

AUDITOR

The Commonwealth of Massachusetts

AUDITOR OF THE COMMONWEALTH

ONE ASHBURTON PLACE, ROOM 1819 BOSTON, MASSACHUSETTS 02108

TEL. (617) 727-6200

NO. 2006-0828-3A

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

> OFFICIAL AUDIT REPORT AUGUST 9, 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 Yarmouth 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.

Our review noted that the Authority did not conduct annual inspections of dwelling units during fiscal year 2005. The Executive Director indicated that, due to funding constraints, the Authority inspected some of its dwelling units during the last two years, but was unable to inspect all units annually.

Moreover, on May 3, 2006, we inspected four of the 48 state-aided housing units managed by the Authority and noted 79 instances of noncompliance with Chapter II of the State Sanitary Code, including water stains, rusted sinks, mold and mildew, loose railings, broken doors, floors, countertops, cabinets, and stairways, and cracked and crumbling driveways, curbs, and sidewalks.

i

## 2. MODERNIZATION INITIATIVES NOT FUNDED

In response to our questionnaires, the Authority informed us that there is a need for modernizing its managed properties. The Authority indicated that on September 20, 2001, it requested funding from DHCD for capital modernization projects at its 667-1 Elderly Development. However, this request was not funded by DHCD. 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 tenants could be seriously compromised.

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

During our audit, we found that the Authority had one parcel of land on which to build affordable housing. The Authority should continue in its efforts to obtain funds from DHCD to construct additional housing units on this parcel.

### 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 to meet it expenses. However, our review of the Authority's operating subsidy records indicated that \$4,198 was due the Authority from DHCD, contrary to DHCD's records that indicated it owed the Authority \$4,613. By not reconciling the subsidy balance due the Authority with DHCD's records, the Authority risks receiving late or insufficient subsidy payments.

### SUPPLEMENTARY INFORMATION

#### APPENDIX I

State Sanitary Code Noncompliance Noted

#### APPENDIX II

**Photographs of Conditions Found** 

6

8

9

15

10

11

## 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 also obtained data from surveys and site visits to a selected, representative cross-section of 66 Local Housing Authorities (LHAs) throughout the state. The Yarmouth 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 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 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 cited LHA's plans to address the 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 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 Authority did not conduct annual inspections of dwelling units during fiscal year 2005. The Executive Director indicated that due to funding constraints, the Authority inspected some of its dwelling units during the last two years, but was unable to inspect all units annually.

For the period July 1, 2003 to June 30, 2005, we reviewed inspection reports for four of the 48 state-aided dwelling units managed by the Authority. In addition, we conducted inspections of these units located at the Authority's Long Pond Plaza (667-1 Elderly/Handicapped Development). Our inspection noted 79 instances of noncompliance with Chapter II of the State Sanitary Code, including water stains, mold and mildew on ceilings and walls, rusted sinks, broken doors, floors, countertops, cabinets, and stairways, and cracked and crumbling driveways, curbs, and sidewalks. (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

In response to this issue, the Authority stated:

The Authority does conduct annual inspections of all dwelling units utilizing existing part time staff. Prior to 05 all units were inspected at the same time. During 05 the Authority changed to a quarterly unit inspection schedule to ensure that all work orders resulting from inspections would be performed in a timely manner. The Authority would like to hire an independent inspector for inspections to this program but does not have the funds available....

The Yarmouth Housing Authority will continue in its efforts to secure funding from DHCD and other sources for badly needed repairs at our elderly complex.

#### Auditor's Reply

Contrary to the Authority's response, our review disclosed no evidence that 667-1 Elderly Program unit inspections were performed during the fiscal year ended June 30, 2005 or that the Authority changed to a quarterly unit inspection schedule during fiscal year 2005. Therefore, there is no assurance that the Authority was in compliance with the annual unit inspection requirement of DHCD's Property Maintenance Guide.

#### 2. MODERNIZATION INITIATIVES NOT FUNDED

In response to our questionnaires, the Authority informed us that there is need for modernizing its managed properties. Specifically, on September 20, 2001, the Authority requested modernization funding from DHCD for the following capital improvement projects:

<b>Development</b>	Condition	<u>Status</u>
667-1 Elderly Program	Rehabilitate bathrooms, replace tubs and showers	Not Funded
667-1 Elderly Program	Repave driveways, parking lot, walkways	Funded in 2006

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 tenants could be seriously compromised. Lastly, deferring the modernization needs of the Authority into future years will cost the Commonwealth's taxpayers additional money due to inflation, higher wages, and other related costs.

6

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, "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

In response to the issue, the Authority stated, in part:

In 2002 the Yarmouth Housing Authority did receive a letter awarding funding in the amount of \$243,000 to repave driveways, the parking lot and some walkways. However, it was not until 4 years later, March 16, 06, that the Authority received approval from DHCD to advertise for engineering services. Presently we are in the design phase.

The Yarmouth Housing Authority has and will continue to look to sources other than DHCD to meet our capital repair needs. The Authority has been awarded \$247,000 from Yarmouth's Community Preservation Committee for the design and installation of a new heating and hot water system for our 44-year-old elderly development. (Confirmation at town meeting is scheduled for April 8, 07.) Additionally, we have received \$25,000 in Community Development Block Grant Funds for new ADA toilets and new metal exterior doors for our elderly development.

Unfortunately, when applying for Modernization funds in the last two rounds, the Authority was only allowed to apply for one item in each round. This is particularly distressing for a housing authority like Yarmouth with more than one development, one of which is a 44-year-old elderly complex.

In some instances we have been forced to wait until an item deteriorates to the point that it qualifies for DHCD "emergency modernization funds" before the repair can be made. The Authority did receive DHCD emergency funding for repair of the balconies at 667-1 in the amount of \$13,000 and the work is currently underway. In addition, the Authority recently received \$15,000 in emergency modernization funding for a water penetration problem.

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

During our audit, we found that the Authority owns one parcel of land with an area of approximately 19 acres on Forest Road on which it could build 40 units of additional affordable housing for the 667 Elderly Program. The Authority has applied to DHCD for development funding for this parcel; however, as of the close of our audit period, DHCD had not provided such funding.

Without affordable housing, substantial costs may be incurred by the Commonwealth's social service programs and assistance organizations where displaced individuals turn for help. A lack of decent, 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, whose fixed income and special needs limit their housing options.

## Recommendation

The Authority should continue in its efforts to have DHCD provide the necessary development funds to construct sufficient units to address the demand for state-aided housing.

## Auditee's Response

In addition to the 19-acre parcel on Forest Rd., the Authority also has six lots available for development for family housing on Brush Hill Rd. Although the Authority is working with DHCD, once again, we have had to turn to other sources for funding to develop these sites.

At the request of the Housing Authority, the Town of Yarmouth applied for Priority Development Funds for planning costs of developing Forest Rd. and to complete development on Brush Hill Rd. (Housing Authorities are not eligible recipients of Priority Development Funds.) Listed below is a brief status of activities on both parcels.

Brush Hill Rd. – PDF funds were used to hire a consultant to assist the Authority and the town in developing a Request for Proposals for the development and disposition of the six remaining lots at Brush Hill Rd. A developer has been chosen; and the Authority is in the process of developing a Land Disposition Agreement.

Forest Rd. – The Authority is in the process of developing a Request for Proposal for consulting services for site and financial feasibility to develop this 19-acre site for elderly housing utilizing PDF funds.

## Auditor's Reply

Our report did not comment on the Authority's Brush Hill Road lots because the process to develop this property was underway during fiscal year 2005. The Authority should continue to request funding from DHCD to aid in its development efforts.

## 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 to meet its expenses. During our audit, we requested and received from DHCD a statement of operating subsidy balances due and outstanding for each LHA of the Commonwealth as of June 30, 2005. During our field visits to the LHAs, we reviewed each Authority's subsidy records to determine whether the amounts were in agreement with the balances provided by DHCD.

Our review of the Authority's operating subsidy accounts indicated that as of June 30, 2005, it was owed \$4,198 from DHCD. However, DHCD's subsidy records indicated that it owed the Authority \$4,613. By not reconciling the subsidy balance due the Authority with DHCD's records, the Authority risks receiving late or insufficient subsidy payments.

### Recommendation

The Authority should communicate with DHCD to determine the correct operating subsidy amount and ensure that this amount is properly recorded in both DHCD's and the Authority's financial statements. Secondly, DHCD should work with each LHA to resolve any variances by obtaining quarterly financial statements from the LHAs so that it can monitor and reconcile operating subsidies due to and due from each LHA. Third, for the Authority to receive all subsidies to which it is entitled on a timely and accurate basis, it is necessary that all variances be reconciled and that DHCD provides the requisite, adequate contribution.

### Auditee's Response

The Authority did not respond to this issue.

# SUPPLEMENTARY INFORMATION

# Yarmouth 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
667-1	40	1963
689-1	_8	1990
Total	<u>48</u>	

# **APPENDIX I**

## State Sanitary Code Noncompliance Noted

# <u>667-1 Elderly Housing Program</u> Long Pond Plaza

Location	Noncompliance	Regulation
Apt. 8	Living Room – Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Living Room – Cracked and peeling paint on walls, ceiling	105 CMR 410.500
	Living Room – Floors deteriorated	105 CMR 410.500
	Living Room – Doors broken	105 CMR 410.480
	Living Room – Doors blocked Kitchen – Water stains, mold, and mildew on walls, ceiling	105 CMR 410.451 105 CMR 410.750
	Kitchen – Cracked and peeling paint on walls, ceiling	105 CMR 410.500
	Kitchen - Floors deteriorated	105 CMR 410.504
	Kitchen – Doors blocked	105 CMR 410.451
	Kitchen – Cabinets and countertops deteriorated	105 CMR 410.100
	Kitchen – Sink rusted	105 CMR 410.351
	Bedroom - Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Bathroom - Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Bathroom - Cracked and peeling paint on walls, ceiling	105 CMR 410.500
	Bathroom - Sink rusted	105 CMR 410.351
	Bathroom – Doors broken	105 CMR 410.480
	Bathroom - Floors deteriorated	105 CMR 410.504

Location	Noncompliance	<b>Regulation</b>
	Bathroom – Shower stall tiles missing, wall is covered with plaster sheeting and tape	105 CMR 410.351
Balcony	Mold on balcony wood	105 CMR 410.500
Apt. 23	Living Room – Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Living Room – Cracked and peeling paint on walls, ceiling	105 CMR 410.500
	Living Room – Floors deteriorated	105 CMR 410.504
	Living Room – Doors broken	105 CMR 410.480
	Living Room – Doors blocked	105 CMR 410.451
	Kitchen – Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Kitchen – Cracked and peeling paint on walls, ceiling	105 CMR 410.500
	Kitchen - Floors deteriorated	105 CMR 410.504
	Kitchen – Doors blocked	105 CMR 410.451
	Kitchen – Cabinets and countertops deteriorated	105 CMR 410.100
	Kitchen – Sink rusted	105 CMR 410.351
	Bedroom - Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Bathroom - Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Bathroom - Cracked and peeling paint on walls, ceiling	105 CMR 410.500
	Bathroom - Sink rusted	105 CMR 410.351
	Bathroom – Doors broken	105 CMR 410.480
	Bathroom - Floors deteriorated	105 CMR 410.504
Apt. 25	Living Room – Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Living Room – Cracked and peeling paint on walls, ceiling	105 CMR 410.500
	Living Room – Floors deteriorated	105 CMR 410.504

Location	Noncompliance	Regulation
	Living Room – Doors broken	105 CMR 410.480
	Living Room – Doors blocked	105 CMR 410.451
	Kitchen – Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Kitchen – Cracked and peeling paint on walls, ceiling	105 CMR 410.500
	Kitchen - Floors deteriorated	105 CMR 410.504
	Kitchen – Doors blocked	105 CMR 410.451
	Kitchen – Cabinets and countertops deteriorated	105 CMR 410.100
	Kitchen – Sink rusted	105 CMR 410.351
	Bathroom - Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Bathroom - Cracked and peeling paint on walls, ceiling	105 CMR 410.500
	Bathroom - Sink rusted	105 CMR 410.351
	Bathroom – Doors broken	105 CMR 410.480
	Bathroom - Floors deteriorated	105 CMR 410.504
Apt. 27	Living Room – Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Living Room – Cracked and peeling paint on walls, ceiling	105 CMR 410.500
	Living Room – Floors deteriorated	105 CMR 410.504
	Living Room – Doors broken	105 CMR 410.480
	Living Room – Doors blocked	105 CMR 410.451
	Kitchen – Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Kitchen – Cracked and peeling paint on walls, ceiling	105 CMR 410.500
	Kitchen - Floors deteriorated	105 CMR 410.504
	Kitchen – Doors blocked	105 CMR 410.451
	Kitchen – Cabinets and countertops deteriorated	105 CMR 410.100

Location	Noncompliance	<b>Regulation</b>
	Kitchen – Sink rusted	105 CMR 410.351
	Bathroom - Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Bathroom - Cracked and peeling paint on walls, ceiling	105 CMR 410.500
	Bathroom - Sink rusted	105 CMR 410.351
	Bathroom – Doors broken	105 CMR 410.480
	Bathroom - Floors deteriorated	105 CMR 410.504
Common Area	Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Cracked and peeling paint on walls, ceiling	105 CMR 410.500
	Doors broken	105 CMR 410.480
	Doors blocked	105 CMR 410.451
	Floors deteriorated	105 CMR 410.504
Basement	Water stains, mold, and mildew on walls, ceiling	105 CMR 410.750
	Rusted furnace	105 CMR 410.500
	Pump held together with duct tape	105 CMR 410.352
Exterior	Loose balcony railings, broken floors and stairways	105 CMR 410.503
	Broken siding	105 CMR 410.500
	Cracked and crumbling driveways, curbs, and sidewalks	105 CMR 410.750

# **APPENDIX II**

## Photographs of Conditions Found

667-1 Development, Long Pond Plaza Water Damaged Hardwood Floor at the Stairwell



667-1 Development, Long Pond Plaza Loose Railings and Damaged Wood Floor on Balcony

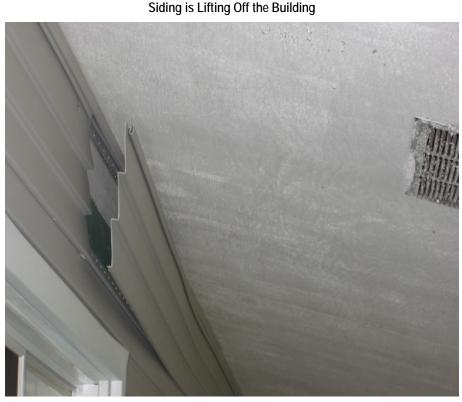


667-1 Development, Long Pond Plaza, Unit #8 Bathroom – Shower Stall Tiles Missing, Wall is Covered with Plastic Sheeting and Tape



667-1 Development, Long Pond Plaza Mold on Balcony Wood

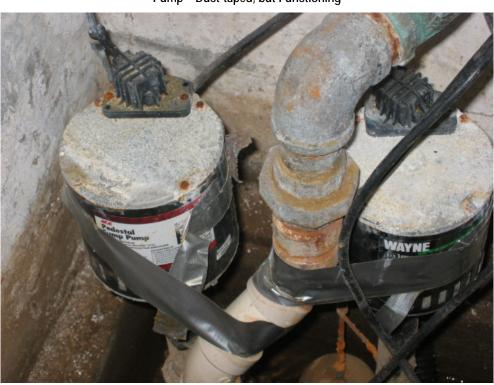




667-1 Development, Long Pond Plaza Siding is Lifting Off the Building

667-1 Development, Long Pond Plaza Damaged Berms on Long Pond Plaza Road





667-1 Elderly Development, Long Pond Plaza Pump – Duct-taped, but Functioning

667-1 Elderly Development, Long Pond Plaza Black Mold on Walls and Ceiling in Basement





667-1 Elderly Development, Long Pond Plaza 45-Year Old Rusted Furnace Functioning but Needs Replacemen