

AUDITOR

The Commonwealth of Massachusetts

AUDITOR OF THE COMMONWEALTH

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NO. 2006-0819-3A 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 WILMINGTON HOUSING AUTHORITY JULY 1, 2003 TO JUNE 30, 2005

> OFFICIAL AUDIT REPORT JUNE 10, 2008

# 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 Wilmington 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.

#### 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 November 22, 23, and December 15, 2005, we inspected five of the 85 state-aided housing units managed by the Authority and noted 26 instances of noncompliance with Chapter II of the State Sanitary Code, including a missing window, water damage to ceilings, mold, mildew, improper electrical wiring, cracks on ceilings and walls, obstructed exits, holes in doors, fire hazards, an unsafe handicapped access ramp, and other health and safety hazards. The Authority indicated in its response that it is in the process of receiving emergency funds to replace the boilers in the 667-1 development and has been notified by DHCD that a work order has been approved to upgrade the sidewalks, roadways, and parking.

i

## 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, 2003 to June 30, 2005, the Authority's average turnaround time for reoccupying vacant units was 34 days. Moreover, in response to our questionnaire, the Authority indicated that there were over 100 applicants on the Authority's waiting list. The Authority stated in its response that a part-time maintenance man was hired with the approval of DHCD; however, the Executive Director further stated that an additional full-time maintenance man is needed to address the current issues.

## 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 had capital modernization needs for paving, window and door replacement, and electrical upgrades in its 667 Elderly development and new roofs in the 705 program. 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, 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. The Authority stated in its response that modernization funds for repairs to the 705-3 family unit has not been addressed to date by DHCD.

## 4. OFFICIAL WRITTEN PROPERTY MAINTENANCE PLAN NOT ESTABLISHED

Our audit disclosed that the Authority did not incorporate DHCD's Property Maintenance Guide into its policies and procedures. The Authority does hire a property inspection company to perform yearly inspections, but does not have an official written preventive maintenance plan to inspect, maintain, repair, and upgrade its existing housing units. Such a plan would establish procedures to ensure that Authority-managed properties are in safe, decent, and sanitary condition as defined by Chapter II of the State Sanitary Code. The Authority stated in its response that it is in the process of incorporating DHCD's Property Maintenance Guide into its policies and procedures.

#### SUPPLEMENTARY INFORMATION

#### APPENDIX I

State Sanitary Code Noncompliance Noted

#### APPENDIX II

Photographs of Conditions Found

7

6

11

12

12

14

14

## 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 Wilmington 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.

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## 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 housing authorities 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 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 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 LHAs.

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 LHAs had uninhabitable units, the length of time the units were in this state of disrepair, and the actions taken by the LHAs 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 five of the 85 state-aided dwelling units managed by the Wilmington Housing Authority. In addition, on November 22, 23, and December 15, 2005, we conducted inspections of the units located at Deming Way, Elderly Housing Development 667-1; Deming Way Extension, Elderly Housing Development 667-2; Blackstone Street, Family Housing Development 705-C; and North Street, which is also part of the Family Housing Development 705-C. Our inspection noted 26 instances of noncompliance with Chapter II of the State Sanitary Code, including a missing window, water damage to ceilings, mold, mildew, improper electrical wiring, cracks on ceilings and walls, obstructed exits, holes in doors, fire hazards, an unsafe handicapped access ramp, and other health and safety hazards. (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.

## Auditee's Response

The Executive Director, who was hired subsequent to our audit period, stated, in part:

As for the recommendation that the Authority should apply for funding from DHCD, I have done so. Up to this point I have asked DHCD for funding to replace our old, and

unrepairable boilers in the 667-1 development, upgrade of our sidewalks, roadways, and parking, upgrade of the entry doors and windows in the 667-1 units, and an upgrade of our 25+ year emergency generator in our 667-2 development. We are in the process of finishing a fire alarm/sprinkler upgrade in our 667-2 development. The unsafe handicap access ramp that was noted in your report has been completed in this upgrade. The Wilmington Housing Authority is in the process of receiving emergency money to replace the boilers in the 667-1 development and I have been notified by DHCD that they are putting a work order together for the upgrade of the sidewalks, roadways, and parking. As to the upgrade of the entry doors and windows, it is before the emergency committee, but I was just informed by DHCD that it has been denied at this time. The problem with the doors is that they are wooden doors on metal frames and the doors have warped causing them not to close properly. The latch on the door frame cannot be moved due to the fact that it is electronically connected to the emergency pull chains in their units. The problem that exists with the windows in their units is that they are sliding windows, the seals are leaking, and the company that manufactured the windows is no longer in business. Thus, broken windows can not be repaired. The housing authority has made numerous attempts to locate a window repair dealer to try to get replacement parts. The window repair dealers have stated that these parts are no longer available. During spring, summer, and fall, tenants can no longer open their windows to enjoy the fresh air. Due to the fact that the seals are leaking, tenants have had to put plastic over their windows. Tenants have had water leaking on their sills. The issues with the doors and windows have been going on for numerous years, but with the modernization funding issues, they have not been addressed. These windows are the original windows that were installed back in the early 1950's and therefore are not energy efficient.

## Auditor's Reply

We commend the actions initiated by the Authority in response to our concerns. However, since the corrective measures taken by the Authority occurred after the completion of our audit fieldwork, we cannot express an opinion on their adequacy, and we will review any and all corrective actions taken during our next scheduled audit. The Authority should continue to appeal to DHCD to provide the necessary modernization funds to remedy the remaining issues.

# 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, 2003 through June 30, 2005, the Authority's average turnaround time for reoccupying vacant units was 34 days (15 units with a total of 506 excess days). Moreover, in response to our questionnaire, the Authority indicated that there were over 100 applicants on the Authority's waiting list.

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

6

and may have lost the opportunity, at least temporarily, to provide needy citizens with subsidized housing. The Authority noted that it has employed only one maintenance person due to a lack of funding, and that if it could hire a part-time maintenance person to assist the Authority's current maintenance person, unit turnaround time could be reduced and preventive maintenance and repairs of units could be expedited.

#### Recommendation

The Authority should request the necessary funding from DHCD to hire a part-time maintenance person and ensure that vacant units are refurbished and reoccupied within DHCD's timeframe.

#### Auditee's Response

The Executive Director stated that a part-time maintenance man was hired with the approval of DHCD. However, the Executive Director also indicated that the hiring of a part-time maintenance man has not brought much relief to the existing full-time maintenance man. The Executive Director stated that a second full-time maintenance man is needed to expedite the process of unit turnaround.

#### Auditor's Reply

The Authority should request the necessary funding for a full-time maintenance person to ensure that vacant units are refurbished and reoccupied within DHCD's timeframe.

### 3. MODERNIZATION INITIATIVES NOT FUNDED

In response to our questionnaires, the Authority informed us that there is need for modernizing its properties. Specifically, the Authority stated that the Elderly (667-1) development needed repaving and repair of the road, parking areas, and sidewalks, as well as window and door replacement. The Elderly (667-2) development has electrical problems that are causing electrical fixtures to melt. The Authority also stated that because its Family (705) development consists of 13 scattered site structures, it is much more expensive to maintain than a 13-unit single structure. The Executive Director also informed us that the Family (705) development will need new roofs in the next few years.

7

Deferring or denying the Authority's modernization needs 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, 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 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 inventory of capital needs and to make recommendations regarding the level of funding and the administrative and statutory changes necessary to give local housing authorities (LHAs) 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 to provide the necessary modernization funds to remedy these issues in a timely manner.

#### Auditee's Response

The Executive Director stated, in part, that the Authority has continued to appeal to DHCD for necessary modernization funds, as follows:

Currently, the Wilmington Housing Authority has one 705 3 bedroom family unit out of a total of 13 that is offline. The 705 home that is offline is located at 43 North Street, which is the 705 unit mentioned in the State Auditor's Report. The repair work for this home is both very costly and needs a phenomenal amount of supplies, time and labor. This home needs a new roof, fascia, siding, windows, doors, outside cement stairs, new deck, new ceilings and walls, new kitchen cabinets and flooring, stove, new hardwood floors, new bathroom, cellar windows, and other things, just to mention a few. I was told that it would take over \$60,000 to bring this home into compliance. DHCD is aware of this home and has been out several times to take a look at it, but with the lack of state funding it has made it impossible to repair. As Executive Director, I have taken

numerous calls and received several letters from surrounding neighbors voicing their complaints in regards to the deplorable condition and appalling sight it brings to their neighborhood, as well as to the dropping valuation in their properties. The Town Manager of Wilmington has also taken several calls in regards to this property. The longer that this home sits vacant, the more it presents a fire hazard to the neighborhood, to the Housing Authority, and one less needy family to be placed from the waiting list. . . . . As noted in the report most of the remaining 12 705 family units need new roofs, siding, window replacements and other needed repairs.

## Auditor's Reply

The Authority should continue to appeal to DHCD to provide the necessary modernization funds to bring all of its housing units into compliance through its modernization initiatives.

## 4. OFFICIAL WRITTEN PROPERTY MAINTENANCE PLAN NOT ESTABLISHED

Our audit disclosed that the Authority did not incorporate DHCD's Property Maintenance Guide into its policies and procedures. The Authority conducts annual inspections through a property inspection company and also performs inspections when a unit is vacated, but does not have an official written 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 without adequate funds and resources a plan is difficult, if not impossible, to implement. Nevertheless, without an official written property maintenance program in place,

the Authority cannot ensure that its managed properties are in safe, decent, 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 written preventive maintenance plan, and DHCD in turn should obtain and provide the necessary funds and resources to ensure that this plan is enacted.

# Auditee's Response

The Executive Director stated, in part:

The Wilmington Housing Authority is in the process of updating all their policies including by-laws, personnel policy, CORI policy, emergency case plan, and will now also incorporate a DHCD Property Maintenance Guide into its policies and procedures.

# Auditor's Reply

We commend the actions initiated by the Authority in response to our concerns. However, since the corrective measures taken by the Authority occurred after the completion of our audit fieldwork, we cannot express an opinion on their adequacy, and we will review any and all corrective action taken during our next scheduled audit.

# SUPPLEMENTARY INFORMATION

## 1. Wilmington Housing Authority-Managed State Properties

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

Development	Number of Units	Year Built
667-1	71	1958
667-2	1	1990
705-1*	4	1953-1973
705-2*	8	1987
705-3*	<u>_1</u>	1989
Total	<u>85</u>	
*705-C		

# 2. Availability of Land to Build Affordable Housing Units

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

# 3. Operating Subsidies Owed the Authority

As of June 30, 2005, the Authority was not a subsidized authority and was not owed any operating subsidy funding.

# APPENDIX I

# State Sanitary Code Noncompliance Noted

Location	Noncompliance	Regulation
667-2 Elderly Development		
100 Deming Way Extension Apartment # 10	Water damage to ceiling in bathroom	105 CMR 410.500
Common Area	Improper electrical wiring in light fixtures	105 CMR 410.351
Exterior	Siding damaged-need to cover A/C holes	105 CMR 410.500
Exterior	Roof may need replacing soon	105 CMR 410.500
705-C Family Development		
20 Blackstone Street	Chipped paint on siding	105 CMR 410.500
Exterior	Mold and mildew	105 CMR 410.750
Exterior	Rotted window sills	105 CMR 410.500
Exterior	Loose handicap ramp, too steep	105 CMR 410.450
Exterior	Cracked driveway, not level, large puddle during heavy rains	105 CMR 410.750
705-C Family Development	5	
43 North Street		
Bedroom	Trash and personal belongings on floor	105 CMR 410.602
	Hole in door	105 CMR 410.500
Cellar	Rotted window frame	105 CMR 410.500
Cellar	Trash in cellar, fire hazard	105 CMR 410.750
Exterior	Window missing	105 CMR 410.501
Exterior	Exit obstructed with trash and personal belongings under back stairs	105 CMR 410.451
Bathroom	Bathtub in disrepair	105 CMR 410.150
Exterior	Loose cinder blocks obstruct bulkhead entrance	105 CMR 410.451
Exterior	Refuse and personal belongings under back stairs	105 CMR 410.602
	Trash in yard	105 CMR 410.602

Location	Noncompliance	Regulation
667-1 Elderly Development		
13 Deming Way		
Kitchen	Cracks on walls	105 CMR 410.500
Kitchen	Light needs rewiring	105 CMR 410.351
Kitchen	Cracks on ceiling	105 CMR 410.500
Kitchen	Cabinets worn with age	105 CMR 410.100
14 Deming Way		
Kitchen	Light needs rewiring, plug frayed	105 CMR 410.351
Kitchen	Cracks on ceiling Cabinets worn with age, doors missing	105 CMR 410.500 105 CMR 410.100

# **APPENDIX II**

# Photographs of Conditions Found

705-C Development

20 Blackstone Street Chipped Siding, Paint, Mold, and Mildew



705-C Development 43 North Street Window Frame Rotted



705-C Development 43 North Street Window Missing



# 705-C Development 43 North Street Trash and Personal Belongings on Bedroom Floor



# 705-C Development 43 North Street Bulkhead Obstructed by Loose Cinder Blocks



705-C Development

43 North Street Refuse and Personal Belongings under Back Stairs



# 705-C Development 43 North Street Trash in Cellar, Fire Hazard



667-2 Development 100 Deming Way Extension, #10 Water Damage to Bathroom Ceiling

