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
LEE HOUSING AUTHORITY
JULY 1, 2003 TO JUNE 30, 2005
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 Lee 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

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.

For the fiscal year ended June 30, 2005, we inspected five of the 64 state-aided housing units managed by the Authority and noted 36 instances of noncompliance with Chapter II of the State Sanitary Code, including a missing smoke detector, cracked walls, paint peeling on walls, screens missing from windows, kitchens cabinets falling apart, mold, mildew, insect infestation, trip hazards, cracks, and holes in the pavement. In its response, the Authority indicated that it had requested funding from DHCD to address these issues.

2. MODERNIZATION INITIATIVES NOT FUNDED

In response to our questionnaires, the Authority informed us that there is a need for modernizing its managed properties. During fiscal year 2002, the Authority submitted a Condition Assessment Report to DHCD requesting funding for the paving of parking
lots and roads at its 667-1 development; however, this request was denied. 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. In its response, the Authority indicated that it is unable to maintain these developments properly because of lack of funding.

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

In response to our questionnaires, the Authority indicated that there is a possibility it may have land available on which to build affordable housing. The Authority should determine whether there is land available, and if so, apply for funding from DHCD to develop additional housing units.

4. **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 vacant units was 42 days. Moreover, we found that there were over 60 applicants on the Authority's waiting list. In its response, the Authority indicated that circumstances sometimes prevent the units from being reoccupied within the guidelines.

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

During our audit, we found that the Authority did not incorporate DHCD’s Property Maintenance Guide into its own 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 although it does not have a written maintenance plan, all repairs are addressed as funding allows.

**SUPPLEMENTARY INFORMATION**

**APPENDIX I**

State Sanitary Code Noncompliance Noted

**APPENDIX II**

Photographs of Conditions Found
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 Lee 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 the 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 plan 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 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 inspected five of the 64 elderly and family state-aided dwelling units at the Lee Housing Authority. Our inspection noted 36 instances of noncompliance with Chapter II of the State Sanitary Code, including a missing smoke detector, cracked walls, paint peeling on walls, kitchen cabinets falling apart, mold, mildew, insect infestation, trip hazards, screens missing from windows, and cracks and holes in the pavement. (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 increased costs at a future date, and may result in the Authority’s 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 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

The Authority’s Executive Director responded, in part:

The results from your inspection of our 705 and 667 developments ranged from minor issues to capital improvement issues. The minor issues are always addressed and dealt with through the maintenance staff. The capital improvement issues are placed on a list, which was included in your audit, for when funding is available. Over the years, 1994, 1999, and 2002, I requested funding for kitchens, baths, driveways and sidewalks by submitting Condition Assessment Reports (CARS) and each year was denied. We have
been Band Aiding driveways, sidewalks, and baths the best way we know how. Kitchens are done as yearly budgets allow. Most major issues are the result of aging, use, and wear and tear.

2. MODERNIZATION INITIATIVES NOT FUNDED

In response to our questionnaires, the Authority informed us that there is a need for modernizing its managed properties. Specifically, the Authority provided the following information regarding requests for capital modernization projects during fiscal year 2002 from DHCD, for which funding was denied:

<table>
<thead>
<tr>
<th>Description</th>
<th>Development</th>
<th>Approximate Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water meters</td>
<td>667-1</td>
<td>$30,000</td>
</tr>
<tr>
<td>Parking lot/road paving*</td>
<td>667-1</td>
<td>Unknown</td>
</tr>
<tr>
<td>Sidewalks – community building</td>
<td>667-1</td>
<td>$20,000</td>
</tr>
<tr>
<td>Driveways with drainage</td>
<td>667-1</td>
<td>$25,000</td>
</tr>
<tr>
<td>Stairwell walls replaced</td>
<td>667-1</td>
<td>$6,000</td>
</tr>
<tr>
<td>Eaves painted</td>
<td>667-1</td>
<td>$8,000</td>
</tr>
<tr>
<td>Decks painted</td>
<td>667-1</td>
<td>$10,000</td>
</tr>
<tr>
<td>Replace windows (120)</td>
<td>667-1</td>
<td>Unknown</td>
</tr>
<tr>
<td>Bathrooms – sinks, toilets, and medicine cabinets (48)</td>
<td>667-1</td>
<td>$80,000</td>
</tr>
<tr>
<td>Kitchen cabinets and countertops (31)</td>
<td>667-1</td>
<td>$120,000</td>
</tr>
<tr>
<td>Carpet/flooring</td>
<td>667-1</td>
<td>$6,000</td>
</tr>
<tr>
<td>Stairwell carpet</td>
<td>667-1</td>
<td>Unknown</td>
</tr>
<tr>
<td>Stoves and refrigerators</td>
<td>667-1</td>
<td>Unknown</td>
</tr>
<tr>
<td>Exterior trim paint</td>
<td>705-1</td>
<td>Unknown</td>
</tr>
<tr>
<td>Tub walls</td>
<td>705-1</td>
<td>Unknown</td>
</tr>
<tr>
<td>Replace furnaces</td>
<td>705-1</td>
<td>Unknown</td>
</tr>
<tr>
<td>CO2 detectors –may be required to install</td>
<td>705-1</td>
<td>Unknown</td>
</tr>
</tbody>
</table>

*During fiscal year 2002, the Authority submitted a Condition Assessment Report (CAR) to DHCD requesting funding to pave its parking lots and roads; however, this request was denied. In response to our questionnaire, the Authority indicated that it had submitted CARS to DHCD in the last 10 years.

The above conditions are mainly the result of aging, use, and wear and tear and, as illustrated by photographs included in Appendix II, may pose a safety hazard to tenants.

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. 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.

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 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**

The Authority’s Executive Director responded, in part:

>As the age of our developments increases so do the issues that come up. Our 705 development has been occupied for 14 years and our 667 development 34 years. As the director, it is frustrating for me to be unable to keep these developments safe and decent because of lack of funding. Since the budget caps were frozen in 2002 keeping these developments safe and decent has been an enormous challenge not only for myself but also for the maintenance staff.

**3. AVAILABILITY OF LAND TO BUILD AFFORDABLE HOUSING**

In response to our questionnaires, the Authority informed us that there is a possibility it may have available land to construct additional housing units. The need for additional housing is justified, considering that there are over 60 applicants on the Authority’s waiting list.
Recommendation

The Authority should determine if the land is available, and if so, apply for funding from DHCD to build additional housing units.

Auditee’s Response

The Authority chose not to respond to this issue.

4. 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 42 days. Moreover, we found that there were over 60 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.

Recommendation

The Authority should ensure that its vacant units are refurbished and reoccupied within DHCD’s guidelines. DHCD should obtain and provide the Authority with the funds necessary to fulfill their respective statutory mandate.

Auditee’s Response

The Authority’s Executive Director responded, in part:

The vacant unit results state that the average turnover for reoccupying vacant units was 42 days which is not within DHCD guidelines. Certain circumstances don’t always allow the housing authority to reoccupy a unit within DHCD 21 day turnover. Something to take into consideration is, during the period that was looked at, there were a large amount of turnovers for a small authority within the same months. There were on 11/03 2-1 bedroom units, 2/04 3-1 bedroom units and 1-2 bedroom unit, 3/04 1-1 bedroom and 1-3 bedroom unit, 8/04 3-1 bedroom units, 2/05 1-1 bedroom unit and 1-2 bedroom unit, 6/05 2-1 bedroom units, plus the other vacancies in between for a total of 19-1 bedroom units and 3-3 bedroom units and 2-2 bedroom units. We handle vacancies as our priority but unfortunately that doesn’t always work out. With no full time...
maintenance staff, one at 35 hours and other at 16 hours, an unexpected issue can push the work behind which in turn will go past DHCD’s 21 day turnover time.

5. OFFICIAL WRITTEN PROPERTY MAINTENANCE PLAN NOT ESTABLISHED

During our audit, we found that the Authority did not incorporate DHCD’s Property Maintenance Guide into its own 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 a plan without adequate funds and resources 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 should respectively obtain and provide the necessary funds and resources to ensure that this plan is enacted.

Auditee’s Response

The Authority’s Executive Director responded, in part:

As for a written property maintenance plan, we do not have one. All our programs are inspected on an annual basis. Routine, emergency and inspection repairs are documented through our work order system. All repairs documented are prioritized and addressed as funding allows.
SUPPLEMENTARY INFORMATION

1. Lee 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:

<table>
<thead>
<tr>
<th>Development</th>
<th>Number of Units</th>
<th>Year Built</th>
</tr>
</thead>
<tbody>
<tr>
<td>667-1</td>
<td>48</td>
<td>1973</td>
</tr>
<tr>
<td>705-1</td>
<td>16</td>
<td>1992</td>
</tr>
<tr>
<td>Total</td>
<td>64</td>
<td></td>
</tr>
</tbody>
</table>

2. Operating Subsidies Owed the Authority

As of June 30, 2005, the Authority was not owed any operating subsidy from DHCD.
APPENDIX I

State Sanitary Code Noncompliance Noted

**Family 705-1 Development**

<table>
<thead>
<tr>
<th>Location</th>
<th>Noncompliance</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>35 Clark Court</td>
<td>Living room – baseboard falling off walls</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Living room – contains large car bench seat</td>
<td>105 CMR 410.602</td>
</tr>
<tr>
<td></td>
<td>Kitchen – chip out of wall</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Kitchen – enamel chipped on stove</td>
<td>105 CMR 410.100</td>
</tr>
<tr>
<td></td>
<td>Kitchen – sink dripping due to loose faucet</td>
<td>105 CMR 410.351</td>
</tr>
<tr>
<td></td>
<td>Kitchen – cabinet door coming off hinges</td>
<td>105 CMR 410.100</td>
</tr>
<tr>
<td></td>
<td>Kitchen – insect infestation on walls and ceiling</td>
<td>105 CMR 410.550</td>
</tr>
<tr>
<td></td>
<td>Bedroom # 1 – no screen on window</td>
<td>105 CMR 410.551</td>
</tr>
<tr>
<td></td>
<td>Bedroom # 1 – door is broken</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Bedroom #2 – holes in wall</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Unit - carpets rippling</td>
<td>105 CMR 410.504</td>
</tr>
<tr>
<td></td>
<td>Unit - crayon markings all over every wall</td>
<td>105 CMR 410.505</td>
</tr>
<tr>
<td></td>
<td>Unit - generally dirty and messy</td>
<td>105 CMR 410.505</td>
</tr>
<tr>
<td></td>
<td>Unit - missing smoke detector</td>
<td>105 CMR 410.482</td>
</tr>
<tr>
<td></td>
<td>Common Area – clothes dryer vent in disrepair</td>
<td>105 CMR 410.351</td>
</tr>
</tbody>
</table>

**Elderly 667-1 Development**

<table>
<thead>
<tr>
<th>Location</th>
<th>Noncompliance</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>13 Brown Memorial Court</td>
<td>Bathroom – cracked sink</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Unit – windows old and drafty</td>
<td>105 CMR 410.501</td>
</tr>
<tr>
<td>26 Brown Memorial Court</td>
<td>Bathroom – cracked sink</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Unit – windows old and drafty</td>
<td>105 CMR 410.501</td>
</tr>
<tr>
<td>36 Brown Memorial Court</td>
<td>Bathroom – peeling paint on all walls</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Bedroom – crack in corner wall</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Bedroom – window screen is coming off</td>
<td>105 CMR 410.551</td>
</tr>
<tr>
<td></td>
<td>Unit - windows old and drafty</td>
<td>105 CMR 410.501</td>
</tr>
<tr>
<td></td>
<td>Kitchen – cabinets falling apart</td>
<td>105 CMR 410.100</td>
</tr>
<tr>
<td>46 Brown Memorial Court</td>
<td>Bedroom – cracks in corner wall</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Bedroom – crack in ceiling</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>Brown Memorial Court</td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------------</td>
<td>--------------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>Bathroom – vent clogged</td>
<td>105 CMR 410.750</td>
<td></td>
</tr>
<tr>
<td>Bathroom - cracked shower tiles</td>
<td>105 CMR 410.150</td>
<td></td>
</tr>
<tr>
<td>Bathroom - mold/mildew</td>
<td>105 CMR 410.750</td>
<td></td>
</tr>
<tr>
<td>Unit - windows old and drafty</td>
<td>105 CMR 410.501</td>
<td></td>
</tr>
<tr>
<td>Unit - new carpets badly soiled and stained with burn holes</td>
<td>105 CMR 410.500</td>
<td></td>
</tr>
<tr>
<td>Driveway to parking area – cracks and large holes in hardtop</td>
<td>105 CMR 410.750</td>
<td></td>
</tr>
<tr>
<td>Parking area – large cracks in hardtop</td>
<td>105 CMR 410.750</td>
<td></td>
</tr>
<tr>
<td>Stairs leading to concrete patio from central courtyard – concrete base of handrail deteriorating</td>
<td>105 CMR 410.503</td>
<td></td>
</tr>
<tr>
<td>Outside community building – cracked sidewalk creating a trip hazard</td>
<td>105 CMR 410.750</td>
<td></td>
</tr>
<tr>
<td>Outside community building - peeling paint under building overhang</td>
<td>105 CMR 410.500</td>
<td></td>
</tr>
</tbody>
</table>
APPENDIX II

Photographs of Conditions Found

667-1 Development, 36 Brown Memorial Court
Bathroom - Peeling Paint on All of the Walls

667-1 Development, 46 Brown Memorial Court
Bedroom - Crack in Ceiling
667-1 Development, 36 Brown Memorial Court
Kitchen Cabinets Falling Apart

667-1 Development, 26 Brown Memorial Court
Bathroom - Cracked Sink
667-1 Development, 46 Brown Memorial Court
Bathroom - Vent Clogged

667-1 Development, 46 Brown Memorial Court
Bathroom - Cracked Shower Tiles and Mold/ Mildew
**APPENDIX II**

667-1 Development, Brown Memorial Court, Exterior
Cracked Sidewalks Creating Tripping Hazards

667-1 Development, Brown Memorial Court, Exterior
Paint Peeling on Exterior of Buildings
667-1 Development, Brown Memorial Court, Exterior
Concrete Base of Handrail Deteriorating

667-1 Development, Brown Memorial Court, Exterior
Cracked Sidewalk Creating Tripping Hazard
667-1 Development, Brown Memorial Court, Exterior
Cracked Sidewalk Creating Tripping Hazard

667-1 Development, Brown Memorial Court
Driveway to Parking Areas
Cracks and Large Holes in Hardtop
667-1 Development, Brown Memorial Court, Exterior
Cracked Parking Area Creating Tripping Hazard

705-1 Development, 35 Clark Court
Missing Smoke Detector in Kitchen
705-1 Development, 35 Clark Court
Insect Infestation on Walls in Kitchen

705-1 Development, 35 Clark Court
Broken Door on Master Bedroom