

The Commonwealth of Massachusetts

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**INDEPENDENT STATE AUDITOR'S REPORT
ON THE PHYSICAL CONDITION
OF STATE-AIDED PUBLIC HOUSING UNITS
AND RESOURCES ALLOCATED FOR THE
OPERATION AND UPKEEP
OF THE BEVERLY HOUSING AUTHORITY
JULY 1, 2003 TO JUNE 30, 2005**

**OFFICIAL AUDIT
REPORT
FEBRUARY 12, 2007**

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In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, we have conducted a statewide comprehensive audit of the physical conditions and the resources available to provide for the operation and upkeep of the state-aided public housing authorities of the Commonwealth. To accomplish our audit, we performed work at the Department of Housing and Community Development (DHCD) and obtained data from surveys and site visits to a selected representative cross-section of 66 Local Housing Authorities (LHAs) throughout the state. The Beverly Housing Authority was one of the LHAs selected to be reviewed for the period July 1, 2003 to June 30, 2005. A complete list of the LHAs visited and surveyed is provided in our statewide report No. 2005-5119-3A. Our on-site visits were conducted to follow up on survey data we obtained in order to: observe and evaluate the physical condition of the state-regulated LHAs, review policies and procedures over unit site inspections, determine whether LHA-managed properties were maintained in accordance with public health and safety standards, and review the state modernization funds awarded to determine whether such funds have been received and expended for the intended purpose. In addition, we reviewed the adequacy of the level of funding provided to each LHA for annual operating costs to maintain the exterior and interior of the buildings and housing units, as well as capital renovation infrastructure costs to maximize the public housing stock across the state, and determined whether land already owned by the LHAs could be utilized to build additional affordable housing units. We also determined the number of vacant units, vacancy turnaround time, and whether any units have been taken off line and are no longer available for occupancy by qualifying families or individuals in need of housing.

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1. RESULTS OF INSPECTIONS – NONCOMPLIANCE WITH STATE SANITARY CODE

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DHCD's Property Maintenance Guide, Chapter 3(F), requires that inspections of dwelling units be conducted annually and upon each vacancy to ensure that every dwelling unit conforms to minimum standards for safe, decent, and sanitary housing as set forth in Chapter II of the State Sanitary Code. Between October 25, 2005 and November 2, 2005, we inspected 15 of the 477 state-aided housing units managed by the Authority and noted 71 instances of noncompliance with Chapter II of the State Sanitary Code, including missing smoke detectors, broken glass windows, peeling paint on walls/ceilings, mold, mildew, trip hazards, fire hazards, and gas and water leaks. As discussed in Audit Result No. 2, DHCD has not provided the Authority with adequate modernization funding to correct these deficiencies.

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INTRODUCTION

Background

In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, we have conducted a statewide comprehensive audit of the physical conditions and the resources available to provide for the operation and upkeep of the state-aided public housing authorities of the Commonwealth. To accomplish our audit, we performed work at the Department of Housing and Community Development (DHCD) and obtained data from surveys and site visits to a selected representative cross-section of 66 Local Housing Authorities (LHAs) throughout the state. The Beverly Housing Authority was one of the LHAs selected to be reviewed for the period July 1, 2003 to June 30, 2005. A complete list of the LHAs visited and surveyed is provided in our statewide report No. 2005-5119-3A.

Our on-site visits were conducted to follow up on survey data we obtained in order to: observe and evaluate the physical condition of the state-regulated LHAs, review policies and procedures over unit site inspections, determine whether LHA-managed properties were maintained in accordance with public health and safety standards, and review the state modernization funds awarded to determine whether such funds have been received and expended for the intended purpose. In addition, we reviewed the adequacy of the level of funding provided to each LHA for annual operating costs to maintain the exterior and interior of the buildings and housing units, as well as the capital renovation infrastructure costs to maximize the public housing stock across the state, and determined whether land already owned by the LHAs could be utilized to build additional affordable housing units. We also determined the number of vacant units, vacancy turnaround time, and whether any units have been taken off line and are no longer available for occupancy by qualifying families or individuals in need of housing.

Audit Scope, Objectives, and Methodology

The scope of our audit included an evaluation of management controls over dwelling unit inspections, modernization funds, and maintenance plans. Our review of management controls included those of both the LHAs and DHCD. Our audit scope included an evaluation of the physical condition of the properties managed; the effect, if any, that a lack of reserves, operating and modernization funds, and maintenance and repair plans has on the physical condition of the LHAs'

state-aided housing units/projects; and the resulting effect on the LHAs' waiting lists, operating subsidies, and vacant units.

Our audit was conducted in accordance with applicable generally accepted government auditing standards for performance audits and, accordingly, included such audits tests and procedures as we considered necessary.

Our primary objective was to determine whether housing units were maintained in proper condition and in accordance with public health and safety standards (e.g., the State Sanitary Code, state and local building codes, fire codes, and Board of Health regulations), and whether adequate controls were in place and in effect over site-inspection procedures and records. Our objective was to determine whether the inspections conducted were complete, accurate, up-to-date, and in compliance with applicable laws, rules, and regulations. Further, we sought to determine whether management and DHCD were conducting follow-up actions based on the results of site inspections.

Second, we sought to determine whether individual LHAs were owed prior-year operating subsidies from DHCD, and whether the untimely receipt of operating subsidies from DHCD may have resulted in housing units not being maintained in proper condition.

Third, in instances where the physical interior/exterior of LHA-managed properties were found to be in a state of disrepair or deteriorating condition, we sought to determine whether an insufficient allocation of operating or modernization funds from DHCD contributed to the present conditions noted and the resulting effect, if any, on the LHA's waiting lists and vacant unit reoccupancy.

To conduct our audit, we first reviewed DHCD's policies and procedures to modernize state-aided LHAs, DHCD subsidy formulas, DHCD inspection standards and guidelines, and LHA responsibilities regarding vacant units.

Second, we sent questionnaires to each LHA in the Commonwealth requesting information on the:

- *Physical condition of its managed units/projects*
- *State program units in management*
- *Off-line units*
- *Waiting lists of applicants*

- *Listing of modernization projects that have been formally requested from DHCD within the last five years, for which funding was denied*
- *Amount of funds disbursed, if any, to house tenants in hotels/motels*
- *Availability of land to build affordable units*
- *Written plans in place to maintain, repair, and upgrade its existing units*
- *Frequency of conducting inspections of its units/projects*
- *Balances, if any, of subsidies owed to the LHA by DHCD*
- *Condition Assessment Reports (CARs) submitted to DHCD*
- *LHA concerns, if any, pertaining to DHCD's current modernization process*

The information provided by the LHAs was reviewed and evaluated to assist in the selection of LHAs to be visited as part of our statewide review.

Third, we reviewed the report entitled “Protecting the Commonwealth’s Investment – Securing the Future of State-Aided Public Housing.” The report, funded through the Harvard Housing Innovations Program by the Office of Government, Community and Public Affairs, in partnership with the Citizens Housing and Planning Association, assessed the Commonwealth’s portfolio of public housing, documented the state inventory capital needs, proposed strategies to aid in its preservation, and made recommendations regarding the level of funding and the administrative and statutory changes necessary to preserve state public housing.

Fourth, we attended the Joint Legislative Committee on Housing’s public hearings on March 7, 2005 and February 27, 2006 on the “State of State Public Housing;” interviewed officials from the LHAs, the Massachusetts Chapter of National Association of Housing and Redevelopment Officials, and DHCD; and reviewed various local media coverage regarding the condition of certain local public housing stock.

To determine whether state-aided programs were maintained in proper condition and safety standards, we (a) observed the physical condition of housing units/projects by conducting inspections of selected units/projects to ensure that the units and buildings met the necessary minimum standards set forth in the State Sanitary Code, (b) obtained and reviewed the LHAs’ policies and procedures relative to unit site inspections, and (c) made inquiries with the local Boards

of Health to determine whether any citations had been issued, and if so, the LHA's plans to address the cited deficiencies.

To determine whether the modernization funds received by the LHAs were being expended for the intended purposes and in compliance with laws, rules, and regulations, we obtained and reviewed the Quarterly Consolidated Capital Improvement Cost Reports, Contracts for Financial Assistance, and budget and construction contracts. In addition, we conducted inspections of the modernization work performed at each LHA to determine compliance with its work plan.

To determine whether LHAs were receiving operating subsidies in a timely manner, we analyzed each LHA subsidy account for operating subsidies earned and received and the period of time that the payments covered. In addition, we made inquiries with the LHA's Executive Director/fee accountant, as necessary. We compared the subsidy balance due the LHA per DHCD records to the subsidy data recorded by the LHA.

To assess controls over waiting lists, we determined the number of applicants on the waiting list for each state program and reviewed the waiting list for compliance with DHCD regulations.

To assess whether each LHA was adhering to DHCD procedures for preparing and filling vacant units in a timely manner, we performed selected tests to determine whether the LHA had uninhabitable units, the length of time the units were in this state of disrepair, and the actions taken by the LHA to renovate the units.

AUDIT RESULTS

1. RESULTS OF INSPECTIONS – NONCOMPLIANCE WITH STATE SANITARY CODE

The Department of Housing and Community Development (DHCD) Property Maintenance Guide, Chapter 3(F), requires that inspections of dwelling units be conducted annually and upon each vacancy to ensure that every dwelling unit conforms to minimum standards for safe, decent, and sanitary housing as set forth in Chapter II of the State Sanitary Code. For the fiscal year ended June 30, 2005, we reviewed inspection reports for 15 of 477 (including 19 Project 667-1 elderly units located at 66 Herrick Street) state-aided dwelling units at the Beverly Housing Authority. In addition, from October 25, 2005 through November 6, 2005, we conducted inspections of the 15 units located at 13 Bresnahan Street; 63 and 65 Herrick Street; 47, 61, and 68 Story Street (Family Development 200-1); and nine units at 66 Herrick Street, (Elderly Housing 667-1 development). We found the grounds and building exteriors to be in poor condition, and our inspections revealed 71 instances of noncompliance with Chapter II of the State Sanitary Code, including fire and trip hazards, roofs and floors in disrepair, holes in walls, broken glass windows, peeling paint, mold, mildew, and gas and water leaks. (Appendix I of our report summarizes the specific State Sanitary Code violations noted, and Appendix II includes photographs documenting the conditions found.)

The photographs presented in Appendix II illustrate the pressing need to address the conditions noted, since postponing the necessary improvements would require greater costs at a future date and may result in the properties not conforming to minimum standards for safe, decent, and sanitary housing.

The Authority's Elderly Housing 667-1 development located at 66 Herrick Street contains 19 units, of which only two were occupied. We observed deplorable living conditions at one of the occupied units (No. 7) and numerous instances of State Sanitary Code noncompliance at the other eight units we inspected in this building. Although we did not inspect the remaining 10 units, the Authority indicated that they are in similar condition. A brief history of this development and the Authority's efforts to correct the deficiencies follows.

In 1956, 20 one-bedroom apartments were developed at 66 Herrick Street. Two of these units were combined into a two-bedroom unit. Due to numerous structural problems and design limitations, these units became undesirable as rental units and, as a result, many local eligible

tenants have turned down residency at the Herrick Street units. The Authority has a current backlog of over 200 applicants for elderly housing, but only eight eligible applicants desire a single-bedroom unit.

The Authority proposed a Herrick Street Development Modernization Project to correct both the interior design of the units and the physical condition of the building. During calendar year 1998, in response to the Authority's proposal, DHCD authorized the Authority to convert two one-bedroom units into large two-bedroom elderly housing units. In calendar year 2000, the Authority solicited a Request for Proposals for real estate advisory services. The Authority received a proposal from and engaged RKG Associates, Inc., which in 2001 and 2003 submitted to DHCD and the Authority two reports entitled, "Market Study of the Beverly Housing Authority's Herrick Street Apartments." During calendar year 2003, DHCD authorized the Authority to designate Herrick Street "off line" due to extensive renovations needed and submitted to the Authority a "Draft Request for Architectural Services" for renovation design for comments. On February 18, 1999, \$1,100,000 in funding was approved for renovation work at 66 Herrick Street. However, DHCD subsequently faced budget problems and verbally informed the Authority that all capital improvement projects were being put on hold indefinitely. DHCD authorized the Authority to advertise and enter into a contract for architectural services during calendar year 2004. As of June 30, 2005, the concept design was 100% completed, but DHCD placed the design on hold pending issuance of a go-ahead for a schematic design.

The Executive Director noted that the average federal development modernization project takes only one year from initial request to final funding, in contrast to the corresponding state development/ modernization project, which takes at least five times longer to reach the funding stage. Moreover, the problems found in the federal annual inspections of rental units were few compared to the state housing developments because the level of federal funding is more adequate and timely.

On July 29, 2005, DHCD inspected the Authority's state-aided 667-1 Elderly Housing units at 66 Herrick Street. The inspection report observed, "This complex is vacant and closed for major renovation." The Authority has continued to rent two of the 19 units (one since 1997 and the other since 2001) to eligible tenants and has performed annual inspections of these units. In an August 5, 2005 unit inspection report, the Authority's maintenance staff gave unit No. 7 (see

Appendix for pictures taken during our inspection) a positive rating without any additional work orders or changes required. The Executive Director indicated that the Authority's maintenance staff wanted to comply with the annual site inspection policy, and the maintenance staff employee who performed the inspection may have considered the living conditions to be a problem caused by the tenant and not a correctable structural condition.

Recommendation

The Authority should apply for funding from DHCD to address the issues noted during our inspections of the interior (dwelling units) and exterior (buildings) of the Authority, as well as other issues that need to be addressed. Moreover, DHCD should obtain and provide sufficient funds to the Authority in a timely manner so that it may provide safe, decent, and sanitary housing for its tenants. Also, the Authority should transfer the two tenants who still reside at 66 Herrick Street to units that are in compliance with the requirements set forth in Chapter II of the State Sanitary Code, and take the building off line until DHCD funds the renovation of the project and all other renovations are completed in the off line units.

Auditee's Response

In its response, the Authority stated that it will make every effort to satisfy all of the recommendations mentioned in the audit report, and noted that it has been adversely impacted in its efforts to provide safe, decent, and affordable housing because of inadequate funding from the Commonwealth of Massachusetts.

2. MODERNIZATION INITIATIVES NOT FUNDED

In response to our questionnaires, the Authority informed us that there is a need for modernizing its managed properties. Specifically, the Authority provided the following information regarding capital modernization projects that have been formally requested from DHCD in Condition Assessment Reports, yet remained unfunded:

| <u>Date of Request</u> | <u>Description</u> | <u>Estimated Cost</u> |
|------------------------|---|-----------------------|
| September 13, 2001 | Kitchen/Bath Improvements - Kelleher Street | \$425,000* |
| September 13, 2001 | Window Replacement - Kelleher Street | \$125,000* |

| | | |
|--------------------|---|-----------|
| September 13, 2001 | Heating, Ventilation, and Hot Water Heaters - Cedar Street | \$120,000 |
| September 13, 2001 | Window Replacement - Roger Conant Apartments | \$200,000 |
| September 13, 2001 | Back-up Generator - Federal Street | \$50,000 |

DHCD has authorized these projects, and the Authority has arranged to meet with its architect to implement these requests.

In addition, the Authority informed us that the 200-1 and 200-2 Family Housing developments have leaking roofs and that three boilers in the 667-2 Elderly Housing development located at 45 Balch Street are 20 years old and in very poor condition (one had to be replaced in January 2005 under an emergency situation in which it failed and left 15 tenants without heat).

Deferring or denying needed modernization funding may result in further deteriorating conditions that could render the units and buildings uninhabitable. If the Authority does not receive funding to correct these conditions, (which have been reported to DHCD), additional emergency situations may occur, and the Authority's ability to provide safe, decent, and sanitary housing for its elderly and family tenants could be seriously compromised. Lastly, deferring the Authority's modernization needs into future years will only cost the Commonwealth's taxpayers additional money due to inflation, higher wages, and other related costs.

In June 2000, Harvard University awarded a grant to a partnership of the Boston and Cambridge Housing Authorities to undertake a study of state-aided family and elderly/disabled housing. The purpose of the study was to document the state's inventory of capital needs and to make recommendations regarding the level of funding and the administrative and statutory changes necessary to give Massachusetts local housing authorities the tools to preserve and improve this important resource. The report, "Protecting the Commonwealth's Investment - Securing the Future of State-Aided Public Housing," dated April 4, 2001, stated that "Preservation of existing housing is the fiscally prudent course of action at a time when Massachusetts faces an increased demand for affordable housing. While preservation will require additional funding, loss and replacement of the units would be much more expensive in both fiscal and human terms."

Recommendation

The Authority should continue to appeal to DHCD for the modernization funds needed to remedy these issues.

Auditee's Response

In its response, the Authority stated that it will make every effort to satisfy all of the recommendations mentioned in the audit report, and noted that it has been adversely impacted in its efforts to provide safe, decent, and affordable housing because of inadequate funding from the Commonwealth of Massachusetts.

3. OFFICIAL WRITTEN PROPERTY MAINTENANCE PLAN NOT ESTABLISHED

During our audit, we found that the Authority did not incorporate DHCD's Property Maintenance Guide into its policies and procedures. Specifically, we noted that the Authority did not have an official preventive maintenance plan to inspect, maintain, repair, and upgrade its existing housing units.

DHCD's Property Maintenance Guide states, in part:

The goal of good property maintenance at a public housing authority is to serve the residents by assuring that the homes in which they live are decent, safe and sanitary . . . every housing authority must have a preventive plan which deals with all the elements of its physical property and is strictly followed. . . .The basic foundation for your (LHA) maintenance program is your inspection effort . . . the basic goals of an inspection program are to improve the effectiveness and efficiency of your maintenance effort. This will be achieved when you (LHA) have a thorough program of inspections when you observe all parts of the (LHA's) physical property, document the results of the inspections thoroughly, and convert the findings into work orders so that the work effort can be scheduled and organized. Inspections are the systematic observation of conditions and provide the foundation for capital improvements and long range planning, as well as a record of present maintenance needs.

A preventive maintenance program would also:

- Assist in capital improvement planning by assessing the current and future modernization needs of the Authority,
- Enable the Authority to establish procedures to assist in its day-to-day operating activities to correct minor maintenance problems, and
- Schedule major repairs with the assistance of DHCD.

We recognize that a plan without adequate funds and resources is difficult, if not impossible, to implement. Nevertheless, without an official property maintenance program in place, the Authority cannot ensure that its managed properties are in decent, safe, and sanitary condition in accordance with the State Sanitary Code.

Recommendation

The Authority should comply with DHCD's Property Maintenance Guide by establishing an official preventive maintenance plan, and DHCD should obtain and provide the necessary funds and resources to ensure that this plan is enacted.

Auditee's Response

In its response, the Authority stated that it will make every effort to satisfy all of the recommendations mentioned in the audit report, and noted that it has been adversely impacted in its efforts to provide safe, decent, and affordable housing because of inadequate funding from the Commonwealth of Massachusetts.

SUPPLEMENTARY INFORMATION

1. Beverly Housing Authority-Managed State Properties

The Authority's state-aided housing developments, the number of units, and the year each development was built, is as follows:

| <u>Development</u> | <u>Number of Units</u> | <u>Year Built</u> |
|--------------------|------------------------|-------------------|
| 200-1 | 77 | 1948 |
| 200-2 | 40 | 1950 |
| 667-1 | 19 | 1956 |
| 667-2 | 26 | 1959 |
| 667-3 | 54 | 1960 |
| 667-4 | 50 | 1963 |
| 667-5 | 50 | 1965 |
| 667-6 | 47 | 1969 |
| 667-7 | 57 | 1980 |
| 667-8 | 42 | 1990 |
| 705-1 | <u>15</u> | 1990 |
| Total | <u>477</u> | |

2. Availability of Land to Build Affordable Housing Units

The Authority does not have any additional land available to build affordable units for state-aided housing.

APPENDIX I

State Sanitary Code Noncompliance Noted

200-1 Family Development

| <u>Location</u> | <u>Noncompliance</u> | <u>Regulation</u> |
|---|---|-------------------|
| 47 Story Street | Kitchen – chipped floor tiles cause trip hazards | 105 CMR 410.500 |
| | - The walls have cracks in plaster | 105 CMR 410.500 |
| | Bedroom – non-functioning smoke detector | 105 CMR 410.482 |
| | Building exterior – roof is not watertight and has bird nests | 105 CMR 410.500 |
| | - Siding/painting was peeling | 105 CMR 410.500 |
| | - Porch columns were peeling paint | 105 CMR 410.500 |
| | - Railings missing and steps cracked | 105 CMR 410.503 |
| 68 Story Street | - Sidewalks were cracked and pose trip hazard | 105 CMR 410.750 |
| | Entry doors - unsecured and in disrepair | 105 CMR 410.480 |
| | Living room – damaged floor | 105 CMR 410.500 |
| | - Torn window screens | 105 CMR 410.551 |
| | - Loose plaster and dampness on ceiling | 105 CMR 410.500 |
| | - Cracks in plaster walls | 105 CMR 410.500 |
| | Kitchen - loose plaster and dampness on ceiling | 105 CMR 410.500 |
| | - Cracks in plaster walls | 105 CMR 410.500 |
| | - Non-functioning refrigerator | 105 CMR 410.100 |
| | Bathroom – damaged floor | 105 CMR 410.500 |
| | - Peeling paint and dampness on ceiling | 105 CMR 410.500 |
| | - Wall missing dust board | 105 CMR 410.500 |
| | Building exterior – roof is not watertight | 105 CMR 410.500 |
| | - Product used to side building is rotting | 105 CMR 410.500 |
| - Porches were peeling paint and not properly lighted | 105 CMR 410.253 | |
| - Hand railings were rotting and unsafe | 105 CMR 410.503 | |
| - Yard area not maintained | 105 CMR 410.750 | |
| - Sidewalks cracked and heaved | 105 CMR 410.750 | |

| | | |
|---|---|-----------------|
| 13 Bresnahan Street | Living room - hole, loose plaster, and dampness on the ceiling | 105 CMR 410.500 |
| | Building exterior – roof is not watertight | 105 CMR 410.500 |
| 61 Story Street | Living room – hole in wall | 105 CMR 410.500 |
| | Bathroom – ceiling is peeling and has water damage | 105 CMR 410.500 |
| | Building exterior – roof is not watertight | 105 CMR 410.500 |
| | - Siding is decaying | 105 CMR 410.500 |
| | - Railings/stairs were unsafe and in disrepair | 105 CMR 410.503 |
| 63 Herrick Street | - Sidewalks were cracked and in disrepair | 105 CMR 410.750 |
| | Bathroom – walls have mold and loose grout | 105 CMR 410.500 |
| | Building exterior - yard not maintained | 105 CMR 410.750 |
| | - Sidewalks were cracked, heaved, and pose trip hazard | 105 CMR 410.750 |
| <u>667-1 Elderly Development</u> | | |
| 66 Herrick Street, #1 | Living room – hole in living room wall | 105 CMR 410.500 |
| | Bathroom - walls have deteriorated grout and loose fixtures | 105 CMR 410.500 |
| | Building exterior – paint is peeling | 105 CMR 410.500 |
| | - Yard is not maintained | 105 CMR 410.750 |
| | - Sidewalks are cracked, heaved, and pose a trip hazard | 105 CMR 410.750 |
| 66 Herrick Street, #7 | Living room – the floor was littered with tenant’s belongings | 105 CMR 410.750 |
| | - Walls were covered with tar and smoke | 105 CMR 410.500 |
| | - Window screens had holes | 105 CMR 410.551 |
| | - Ceiling had loose plaster, paint, and dampness | 105 CMR 410.500 |
| | Kitchen – the floor was littered with tenant’s belongings | 105 CMR 410.750 |
| | - Walls were covered with tar and smoke | 105 CMR 410.500 |
| | - Window screens had holes | 105 CMR 410.551 |
| | - Ceiling had loose plaster, paint, and dampness | 105 CMR 410.500 |
| | -Sink was filthy and did not have an impervious surface | 105 CMR 410.100 |
| | - Refrigerator was not operable | 105 CMR 410.100 |
| | - Cabinets and counter tops covered with smoke | 105 CMR 410.100 |
| | - Counter tops were used for storage and not fit for use | 105 CMR 410.100 |
| | Bathroom – the floor has loose tiles, posing a trip hazard | 105 CMR 410.500 |
| | - Walls were covered with smoke | 105 CMR 410.500 |
| | - Window screens had holes | 105 CMR 410.551 |

| | | |
|-------------------------------|---|------------------|
| | – Ceiling had loose plaster, paint, and dampness | 105 CMR 410.500 |
| | Sink was filthy and did not have an impervious surface | 105 CMR 410.100 |
| Bedroom | – the floor was littered with tenant’s belongings | 105 CMR 410.750 |
| | – Walls were covered with smoke | 105 CMR 410.500 |
| | – Window screens had holes | 105 CMR 410.551 |
| | – Ceiling had loose plaster, paint, and dampness | 105 CMR 410.500 |
| Hallway | – exit passages were blocked with tenant’s belongings | 105 CMR 410. 451 |
| Building exterior | – The roof not watertight | 105 CMR 410.500 |
| | –Painted trim was peeling | 105 CMR 410.500 |
| | – Yard was not maintained | 105 CMR 410.750 |
| | – Sidewalks cracked, heaved, and pose a trip hazard | 105 CMR 410.750 |
| 66 Herrick Street, #9 | | |
| | Kitchen – The floor was in disrepair and had trip hazards | 105 CMR 410.500 |
| | – Sink was missing | 105 CMR 410.100 |
| | – Sink was not connected to hot and cold water | 105 CMR 410.350 |
| 66 Herrick St. Boiler Room | | |
| | Gas lines improperly repaired | 105 CMR 410.500 |

APPENDIX II

Photographs of Conditions Found

667-1 Elderly Development: Kitchen Sink Missing



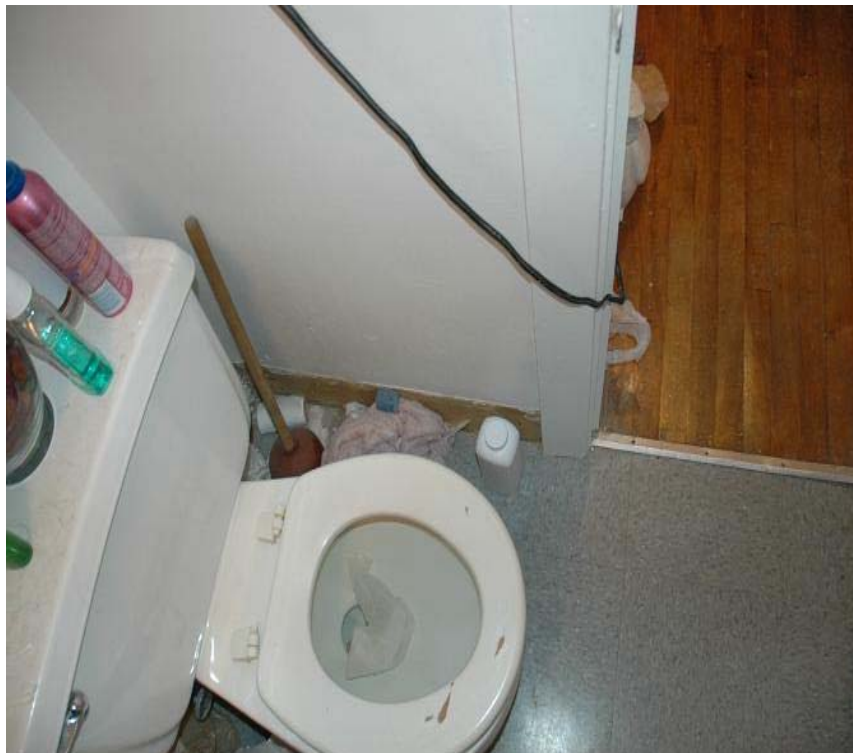
667-1 Elderly Development: Gas Lines Improperly Repaired



200-1 Development, 68 Story Street: Loose Plaster and Dampness on Kitchen Ceiling



200-1 Development, 68 Story Street: Bathroom Wall Missing Dust Board



**200-1 Development, 13 Bresnahan Street: Living Room Ceiling Has Hole From Leak,
Loose Plaster and Dampness**



200-1-Development, 61 Story Street: Siding is Decaying



200-1 Development, 66 Herrick Street: Bathroom Walls Have Mold And Loose Grout



667-1 Development, 66 Herrick Street, #7: Living Room Floor Littered with Tenant's Belongings



667-1 Development, 66 Herrick St. #7: Kitchen Floor Littered with Tenant's Belongings

