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NO. 2006-0621-3A

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 BROCKTON HOUSING AUTHORITY JULY 1, 2003 TO JUNE 30, 2005

> OFFICIAL AUDIT REPORT MAY 7, 2007

#### TABLE OF CONTENTS/EXECUTIVE SUMMARY

#### INTRODUCTION

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 Brockton 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 their 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. In its response, the Authority indicated that it agreed with the issues contained in our report. In addition, the Authority stated that two grants were awarded from DHCD for some of its capital improvement needs.

#### AUDIT RESULTS

5 5

1

#### 1. RESULTS OF INSPECTIONS – NONCOMPLIANCE WITH STATE SANITARY CODE

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. On April 3 and 4, 2006, we inspected 24 of the 745 state-aided housing units managed by the Authority and noted 121 instances of noncompliance with Chapter II of the State Sanitary Code, including windows not working properly, lifting and broken asbestos floor tiles, inadequate electrical systems, cracked and broken pavement, extensive siding and roof problems, serious mold problems, peeling and flaking lead paint, a serious mold problem, and other health and safety hazards.

i

#### 2. UNINHABITABLE UNITS IN NEED OF RENOVATION

As of April 18, 2006, the Brockton Board of Health had condemned 11 units at the Authority's 200-2 Family Housing Washburn Heights development as being unfit for human habitation due to serious structural deterioration and mold. These units need extensive renovation in order to be safe for reoccupancy.

#### 3. MODERNIZATION INITIATIVES NOT FUNDED

In response to our questionnaires, the Authority indicated that on September 24, 2001 it requested from DHCD state modernization funding for capital modernization projects for its state-aided properties. However, these requests have not been funded by DHCD. Deferring or denying the Authority's modernization needs will result in further deteriorating conditions that could render the units and buildings uninhabitable. Moreover, 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.

## 4. AVAILABILITY OF LAND TO BUILD AFFORDABLE HOUSING UNITS

During our audit, we found that the Authority owns approximately two acres of land located at North Main and Clifford Streets on which it could potentially build affordable housing. Since the Authority has over 200 applicants on its waiting list, it should apply for funding from DHCD to determine whether additional housing can be built at this location.

SUPPLEMENTARY INFORMATION	9
APPENDIX I	10
State Sanitary Code Noncompliance Noted	10
APPENDIX II	19
Photographs of Conditions Found	19

ii

6

6

8

#### 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 Brockton 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 Authority-managed properties are 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 their intended purpose. In addition, we reviewed the adequacy of the level of funding provided to LHAs 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, 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 the 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 LHAs' 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's 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 the 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 LHAs' 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 the 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's (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 24 of the 745 state-aided dwelling units managed by the Brockton Housing Authority. In addition, on April 3 and 4, 2006, we conducted inspections of these units, located at the Authority's Rainbow Terrace (Elderly Housing 667-1), Kennedy Drive (Elderly Housing 667-2), Belair Towers (Elderly Housing 667-3), Walnut/Turner (Family Housing 705-1), Golden Circle (Family Housing 705-1), and Washburn Heights (Family Housing 200-2). Our inspection noted 121 instances of noncompliance with Chapter II of the State Sanitary Code, including windows not working properly, lifting and broken asbestos floor tiles, inadequate electrical systems, cracked and broken pavement, extensive siding and roof problems, peeling and flaking lead paint, a serious mold problem, and other health and safety hazards. (Appendix I of our report summarizes the specific State Sanitary Code violations noted, and Appendix II includes photographs illustrating 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.

#### 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 any 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.

5

#### 2. UNINHABITABLE UNITS IN NEED OF RENOVATION

As of April 18, 2006, the Brockton Board of Health had condemned 11 units at the Authority's 200-2 Family Housing Washburn Heights development as being unfit for human habitation due to serious structural deterioration and mold. These units, which were built in 1951 and occupied in 1950, need extensive renovation in order to be safe for reoccupancy. The Authority continues to lose tenant rental income as long as these units remain uninhabitable. These 11 units need to be repaired and brought back on line as soon as possible to provide needed housing, as the Authority's Family Program waiting list includes over 200 applicants. Also, as noted in Audit Result No. 3, on September 24, 2001 the Authority requested modernization funding from DHCD to replace kitchens and bathrooms in the units. However, DHCD has not responded to this request. Deferring the needed renovations into future years will cost the Commonwealth's taxpayers additional money due to inflation and greater labor costs. In response to our Comprehensive Report on the Physical Condition of and Resources Allocated for the Operation and Upkeep of the State-Aided Public Housing in the Commonwealth of Massachusetts (Audit No. 2005-5119-3A) DHCD informed us that:

It was not until May, 2006, that the Board of Health sent the Brockton Housing Authority a letter fully articulating the nature of the violations in clear, unambiguous terms. In response, DHCD is assisting the Brockton Housing Authority in completing some repairs with in-house staff and in the preparation of three different capital improvement projects.

#### Recommendation

The Authority should apply for funding from DHCD to provide the necessary modernization funds to facilitate the needed renovations.

#### 3. 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 had been formally requested from DHCD on September 24, 2001, yet remained unfunded:

6

Development	Description	Estimated Cost
200-2 Family Housing		
Washburn Heights	Replace kitchens and	\$7,000,000
	bathrooms, repave parking	
	lots and roads	
Elderly Housing		
667-3, Belair Towers	Replace windows and doors	\$2,000,000
668-1A, 2, Rainbow and	Replace kitchens, bathrooms,	\$750 <b>,</b> 000
Kennedy	and intercoms	
667-4, Crosby Gardens	Replace sub-floors and carpets	\$50,000
Congregate	Replace boilers	\$20,000

The above conditions are mainly the result of aging, use, and wear and tear and, as illustrated by the photographs included in Appendix II, may pose a safety hazard to tenants. DHCD has not responded to these requests.

Deferring or denying the Authority's modernization needs may result in further deteriorating conditions that could render the units and buildings uninhabitable. Moreover, 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 will be seriously compromised. Lastly, deferring the modernization needs into future years will 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 local Massachusetts 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 more expensive in both fiscal and human terms."

#### Recommendation

The Authority should continue to appeal to DHCD to provide the necessary modernization funds to remedy these issues in a timely manner.

## 4. AVAILABILITY OF LAND TO BUILD AFFORDABLE HOUSING UNITS

During our audit, we found that the Authority owns approximately two acres of land on which it could potentially build affordable housing units at its Washburn Heights 200-2 Family development site located at North Main and Clifford Streets. The need for additional housing at the Authority is justified, given that there are over 200 applicants on the Authority's waiting list in need of affordable housing.

Without affordable housing, substantial costs may be incurred by the Commonwealth's social service programs and assistance organizations where displaced individuals turn for help. The lack of safe, decent, and affordable housing may result in families living in substandard housing, living in temporary shelters or motels, or becoming homeless. The need for affordable housing is especially critical for the elderly, where fixed incomes and special needs limit their housing options.

#### Recommendation

The Authority should apply to DHCD for the development funds needed to construct sufficient affordable housing units to meet the current demand.

#### Auditee's Response

In response to the issues contained in our report, the Authority stated, in part:

Since the Independent [Statewide] Report was issued, two grants were awarded to the Brockton Housing Authority by the department. The first award is for nearly threequarters of a million dollars for the deleading and replacement of trim, encapsulation of porch columns, replacement of gutters and fascia boards, re-shingling of porch roofs, general carpentry repairs and complete window replacement for the Washburn Heights development. Another one million two hundred twenty-five thousand dollars has been pledged to correct deficiencies in the eleven family housing units condemned by the Brockton Board of Health. Our agency will continue to work with the department to address all outstanding deficiencies in the development for all of the housing units.

## SUPPLEMENTARY INFORMATION

## Brockton 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:

Development	Number of Units	Year Built
200-1	102	1949
200-2	50	1951
667-1	64	1957
667-2	120	1962
667-3	269	1973
667-4	74	1982
667-5	23	1960
705-1	18	1982
705-2	19	1990
705-3	<u>6</u>	2001
Total	<u>745</u>	

# APPENDIX I

## State Sanitary Code Noncompliance Noted

# 667-1 Elderly Housing Development, Rainbow Terrace

Location	Noncompliance	<b>Regulation</b>
21 Malvern Road	Bathroom – sink stopper mechanism and cold water faucet are broken	105 CMR 410.351
	Bathroom - broken toilet seat	105 CMR 410.150
21A Malvern Road	Kitchen – hot water faucet is broken	105 CMR 410.351
	Kitchen - countertop laminate is lifting	105 CMR 410.100
	Bathroom – sink stopper mechanism is broken	105 CMR 410.350
	Common area – clutter is obstructing egress	105 CMR 410.451
Building	Floor tiles, heating, and water pipes are covered with asbestos	105 CMR 410.353
76 Hawley Street	Living room – missing floor tiles	105 CMR 410.504
	Kitchen – missing floor tiles	105 CMR 410.504
	Bathroom – broken sink stopper mechanism	105 CMR 410.350
<u>667-2 Elderly Housi</u> Kennedy Drive	ng Development	
Kennedy Drive		
Location	<u>Noncompliance</u>	<b>Regulation</b>
8 Kennedy Drive	Building exterior – siding is missing from fascia	105 CMR 410.500
36A Kennedy Drive	Kitchen – leaking faucet	105 CMR 410.351

73A Kennedy Drive Kitchen – wood under the laminated countertop is decaying		105 CMR 410.100
	Common area – broken and missing floor tiles	105 CMR 410.504

# 667-3 Elderly Housing Development Belair Towers

Location	Noncompliance	<b>Regulation</b>
Unit # 115	Living room – sliding door to porch is broken	105 CMR 410.500
	Living room – screen is damaged	105 CMR 410.552
	Living room – window seal is gone	105 CMR 410.501
	Living room – concrete reinforcements adjacent to patio are exposed, poor concrete integrity	105 CMR 410.500
	Common area just outside unit – damage to wall corner bead	105 CMR 410.500
Unit # 216	Living room – sliding door is broken	105 CMR 410.500
	Common area just outside unit – the rug is lifting from the floor, causing a trip hazard	105 CMR 410.504
Unit # 1026	Bedroom – ceiling tiles are water stained	105 CMR 410.500
	Bedroom – sliding door does not prevent rain and snow from entering room	105 CMR 410.501
Building	Basement – the passageway for the metal dumpsters and the electrical junction boxes is too narrow. The dumpsters previously collided with and damaged the junction boxes. Also, the potential for a serious, possibly life-threatening, electrical injury exists for workers handling the dumpsters if the latter should come in contact with the junction boxes. The accidental completion of the circuit that may result could then cause a malfunction of the building's entire electrical system, necessitating an upgrade to code of the whole system.	105 CMR 410.750

# 705-1 Family Housing Development Scattered Site

Location	Noncompliance	<b>Regulation</b>
14 Crowell Street	Living room – tenant drilled a hole in window frame to run some illegal wiring	105 CMR 410.352
	Bedroom – nonfunctioning smoke detector	105 CMR 410.482
	Common area – tenant is storing personal possessions on the stairs between the second and third floors, blocking exit and presenting a trip hazard	105 CMR 410.451
	Building exterior – roof shingles are broken and missing, original roof over 20 years old	105 CMR 410.500
	Building exterior – rotting siding, window trim, and window sill	105 CMR 410.500
50 Walnut Street	Common area – tenant possessions are blocking front door egress	105 CMR 410.451
	Building exterior – roof shingles are broken and missing, original roof over 20 years old	105 CMR 410.500
	Building exterior – rotting siding, window trim, and window sills	105 CMR 410.500
56 Walnut Street	Bathroom – broken floor tiles	105 CMR 410.504
	Building exterior – roof shingles are broken and missing, original roof over 20 years old	105 CMR 410.500
	Building exterior – rotting siding, window trim, and window sills	105 CMR 410.500

CMR 410.551
CMR 410.451
CMR 410.351
CMR 410.351
CMR 410.352
CMR 410.500
CMR 410.500
CMR 410.500
CMR 410.482
CMR 410.351
CMR 410.351
CMR 410.480
CMR 410.750
CMR 410.750
CMR 410.750
CMR 410.100
CMR 410.750
CMR 410.750
CMR 410.750

18 Golden Circle	Bathroom – water damage near tub	105 CMR 410.500
	Bathroom – ceiling has water damage	105 CMR 410.500
	Living room – water damage on ceiling	105 CMR 410.500
	Kitchen – faucet loose and not secured, low water pressure	105 CMR 410.351
	Kitchen – missing and damaged island cabinet doors	105 CMR 410.100
	Common area – tenant possessions are blocking stairs to the second floor	105 CMR 410.451
	Outside area – cracked asphalt on sidewalks, causing trip hazard	105 CMR 410.750
19 Golden Circle	Bedroom #1 – loose electrical wiring from power source	105 CMR 410.750
	to an appliance	105 CIVIN 410.750
	<b>o</b> 1	105 CMR 410.750
	to an appliance	
	to an appliance Living room – storm door closer is missing	105 CMR 410.500
	to an appliance Living room – storm door closer is missing Bathroom – mold on ceiling and walls Kitchen – countertops and backsplashes are cracked	105 CMR 410.500 105 CMR 410.750
	to an appliance Living room – storm door closer is missing Bathroom – mold on ceiling and walls Kitchen – countertops and backsplashes are cracked and broken	105 CMR 410.500 105 CMR 410.750 105 CMR 410.100
	to an appliance Living room – storm door closer is missing Bathroom – mold on ceiling and walls Kitchen – countertops and backsplashes are cracked and broken Unit – broken electrical heating baseboards Common area – tenant possessions are blocking stairs	105 CMR 410.500 105 CMR 410.750 105 CMR 410.100 105 CMR 410.200

## 200-2 Family Housing Development Washburn Heights

Location	Noncompliance	<b>Regulation</b>
32 Clifford Ave.	Unit – damage on walls	105 CMR 410.500
(Note: The Board of Health shut down this unit).	Cellar – mold on walls	105 CMR 410.750
	Cellar – crumbling foundation	105 CMR 410.500
	Living room – windows have mold	105 CMR 410.750
	Living room – thermal seals are broken	105 CMR 410.501
	Living room – broken smoke detector	105 CMR 410.482
	Kitchen – windows have mold	105 CMR 410.750
	Kitchen – thermal seals are broken	105 CMR 410.501
	Bathroom – windows have mold	105 CMR 410.750
	Bathroom – thermal seals are broken	105 CMR 410.501
	Bathroom – toilet and waste line are broken	105 CMR 410.300
	Building exterior – roof has broken and missing shingles; broken flashing, roof vents, soffits, gutters, and downspouts	105 CMR 410.500
	Building exterior – chimney needs repair	105 CMR 410.500
	Building exterior – brick siding needs repointing, rotting fascia and window trim, peeling and chipping paint	105 CMR 410.500
	Building exterior – porches/stairs have a broken light fixture	105 CMR 410.253
	Building exterior – there is only a 60 amp electrical system	105 CMR 410.255

	Cellar – water damaged beams, corroded pipes in need of replacement	105 CMR 410.500
34 1/2 Clifford Ave.	Living room – mold on wall	105 CMR 410.750
(Note: The Board of Health shut down this unit.)	Living room – mold on windows	105 CMR 410.750
	Kitchen – mold on wall	105 CMR 410.750
	Kitchen – mold on windows	105 CMR 410.750
	Bathroom – mold on wall	105 CMR 410.750
	Bathroom - mold on windows	105 CMR 410.750
	Bedroom #1 – walls are damaged	105 CMR 410.500
	Bedroom #2 – walls are damaged	105 CMR 410.500
	Unit – original pipes corroded and in need of replacement, waste lines are damaged and blocked	105 CMR 410.300
	Unit – a sign has been set in the front entrance stating that the Board of Health declared the unit unfit for human habitation	105 CMR 410.831
	Building exterior – roof has broken and missing shingles; broken flashing, roof vents, soffits, gutters, and down spouts	105 CMR 410.500
	Building exterior – chimney needs repair	105 CMR 410.500
	Building exterior – brick siding needs repointing, rotting fascia and window trim, peeling and chipping paint	105 CMR 410.500

38 Clifford Avenue	Living room – mold on walls and windows	105 CMR 410.750
(Note: The Board of Health closed down this unit.)	Kitchen – mold on walls and windows	105 CMR 410.750
	Bathroom – mold on walls and windows	105 CMR 410.750
	Bedroom #1 – damage to walls and windows	105 CMR 410.500
	Bedroom #2 – damage to walls and windows	105 CMR 410.500
	Bedroom #3 – damage to walls and windows	105 CMR 410.500
	Building exterior – roof has broken and missing shingles; broken flashing, roof vents, soffits, gutters, and down spouts	105 CMR 410.500
	Building exterior – chimney needs repair	105 CMR 410.500
	Building exterior – brick siding needs repointing, rotting fascia and window trim	105 CMR 410.500
	Building exterior – post supporting the roof overhang has pulled away from its base and is rotting, concrete is deteriorating, hand railing missing	105 CMR 410.503
	Building exterior – crumbling concrete front	105 CMR 410.500
	Unit – original pipes are corroded and in need of replacement, waste lines are damaged and blocked	105 CMR 410.300

44	1/2	Clifford	Ave.
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Bedroom #1 – holes in wall	105 CMR 410.500
Bedroom #1 – broken door	105 CMR 410.500
Bedroom #2 – holes in wall	105 CMR 410.500
Bedroom #3 – holes in wall	105 CMR 410.500
Living room – mold on walls and windows	105 CMR 410.750
Kitchen – mold on walls and windows	105 CMR 410.750
Bathroom – mold on walls and windows	105 CMR 410.750
Bathroom – missing wall tiles	105 CMR 410.500
Bathroom – broken toilet	105 CMR 410.150
Building exterior - brick siding needs repointing, rotting fascia and window trim, peeling and chipping paint	105 CMR 410.500
Unit – original pipes are corroded and in need of replacement, waste lines damaged and blocked	105 CMR 410.300

## APPENDIX II

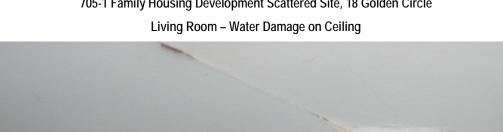
#### Photographs of Conditions Found

200-2 Family Housing Development, Washburn Heights, 32 Clifford Avenue Cellar – Crumbling Foundation



200-2 Family Housing Development, Washburn Heights, 32 Clifford Avenue Cellar – Water-Damaged Beams, Corroded Pipes in Need of Replacement

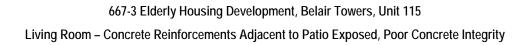




705-1 Family Housing Development Scattered Site, 18 Golden Circle

705-1 Family Housing Development Scattered Site, 14 Golden Circle Utility Room - Mold on Ceiling and Walls







200-2 Family Housing Development, Washburn Heights, 34 ½ Clifford Avenue –Board of Health Warning That Unit Is Unfit for Human Habitation



200-2 Family Development, Washburn Heights, 38 Clifford Avenue, Building Exterior – Post Supporting the Roof Overhang Has Pulled Away from Its Base and Is Rotting, Concrete Deteriorating, Hand Railing Missing



200-2 Family Development, Washburn Heights, 38 Clifford Avenue Building Exterior – Crumbling Concrete Front





200-2 Family Housing Development, Washburn Heights, 32 Clifford Avenue

Cellar – Crumbling Foundation

705-1 Family Housing Development Scattered Site, 19 Golden Circle Unit – Broken Electrical Heating Baseboards

