

CITY OF PROVIDENCE  
ZONING BOARD OF REVIEW

INSPECTION & STANDARDS  
RECEIVED

OCT 21 2024

APPLICATION FOR VARIANCE OR SPECIAL USE PERMIT

Check Each Type Zoning Relief Sought:

- Variance – Use\*
- Variance – Dimensional\*
- Special Use Permit\*\*

\* Attach APPENDIX A to apply for a Use or Dimensional Variance  
\*\* Attach APPENDIX B to apply for a Special Use Permit

If a section of the application is not applicable, please indicate this by using N/A in that field.

Applicant: Judy Jang & Albert Woo Applicant Mailing Address  
Email: judy\_jang@brown.edu Street: 420 Blackstone Boulevard  
Phone: 401-595-9842 City, State, Zip: PROVIDENCE, RI, 02906

Owner: Judy Lee Jang Trustee & Albert S. Woo Trustee Owner Mailing Address  
Email: judy\_jang@brown.edu Street: 420 Blackstone Boulevard  
Phone: 401-595-9842 City, State, Zip: PROVIDENCE, RI, 02906

Lessee: N/A Lessee Mailing Address  
Email: \_\_\_\_\_ Street: \_\_\_\_\_  
Phone: \_\_\_\_\_ City, State, Zip: \_\_\_\_\_

Attorney: N/A Attorney Mailing Address  
Email: \_\_\_\_\_ Street: \_\_\_\_\_  
Phone: \_\_\_\_\_ City, State, Zip: \_\_\_\_\_

Does the proposal require review by any of the following:

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

1. Street Address of Subject Property: 420 Blackstone Boulevard  
Plat and Lot Numbers of Subject Property: Plat 93, Lot 320

2. Base Zoning District(s): Residential (R1A)  
Overlay District(s): N/A

3a. Date owner purchased the Property: 2019

3b. Month/year of lessee's occupancy: N/A

4. Dimensions of each lot:

Lot # <u>320</u>	Width <u>117'</u>	Depth <u>100'</u>	Total area <u>11700</u> sq. ft.
Lot # <u>N/A</u>	Width _____	Depth _____	Total area _____ sq. ft.
Lot # <u>N/A</u>	Width _____	Depth _____	Total area _____ sq. ft.
Lot # <u>N/A</u>	Width _____	Depth _____	Total area _____ sq. ft.

5a. Size of existing structure(s) located on the Property:

<u>Principal Structure:</u>	<u>Accessory Structure:</u>
Area of Footprint <u>2,984 sq. ft.</u>	Area of Footprint <u>N/A</u>
Overall Height <u>+/- 25'</u>	Overall Height _____
# of Stories <u>2</u>	# of Stories _____

5b. Size of proposed structure(s) located on the Property:

<u>Principal Structure:</u>	<u>Accessory Structure:</u>
Area of Footprint <u>3929 (33.58%)</u>	Area of Footprint <u>N/A</u>
Overall Height <u>Unchanged</u>	Overall Height _____
# of Stories <u>Unchanged</u>	# of Stories _____

6a. Existing Lot Coverage:

Building Coverage (area of all roofed structures) 2,984 sq. ft.

Total Impervious Coverage Area (area of all roofed structures and impervious surfaces) 5,260 sf

Rear Yard Impervious Coverage (area of structures and impervious surface in rear yard) 164.5 sf

Front Yard Impervious Coverage (area of structures and impervious surface in front yard) 857.5 sf

6b. Proposed Lot Coverage:

Building Coverage (area of all roofed structures) 3,795 sq. ft.

Total Impervious Coverage Area (area of all roofed structures and impervious surfaces) 5,584 sq. ft.

Rear Yard Impervious Coverage (area of structures and impervious surface in rear yard) 34 sq. ft.

Front Yard Impervious Coverage (area of structures and impervious surface in front yard) 849.5 sf

7a. Present Zoning Use of the Property: Single Family Dwelling

7b. Legal Zoning Use of the Property as recorded in the Dept. of Inspection & Standards:  
Single Family Dwelling

8. Proposed Zoning Use of the Property: Single Family Dwelling

9. Number of Parking Spaces:

# of existing spaces 2 in garage w/driveway # of proposed spaces 2 in garage w/driveway

10. Are there outstanding violations concerning the Property under any of the following:

No Zoning Ordinance No RI State Building or Property Maintenance Code(s)

**11a. List all Zoning Ordinance Sections from which a variance is sought:**

<u>Section Number</u>	<u>Section Title + Quantity of relief, if applicable (eg. 4' setback where 6' required)</u>
Section 402 (Table 4-1)	Dimensional Standards. Required rear yard setback is 30'. Seeking 5' rear yard setback. We are requesting a relief of 25'

**11b. Identify the section(s) of the Zoning Ordinance that provide for the special use permit, and list all section(s) which provide Use Standards for the proposed Special Use(s):**

<u>Section Number</u>	<u>Section Title</u>
N/A	N/A

**12. Summarize any changes proposed for the Property (use, construction/renovation, site alteration):**

Construction of an attached garage with side entry to replace the previous integrated garage lost through no fault of their own. Installation of new driveway and site drainage.

*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. As indicated on the instructions page, this application may not be signed by an attorney on behalf of their client(s).*

**Owner(s):**

Judy Lee Jang, Trustee & Albert S Woo Trustee

*Type Name*

Judy Lee Jang, Trustee & Albert S Woo Trustee

*Signature*



*Type Name*

Judy Lee Jang, Trustee & Albert S Woo Trustee

**Applicant(s):**

Judy Lee Jang, Trustee & Albert S Woo Trustee

*Type Name*

Judy Lee Jang, Trustee & Albert S Woo Trustee


*Signature*



*Type Name*

Judy Lee Jang, Trustee & Albert S Woo Trustee

*Signature*



*Signature*



**All applicable requirements listed and described on the Instruction Sheet shall be met or this application will not be considered complete.**

## APPENDIX A

### APPLICATION FOR VARIANCE(S)

Rhode Island General Laws § 45-24-41(d) and (e) require 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(a)(16);
2. That the hardship is not the result of any prior action of the applicant;
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
4. (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, meaning that the relief sought is minimal to a reasonable enjoyment of the permitted use to which the property is proposed to be devoted.

Please provide the following information:

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

- 
2. Specify all unique characteristics of the land or structure that cause the hardship:  
See Attached

- 
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 N/A

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

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

N/A

---

5. 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:

N/A

---

6. 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:

See Attached

---

***IF MORE ROOM IS NEEDED TO ANSWER ANY OF THE ABOVE QUESTIONS, PLEASE SUBMIT AN  
ADDENDUM TO THIS APPENDIX WITH COMPLETE RESPONSES.***

**What is the specific hardship from which the Applicant seeks relief?**

The Applicants are seeking dimensional relief of twenty-five feet from the rear yard setback in order to construct an attached garage that would replace a now-closed, integrated basement garage that became unusable due to chronic flooding from stormwater overflow from Blackstone Boulevard. The Applicants are seeking to replace what they have lost by locating a new attached garage in the rear yard. As addressed in the Affidavits of Armando Ricci (RI stormwater engineer) and Judy Jang (co-Applicant), the rear yard is the only reasonable location for a new garage because it will not be subject to or interfere with stormwater flow, will allow safe exit in a forward-facing position, avoid entry through the home's bedrooms, and provide enough space for a width of twenty-six feet, needed to accommodate the Applicants' cars.

**Specify all unique characteristics of the land or structure that cause the hardship:**

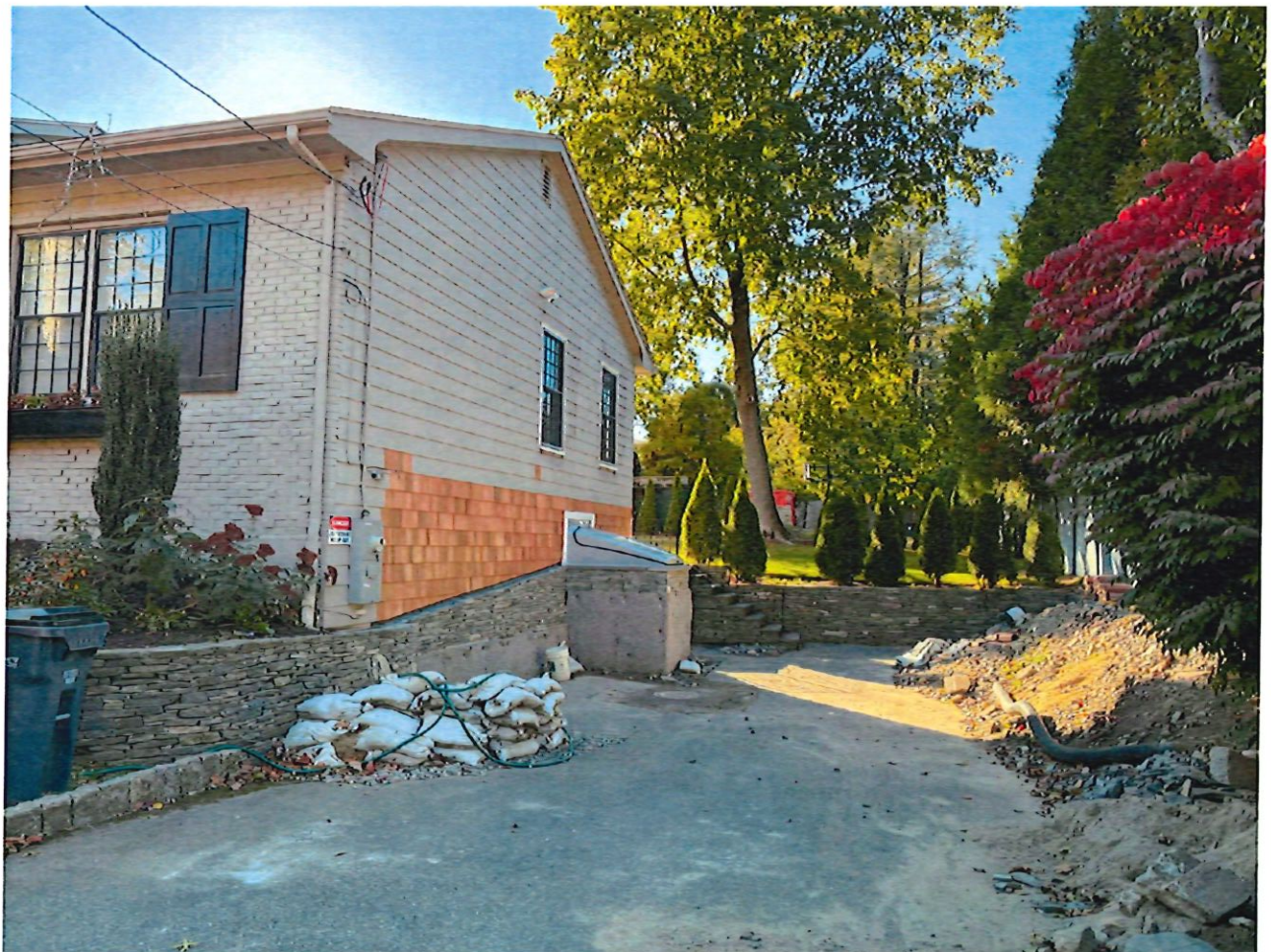
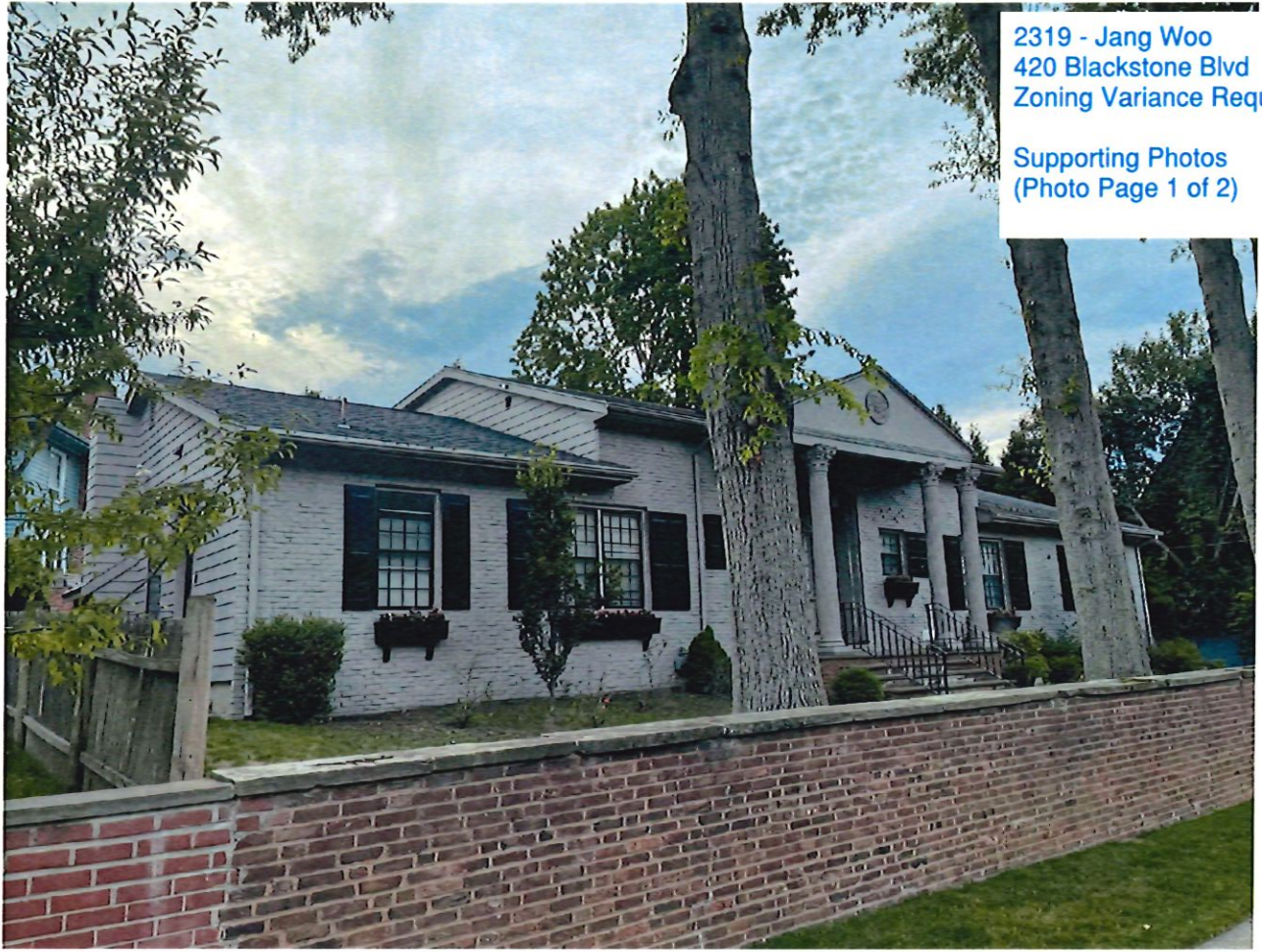
As is detailed in the Affidavit of Armando Ricci and Judy Jang, there is a dip in Blackstone Boulevard as it runs adjacent to Applicants' driveway, a driveway which slopes down from the Boulevard to the entrance of Applicants' former basement garage. Due to this topography, stormwater collects in the dip, overflows and runs down into the driveway, and pools in front of the garage. Before the garage's closure, the volume and pressure of the water would be so great that it broke through the garage doors and entered into the garage, rising up to two feet. Over a 21-month period, the Applicants experienced six such flooding events, each of them causing significant damage to the Applicants' garage, cars, personal items, and basement. The Applicants had no choice but to close-up their garage and are in the process of re-grading their driveway to slope upwards from Blackstone Boulevard.

**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.**

As is detailed in the enclosed affidavits of Armando Ricci and Judy Jang, the home's integrated basement garage had to be closed due to chronic flooding from Blackstone Boulevard during heavy rain events and resulting in costly and reoccurring damage to the Applicants' garage, cars, personal items, and basement. As such, the Applicants have been denied use of a key feature of their home due to no fault of their own. The Applicants would not have bought their property without an attached garage. The Applicants and their children have always entered and exited the house through the garage and the Applicants, both on-call medical doctors, need to come and go from the house at all hours of the day and night to respond to urgent medical matters and without being delayed by weather or subjected to safety risks. Further, as is addressed in the Affidavits, the only reasonable place to locate the garage is in the rear yard. Denial of dimensional relief would constitute more than a mere inconvenience as it would deny the Applicants the ability to use their house as they had intended when they bought their property in 2019 and as they have done for the last several years, and would subject them to hardships that they purposefully avoided when purchasing the property. Given that the backyard is the only reasonable place to locate the new attached garage, this request is minimal to a reasonable enjoyment of the house. Applicants have designed the new driveway with a narrow width and use of pervious pavers in order to minimize as much as possible new impervious surface.

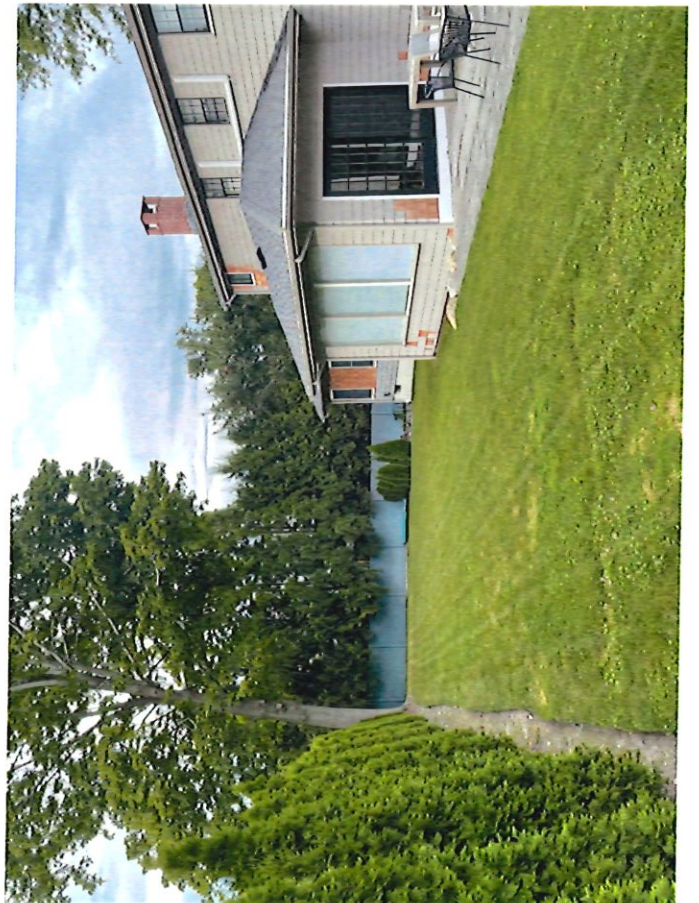
2319 - Jang Woo  
420 Blackstone Blvd  
Zoning Variance Request

Supporting Photos  
(Photo Page 1 of 2)



2319 - Jang Woo  
420 Blackstone Blvd  
Zoning Variance Request

Supporting Photos  
(Photo Page 2 of 2)

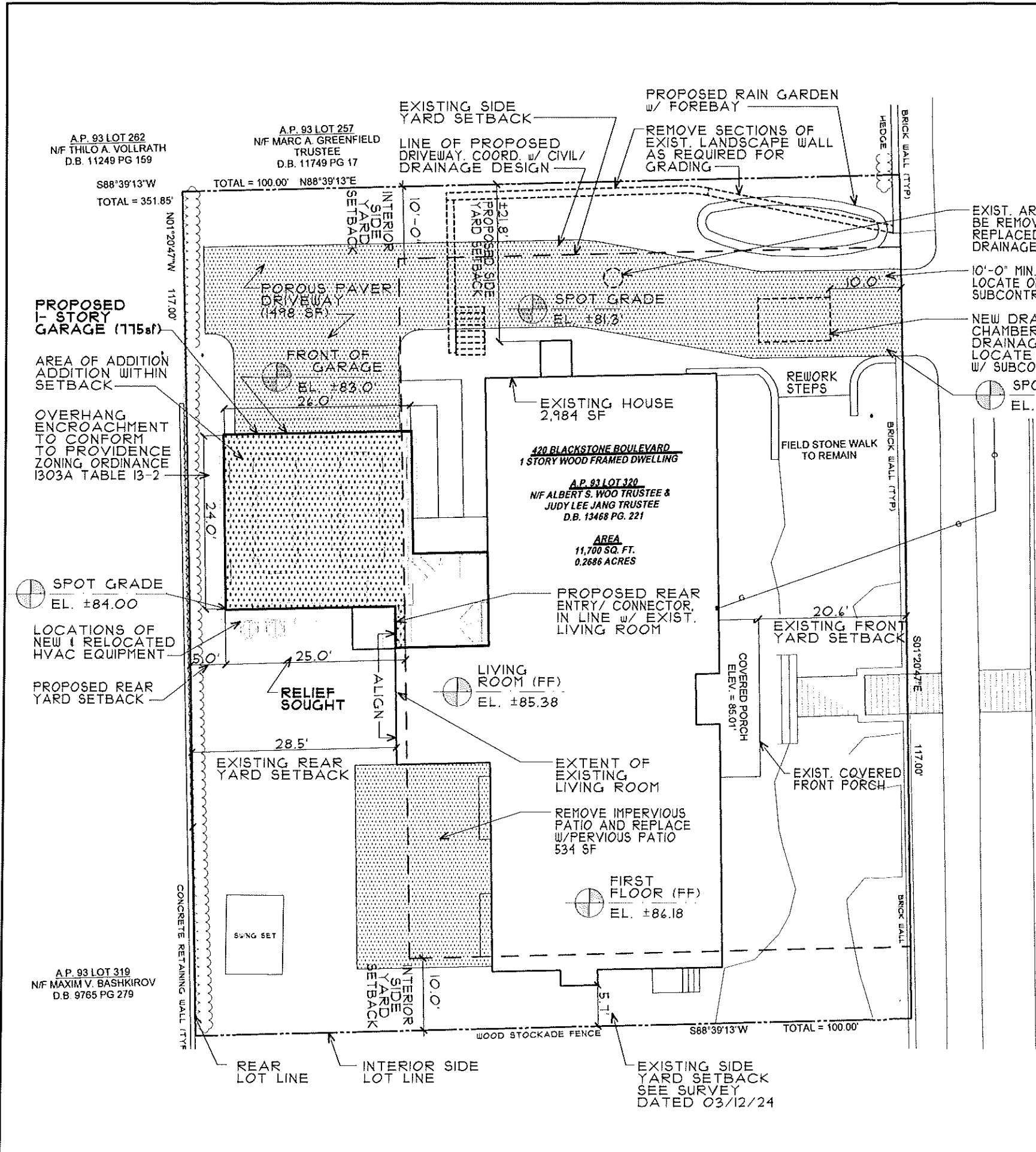




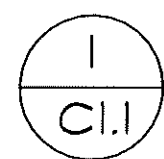
**ZONING INFORMATION**

ADDRESS: 420 BLACKSTONE BLVD  
PLAT / LOT: 93 / 320  
ZONING: R-1A  
LOT SIZE: 11,700 SF

	REQUIRED	EXISTING	PROPOSED
FRONT YARD SETBACK:	BUILD-TO LINE	±20	UNCHANGED
SIDE YARD SETBACK:	10' (NORTH) 10' (SOUTH)	26'-9.56" 5'-8.41"	21.8' UNCHANGED
REAR YARD SETBACK:	30'	28'-4.88"	5' (RELIEF SOUGHT: 25')
BUILDING HEIGHT:	35'	±30'	UNCHANGED
BUILDING LOT COVERAGE:	35% MAX (4,095 SF MAX)	25.5% 2,984 SF	32.43% (3,195 SF)
TOTAL IMPERVIOUS COVERAGE:	50% MAX (5,850 SF MAX)	45.8% (5,260 SF)	41.13% (5,584 SF)
REAR YARD IMPERVIOUS COVERAGE:	50% MAX (3,342 SF) (1,671 SF MAX)	4.9% (164.5 SF)	0.3% (34 SF)
FRONT YARD IMPERVIOUS COVERAGE:	33% MAX (1,007.5 SF MAX)	28.1% (857.5 SF)	28% (849.5 SF)



**BLACKSTONE BOULEVARD**  
(PUBLIC)

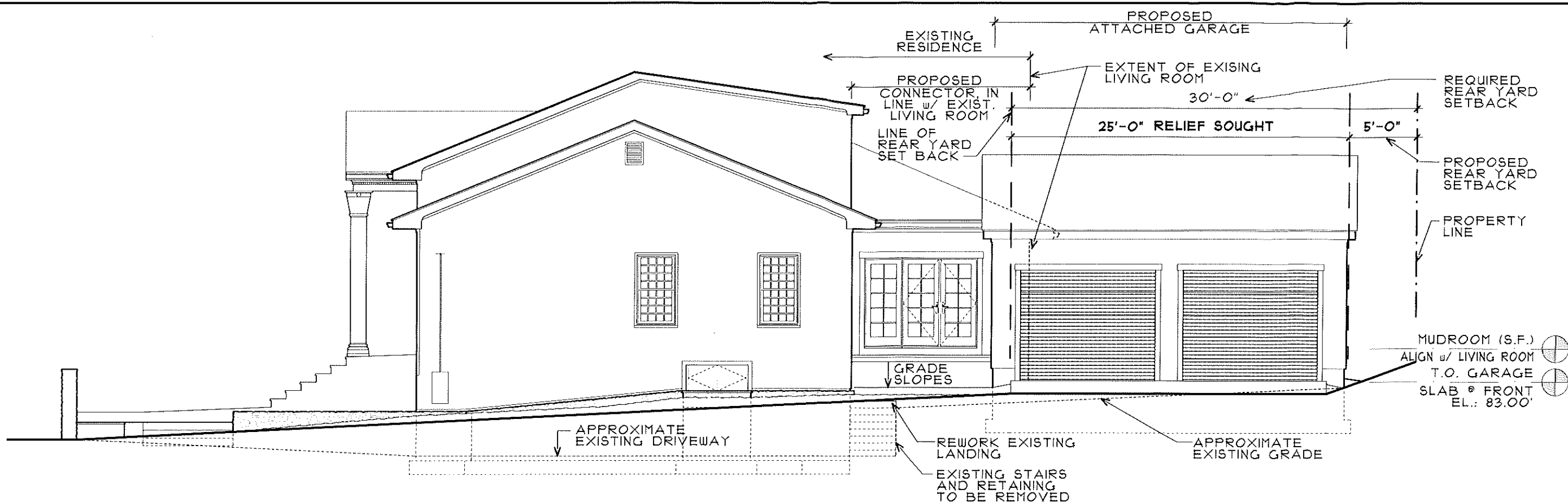


**ARCHITECTURAL SITE PLAN**

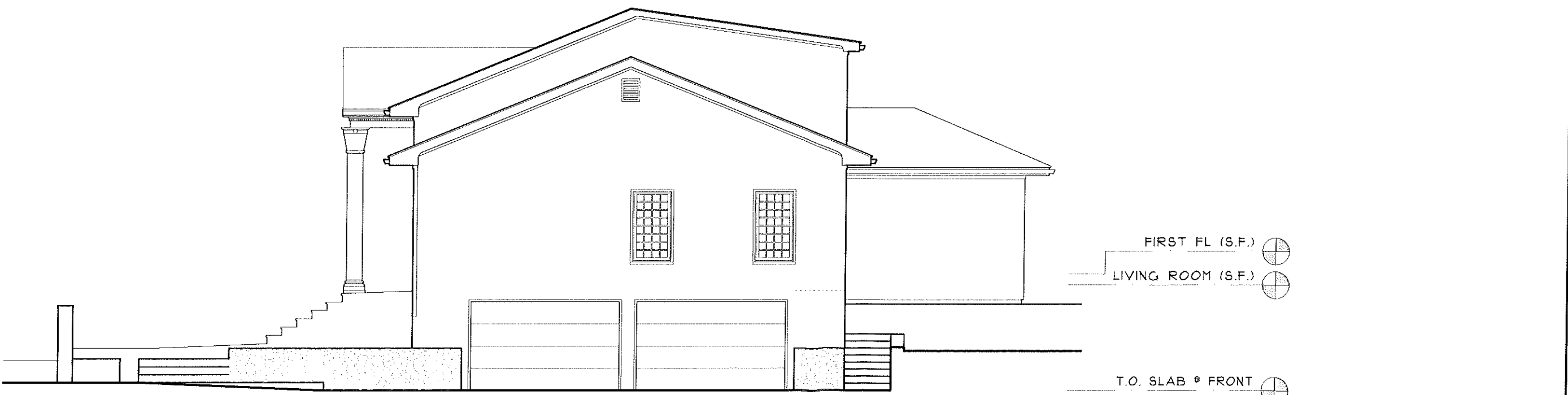
1/16" = 1'-0"  
BASED ON SURVEY BY PRINCIPE COMPANY DATED 03/12/24



GRAPHIC SCALE (IN FEET)



1 NORTH ELEVATION: PROPOSED  
 A2 1/8" = 1'-0"



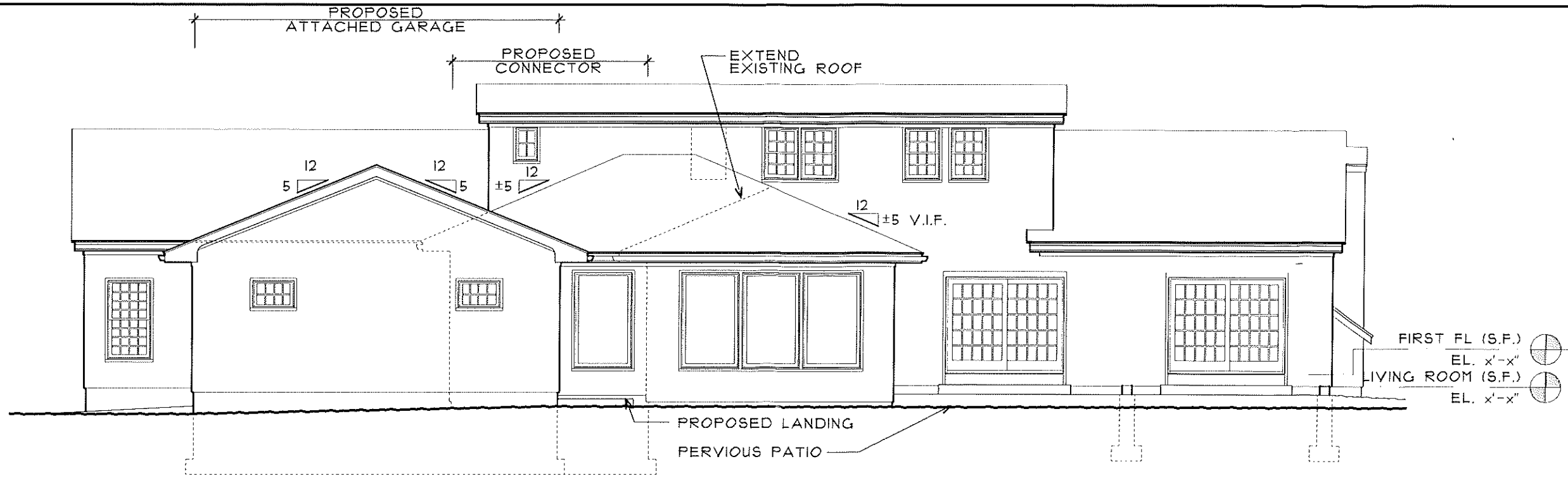
2 NORTH ELEVATION: EXISTING  
 A2 1/8" = 1'-0"

NORTH ELEVATIONS: PROPOSED & EXISTING  
 DATE: 10/09/24

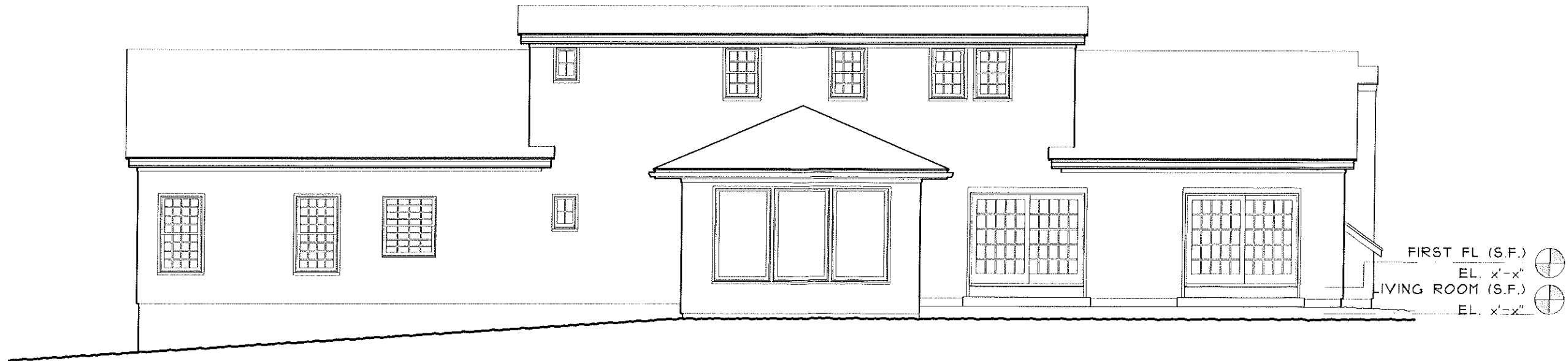
JANG WOO RESIDENCE  
 420 BLACKSTONE BLVD. PROVIDENCE, RI 02906

311 IRON HORSE WAY.  
 SUITE 202  
 PROVIDENCE, RI 02908  
 TEL: 401.841.1000  
 brevesterthornton.com





1  
A3 WEST ELEVATION: PROPOSED  
1/8" = 1'-0"



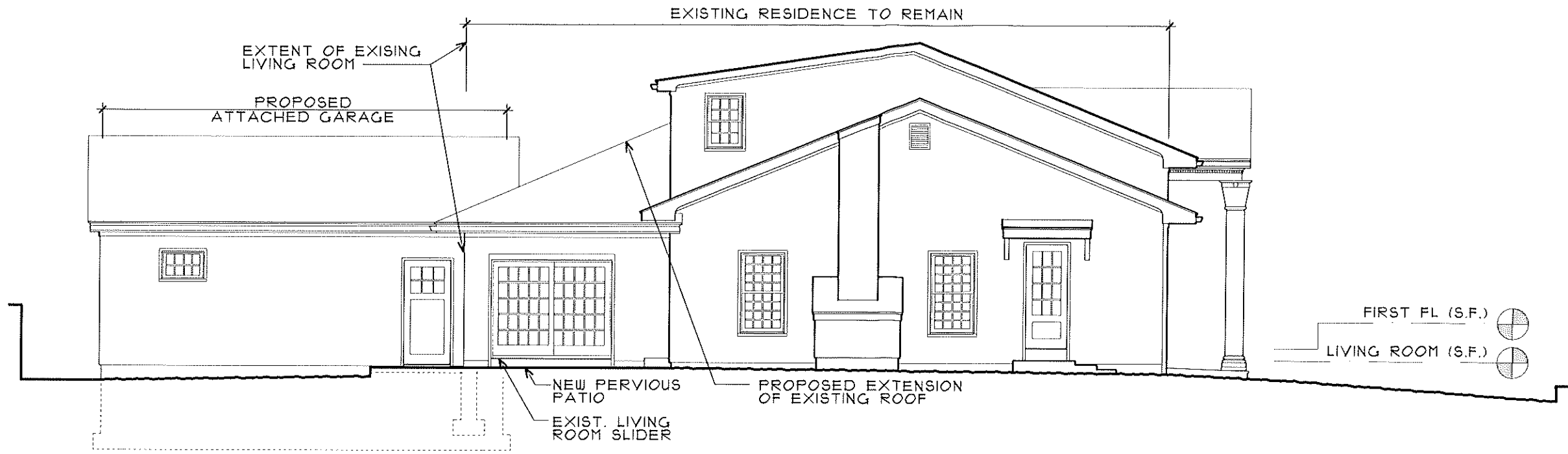
2  
A3 WEST ELEVATION: EXISTING  
1/8" = 1'-0"

WEST ELEVATIONS: PROPOSED & EXISTING  
DATE: 10/09/24

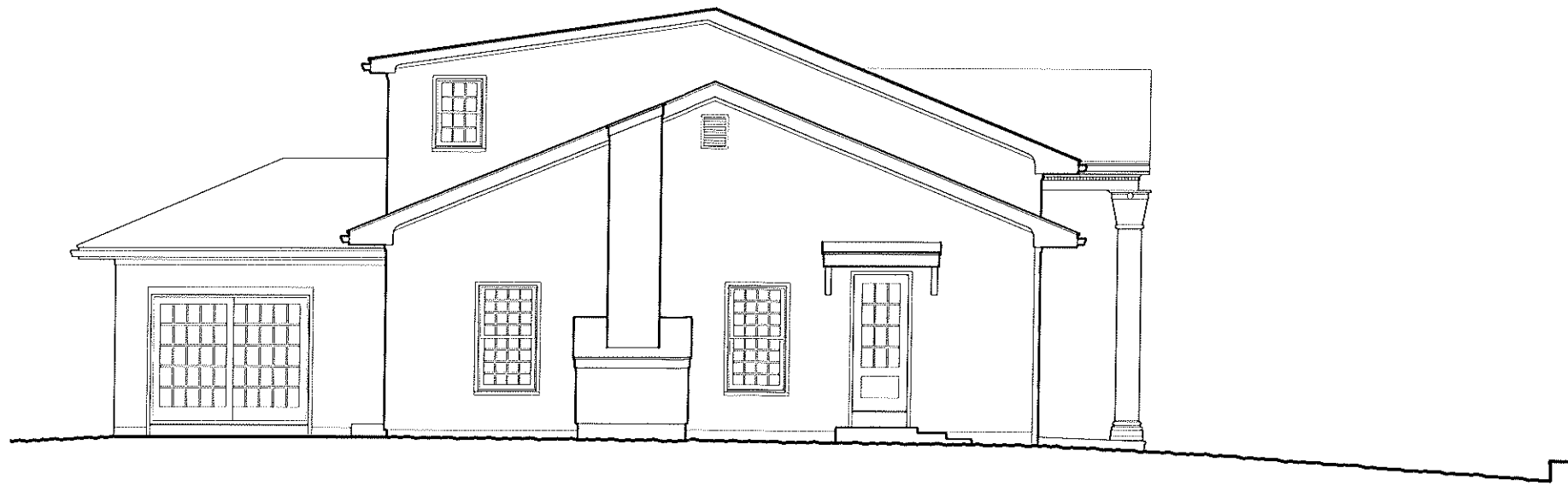
JANG WOO RESIDENCE  
420 BLACKSTONE BLVD. PROVIDENCE, RI 02906

311 IRON HORSE WAY,  
SUITE 202  
PROVIDENCE, RI 02908  
TEL: 401.841.1000  
brenstert Thornton.com

BREWSTER  
THORNTON  
GROUP  
ARCHITECTS



1 SOUTH ELEVATION: PROPOSED  
A4 1/8" = 1'-0"



2 SOUTH ELEVATION: EXISTING  
A4 1/8" = 1'-0"

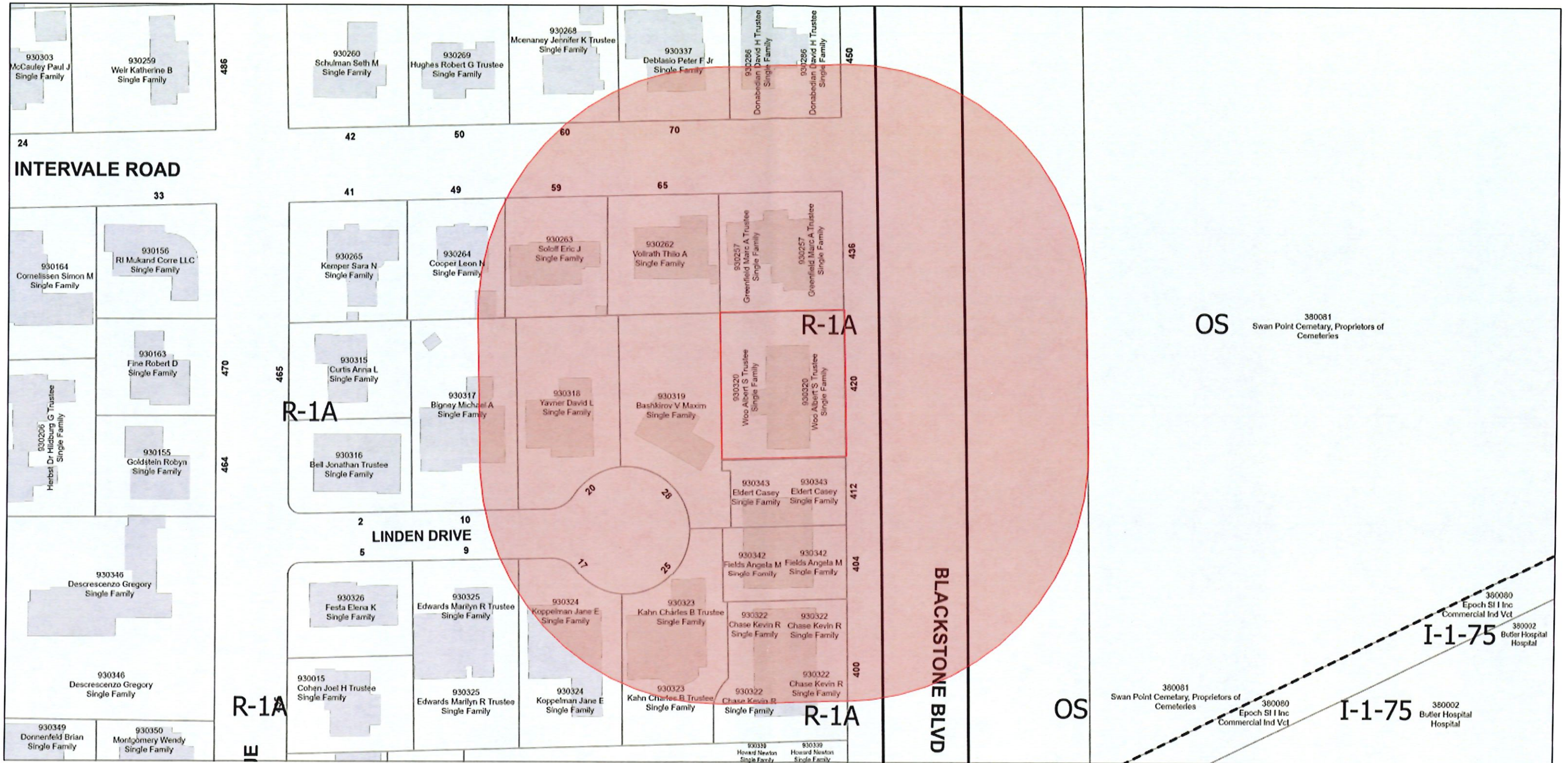
SOUTH ELEVATIONS: PROPOSED & EXISTING  
DATE: 10/09/24

JANG WOO RESIDENCE  
420 BLACKSTONE BLVD, PROVIDENCE, RI 02906

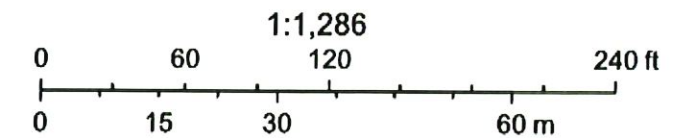
311 IRON HORSE WAY,  
SUITE 202  
PROVIDENCE, RI 02908  
TEL: 401.841.1400  
brewstert Thornton.com



# Radius Map



4/30/2024, 10:52:46 AM



Esri Community Maps Contributors, University of Rhode Island, City of East Providence, City of Providence, MassGIS, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS

**AFFIDAVIT OF ARMANDO J. RICCI, P.E.**

I, Armando J. Ricci, P.E., being duly sworn under oath do hereby depose and state the following:

1. I am a Rhode Island licensed professional engineer with approximately 25 years of civil engineering and stormwater management experience. I am regularly engaged in water, sewer, and drainage projects in the City of Providence

2. I own Ricci Drain Laying Co., Inc., which has been in business since 1959. Ricci Drain is a full-service utility and site contractor for residential, commercial, and municipal clients.

3. I have personal knowledge of the facts referred to in this Affidavit.

4. I am familiar with the residential property located at 420 Blackstone Boulevard, Providence, Rhode Island, which is owned by the Judy Jang Revocable Trust (the "Property").

5. I submit this Affidavit in support of the Zoning Variance Application submitted to the City of Providence by Trustees Judy Jang and Albert Woo for the Property (the "Application").

6. The Application is seeking variance relief for an attached garage proposed to be located in the rear yard.

7. The Property previously had a two-car basement garage that was accessed by a driveway sloping downward from Blackstone Boulevard. The garage entrance was located 1.22 feet below Blackstone Boulevard.

8. On multiple dates between August of 2022 and August 2024, I visited the Property and made the following observations:

- a. There was evidence of flooding within the interior of the basement garage. I viewed water markings on the sheet walls and foundation walls.

- b. There was evidence of flooding on the exterior of the garage. I viewed water markings on the garage door and the retaining wall adjacent to the garage.
- c. Both the interior and exterior markings indicated that flooding had reached upwards of 2 feet above the basement floor level.
- d. There is a dip or low area in Blackstone Boulevard in the area of the street adjacent to the Property's driveway.

9. In addition to my own observations of flooding, I viewed multiple videos and photographs taken by Ms. Jang that showed Blackstone Boulevard flooded to the top of the sidewalk adjacent to the Property driveway, overflowing the sidewalk, and rushing down the driveway and into the garage.

10. Based on my personal observations and review of the videos and photographs, as well as my extensive experience in stormwater management and design, I concluded as follows:

- a. Existing stormwater controls on the Property consist of grass and landscape areas and a drywell in the driveway, and function properly during normal rainfall events.
- b. Stormwater controls on the Property are overwhelmed and fail during heavy rainfall events due to the inundation of overflow from Blackstone Boulevard. This failure is caused by flooding of the dip and inadequate drainage in Blackstone Boulevard that causes water from the Boulevard to overflow onto and down the Property's driveway, resulting in up to two feet of flooding in the garage.

11. I recommended that the homeowners install additional stormwater controls to address the flooding, including backflow valve on the sewer pipe, French drains, and sandbagging. Although

installed and used by the homeowners, they did not prevent flooding in heavy rainfall events which came from the inundation of water from Blackstone Boulevard into the driveway.

12. In addition, the homeowners asked me to evaluate the use of a flood gate at the entrance to the driveway and/or the entrance to the garage. I did make such an evaluation and concluded that flood gates, which would cost in excess of \$100,000, would not definitively prevent flooding from Blackstone Boulevard during heavy rainfall events.

13. I understand that the homeowners contacted the City of Providence and Narragansett Bay Commission to see if they could address the flooding issues in the area adjacent to the Property's driveway, such as regrading Blackstone Boulevard or improving existing stormwater drainage. I understand that the City and Narragansett Bay Commission indicated that they would not be able to make any changes to alleviate the flooding.

14. I advised the homeowners that, if the City could not regrade the dip or improve stormwater management in the Boulevard, the only effective solution would be to close up the garage and raise the driveway so that it is at a higher elevation than Blackstone Boulevard. This work has already begun, with the garage now fully closed.

15. I evaluated potential locations for a new garage in the rear yard and side yard (in the area of the raised driveway).

16. With respect to the side yard, it is my professional opinion that a garage in that location would interfere with the natural flow path of stormwater from the Property and the western neighboring properties that flow through it. A garage located there could cause water to build up, damaging the garage and potentially overflowing onto the adjacent northern property.




17. It is my professional opinion that the stormwater management system that would need to be installed as part of the new garage project should be located in the side yard at the natural downgradient (lowest elevation of the property).

18. It is my professional opinion, that, from a stormwater management perspective, location of the garage in the rear yard is a more appropriate location. In addition, location of the garage in the rear yard will be safer for cars exiting the driveway in that it will allow for a three-point turn and forward exit from the driveway that crosses a highly trafficked sidewalk and bike lane prior to the travel lane.

19. If the variance for the rear yard garage is approved, I recommend that stormwater be managed on the Property by use of porous driveway pavers, a rain garden in the side yard, and sub-surface infiltration. These features are depicted on site plans submitted as part of the Application.

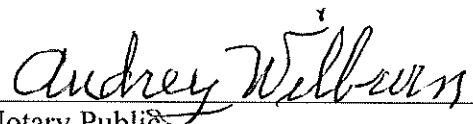
20. I swear under the pains and penalty of perjury that the foregoing is true and correct.

  
Armando J. Ricci, P.E.

STATE OF RHODE ISLAND  
COUNTY OF RHODE ISLAND

Subscribed and sworn to before me personally this 8<sup>TH</sup> day of OCTOBER, 2024.

AUDREY WILBURN  
Notary Public, State of Rhode Island  
My Commission Expires 3/29/25

  
Notary Public  
My commission expires: 3-29-25

## AFFIDAVIT OF JUDY JANG

I, Judy Jang, being duly sworn under oath do hereby depose and state the following:

1. I reside at 420 Blackstone Boulevard, Providence, Rhode Island (the "Property"), owned by the Judy Jang Revocable Trust (the "Trust").
2. My husband, Albert Woo, and I are Trustees of the Trust.
3. I have resided at the Property with my husband and two children since 2019.
4. The Property has a single-family home, which included, until recently, a two-car basement garage.
5. I have personal knowledge of the facts referred to in this Affidavit.
6. I submit this Affidavit in support of the Zoning Variance Application submitted to the City of Providence by myself and my husband, as Trustees of the Trust (the "Application").
7. The Application is seeking variance relief for an attached garage proposed to be located in the rear yard of the Property.
8. The Property previously had a two-car basement garage where my husband and I parked our electric cars and all family members entered and exited the house.
9. The garage was accessed by a driveway sloping downward from Blackstone Boulevard. The garage entrance was located 1.22 feet below Blackstone Boulevard.
10. Our driveway exits at a dip, or low point, in Blackstone Boulevard.
11. During heavy rain events, excessive stormwater collects in the dip on Blackstone Boulevard and overflows into our driveway, flooding our garage with approximately 2 feet of water, making it unusable. This happened on six occasions during a 21-month period.

12. The first flooding event occurred on August 23, 2022. Within a period of approximately ten minutes, the driveway outside of garage completely flooded. The volume and pressure of water was so great that the water broke our wooden garage door and filled the garage until it was about two feet high. The water also seeped through the interior garage door into our basement, filling the finished rooms with several inches of water. *See* pictures and video link, attached as **Exhibit A**.

13. We lost numerous personal items and had to replace the garage door and flooring. Flood cuts had to be made through every wall in the entire finished basement.

14. Due to the extent of damage associated with this first incident, we engaged with Armando Ricci, a Rhode Island stormwater engineer, to discuss options for mitigation of future flooding events. We assumed this was a one-time flooding episode that would not recur.

15. The second flooding event occurred on July 4, 2023. On that date, voluminous amounts of water rushed down the driveway from Blackstone Boulevard and broke our garage door, as it had in 2022. The garage was again filled with approximately two feet of water. *See* pictures and video links, attached as **Exhibit B**.

16. Similar to the 2022 flood event, we lost numerous personal items and had to board up our garage and order a new garage door set.

17. Within the same week, on July 10, 2024, and before we had recovered from the July 4 event, our garage flooded again with stormwater build-up from Blackstone Boulevard.

18. Following the July flooding events, we contacted Mr. Ricci to review and recommend potential stormwater mitigation measures that could be used to prevent or reduce the flooding we experienced in 2022 and 2023. Mr. Ricci recommended that we replace our French drains, clean

the outflow valves, and install a check valve on the sewer pipe, all of which was completed by the Spring of 2024.

19. We also considered investment in flood panels and flood gates, estimated to cost approximately \$150,000.00. Mr. Ricci evaluated these potential investments and determined that they would not definitively solve the stormwater management issues that occur at the Property during heavy rainfall events when the flooding from Blackstone Boulevard overflows onto the driveway. He indicated that the only way to solve the problem would be to close-up the garage and re-grade the driveway to slope up from Blackstone Boulevard.

20. Then, we experienced three more flooding events in 2024.

21. In the middle of the night on January 8, 2024, the garage flooded during a downpour. The destruction was extensive. The water pressure broke both the track for the garage doors, as well as the doors themselves. *See* pictures attached as Exhibit C. In addition, water entered into our electric cars that were parked in the garage at the time of the flooding. My car would not start and had to be towed to a service center. It took weeks to repair the electrical system and other damage to the interior of the car caused by the water.

22. Following the January event, I contacted Roger Biron and Craig Hochman at the City's Department of Public Works. Mr. Biron visited the Property and, after discussion, indicated that he agreed with Mr. Ricci's assessment to close the garage and re-grade the driveway. At this point, we felt that there were no other options besides either abandoning the Property or proceeding with Mr. Ricci's recommendations.

23. Then, on March 23, 2024, and notwithstanding the stormwater management improvements, our basement flooded again during a heavy rain event. Following this episode,

and pursuant to Mr. Ricci's recommendation, we installed sandbags across the entire length of the garage and started parking off-Property.

24. Despite the sandbagging, the basement flooded again on May 23, 2024.

25. Following the May 2024 event, we began the work to close-up the garage and re-grade the driveway, as had been recommended by Mr. Ricci.

26. In total, we have spent over \$200,000 on repairs, replacements, stormwater mitigation measures, and the closure of the garage. While we have tried to recover some of our costs through insurance claims, they have been denied. We were informed that even flood insurance would not cover our damage, as these individual events were not deemed flood disasters by FEMA.

27. Based upon the above, we have no choice but to relocate the garage. Of the two potential areas (side yard or backyard), the backyard is the only reasonable alternative.


28. The side yard is not an appropriate location for several reasons: First, due to the Property's topography, the backyard and western abutting property drain water into the side yard. A garage in this location would likely be impacted by and interfere with the flow of stormwater, potentially pushing excess water towards the house or the Property's northern neighbor. Second, a garage in the side yard would require our cars to back up onto Blackstone Boulevard, an area which has a considerable amount of vehicle, bicycle, and pedestrian traffic, as well as parking spaces, in front of or surrounding the driveway. Exiting the Property in this manner decreases site visibility and increases the chances of an unintended collision. Third, an attached garage in the side yard would connect to the house awkwardly through the home's bedrooms and necessitate the removal of recently added windows facing the yard. Fourth, there

is not enough room for a garage in the side yard as it must be 26 feet wide to accommodate one of our electric vehicles, which has doors that open upwards.

29. Location of the attached garage in the backyard would not interfere with stormwater flow, would allow cars to exit the street in a front-facing manner, connect to the house in an area with common living space, and provide enough space for a garage that is 26 feet wide.

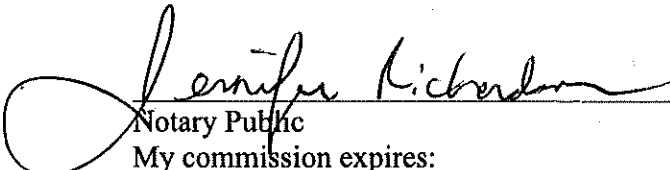
30. We are seeking an attached garage because we have lost the ability to use the attached garage that came with the home when we bought it in 2019. In fact, we would not have purchased our Property unless it had an attached garage. This feature is of great value both to our family and to the market value of the house. We have always lived in homes with attached garages, and our family has always used the garage, not the front door, to enter and exit the home. More importantly, as a two-physician household, we are frequently on call and respond to urgent medical matters that require my husband and me to drive into the hospital at all hours of the day and night. During the winter, having to dig out snow to access a separate garage would add additional time to our ability to respond to urgent medical scenarios. Finally, it should be noted that our security cameras have recorded several incidents in which trespassers have walked through the Property. Given this, I would feel most comfortable walking directly into my home from the garage, rather than through a dark open yard in the middle of the night.

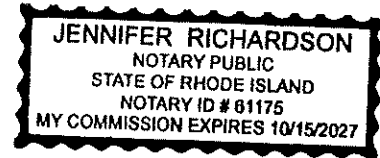
31. I swear under the pains and penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Judy Jang

STATE OF RHODE ISLAND  
COUNTY OF PROVIDENCE

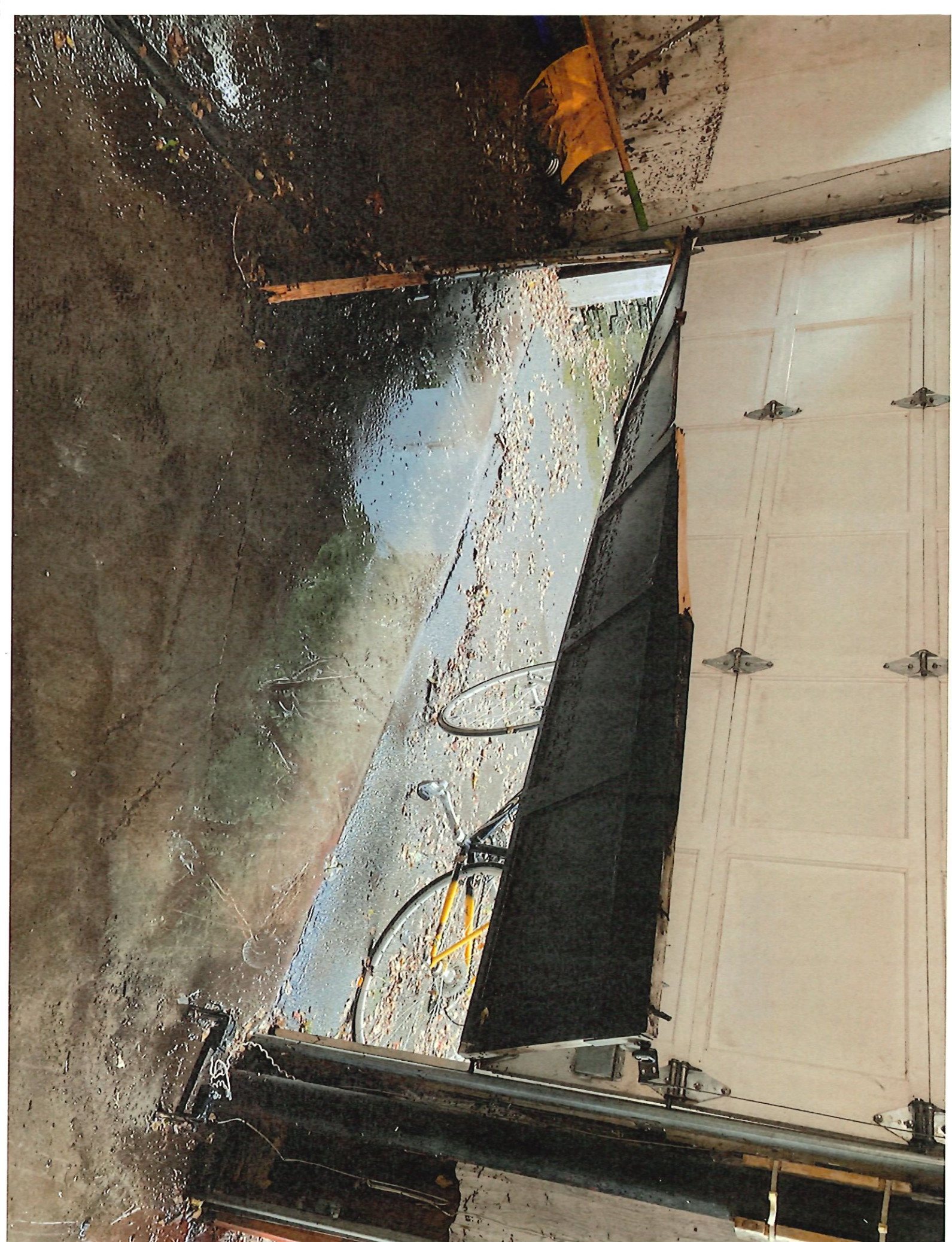
Subscribed and sworn to before me personally this 1<sup>st</sup> day of October, 2024.

  
\_\_\_\_\_  
Notary Public  
My commission expires:



# EXHIBIT A

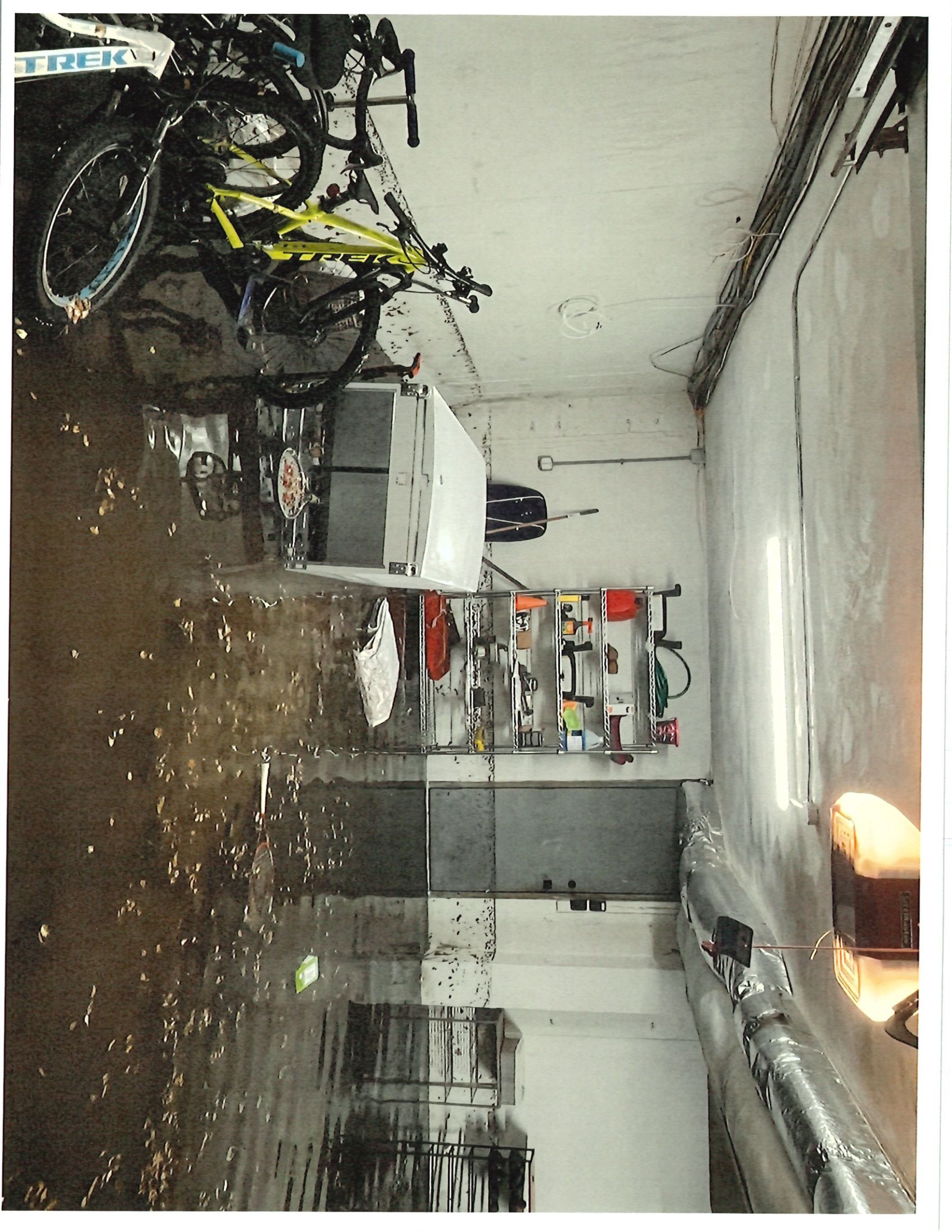






# EXHIBIT B





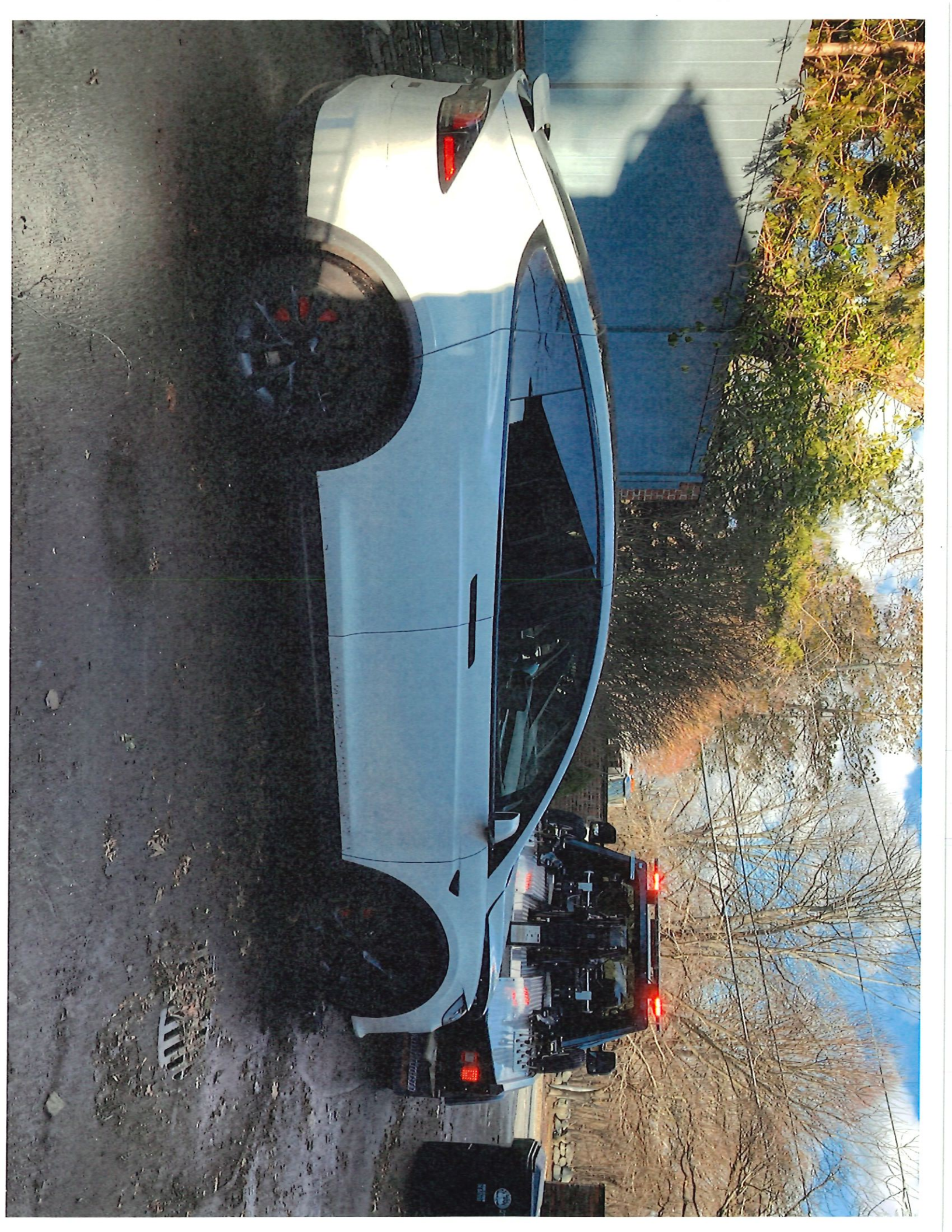


# EXHIBIT C











**Residential**  
**PROPERTIES**  
LTD.

September 28, 2024

Providence Zoning Boarding of Review  
RE: 420 Blackstone Boulevard, Providence, RI

Dear Providence Zoning Board:

I am a licensed realtor in Rhode Island and Massachusetts, employed by Residential Properties Ltd. I have over 30 years of experience, specializing in properties on the East Side of Providence. I represented Judy Jang and Albert Woo in the purchase of their home at 420 Blackstone Boulevard in 2019. It is important to note that a key feature for Judy and Albert was the presence of an attached or integral garage, as they looked to downsize from their previous home on the East Side. In fact, they did not even consider looking at any homes without an attached or integral garage. At the time of inspection and purchase of the property, there was no indication that the home had ever been flooded in the past and there were no reports of flooding or water intrusion of any kind in the sellers' disclosure.

Over the past few years, I have seen multiple properties in the vicinity of 420 Blackstone Boulevard which have experienced issues with flooding. This seems especially problematic in front of Judy and Albert's property as water appears to descend directly in front of their home from either side of the street. I have been on Blackstone Boulevard during one of these torrential rainfalls and have personally witnessed and driven through the flooded roadways in the area, as the volume of water quickly overwhelms the current stormwater management system.

After their initial flooding event, Judy and Albert had contacted me to inform me of their experience and noted that none of the devastating damage sustained was covered by insurance. Since then, the family has unfortunately experienced 5 more flooding events over the past two years. The flooding has resulted in extensive damage to their property, including their beautifully finished basement, garage, and vehicle which was in the garage at the time of the flooding.

I am aware that they have explored multiple avenues to attempt to solve this problem, including the possibility of installing a flood gate and sandbagging. I also know they engaged a civil engineer to explore mitigation measures. The engineer came to the conclusion that any measures other than closing the garage, regrading the driveway, and building a new garage would fall short of solving the problem. Despite the significant costs of these recommendations, they have decided to proceed with this plan to ensure that no more water enters their home.

I should note that upon purchase of this home, while Judy and Albert did discuss the possibility of updating some of the interior features as well as the exterior facade at some point, they had absolutely no plans or need to change any of the recently refinished basement space or the garage.

I met with them at the house to discuss possible locations for the placement of the new garage. Placing the garage in the location of the current driveway would indeed be impractical as the garage entrance would then lead directly into the bedroom wing of the home. It would also cause the loss of multiple windows to two of the bedrooms, significantly reducing the light into these rooms. Because of this, I concluded that the best location for the new garage would be in the rear yard.

I am very familiar with the neighboring properties, all of which have attached or integral garages. The properties adjacent to Judy and Albert's home, particularly several newer homes built on smaller lots, are located close to the property line or within setbacks. I believe that the proposed attached garage for 420 Blackstone Boulevard will be in keeping with the general character of the neighborhood. And based on my professional experience as a realtor, the presence of an attached garage will be critical to maintaining the value of the home and to preserving the lifestyle they expected when they purchased this home with its integral garage.

Sincerely,

A handwritten signature in blue ink that reads "Gerri Schiffman". The signature is written in a cursive, flowing style.

Gerri Schiffman  
Sales Associate