFORE, Mr. Wolf made a motion, seconded by Ms. Rodriguez, to approve the Application subject to the condition that none of the units be used as temporary lodging (so-called "air-b-n-b"). The Board voted 3-2 in favor of the motion. ACCORDINGLY, the motion failed and the application is DENIED.

By Order of the Zoning Board of Review.



MARC GREENFIELD
CHAIR

MOTION TO APPROVE THE APPLICATION FOR DIMENSIONAL VARIANCES, ON THE CONDITION THAT NO UNITS BE USED AS TEMPORARY LODGING ("AIR-B-N-B")

MADE BY: Wolf

SECONDED BY: Rodriguez

MEMBERS VOTING IN FAVOR OF THE MOTION: Wolf, Rodriguez, Strother

MEMBERS VOTING AGAINST THE MOTION: Greenfield, Maniotes

⁵ Mr. Mitchell, a non-voting alternate, echoed the concerns of the Chair and Ms. Maniotes with respect to the Applicant's failing to satisfy the standard for the least relief necessary.

PAUL J. DiMAIO

for consideration of the sum of SEVEN HUNDRED FIFTY THOUSAND and 00/100 (\$750,000.00) DOLLARS
paid grant to 215 BROADWAY, LLC, a Rhode Island limited liability company
of 81 GENTIAN AVENUE, PROVIDENCE, RI 02908 with WARRANTY COVENANTS
(DESCRIPTION, AND INCUMBRANCES, IF ANY)

SEE SCHEDULE "A" DESCRIPTION ATTACHED HERETO AND HEREBY INCORPORATED BY REFERENCE
Grantor hereby covenants that he is a resident of the State of Rhode Island in
compliance with R.I.G.L. 44-30-71.3 as evidenced by affidavit.
Grantor hereby covenants that he is in compliance with the Rhode Island Fire Safety Code

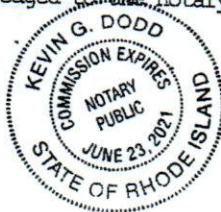
Tax: \$3,450.00
Date: 12/24/2020
RECORDER: KM
CITY OF PROVIDENCE
669673
RHODE ISLAND
REAL ESTATE
CONVEYANCE TAX

Witness, my hand, this.....

23rd day of December, 2020
Paul J. DiMaio
PAUL J. DiMAIO

State of Rhode Island
County of Providence

In Providence, on the 23rd day of December, 2020, before me,
the undersigned notary public, personally appeared PAUL J. DiMAIO
License, personally known to the notary or proved to the
notary through satisfactory evidence of identification, which was RI Driver's
attached document, and acknowledged to the notary that he signed it voluntarily
for its stated purpose.



Kevin G. Dodd
NOTARY PUBLIC KEVIN G. DODD
My commission expires: 6-23-2021
#4202

SCHEDULE "A" DESCRIPTION

That parcel of land, with all buildings and improvements thereon, situated in the City of Providence and State of Rhode Island, and bounded and described as follows:

Beginning at a point in the northerly line of Broadway at the southwesterly corner of land now or lately of Domenico Almonte; thence westerly bounding southerly on said Broadway, ninety and 225/1000 (90.225) feet, and holding that width extending northerly one hundred and 25/100 (100.25) feet to and bounds northerly on land now or lately of Maria DiPietro in part and in part on land now or lately of Nicola Russillo and wife, bounding easterly on land now or lately of Nicola Zarrella and wife in part and part on land now or lately of said Domenico Almonte, and westerly on land now or lately of Constance DiLeone.

Property address:
215 Broadway
Providence, RI 02903
AP 28 Lot 260

PJA

RECEIVED:
Providence
Received for Record
12/24/2020 10:17:48 AM
Document Num: 2020274076
John A Murphy
Recorder of Deeds

P. J. D.

Address	Owners	Address	City	State	Zip	2nd Owner	Address	City	State	Zip
99 Kenyon St	City of Providence/Children's Friend	153 Summer St	PROVIDENCE	RI	02903-1738	Providence Schools	25 DORRANCE ST	PROVIDENCE	RI	02903-1738
20 Pallas St	Savastano Michelle Trustee	314 Middle Rd	Portsmouth	RI	02871	Fay Katharine Trustee	1122 Narragansett Blvd	Cranston	RI	02905
59 Kenyon St	Fitzmaurice Scott A	P.O. Box 805	Monument Beach	MA	02553					
146 De Pasquale Ave	SCARAMUZZO ASSUNTA Trustee	161 ALPINE ESTATES DR	CRANSTON	RI	02921-3508	SCARAMUZZO ANGELO Trustee	71 KENYON ST	PROVIDENCE	RI	02903-1436
201 Broadway St	JOSEPH A DECESARE	201 Broadway ST	Providence	RI	02903	DECESARE CATHERINE O	201 Broadway	Providence	RI	02903
71 Kenyon St	SCARAMUZZO ANGELO Trustee	71 KENYON ST	PROVIDENCE	RI	02903-1436	SCARAMUZZO ASSUNTA Trustee	161 ALPINE ESTATES DR	CRANSTON	RI	02921-3508
16 Pallas St	KUENZLE CORINNE	16 PALLAS ST	PROVIDENCE	RI	02903-1472	KUENZLE KATHLEEN M	16 PALLAS ST	PROVIDENCE	RI	02903-1472
67 Kenyon St	Scaramuzzo Family Trust	161 ALPINE ESTATES DR	CRANSTON	RI	02921-3508	SCARAMUZZO ANGELO Trustee	71 KENYON ST	PROVIDENCE	RI	02903-1436
35 Kenyon St Unit 2	Curley Shannon M	35 Kenyon St	Providence	RI	02909					
35 Kenyon St Unit 6	Mora Jose Domingo	35 Kenyon St	Providence	RI	02903	Tineo Beatriz	35 Kenyon St	Providence	RI	02903
35 Kenyon St Unit 4	Zani Cleo	35 Kenyon St	Providence	RI	02903					
35 Kenyon St Unit 3	Boudreau Stephen	35 Kenyon St	Providence	RI	02903					
35 Kenyon St Unit 1	Roffo Dennis	35 Kenyon St	Providence	RI	02909					
35 Kenyon St Unit 5	Joynes Jermaine	35 Kenyon St	Providence	RI	02903					
64 Kenyon St	Ghazi Ghazwan	64 Kenyon St	Providence	RI	02903					
197 Broadway St	JOSEPH A DECESARE	201 BROADWAY	PROVIDENCE	RI	02903-3015	DECESARE CATHERINE O	201 Broadway	Providence	RI	02903
19 Pallas St	LLC Tier 3	27 Hillside Ave	Providence	RI	02906					
150 De Pasquale Ave	Scaramuzzo Family Trust	161 ALPINE ESTATES DR	CRANSTON	RI	02921-3508					
18 Pallas St	Sarco Dean	7208 La Presa Dr	Los Angeles	CA	90068	Sarco Anne D	7208 La Presa Dr	Los Angeles	CA	90068
37 Kenyon St	Miele Karen J	95 HUCKLEBERRY RD	NORTH KINGSTOWN	RI	02852-5233					
13 Pallas St	Rietveld Eric	13 Pallas St	Providence	RI	02909					
15 Vernon St	Scheper Michael H	15-17 Vernon St	Providence	RI	02909					
210 Broadway St	Space Realty Inc	916 Reservoir Ave	Cranston	RI	02910					
236 Broadway St	Voulalas George	1 International Pl	Boston	MA	02110					
232 Broadway St	Carragher Terry	232 BROADWAY	PROVIDENCE	RI	02903-3018					
228 Broadway St	Realty LLC Dash	228 Broadway St	Providence	RI	02909					
222 Broadway St	JOHNSON RANI	222 BROADWAY	PROVIDENCE	RI	02903-3018					
216 Broadway St	Li Chengju	216 Broadway	Providence	RI	02903	Dong Tao	216 Broadway St	Providence	RI	02903
214 Broadway St	Friedemann Marilyn Jean	214 Broadway	Providence	RI	02903					
202 Broadway St	Marisa Damora Millard	202 BROAD ST	PROVIDENCE	RI	02903-4029	Richard Kent Millard	202 Broad St	Providence	RI	02903-4029
30 Kenyon St	Gates Chelsea M	30-32 Kenyon St	Providence	RI	02903					
227 Broadway St	ARTA On Broadway LLC	81 Gentian Ave	Providence	RI	02908					
205 Broadway St	Broadway Bistro Realty, LLC	205 Broadway St	Providence	RI	02903					
235 Broadway St	Dupre Robert Jr	235 Broadway	Providence	RI	02903					
223 Broadway St	DOVE PROPERTIES LLC	221 Broadway	Providence	RI	02903					
215 Broadway St	215 Broadway LLC	81 Gentian Ave	Providence	RI	02908					
70 Kenyon St	Kane Christopher David	70 Kenyon St	Providence	RI	02903	Kane Alicia Kristin	70 Kenyon St	Providence	RI	02903
15 Pallas St	ZARELLA SANDRA R	15 PALLAS ST	PROVIDENCE	RI	02903-1426	ZARELLA PAUL A	15 PALLAS ST	PROVIDENCE	RI	02903-1426
68 Kenyon St	CAPALBO VINCENZA	68 KENYON ST	PROVIDENCE	RI	02903-1411	CAPALBO VINCENZA	68 KENYON ST	PROVIDENCE	RI	02903-1411
58 Kenyon St	Investments LLC Modo	58 Kenyon St	Providence	RI	02909					
21 Pallas St	Clifford Ashley	21 Pallas St	Providence	RI	02903					
9 Lyon Ct	Joanne Linda Kissinger	9 LYON CT	PROVIDENCE	RI	02903-1429					
43 Kenyon St	IOVINO ALBERT J	42 NORTH ST	CRANSTON	RI	02920	Iovino Alicia B	42 North St	Cranston	RI	02920
53 Kenyon St	Nichols Patrick	37 Westwood Ave	Rumford	RI	02916					
7 Vernon St	QUARANTA FILOMENA	7 VERNON ST	PROVIDENCE	RI	02903-3027					
196 Broadway St	Panagos Dimitri N	196 BROADWAY	PROVIDENCE	RI	02903-3016	Winter Nadia C	196 Broadway	Providence	RI	02903-3016

Google Maps 216 Broadway



Image capture: Jul 2019 © 2022 Google

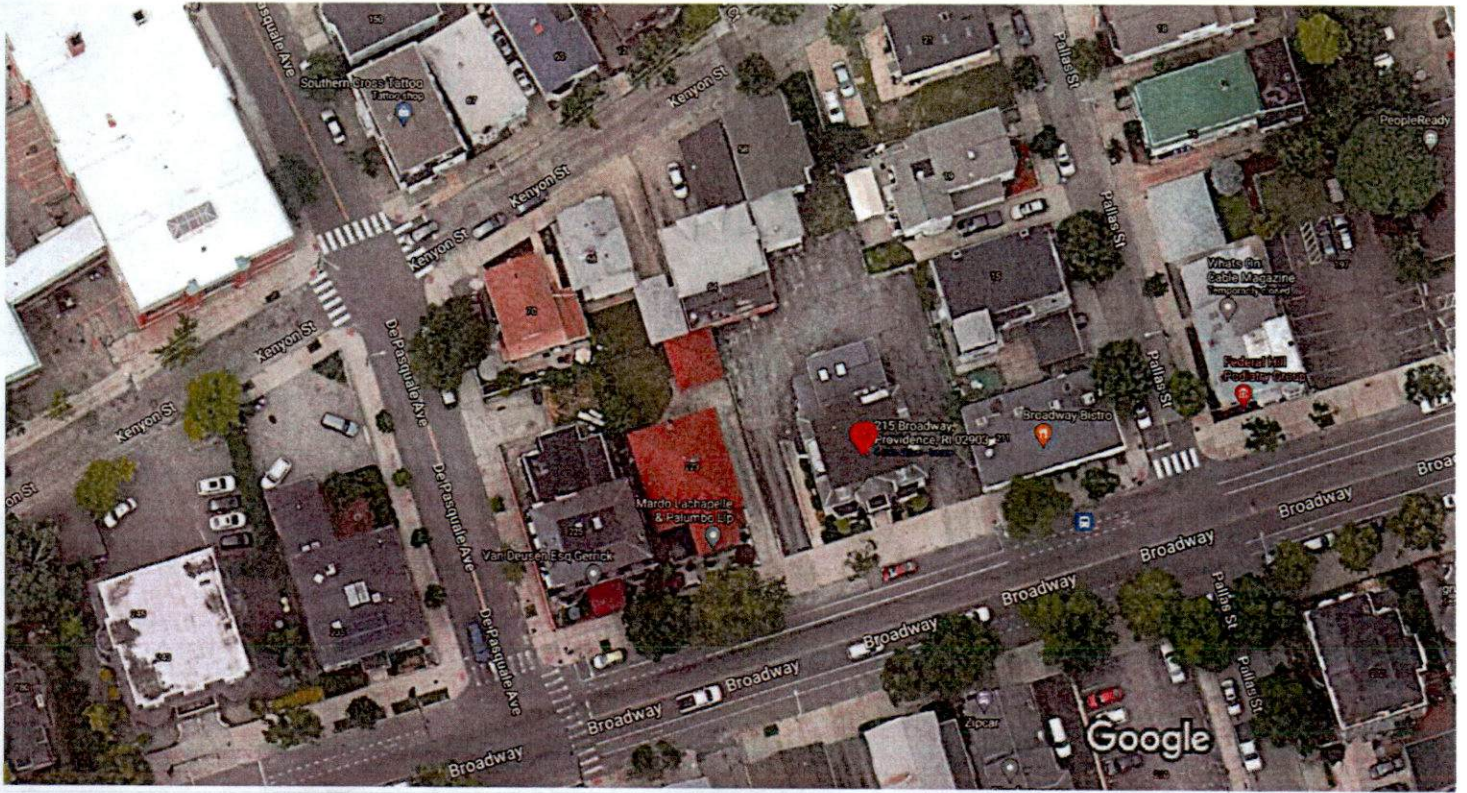
Providence, Rhode Island

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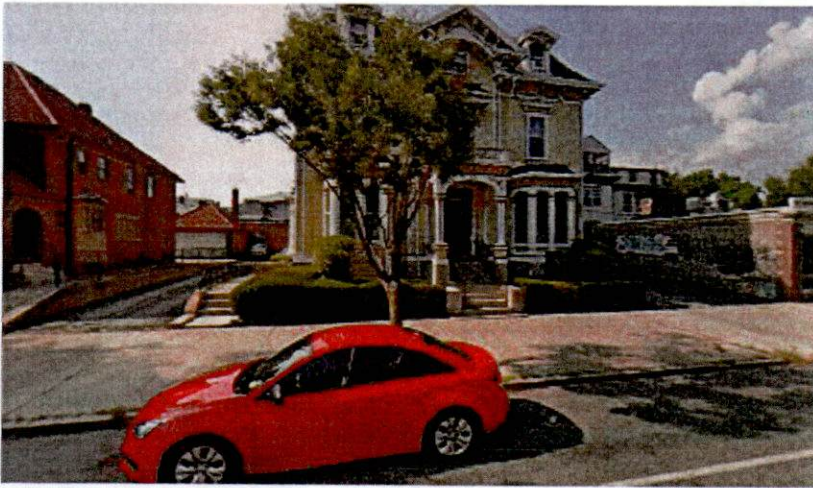
Street View - Jul 2019



Google Maps 215 Broadway



Imagery ©2022 Maxar Technologies, Map data ©2022 20 ft



215 Broadway

Providence, RI 02903
Building



Directions



Save



Nearby



Send to
phone



Share

Photos

Google Maps 214 Broadway

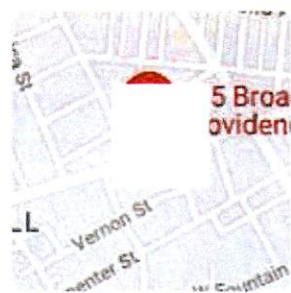


Image capture: Jul 2019 © 2022 Google

Providence, Rhode Island

Google

Street View - Jul 2019



Google Maps 222 Broadway

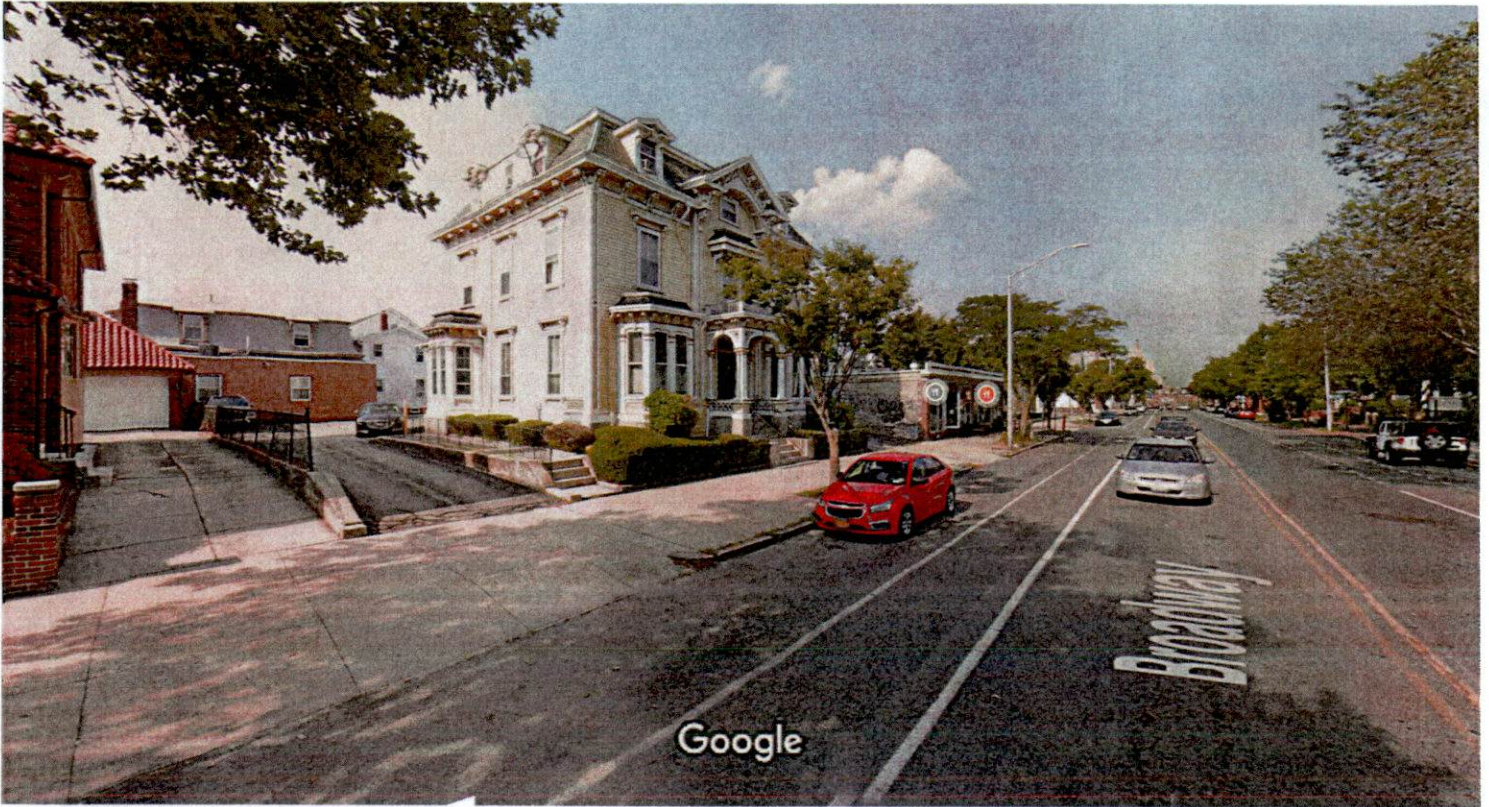


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Providence, Rhode Island

Google

Street View - Jul 2019

