

Request for Action
by
Board of Commissioners

**Approval of Reservation of Low-Income Housing Tax Credits and
Preliminary Approval of Financing for Joseph Caffey Apartments**

A. PROJECT SUMMARY

This Request for Action (“RFA”) is for the reservation of up to \$1,298,250 of 2021 and/or 2022 9% Low-Income Housing Tax Credits (“LIHTCs”) and preliminary approval of: (i) a \$9,000,000 tax-exempt construction loan, (ii) a Capital Magnet Fund (“CMF”) loan of \$999,999, and (iii) a deferred payment loan of \$222,723 for Joseph Caffey Apartments (the “Development” or “JCA”).

The developer, Upper South Providence Partners, LLC (“USPP” or the “Developer”) is a joint venture partnership between Omni Development Corporation (“Omni”), a Rhode Island non-profit entity with a portfolio of affordable housing in Rhode Island and southern Massachusetts and The Wingate Companies, LLC (“Wingate”), a Massachusetts for-profit entity with a portfolio of 15,000 residential units across 18 states.

The Development site is formerly known as Barbara Jordan 2 Apartments (“BJ2”). The BJ2 development consisted of 74 units and has been vacant since 2015. The U.S. Department of Housing and Urban Development (“HUD”) foreclosed on the site several years ago and transferred the property to RIHousing in 2020. RIHousing issued a Request for Proposals seeking a developer for BJ2 and ultimately selected the Omni/Wingate partnership to undertake the redevelopment. At closing, the site will transfer to USPP for approximately \$1,333,000.

JCA entails the acquisition and demolition of BJ2, and the new construction of 79 affordable rental units in 11 buildings. As proposed, one of the new buildings located at 16 Somerset Street will be a 54-unit four-story elevator building with parking and open space that will encompass an entire city block between Somerset and Portland Streets. The other buildings are a mix of two- to six-unit buildings.

Upon completion, the 79 rental units will include 10 one-bedroom, 36 two-bedroom, 27 three-bedroom and six four-bedroom units. Sixteen units will be available at 30% AMI rents, five units will be available at 50% AMI rents and 58 units will be available at 60% AMI rents. Sixteen units are expected to receive operating subsidy support from an allocation of Project Based Section 8 Vouchers by the Providence Housing Authority.

To maximize resources, the Developer has proposed a bifurcated 9%/4% structure to fund the Development. The 9% transaction will be known as Phase A and will consist of 39 units. Phase B, which includes 40 units, will be funded with tax exempt bonds and 4% LIHTCs. The two phases will close simultaneously.

The proposed Development has received preliminary zoning approval and no additional variances are required. The Developer anticipates closing and beginning construction in the early fall of 2021. USPP will put construction pricing out to bid and has created a budget with

the help of their architect, Providence-based DBVW Architects, Inc. (“DBVW”), who has outlined a 15-month construction schedule. Current plans are 90% complete and final plans and specifications are projected to be complete by June. A contractor is expected to be selected in July.

The total development cost for the entire Development, inclusive of both phases, is \$28,841,640. The National Equity Fund, Inc. has provided a letter of intent to USPP with pricing of approximately \$0.94 for the LIHTCs in both phases. Proposed sources of funding include: (i) syndication equity from the allocation of LIHTCs; (ii) a tax-exempt construction loan; (iii) a taxable construction loan; (iv) taxable permanent loans; (v) HOME Investment Partnerships Program (“HOME Program”) loans from RIHousing and the City of Providence; (vi) Capital Magnet funds; (vii) a Housing Trust Fund loan from RIHousing; (viii) a RIHousing deferred payment loan; and (ix) deferred developer fees.

The Developer has provided a commitment letter from Citizens Bank for a taxable construction loan for Phase A. RIHousing will provide a tax-exempt construction loan for Phase B. Upon completion, as currently proposed, the Providence Redevelopment Authority will provide taxable permanent loans for both phases.

As part of the underwriting process, following preliminary approval, RIHousing staff will work with the Developer to appropriately size the soft cost budget, including reserves and carrying costs, to ensure that the minimum amount of tax credits and soft sources are allocated to the Development. Several of the project’s strengths include: (i) a strong development team that is engaged with the local community and currently developing affordable housing developments in Rhode Island and other states; (ii) City of Providence HOME Program funding; (iii) operating subsidy from the Providence Housing Authority; (iv) funds from the City of Providence Redevelopment Agency; (v) redevelopment of a vacant and blighted urban site; and (vi) significant access to retail, entertainment, schools, government and employment opportunities given the location of the site in a highly developed commercial area.

The Funding Committee, which is comprised of senior staff and a member of the RIHousing Board of Commissioners, awarded the highest score to JCA in the 2021 9% LIHTC round based on the strength of the application and the criteria outlined in the State of Rhode Island 2021 Qualified Allocation Plan (“QAP”). It is anticipated the Development will generate 142 jobs during construction.

The Request for Action is for the reservation of up to \$1,298,250 of 2021 and/or 2022 Low-Income Housing Tax Credits (“LIHTC”) and Preliminary Approval of: (i) a \$9,000,000 tax-exempt construction loan as set forth in Attachment B for Phase A, (ii) a CMF loan of \$999,999 as set forth in Attachment C for Phase B, and (iii) a deferred payment loan of \$222,723 as set forth in Attachment C for Phase B.

B. RECOMMENDATION

The attached resolutions are recommended for approval subject to:

- Approval by RIHousing of the development team.

- Final appraisals and market studies acceptable to RIHousing prepared by an independent appraiser demonstrating that the first mortgage loans do not exceed 90% of the as-stabilized value of the Development phases and that sufficient demand exists for the proposed units.
- Syndication equity from the allocation of LIHTC credits in amounts sufficient to achieve project feasibility.
- Approval of HOME Investment Partnerships Program loans from RIHousing and the City of Providence in amounts sufficient to achieve project feasibility or the availability of alternative equity satisfactory to RIHousing.
- Approval of a Housing Trust Fund Loan from RIHousing in an amount sufficient to achieve project feasibility or the availability of alternative equity satisfactory to RIHousing.
- Approval from the City of Providence verifying real estate tax assessment at no more than 8% of gross potential income.
- Approval by RIHousing's bond underwriter and bond counsel that the tax-exempt loan will satisfy all required financing provisions as well as assurance that the equity investors will not also be involved in the transaction as purchasers of the RIHousing bonds used to fund the loan.
- A taxable construction loan from Citizens Bank or another lender in an amount sufficient to achieve project feasibility.
- Commitments of permanent loan funds from the Providence Redevelopment Authority or another lender in amounts sufficient to achieve project feasibility.
- The simultaneous closing of both phases of the Development including construction financing.
- Full construction completion and repayment guarantees from the Borrower, the Developer and each managing member. All liquidity requirements will be equal to those required by Citizens Bank for their Phase A construction loan.
- Approval by RIHousing of design and construction plans, specifications and construction documentation.
- Approval of the proposed operating budget for the development.
- Approval by RIHousing of all management related documentation, including the marketing and tenant selection plans.
- Confirmation by RIHousing that the final development budget, schedule, and unit configuration presented for preliminary approval is consistent with USPP's application submission for 2021 LIHTC.
- Satisfactory and timely performance in accordance with the schedule established by RIHousing staff.
- Completion of all items required for firm commitment and closing in accordance with normal underwriting and processing requirements.

C. ATTACHMENTS

- A. Development Summary
- B. Resolution Phase A
- C. Resolution Phase B

D. Site Map

**Attachment A
Development Summary**

A. Development Team

- | | |
|-------------------------------|---|
| 1. Co-Developer: | Omni Development Corporation
810 Eddy Street
Providence, RI 02903 |
| 2. Co-developer: | The Wingate Companies, LLC
100 Wells Avenue
Newton, MA 02459 |
| 3. Architect: | DBVW Architects, Inc.
111 Chestnut Street
Providence, RI 02903 |
| 4. Management Agent: | The Wingate Companies, LLC
100 Wells Avenue
Newton, MA 02459 |
| 5. Legal: | Chace Ruttenberg & Freedman, LLP
1 Park Row #300
Providence, RI 02903 |
| 6. General Contractor: | TBD |

Development Team Qualifications

Co-Developer

Omni Development Corporation (“Omni”) is an experienced non-profit real estate developer focusing on homeownership, family rental housing, elderly/disabled housing and commercial property development since 1986. With its development of over 1,644 units of affordable housing, Omni has helped transform neighborhoods by replacing vacant lots and substandard properties with high quality and safe affordable housing. Omni has successfully completed projects in South Providence, Federal Hill, the Elmwood neighborhood, the East Side of Providence, North Providence and Waterbury, CT. Omni and its related entities have 12 developments in RIHousing’s portfolio. In recent years, Omni completed the redevelopment of the Four Sisters Apartments, Phoenix Renaissance Apartments and Phoenix Apartments, all in Providence, and is currently completing Trio Partners, which consists of 354 units in Providence, North Providence and Woonsocket. The current Executive Director, Sharon Morris, assumed her leadership role in the spring of 2018. She has previously worked with NEF, Winn Management, and RIHousing in a variety of asset management positions.

Developer and Management Agent

The Wingate Companies, LLC (“Wingate”), based in Newton, Massachusetts, will be the co-developer of Joseph Caffey Apartments. They have over 55 years of experience and during that time have acquired and developed more than \$1 billion worth of real estate, including both repositioned properties and ground-up projects.

In February 2019, Omni made the decision to transition their existing property management engagements to Wingate Management Company, LLC (“Wingate Management”), an affiliate of Wingate. Wingate Management currently manages 15,000 residential units and over 500,000 square feet of commercial property across 18 states. Most of their management portfolio is for private investors and institutions rather than their own properties. Wingate Management provides property management services for several other developers in the RIHousing portfolio. The management team is led by Michael Martin. Melissa Kosecki is the regional manager who oversees the Omni portfolio.

Architect

DBVW Architects, Inc. (“DBVW”) is a full-service architectural firm located in Providence, Rhode Island. Doug Brown began his own career in 1994 and has acted as Principal-in-Charge of many of the firm’s projects including the following Rhode Island developments: WaterFire Arts Center, Westfield Lofts, Stillwater Mill, The Institute for the Study and Practice of Nonviolence, and Glenark Landing.

Legal

Chace Ruttenberg & Freedman is a Rhode Island-based full-service law firm offering extensive experience in tax credit developments. Attorney Drew Kaplan has represented a number of sponsors funded through RIHousing and will serve as borrower’s legal counsel for tax credit matters. Mr. Kaplan concentrates his practice in the areas of affordable housing, business, corporate and non-profit law and estate planning and administration. He also serves as counsel to many syndicated partnerships formed to develop affordable housing.

Consultant

Barbara Sokoloff Associates has provided consulting services in a variety of areas relating to the development of affordable housing in Rhode Island. With a portfolio of housing developments in excess of \$150 million producing over 500 units, Barbara Sokoloff has extensive experience with project development and management, housing development financing from public and private funding sources, strategic planning and construction oversight. Ms. Sokoloff has consulted on various housing developments in the RIHousing portfolio.

B. Unit Distribution and Revenue

Rent Type	Bed-rooms	# of Units			Gross Rents		% of Max
		9%	4%	Total	Under-writing	LIHTC Max Rent	
30%	2	5	4	9	\$1,150	\$587	196%
	3	3	4	7	\$1,433	\$678	211%
50%	1	2	0	2	\$815	\$815	100%
	2	2	0	2	\$978	\$978	100%
	3	1	0	1	\$1,131	\$1,131	100%
60%	1	5	3	8	\$949	\$978	97%
	2	13	12	25	\$1,136	\$1,174	97%
	3	8	11	19	\$1,313	\$1,357	97%
	4	0	6	6	\$1,466	\$1,515	97%
Total		39	40	79			

C. Finance Summary

Sources	9%		4%		Total	
	Amount	Per Unit	Amount	Per Unit	Amount	Per Unit
RIH First Mortgage	\$1,530,000	\$39,231	\$2,345,000	\$58,625	\$3,875,000	\$49,051
LIHTC Proceeds	\$12,202,330	\$312,880	\$6,452,277	\$161,307	\$18,654,607	\$236,134
Deferred Developer Fee	\$244,310	\$6,264	\$405,001	\$10,125	\$649,311	\$8,219
RIH HOME	\$0	\$0	\$1,600,000	\$40,000	\$1,600,000	\$20,253
RIH Capital Magnet	\$0	\$0	\$999,999	\$25,000	\$999,999	\$12,658
RIH HTF	\$0	\$0	\$1,960,000	\$49,000	\$1,960,000	\$24,810
RIH Deferred Payment Loan	\$0	\$0	\$222,723	\$5,568	\$222,723	\$2,819
City HOME loan	\$0	\$0	\$880,000	\$22,000	\$880,000	\$11,139
Total Sources	\$13,976,640	\$358,375	\$14,865,000	\$371,625	\$28,841,640	\$365,084

Uses	9%		4%		Total	
	Amount	Per Unit	Amount	Per Unit	Amount	Per Unit
Construction	\$9,758,089	\$250,207	\$10,250,411	\$256,260	\$20,008,500	\$253,272
Contingency	\$683,066	\$17,515	\$717,529	\$17,938	\$1,400,595	\$17,729
Acquisition	\$657,831	\$16,867	\$674,699	\$16,867	\$1,332,530	\$16,867
Soft Costs	\$1,079,783	\$27,687	\$1,111,038	\$27,776	\$2,190,821	\$27,732
Financing	\$772,783	\$19,815	\$932,778	\$23,319	\$1,705,561	\$21,589
Developer Fee	\$762,300	\$19,546	\$891,500	\$22,288	\$1,653,800	\$20,934
Operating Reserve	\$213,035	\$5,462	\$237,025	\$5,926	\$450,060	\$5,697
Lease Up Reserve	\$0	\$0	\$0	\$0	\$0	\$0
Replacement Reserve Year 1 Deposit	\$12,675	\$325	\$13,000	\$325	\$25,675	\$325
Other Reserves	\$37,077	\$951	\$37,022	\$926	\$74,099	\$938
Total Uses	\$13,976,640	\$358,375	\$14,865,000	\$371,625	\$28,841,641	\$365,084

Attachment B
Joseph Caffey Apartments Phase “A”

**Resolution of the Board of Commissioners of
Rhode Island Housing and Mortgage Finance Corporation**

- Whereas,** Rhode Island Housing and Mortgage Finance Corporation (“RIHousing”) is authorized to make loans to mortgagors or sponsors for such developments as in the judgment of RIHousing have promise of supplying well-planned, well-designed apartment units which will provide housing for low and moderate-income persons or families, or the elderly, or others in locations where there is a need for such housing; and
- Whereas,** the Low-Income Housing Tax Credit Program (the “Program”) was created as part of the Tax Reform Act of 1986, as amended (the “Act”); and
- Whereas,** RIHousing has been designated the administrator of the Program in the State of Rhode Island; and
- Whereas,** staff for RIHousing has determined that the Applicant (“Applicant”) listed below is eligible for the Program under the laws of the State of Rhode Island and the Federal Tax Code; and
- Whereas,** the Applicant has submitted an application to RIHousing for the reservation of low-income housing tax credits available in calendar years 2021 and/or 2022 (the “Tax Credits”) as follows:

Applicant	Development	9% LIHTCs
Upper South Providence Partners, LLC	Joseph Caffey Apartments Phase A	\$1,298,250

- Whereas,** RIHousing staff has reviewed the submission, inspected the site, and determined that this development may qualify for financing under RIHousing’s enabling legislation, regulations, guidelines and policies; and
- Whereas,** RIHousing finds that:
- (1) there exists a shortage of decent, safe, and sanitary housing at rents or prices which persons and families of low or moderate income can afford within the general housing market area to be served by the proposed housing development;
 - (2) private enterprise and investment have been unable, without assistance, to provide an adequate supply of decent, safe, and sanitary housing in the general

housing market area at prices which persons or families of low and moderate-income can afford or to provide sufficient mortgage financing for residential housing for occupancy by those persons or families;

(3) the housing sponsor or sponsors undertaking the proposed housing development in this state will supply well-planned, well-designed housing for persons or families of low and moderate income and that those sponsors are financially responsible;

(4) the proposed housing development to be assisted pursuant to the provisions of this chapter will be of public use and will provide a public benefit; and

(5) the proposed housing development will be undertaken, and the housing sponsor or sponsors regulated pursuant to the authority and within the restrictions provided for by the RIHousing enabling act, namely Chapter 55 of Title 42 of the Rhode Island General Laws.

NOW, THEREFORE, IT IS HEREBY:

Resolved, that up to \$1,298,250 of allocated 2021 and/or 2022 Tax Credits be reserved for the Applicant pursuant to Section 4.4 of the Rules Relative to Multifamily Loan Programs - Allocation of Low-Income Housing Tax Credits (825-RICR-30-00-4) (the “RIHousing Regulations”) for rental housing to be located in Providence, Rhode Island and known as Joseph Caffey Apartments Phase A.

Resolved, that the Executive Director, Deputy Executive Director, and the Director of Development, each acting singly be, and hereby is, authorized and empowered in the name of and on behalf of RIHousing to take any and all actions necessary to cause such reservation to be effective; and further, that any final allocation shall be made at such time as the applicant complies with the requirements of the Act and the RIHousing Regulations.

Resolved, that the foregoing resolutions are subject to the following conditions:

- Approval by RIHousing of the development team.
- Final appraisals and market studies acceptable to RIHousing prepared by an independent appraiser demonstrating that the first mortgage loans do not exceed 90% of the as-stabilized value of the Development phases and that sufficient demand exists for the proposed units.
- Syndication equity from the allocation of LIHTC credits in amounts sufficient to achieve project feasibility.
- Approval of HOME Investment Partnerships Program loans from RIHousing and the City of Providence in amounts sufficient to achieve project feasibility or the availability of alternative equity satisfactory to RIHousing.

- Approval of a Housing Trust Fund Loan from RIHousing in an amount sufficient to achieve project feasibility or the availability of alternative equity satisfactory to RIHousing.
- Approval from the City of Providence verifying real estate tax assessment at no more than 8% of gross potential income.
- Approval by RIHousing's bond underwriter and bond counsel that the tax-exempt loan will satisfy all required financing provisions as well as assurance that the equity investors will not also be involved in the transaction as purchasers of the RIHousing bonds used to fund the loan.
- A taxable construction loan from Citizens Bank or another lender in an amount sufficient to achieve project feasibility.
- Commitments of permanent loan funds from the Providence Redevelopment Authority or another in an amount sufficient to achieve project feasibility.
- The simultaneous closing of both phases of the Development including construction financing.
- Full construction completion and repayment guarantees from the Borrower, the Developer, and each managing member. All liquidity requirements will be equal to those required by Citizens Bank for their Phase A construction loan.
- Approval by RIHousing of design and construction plans, specifications, and construction documentation.
- Approval of the proposed operating budget for the development.
- Approval by RIHousing of all management related documentation, including the marketing and tenant selection plans.
- Confirmation by RIHousing that the final development budget, schedule, and unit configuration presented for preliminary approval is consistent with USPP's application submission for 2021 LIHTC.
- Satisfactory and timely performance in accordance with the schedule established by RIHousing staff.
- Completion of all items required for firm commitment and closing in accordance with normal underwriting and processing requirements.

Resolved, that the Executive Director, Deputy Executive Director, and the Director of Development, each acting singly, be and hereby is authorized to take any and all actions he or she deems necessary or desirable to carry out the foregoing resolutions.

Attachment C
Joseph Caffey Apartments Phase “B”

**Resolution of the Board of Commissioners of
Rhode Island Housing and Mortgage Finance Corporation**

- Whereas,** Rhode Island Housing and Mortgage Finance Corporation (“RIHousing”) is authorized to make loans to mortgagors or sponsors for such developments as in the judgment of RIHousing have promise of supplying well-planned, well-designed apartment units which will provide housing for low and moderate-income persons or families, or the elderly, or others in locations where there is a need for such housing; and
- Whereas,** the Low-Income Housing Tax Credit Program (the “Program”) was created as part of the Tax Reform Act of 1986, as amended (the “Act”); and
- Whereas,** RIHousing has been designated the administrator of the Program in the State of Rhode Island; and
- Whereas,** staff for RIHousing has determined that the Applicant (“Applicant”) listed below is eligible for the Program under the laws of the State of Rhode Island and the Federal Tax Code; and
- Whereas,** the Applicant has submitted an application to RIHousing for the reservation of low-income housing tax credits available in calendar years 2020 and/or 2021 (the “Tax Credits”), and for construction and/or permanent financing as follows:

Applicant	Development	Tax Exempt Loan	Capital Magnet Funds	Deferred Payment Loan
Upper South Providence Partners, LLC	Joseph Caffey Apartments Phase B	\$9,000,000	\$999,999	\$222,723

Whereas, RIHousing staff has reviewed the submission, inspected the site, and determined that this development may qualify for financing under RIHousing’s enabling legislation, regulations, guidelines and policies; and

Whereas, RIHousing finds that:

(1) there exists a shortage of decent, safe, and sanitary housing at rents or prices which persons and families of low or moderate income can afford within

the general housing market area to be served by the proposed housing development;

(2) private enterprise and investment have been unable, without assistance, to provide an adequate supply of decent, safe, and sanitary housing in the general housing market area at prices which persons or families of low and moderate-income can afford or to provide sufficient mortgage financing for residential housing for occupancy by those persons or families;

(3) the housing sponsor or sponsors undertaking the proposed housing development in this state will supply well-planned, well-designed housing for persons or families of low and moderate income and that those sponsors are financially responsible;

(4) the proposed housing development to be assisted pursuant to the provisions of this chapter will be of public use and will provide a public benefit; and

(5) the proposed housing development will be undertaken, and the housing sponsor or sponsors regulated pursuant to the authority and within the restrictions provided for by the RIHousing enabling act, namely Chapter 55 of Title 42 of the Rhode Island General Laws.

NOW, THEREFORE, IT IS HEREBY:

Resolved, that, subject to the special conditions listed below RIHousing hereby approves preliminary commitment up to \$9,000,000 for a tax-exempt first mortgage loan to Upper South Providence Partners, LLC or an affiliated entity (the “Borrower”) for rental housing to be located in Providence, Rhode Island and known as Joseph Caffey Apartments Phase B.

Resolved, that, subject to the special conditions listed below, RIHousing hereby approves preliminary commitment for a Capital Magnet Fund loan to the Borrower, in an amount not to exceed \$999,999 for rental housing to be located in Providence, Rhode Island and known as Joseph Caffey Apartments Phase B.

Resolved: that, subject to the special conditions listed below, RIHousing hereby approves preliminary commitment for a deferred payment loan to the Borrower in an amount not to exceed \$222,723 for rental housing to be located in Providence, Rhode Island and known as Joseph Caffey Apartments Phase B.

Resolved, that the foregoing resolutions are subject to the following conditions:

- Approval by RIHousing of the development team.
- Final appraisals and market studies acceptable to RIHousing prepared by an independent appraiser demonstrating that the first mortgage loans do not exceed 90% of the as-stabilized value of the Developments and that sufficient demand exists for the proposed units.

- Syndication equity from the allocation of LIHTC credits in amounts sufficient to achieve project feasibility.
- Approval of HOME Investment Partnerships Program loans from RIHousing and the City of Providence in amounts sufficient to achieve project feasibility or the availability of alternative equity satisfactory to RIHousing.
- Approval of a Housing Trust Fund Loan from RIHousing in amounts sufficient to achieve project feasibility or the availability of alternative equity satisfactory to RIHousing.
- Approval from the City of Providence verifying real estate tax assessment at no more than 8% of gross potential income.
- Approval by RIHousing's bond underwriter and bond counsel that the tax-exempt loan will satisfy all required financing provisions as well as assurance that the equity investors will not also be involved in the transaction as purchasers of the RIHousing bonds used to fund the loan.
- A taxable construction loan from Citizens Bank or another lender in an amount sufficient to achieve project feasibility.
- Commitment of permanent loan funds from the Providence Redevelopment Authority or another lender in an amount sufficient to achieve project feasibility.
- The simultaneous closing of both phases of the Development including construction financing.
- Full construction completion and repayment guarantees from the Borrower, Upper South Providence Partners, LLC. and each General Partner. All liquidity requirements will be equal to those required by Citizens Bank for their Phase A construction loan.
- Approval by RIHousing of design and construction plans, specifications and construction documentation.
- Approval of the proposed operating budget for the development.
- Approval by RIHousing of all management related documentation, including the marketing and tenant selection plans.
- Confirmation by RIHousing that the final development budget, schedule and unit configuration presented for preliminary approval is consistent with USPP's application submission for 2021 LIHTC.
- Satisfactory and timely performance in accordance with the schedule established by RIHousing staff.
- Completion of all items required for firm commitment and closing in accordance with normal underwriting and processing requirements.

Resolved, that the Executive Director, Deputy Executive Director, and the Director of Development, each acting singly, be and hereby are authorized to take all actions they deem necessary or desirable to carry out the foregoing resolutions.

Attachment D - SITE LOCUS MAP

Joseph Caffey Apartments: Scattered Site in Upper South Providence, RI

Northern Cluster



Southern Cluster

