



# The Commonwealth of Massachusetts

## AUDITOR OF THE COMMONWEALTH

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

**OFFICIAL AUDIT  
REPORT  
JUNE 20, 2008**

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

In its response, the Authority indicated that it agreed with the issues contained in our report. In addition, the Authority stated that it will pursue additional funding from DHCD to address the issues.

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### AUDIT RESULTS

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

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DHCD's Property Maintenance Guide, Chapter 3(F), requires that inspections of dwelling units be conducted annually and upon each vacancy to ensure that every dwelling unit conforms to minimum standards for safe, decent, and sanitary housing as set forth in Chapter II of the State Sanitary Code. We inspected 24 of the 516 state-aided housing units managed by the Authority and noted 64 instances of noncompliance with Chapter II of the State Sanitary Code, including peeling paint on ceilings, chipped and cracked countertops and cabinets, leaking roofs, and windows in need of replacement. In its response, the Authority indicated that there has never been adequate funding for repairs.

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#### 2. NOT ALL UNIT INSPECTIONS CONDUCTED ON A TIMELY BASIS

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DHCD's Property Maintenance Guide, Chapter 3(F), requires that inspections of housing 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. However, our review determined that the Authority did not inspect all of its dwelling units in a timely manner. To ensure that its dwelling units are in safe, decent, and sanitary condition, the Authority should comply with DHCD regulations by conducting annual inspections on a timely basis. The Authority, in its response, indicated that it agreed with the audit result.

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### **3. VACANT UNITS NOT REOCCUPIED WITHIN DHCD GUIDELINES** **6**

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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 36 days. Moreover, we found that there were over 1,000 applicants on the Authority's waiting list. In its response, the Authority indicated that all phases of its maintenance operations had inadequate funding.

### **4. MODERNIZATION INITIATIVES NOT FUNDED** **7**

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In response to our questionnaires, the Authority informed us of its need for funding of several capital improvement projects for its Family and Elderly Housing Developments. 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 could be seriously compromised. The Authority, in its response, indicated that it agreed with the audit result.

### **5. OFFICIAL WRITTEN PROPERTY MAINTENANCE PLAN NOT ESTABLISHED** **9**

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During our audit, we found that the Authority did not incorporate DHCD's Property Maintenance Guide into its policies and procedures. Specifically, we noted that the Authority did not have an official written preventive maintenance plan to inspect, maintain, repair, and upgrade its existing housing units. Such a plan would establish procedures to ensure that the Authority-managed properties are in decent, safe, and sanitary condition as defined by Chapter II of the State Sanitary Code. The Authority, in its response, indicated that it agreed with the audit result.

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## INTRODUCTION

### ***Background***

In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, we have conducted a statewide comprehensive audit of the physical conditions and the resources available to provide for the operation and upkeep of the state-aided public housing authorities of the Commonwealth. To accomplish our audit, we performed work at the Department of Housing and Community Development (DHCD) and obtained data from surveys and site visits to a selected, representative cross-section of 66 Local Housing Authorities (LHAs) throughout the state. The Watertown 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 LHAs to be visited as part of our statewide review.

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

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

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

of health to determine whether any citations had been issued, and if so, the LHAs' plans to address any reported 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 LHAs 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 lists 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.

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## 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 conducted inspections of 24 of the Authority's 516 state-aided dwelling units managed by the Watertown Housing Authority located at 55 Waverley Avenue, 100 Warren Street, Forest Street and Phillip Darch Road Apartments, Robert Ford Road Apartments, 230 Lexington Street, 90 Nichols Avenue, 72C and 90C Melendy Avenue, Quimby Street Apartments, Keith Street Apartments, Woodland Towers, Warren Street Towers, McSherry Gardens, Lexington Gardens, 8 Hersom Street, 113 Poplar Street, and Willow Park Apartments. Our inspection noted 64 instances of noncompliance with Chapter II of the State Sanitary Code, including peeling paint on ceilings, ceilings in need of repair, concrete stairs that need replacement, chipped and cracked countertops and cabinets, windows in need of replacement, leaking roofs, and back porches in need of repair and re-painting. (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***



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In its response, the Authority indicated that there never has been adequate funding for repairs.

## **2. NOT ALL UNIT INSPECTIONS CONDUCTED ON A TIMELY BASIS**

DHCD's Property Maintenance Guide, Chapter 3(F), requires that inspections of housing 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. However, our review determined that the Authority did not inspect all of its dwelling units in a timely manner. Specifically, we noted that of those units we inspected, nine were not inspected during 2005, three were not inspected in 2004, and five were not inspected in 2003.

### ***Recommendation***

The Authority should ensure that annual inspections of its housing units are conducted in accordance with DHCD policies and guidelines and request authorization from DHCD to fill vacant maintenance positions.

## **3. 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 audit period, the Authority's average turnaround time for reoccupying vacant units was 36 days. Moreover, we found that there were over 1,000 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, and may have lost the opportunity, at least temporarily, to provide needy citizens with subsidized housing. The Authority attributed its noncompliance with DHCD's Property Maintenance Guide to vacant maintenance positions and a lack of state funding and stated that if such positions were filled, unit turnaround time would be reduced and preventive maintenance and repairs of units would be expedited.

### ***Recommendation***

The Authority should ensure that its vacant units are refurbished and reoccupied within DHCD's guidelines and should secure the necessary funding from DHCD to fill its maintenance positions.

***Auditee's Response***

In its response, the Authority indicated that all phases of its maintenance operations had inadequate funding.

**4. MODERNIZATION INITIATIVES NOT FUNDED**

In response to our questionnaires, the Authority informed us of the need of modernization funds for the following capital improvement projects:

<u>Development</u>	<u>Description</u>
200-1	Exterior repair/siding Oil tank removal Front and rear stair replacement Foundation drainage Parking lot repair (after drainage modernization) Complete bathroom modernization Landscape improvements
200-2	Common stairs & windows Oil tank removal Courtyard modernization (rotted pt curbing/play area) Bathroom modernization Apartment flooring/doors Electric – new circuit breakers/panel Spiral staircase painting/deck replacement Dumpster pad screening Landscape improvements
667-1	Balcony repair & exterior stair repair Exterior doors Complete vinyl siding New laundry room Parking expansion Apartment flooring New kitchens
667-2	New roofs

	Windows and doors need replacement
	Kitchen modernization/flooring – 24" stoves
	DHW energy improvement
	Electrical upgrade (transformers)
	Apartment circuit breakers
	Parking lot repair
	Fence replacement
	Energy management system upgrade (windows)
<u>Development</u>	<u>Description</u>
667-3	Engineer toilets for rain harvesting
	Exterior repair/roofs
	Doors & windows
	Fencing & parking lot upgrade
	Kitchen modernization/new appliances (24" stoves)

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

In June 2000, Harvard University awarded a grant to a partnership of the Boston and Cambridge Housing Authorities to undertake a study of state-aided family and elderly/disabled housing. The purpose of the study was to document the state 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.

***Auditor's Reply***

In its response, the Authority indicated that it agreed with the issues contained in our report. In addition, the Authority stated that it will pursue additional funding from DHCD to address the issues.

**5. 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. Specifically, we noted that the Authority did 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 the DHCD's Property Maintenance Guide by establishing an official written preventative maintenance plan, and DHCD in turn should obtain and provide the necessary funds and resources to ensure that this plan is enacted.

***Auditor's Reply***

In its response, the Authority indicated that it agreed with the issues contained in our report. In addition, the Authority stated that it will pursue additional funding from DHCD to address the issues.

**SUPPLEMENTARY INFORMATION*****Watertown Housing Authority - Managed State Properties***

<u>Development</u>	<u>Number of Units</u>	<u>Year Built</u>
200-1	168	1948
200-2	60	1948
667-1	40	1960
667-2	164	1967
667-3	72	1983
705-1	10	1960
705-2	<u>2</u>	1960
Total	<u>516</u>	

## APPENDIX I

### State Sanitary Code Noncompliance Noted

#### 200-1 Family Housing Development

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
78 Phillip Darch Road	Living room and Kitchen: Floors need replacement	105 CMR 410.500
14 Phillip Darch Road	Living room: Floor needs replacement	105 CMR 410.500
	Kitchen: Floor and ceiling need repair	105 CMR 410.500
54A Robert Ford Road	Living room: Paint is peeling on walls, need repair	105 CMR 410.500
	Bedroom and Hallway: Paint is peeling on ceilings	105 CMR 410.500
Lexington Gardens	Building Exterior: Severe paint peeling on all buildings, wood is rotting	105 CMR 410.500
	Major repairs are needed throughout all buildings	105 CMR 410.500
	Concrete stairs are damaged, need repair or replacement	105 CMR 410.500
	Boiler Room: Water pipes are rusting and leaking water, need replacement	105 CMR 410.500

#### 200-2 Family Housing Development

90C Melendy Avenue	Living Room: Windows need replacement	105 CMR 410.500
72C Melendy Avenue	Kitchen: Windows need replacement	105 CMR 410.500
Willow Park	Building Exterior: Railings and porches need repair and Painting	105 CMR 410.500
	Hallway and stairs need repair and painting	105 CMR 410.500
	Boiler Room: Heating system is obsolete and inefficient, needs replacement	105 CMR 410.200

Location

Noncompliance

Regulation

200-3 Family Housing Development

230 Lexington Street	Living Room, Bedroom, Kitchen, and Bathroom: Paint is peeling on walls	105 CMR 410.500
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667-1 Elderly Housing Development

88A Forest Street, #10	Living Room and Kitchen: Hard-wired smoke detectors need replacement	105 CMR 410.482
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	Bathroom: Ceilings and walls are ruined due to broken waste pipes	105 CMR 410.500
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	Bedroom: Floor needs replacement	105 CMR 410.500
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86A Forest Street, #11	Bedroom: Floor needs replacement	105 CMR 410.500
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	Bathroom: Walls and ceiling need repair and painting	105 CMR 410.500
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	Kitchen: Cabinets are broken, need repair	105 CMR 410.100
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McSherry Gardens	Building Exterior: Fascia Board is in grave disrepair, wood is rotting, and paint is peeling	105 CMR 410.500
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	Concrete stairs are damaged and in grave disrepair	105 CMR 410.500
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	Foundation is damaged and in grave disrepair	105 CMR 410.500
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	Walkways need repair	105 CMR 410.750
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	Security system on doors needs replacement	105 CMR 410.480
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667-2 Elderly Housing Development

55 Waverley Avenue, #414	Bathroom: Peeling paint/Moisture on ceiling	105 CMR 410.500
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	Kitchen: Cabinets/Countertops are chipped, cracked and broken	105 CMR 410.100
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55 Waverley Avenue, #518	Bathroom: Paint is peeling on ceiling	105 CMR 410.500
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55 Waverley Avenue, #610	Kitchen: Countertops and cabinets are chipped	105 CMR 410.100
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55 Waverley Avenue, #701	Kitchen: Countertops and cabinets are chipped and broken	105 CMR 410.100
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55 Waverley Avenue, #723	All windows and glass doors in the apartment need replacement	105 CMR 410.500
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55 Waverley Avenue, #822	Bathroom: Water penetration on ceiling due to leak on roof	105 CMR 410.500
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<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
<u>667-2 Elderly Housing Development (Continued)</u>		
Woodland Towers	Building Exterior: Rubber seam on roof is damaged and not water-proof	105 CMR 410.501
	Concrete stairs need replacement	105 CMR 410.500
	All driveways need repair	105 CMR 410.750
	Sidewalks need repair or replacement	105 CMR 410.750
	Original windows and sliding doors do not lock, need replacement, cannot buy replacement parts or repair	105 CMR 410.480
	Circuit breakers throughout the buildings are obsolete, can't be replaced, not made anymore	105 CMR 410.351
<u>667-3 Elderly Housing Development</u>		
100 Warren Street, #405 (Off-line)	Kitchen: Walls need repair and painting	105 CMR 410.500
	Bathroom: Paint is peeling on ceiling	105 CMR 410.500
Warren Street Towers	Building Exterior: Original roof needs replacement, severe ice dams occur	105 CMR 410.500
	Severe water damage to 11 units which are un-rentable and have been taken off line, need gutter repair	105 CMR 410.500
	Fence is falling down, needs replacement	105 CMR 410.500
	Driveway needs repair or replacement	105 CMR 410.750
	Window failure, needs replacement	105 CMR 410.501
<u>705-1 Scattered Site Housing Development</u>		
113 Poplar Street	Living Room and Bedroom: Ceilings need repair and paint	105 CMR 410.500
	Kitchen: Cabinets are broken, need replacement	105 CMR 410.100
	Floor is cracked	105 CMR 410.504
	Bathroom: Sink is leaking water	105 CMR 410.352
<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>

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	Building Exterior: Roof leaks and in grave disrepair, needs re-shingling	105 CMR 410.501
	Garage's roof and doors are damaged, need replacement	105 CMR 410.500
	Front steps are damaged, need repair	105 CMR 410.500
6A Keith Street	Kitchen: Ceiling needs repair	105 CMR 410.500
	Bathroom: Water damage on wall due to leak on roof	105 CMR 410.500
	Building Exterior: Roof leaks, needs repair	105 CMR 410.501
	Concrete stairs and walkways need repair	105 CMR 410.750
	Fence needs repair and painting	105 CMR 410.500
	Wooden stairs are rotting	105 CMR 410.500
8 Hersom Street	Kitchen: Cabinets and floor need replacement	105 CMR 410.100
	Bathroom: Water damage on ceiling due to leak on roof	105 CMR 410.500
	Building Exterior: Roof needs replacement	105 CMR 410.500
	Concrete stairs and walkways need repair	105 CMR 410.750
	Back porches need repair and re-painting	105 CMR 410.500

## APPENDIX II

### Photographs of Conditions Found

200-1 Lexington Gardens – Water Pipes are Rusting and Leaking Water



667-2 Woodland Towers – Sidewalks Need Repair or Replacement



705-1 8 Hersom St. – Kitchen cabinets need replacement



667-1 88A Forest St., #10 – Smoke Detectors Need Replacement

