



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 TO
PROVIDE FOR THE OPERATION AND UPKEEP
OF THE WALTHAM HOUSING AUTHORITY
JULY 1, 2004 THROUGH SEPTEMBER 30, 2006**

**OFFICIAL AUDIT
REPORT
APRIL 12, 2007**

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In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, and at the request of certain members of the General Court, we have conducted a comprehensive audit of the physical conditions and the resources available to provide for the operation and upkeep of the Waltham Housing Authority for the period July 1, 2004 through September 30, 2006. Our on-site visit was conducted to observe and evaluate the physical condition of the Authority, review policies and procedures over unit site inspections, determine whether Authority-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 in a timely manner and expended for their intended purpose. We compared DHCD and Authority records to determine the status of operating subsidies earned, received, and outstanding. In addition, we reviewed the adequacy of the level of funding provided to the Authority 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 at the Authority, and determined whether land already owned by the Authority 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 RESULTS

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1. RESULTS OF INSPECTIONS - NONCOMPLIANCE WITH STATE SANITARY CODE

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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. On October 26 and 31, November 22 and 30, and December 8, 2006, we inspected 16 of the 516 state-aided housing units managed by the Authority and noted 34 instances of noncompliance with Chapter II of the State Sanitary Code, including ceilings in need of repair, mold in bedrooms, and chipped and broken tiles. (See Appendices I and II). In its response, the Authority indicated that if any Sanitary Code violations are identified, the Authority will attempt to mitigate these deficiencies, but very often the remedies are temporary and/or beyond the financial ability of the Authority to address without the assistance of DHCD.

2. VACANT UNITS NOT REOCCUPIED WITHIN DHCD GUIDELINES

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DHCD's Property Maintenance Guide indicates that housing authorities should reoccupy units within 21 working days of their being vacated by a tenant. However, our review found that during the audit period, the Authority's average turnaround time for vacant units was over 21 working days, and that it took an average of 120 days to refurbish units. Moreover, we found that as of September 30, 2006, there were 61 vacancies and 1,509 applicants on the Authority's waiting list. The Authority indicated that although it

has 16 maintenance positions available, only 14 have been filled due to a lack of funding. We also found that there were 57 off-line units at the Authority's Prospect Terrace (200-1) Family development. These units were left vacant so that tenants could move in temporarily while their units were being renovated. In addition, there were 37 off-line units at the Authority's Chesterbrook Gardens development, in anticipation of renovations to be done at those units. As of February 2007, the Authority was in the bidding process for the Chesterbrook Gardens renovations. In its response, the Authority indicated that most of these vacant units require significant renovations.

3. MODERNIZATION INITIATIVES NOT FUNDED**7**

Our prior audit (No. 2004-0801-3A) reported 173 health code violations made by the local Board of Health at the Authority's Prospect Terrace (200-1 Family development). The Authority stated that it had made all the required repairs and was working with DHCD regarding the implementation of effective maintenance plans. According to the Executive Director, the Authority has sought funding since 1996 to improve conditions at Prospect Terrace and other state housing projects. Bond authorizations (through the Commonwealth of Massachusetts) totaling approximately \$14 million were approved in 1998 and 2001. As of the inception of our fieldwork on October 26, 2006, the Authority had received an award for \$7 million from DHCD for a kitchen and bathroom project at the Prospect Terrace (200-1) Family development. The scope of the project includes walls, floors, ceilings, plumbing, tubs, sinks, toilets, new electrical boxes, and smoke detectors. The bond authorization also included amounts for Beaverbrook (Grove Street, 667-2 Elderly development). However, funding has yet to be approved. In June 2003, the Authority sought permission from DHCD to use its own operating reserve to make the repairs; however, DHCD determined that the operating reserve funds would be better utilized on the Prospect Terrace kitchen and bathroom project. Conditions at Beaverbrook have continued to deteriorate, posing a safety hazard. In August 2006, several residents at Beaverbrook complained about the hazardous conditions of the sidewalks. A DHCD inspector examined the site and determined that the walkways needed emergency repairs. DHCD awarded the Authority \$11,000 in emergency funds to patch the sidewalks. In addition, the Authority made emergency repairs at various Family and Elderly developments that were also funded by DHCD. In its response, the Authority indicated that, by the time money is available to replace an overdue critical system or element, many others have failed or are in danger of failing.

4. STATUS OF OPERATING SUBSIDIES EARNED, RECEIVED, AND OUTSTANDING**9**

The Contract for Financial Assistance between the Authority and DHCD requires DHCD to subsidize the Authority to meet its expenses. Our review of the Authority's operating subsidy accounts indicated that a balance of \$392,712 was due from DHCD as of September 30, 2006 (\$337,922 was owed for fiscal year 2005 and \$54,790 was owed for fiscal year 2006). We noted that the Authority received a subsidy payment from DHCD of \$250,000 in January 2007, leaving a balance of \$142,712. By not receiving the subsidies owed on a timely basis, the Authority may deplete its cash reserves and may not meet its obligations in a timely manner. The Authority, in its response, agrees that timely payments of subsidies are necessary.

5. REIMBURSEMENT OF FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA) FUNDS FROM THE STATE'S GENERAL FUND	10
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Due to heavy flooding between May 12 and 26, 2006 that caused damage to 12 units at the Authority's Beaverbrook Apartments (667-2 Elderly development) and Chesterbrook Apartments (200-2 Family development), the Authority applied for emergency funding from the Federal Emergency Management Agency (FEMA). FEMA representatives came to Waltham, inspected the sites, and approved emergency funding in the amount of \$6,714. FEMA remitted this amount to the Massachusetts Emergency Management Agency, which was directed by the Executive Office for Administration and Finance to forward the funds to the state's General Fund. As of January 17, 2007, the Authority had not received these funds. In its response, the Authority indicated that the status of the outstanding funds is unknown.

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INTRODUCTION

Background

In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, and at the request of Senator Susan C. Fargo, Representative Thomas M. Stanley, and Representative Peter J. Koutoujian, we have conducted a comprehensive audit of the physical conditions and the resources available to provide for the operation and upkeep of the Waltham Housing Authority. The period reviewed was July 1, 2004 through September 30, 2006.

Our on-site visit was conducted to follow up on survey data we obtained in order to: observe and evaluate the physical condition of the Authority, review policies and procedures over unit site inspections, determine whether Authority-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 in a timely manner and expended for their intended purpose. In addition, we reviewed the adequacy of the level of funding provided to the Authority 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 at the Authority, and determined whether land already owned by the Authority 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 Authority 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 Authority's state-aided housing units/projects; and the resulting effect on the Authority's 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 Authority was 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 the Authority-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 Authority's waiting lists and vacant unit reoccupancy.

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

At the commencement of our audit engagement, we provided a questionnaire to Authority management 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*
- *Authority concerns, if any, pertaining to DHCD's current modernization process*

To determine whether the Authority's 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 Authority's policies and procedures relative to unit site inspections, and (c) made inquiries with the Authority to determine whether any citations had been issued by the local Board of Health, and if so, the Authority's plans to address any reported deficiencies.

To determine whether the modernization funds received by the Authority 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 the Authority to determine compliance with its work plan.

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

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

To assess whether the Authority was adhering to DHCD procedures for preparing and filling vacant units in a timely manner, we performed selected tests to determine whether the Authority had uninhabitable units, the length of time the units were in this state of disrepair, and the actions taken by the Authority 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 the minimum standards for safe, decent, and sanitary housing as set forth in Chapter II of the State Sanitary Code. Our review noted that the Waltham Housing Authority does conduct annual dwelling site inspections in accordance with DHCD guidelines.

We reviewed inspection reports for six of the Authority's 516 state-aided housing units prepared during the period covered by our audit in order to ascertain that these inspections were being performed according to the State Sanitary Code. In addition, on October 26 and 31, November 22 and 30, and December 8, 2006, we conducted inspections of 16 of the 516 state-aided dwelling units at the following locations:

- Beaverbrook Apartments (667-2 Elderly development)
- Prospect Terrace (200-1 Family development)
- Carey Court (667-1 Elderly development)
- Chesterbrook Gardens (200-2 Family development)
- Dana Court (200-3 Family development)
- Walen Apartments (667-4 Elderly development)

Our inspection noted 34 instances of noncompliance with Chapter II of the State Sanitary Code, including ceilings in need of repair, mold in bedrooms, rotted window frames, cracked retaining walls, and broken and water-damaged floor tiles. (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.

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.

Auditee's Response

Please note that if any sanitary code violations are identified the Authority will immediately attempt to mitigate those deficiencies, using its own workforce or outside contractors. Very often mitigation remedies are temporary and/or require substantial (expensive) corrective action that is beyond the financial ability of the Authority to address without the assistance of DHCD. The Authority regularly applied for emergency funds from DHCD to correct these problems. However, this process can be extremely lengthy. As an example, a leaking roof at Development 667-8 required emergency remediation. It took over a year to go through the process of arranging emergency funding and development of construction documents. To temporarily solve the problem it was necessary to expend \$4,500 to patch the roof. This is a typical scenario. It amounts to capital improvements by crisis, which is a disservice to our residents, the Authority and ultimately the taxpayers who will pay for the final repair after repeated costly temporary fixes.

2. VACANT UNITS NOT REOCCUPIED WITHIN DHCD GUIDELINES

DHCD's Property Maintenance Guide indicates that housing authorities should reoccupy units within 21 working days of their being vacated by a tenant. However, our review found that during the period July 1, 2004 through September 30, 2006, the Authority's average turnaround time for reoccupying vacant units was over 21 working days, and that it took an average of 120 days to refurbish units, not including off-line units. Moreover, we found that as of September 30, 2006 there were 61 vacant units and 1,509 applicants on the Authority's waiting list. We also found that there were 57 off-line units at the Authority's Prospect Terrace (200-1) Family development. These units were left vacant so that tenants could move in temporarily while their units were being renovated. In addition, there were 37 off-line units at the Authority's Chesterbrook Gardens development in anticipation of renovations to be done at those units. As of February 2007, the Authority was in the bidding process for the Chesterbrook Gardens renovations.

By not ensuring that vacant units are reoccupied within DHCD's guidelines, the Authority may have lost the opportunity to earn potential rental income net of maintenance and repair costs

and may have lost the opportunity, at least temporarily, to provide needy citizens with subsidized housing. The Authority indicated that it has only filled 14 of its 16 maintenance positions due to a lack of state funding, and that if it could hire one full-time maintenance mechanic, unit turnaround time would be reduced and preventative maintenance and repairs of units could be expedited.

Recommendation

The Authority should endeavor to secure the necessary funding from DHCD to fill its maintenance positions to ensure that vacant units are refurbished and reoccupied within DHCD's timeframe. DHCD should obtain and provide the Authority with the funds necessary to fulfill their respective statutory mandate.

Auditee's Response

The DHCD guidelines indicate 21 working days for return of a vacant unit to reoccupancy. This guideline might be appropriate for units that require little if any repair in addition to painting and final cleaning. However, most if not all of the State units being turned over require significant renovation, rather than routine maintenance of normal wear and tear. Total replacement of floors, antiquated fixtures, and other items are work that should be done as part of ongoing capital improvement programs, are being done piecemeal as a "normal" maintenance activity. Furthermore, with a reduced maintenance staff and a reduced financial ability to use private contractors the turnover time of units will be increased.

Vacant units were left vacant at Prospect Terrace and Chesterbrook Garden Family Developments for the express reason of ultimately conserving resources. It did not make sense to spend thousands of dollars and vast amounts of time to practically rehab units, which would then be completely renovated in the kitchen and bathroom modernization projects currently underway.

3. MODERNIZATION INITIATIVES NOT FUNDED

Our prior audit (No. 2004-0801-3A) reported 173 health code violations made by the local Board of Health in August 2004 at the Authority's Prospect Terrace (200-1 Family development). The Authority stated that it had made all the required repairs and was working with DHCD regarding the implementation of effective maintenance plans. According to the Executive Director, the Authority has sought funding since 1996 to improve conditions at Prospect Terrace, Orange Street, Grove Street, South Street, and other state developments. Bond authorizations (through the Commonwealth of Massachusetts) totaling approximately \$14 million were approved in 1998 and 2001, principally for kitchen and bathroom renovations, but funding was delayed. However, as of the inception of our fieldwork on October 26, 2006, the

Authority had received an award for \$7 million from DHCD for a kitchen and bathroom project at Prospect Terrace (200-1 Family development). The Authority executed a construction contract for \$6,939,000, and work began on August 14, 2006. Funds received as of January 17, 2007 amount to \$428,364 and have been used to pay for architectural drawings and to prepare vacant apartments in order to house tenants while their own units are being renovated. The scope of the project includes walls, floors, ceilings, plumbing, tubs, sinks, toilets, new electrical boxes, and smoke detectors. Another kitchen and bathroom renovation for Chesterbrook Gardens (200-2 Family development) is scheduled for bidding early in 2007.

The bond authorization also included \$987,500 for Beaverbrook (667-2 Elderly development); however, the Commonwealth of Massachusetts has not approved the funding. In June 2003, the Authority sought permission from DHCD to use its own operating reserve to make the repairs. DHCD sent its staff architect to the Beaverbrook development to generate a cost estimate for unit and site renovations, including pavement removal, parking lot and pathway resurfacing, and landscaping. The renovations also would have encompassed energy conservation work such as new siding, wood doors, storm doors, and windows, at a cost of \$523,076. In addition, a cost estimate of \$142,725 was prepared for community room renovations. These renovations would have included a new kitchen; new bathrooms; new wood entry doors; aluminum windows; heating, ventilating, and air conditioning work; and miscellaneous electrical upgrades. The estimate was completed in September 2003, but DHCD determined that the operating reserve funds would be better utilized on the Prospect Terrace kitchen and bathroom project. Subsequently, the Authority spent \$280,000 from its operating reserve to renovate vacant apartments and remove asbestos that was discovered as construction began. Without funding from either the Commonwealth bond bill or the Authority's operating reserve, conditions at Beaverbrook continued to deteriorate, posing a safety hazard.

In August 2006, several residents at Beaverbrook complained about the hazardous conditions of the sidewalks. A DHCD inspector examined the site and determined that the walkways needed emergency repairs. DHCD awarded the Authority \$11,000 in emergency funds to patch the sidewalks. In October 2006, the Authority awarded a contract in the amount of \$9,500 to repair the worst of the sidewalk problems. The Authority received \$5,000 for emergency drainage pipe replacement to prevent flood damage at Beaverbrook. In August 2006, the Authority was cited by the local Board of Health for not providing adequate hot water at Beaverbrook Apartments

(a violation of State Sanitary Code 105 CMR 410.190). This problem was caused by a failing heat and hot water system that was installed in 1959. To provide adequate hot water, the Authority had to install two new gas-fired water heaters at a cost of \$18,900, which was also funded through an emergency grant from DHCD.

The Authority made the following emergency repairs that were also funded by DHCD:

- Roofing repairs at the Winchester Crane (667-8 Elderly development) apartments during September 2006 in the amount of \$4,500 (according to the Executive Director, repairs will continue through April 2007).
- Replaced boilers at Prospect Terrace (200-1 Family development) and Dana Court (200-3 Family development) in February 2006 at a cost of \$109,900.
- Installed water heaters at Carey Court (667-1 Elderly development) at a cost of \$18,900 to comply with State Sanitary Code 105 CMR 410.190 regarding adequate hot water. This problem was caused by a failing heat and hot water system installed in 1956.

These emergency situations arose due to a lack of periodic funding for modernization and preventive maintenance. Emergency repairs tend to be more costly because they preclude competitive bids from being obtained.

Recommendation

The Authority should apply to DHCD for the necessary modernization funds to address the conditions noted. Deferring or denying 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.

Auditee's Response

The Authority agrees that the lack of reliable Capital Improvements Funds make planning for scheduled replacement of critical building elements and systems impossible. Most typically, by the time money is available to replace one long overdue critical system or element, many others have failed or in danger of failing.

4. STATUS OF OPERATING SUBSIDIES EARNED, RECEIVED, AND OUTSTANDING

The Contract for Financial Assistance between the Authority and DHCD requires DHCD to subsidize the Authority in the event that actual Utility Costs and budgeted Non-Utility Costs exceed Rental Revenue and other income. Our review of the Authority's subsidy accounts

indicated that \$392,712 was due from DHCD as of September 30, 2006, which was in agreement with DHCD records, as follows:

Balance due for the fiscal year ended September 30, 2005	\$337,922
Operating subsidy owed for the fiscal year ended September 30, 2006	<u>54,790</u>
Operating subsidy due from DHCD as of September 30, 2006	<u>\$392,712</u>

However, we noted that DHCD has not provided the Authority with timely payments of its operating subsidies. For example, the Authority, whose fiscal year ends September 30, received a partial payment of \$250,000 from DHCD on January 19, 2007, leaving a balance of \$142,712. Untimely payments may result in the Authority not meeting its monthly obligations in a current manner or having to borrow funds from other programs to pay current liabilities as they become due.

Recommendation

DHCD should work with the Authority to resolve any arrearages and ensure that it is providing the correct subsidy on a timely and accurate basis.

Auditee's Response

The Authority agrees with the Audit that timely payments of subsidy and reimbursement of expenses is necessary for the proper operation and financial health of the Authority.

5. REIMBURSEMENT OF FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA) FUNDS FROM THE STATE'S GENERAL FUND

Due to heavy flooding between May 12 and 26, 2006 that caused damage to six units at the Authority's Beaverbrook Apartments (667-2 Elderly development) and six units at the Authority's Chesterbrook Apartments (200-2 Family development), the Authority applied for emergency funding from the Federal Emergency Management Agency (FEMA). FEMA representatives came to Waltham, inspected the sites, and approved emergency funding in the amount of \$6,714, which FEMA remitted to the Massachusetts Emergency Management Agency (MEMA). MEMA was directed by the Executive Office for Administration and Finance to forward these funds to the state's General Fund. As of the end of our field work on January 17, 2007, the Authority had not received these funds.

Recommendation

The Authority and DHCD should work together to obtain the funds from MEMA.

Auditee's Response

The Authority was approved for \$6,714.00 in FEMA funds. This money was deposited in the Commonwealth's General Funds by MEMA as directed by the Executive Office of the Administration and Finance. To date, the Authority has been reimbursed \$1,100.00. The status of the remaining funds is unknown, except that it appears to still be in the Commonwealth's General Fund. Queries regarding the funds have not been answered.

Additional Comments in Auditee's Response

The Waltham Housing Authority would like to note that the observations made in this draft very closely mirror the findings and recommendations made in The Independent State Auditor's Comprehensive Report No. 2005-5119-3A, dated October 5, 2006. That Audit reviewed physical conditions and inadequate financial resources at 66 housing authorities in the Commonwealth not including the Waltham Housing Authority. In general, that report and the current draft point to the inadequate yearly subsidy, untimely subsidy payments, and lack of available modernization funds for capital improvements [that] have made it extremely difficult, if not impossible for housing authorities state wide to meet their statutory mandate to provide safe, sanitary, affordable housing for families, elderly and the disabled.

SUPPLEMENTARY INFORMATION
Waltham 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>
667-1	24	1956
667-2	60	1959
667-3	24	1962
667-4	32	1966
667-8	59	1982
667-9	20	1988
200-1	140	1949
200-2	100	1951
200-3	32	1954
200/689	1	1991
705-2	4	1982
705-2	4	1982
705-2	6	1988
705-3	8	1991
705-3	<u>2</u>	1995
Grand Total	<u>516</u>	

APPENDIX I

State Sanitary Code Noncompliance Noted

200-1 Family Housing Development

<u>Location</u>	<u>Noncompliance</u>	<u>Regulations</u>
34 E Hansen Road	Bedroom #1 – Mold on door	105 CMR 410.750
	Bedroom #2 – Cracks in ceiling	105 CMR 410.500
	Bedroom #2 – Paint chipping on ceiling	105 CMR 410.500
58 B Hansen Road	Bedroom – Mold and mildew on walls	105 CMR 410.750
34 H Hansen Road	Kitchen – Cabinets need replacement	105 CMR 410.100
	Building Exterior – Trash on sidewalk	100 CMR 410.602
	Building Exterior – Hazardous materials (car battery)	100 CMR 410.750

200-2 Family Housing Development

88 Chester Lane (off line)	Kitchen – Cabinets need replacement	105 CMR 410.100
	Bathroom – Ceiling needs repair	105 CMR 410.500
	Bathtub – Needs reglazing	105 CMR 410.150

200-3 Family Housing Development

17 Gardner Street	Kitchen – Ceiling needs repair (hole)	105 CMR 410.500
22 Lowell Street	Kitchen – Floor needs to be replaced	105 CMR 410.504
	Bedroom – Ceiling needs repair	105 CMR 410.500
	Building Exterior – Front door to apartment is damaged	105 CMR 410.500
	Building Exterior Sidewalks are cracked	105 CMR 410.500

667-1 Elderly Housing Development

269 School Street, #4	Kitchen – Sink needs to be replaced	105 CMR 410.100
	Bathroom – Sink needs to be replaced	105 CMR 410.100

**667-2 Elderly Housing
Development**

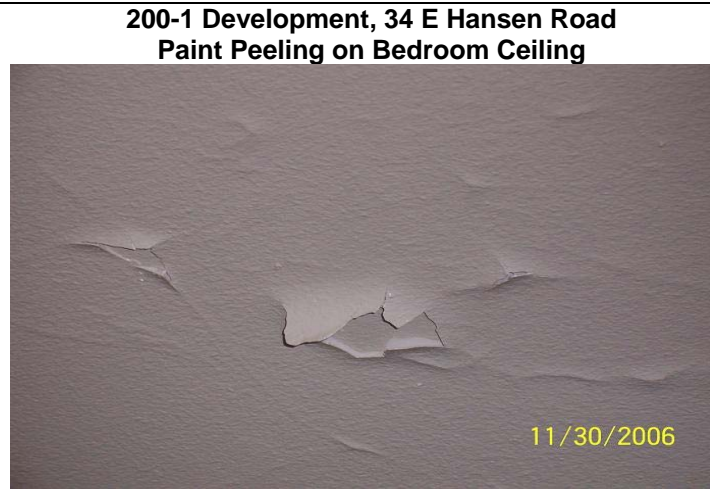
304 Grove Street #3	Living room – Window insulation is dried and cracked	105 CMR 410.501
	Living room – Window frame is rotted	105 CMR 410.501
	Living room – Floor tiles are broken (water-damaged)	105 CMR 410.500
	Damp and musty smell in apartment	105 CMR 410.750
310 Grove Street, #1	Living room – Insulation on window is not weather-tight, dried and cracked	105 CMR 410.501
	Living room – Floor tiles are chipped and broken	105 CMR 410.500
310 Grove Street, #2	Living room – Condensation on window, weatherstripping between glass panes is cracked	105 CMR 410.501
318 Grove Street, #3	Living Room and Kitchen – Tiles are not properly sealed to floor	105 CMR 410.500
	Building Exterior – Decorative tiles are missing on wall	105 CMR 410.500
	Living Room – Insulation on window is dried, cracked, and not weather-tight,	105 CMR 410.501
Grove Street	Boiler Room – Wires and a makeshift pipe secure the door of oil furnace, which was installed in 1959	105 CMR 410.200
	Building Exterior – Parking lot is deteriorating, needs repaving	100 CMR 410.500
	Building Exterior – Retaining wall at back of property is cracked	100 CMR 410.500
	Building Exterior – Trees are leaning over roof, safety hazard	100 CMR 410.750
	Building Exterior – Discarded construction materials on property (old plumbing parts etc.)	100 CMR 410.602
	Building Exterior – Portico above walkway is rotting and needs replacement	105 CMR 410.500

**667-4 Elderly Housing
Development**

82 Orange Street	Common Area – Window is in disrepair, needs replacing	105 CMR 410.500
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APPENDIX II

Photographs of Conditions Found



**667-2 Development, Beaverbrook Apartments
Wires and a Makeshift Pipe Secure the Door of
Gas Furnace That Was Installed in 1959**



**200-3 Development, 17 Gardner Street
Kitchen Ceiling Needs Repair**



**200-3 Development, Lowell Street
Sidewalk Is Cracked**



**667-2 Development, 304 Grove Street
Floor Tiles Are Broken, Damp, and Musty**



**667-2 Development, 304 Grove Street, #3
Floor Tiles Are Broken, Damp, and Musty**



**667-4 Development, 82 Orange Street
Window in Common Area Needs Replacement**



**667-2 Development, 310 Grove Street, #2
Water Condensation on Window,
Weatherstripping between Glass Panes Is
Cracked**



**667-2 Development, 318 Grove Street, #3
Insulation on Window Is Not Weathertight or
Functioning, Weatherstripping Dangles on
Window**



**667-2 Development, Beaverbrook Apartments
Beam above Walkway Is Rotting and Needs
Replacement**



**667-2 Development, Beaverbrook Apartments
Portico above Sidewalk Is Rotting and Needs
Replacement**

