



# The Commonwealth of Massachusetts

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

**OFFICIAL AUDIT  
REPORT  
MARCH 19, 2008**

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**INTRODUCTION**


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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 (LHAs) throughout the state. The Weymouth 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.

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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. Between November 16 and November 23, 2005, we inspected 20 of the 405 state-aided housing units managed by the Authority and noted 108 instances of noncompliance with Chapter II of the State Sanitary Code, including broken glass windows/doors, loose door knobs, broken counter tops, and other health and safety hazards. In its response, the Authority reported that it has applied for and received funding to address some of the issues; however, other issues remain unfunded.

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**2. VACANT UNITS NOT REOCCUPIED WITHIN DHCD GUIDELINES**


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DHCD's Property Maintenance Guide indicates that housing authorities should reoccupy units within 21 working days of their being vacated by a tenant. However, our review found that during the audit period, the Authority's average turnaround time for reoccupying vacant units in the 200-1 development was 165 days. Moreover, at the same

time that we found six vacant units in the Authority's Elderly Developments and three vacant units in the Family Development, there were a total of 485 applicants on the Authority's waiting list. In its response, the Authority indicated that it had asked for and received approval from DHCD not to immediately fill the vacant units at the time they became available, but the Authority could not provide us with documentation to support this statement.

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The Contract for Financial Assistance between the Authority and DHCD requires DHCD to subsidize the Authority to meet its expenses. A review of the Authority's operating subsidy accounts indicated that it was owed \$254,815 as of June 30, 2005, whereas a list of subsidies provided to us by DHCD indicated that it only owed the Authority a balance of \$32,423. Untimely payments may result in authorities not meeting their monthly obligations in a current manner, or may result in authorities having to borrow funds from other programs to pay current liabilities as they become due. In its response, the Authority agreed with this 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 Weymouth 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 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 met safety standards, we (a) observed the physical condition of housing units/projects by conducting inspections of selected units/projects to ensure that the units and buildings met the necessary minimum standards set forth in the State Sanitary Code, (b) obtained and reviewed the LHAs’ policies and procedures relative to unit site inspections, and (c) made inquiries with the local boards

of health to determine whether any citations had been issued, and if so, the LHA's plans to address the cited deficiencies.

To determine whether the modernization funds received by the LHAs were being expended for the intended purposes and in compliance with laws, rules, and regulations, we obtained and reviewed the Quarterly Consolidated Capital Improvement Cost Reports, Contracts for Financial Assistance, and budget and construction contracts. In addition, we conducted inspections of the modernization work performed at each LHA to determine compliance with its work plan.

To determine whether LHAs were receiving operating subsidies in a timely manner, we analyzed each LHA subsidy account for operating subsidies earned and received and the period of time that the payments covered. In addition, we made inquiries with the LHA's Executive Director/fee accountant, as necessary. We compared the subsidy balance due the 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 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 LHA had uninhabitable units, the length of time the units were in this state of disrepair, and the actions taken by the LHA 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 period July 1, 2003 to June 30, 2005, we reviewed inspection reports for 20 of the 405 state-aided dwelling units managed by the Weymouth Housing Authority.

In addition, from November 16 through 23, 2005, we conducted inspections of the units located at the Authority's Lakeview Manor (Family Housing 200-1), Calnan Circle (Elderly Housing 667-1), Harrington Circle (Elderly Housing 667-2), and Pope Towers (Elderly Housing 667-3). Our inspection noted 108 instances of noncompliance with Chapter II of the State Sanitary Code, including broken glass windows/doors, loose door knobs, water stains on ceilings, lifting and broken floor tiles, broken counter tops, crumbling sidewalks and curbs, peeling and flaking paint on walls and ceilings, mildew, mold, and other health and safety hazards. (Appendix I of our report summarizes the specific State Sanitary Code violations noted, and Appendix II includes photographs documenting the conditions found.)

The photographs presented in Appendix II illustrate the pressing need to address the conditions noted, since postponing the necessary improvements would require greater costs at a future date, and may result in the properties not conforming to minimum standards for safe, decent, and sanitary housing.

#### ***Recommendation***

The Authority should apply for funding from DHCD to address the issues noted during our inspections of the interior (dwelling units) and exterior (buildings) of the Authority, as well as other issues that need to be addressed. 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, in part:

*Results of Inspection: Since the audit took place the Authority has applied for and received funding for roof replacement at the J. Crehan Elderly Development; we have received funding and initiated sidewalk repair at the site. We have applied for funding for new windows at the site and have upgraded the fire alarm system. We still have original kitchen cabinets and flooring.*

*We have applied for and received funding for and installed a new boiler system and ventilation system at our Pope Towers Elderly Development. We are in design stages of elevator modernization and the installation of an additional elevator at the same site.*

*Our Lakeview Manor Family Development has undergone a \$6 million dollar exterior renovation and drainage project. We continue to seek funds to modernize our properties...*

**2. VACANT UNITS NOT REOCCUPIED WITHIN DHCD GUIDELINES**

DHCD's Property Maintenance Guide indicates that housing authorities should reoccupy units within 21 working days of their being vacated by a tenant. However, our review found that during the audit period, the Authority's average turnaround time for reoccupying vacant units in the 200-1 development was 165 days. In addition, at the same time that we found six vacant units in the Authority's Elderly Developments and three vacant units in the Family Development, there were a total of 485 applicants on the Authority's waiting list. In response to our questionnaire, the Authority indicated it needs "more maintenance staff to meet DHCD timeframes."

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 seek the necessary funding from DHCD to hire additional maintenance staff to ensure that its vacant units are refurbished and reoccupied within the timeframe established by DHCD.

***Auditee's Response***

While the audit was in progress, the Authority stated that it was attempting to secure financing to complete the \$6 million Lakeview Manor renovation project.

*Part of the financing was to be leverage financing, whereby some families would be paying market rent and the difference between the normal rent and higher rent would be available for debt service. In order to show the banks that units would be available for the higher paying rents we were advised and DHCD agreed to not fill units when they became available. Having stated that let me say that with the limited subsidy and the number of maintenance personnel allowed by DHCD is inadequate to get the job done. We have 8 maintenance personnel to handle 475 public units. They are responsible for all daily maintenance, yard work, snowplowing and unit turnover; it is an impossible task with the limited number of personnel allowed.*

***Auditor's Reply***

The Authority, upon request, could not and/or did not provide us with supporting documentation to prove that authorization was granted by DHCD to not reoccupy vacant units when they became available.

**3. 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 the subsidy records to determine whether the amounts were in agreement with balances provided by DHCD. As of June 30, 2005, the Authority's subsidy records indicated that operating subsidies earned and due the Authority amounted to \$254,815; however, a list of balances provided by DHCD indicated that it only owed the Authority a balance of \$32,423. The discrepancy between the balances provided by the Authority and DHCD prevented us from determining the correct subsidy balance due the Authority. Untimely payments may result in authorities not meeting their monthly obligations in a current manner, and may result in authorities borrowing funds from other programs to pay current liabilities as they become due. The Authority has been forced to cancel road and sidewalk repairs, use reserve funds to pay operating expenses, and has not remitted its Payments in Lieu of Taxes, amounting to \$64,000, to the Town of Weymouth.

***Recommendation***

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

***Auditee's Response***

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

*The Authority does agree with this finding and is still currently owed approximately \$73,000.00. We had been seriously under funded at the time of the audit but DHCD has been doing better.*

**SUPPLEMENTARY INFORMATION*****Weymouth Housing Authority–Managed State Properties***

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

<u>Development</u>	<u>Number of Units</u>	<u>Year Built</u>
200-1	189	1951
667-1	80	1965
667-2	76	1968
667-3	<u>60</u>	1981
Total	<u>405</u>	

## APPENDIX I

### State Sanitary Code Noncompliance Noted

#### **200-1 Family Development**

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
41A Joseph Fern Court	Living Room – floor has water damage	105 CMR 410.500
30A Memorial Drive	Living Room – floor lifting, floor jack (support column) must be replaced.	105 CMR 410.500
	Bathroom – floor is lifting outside bathroom	105 CMR 410.504
	Kitchen – water stains in ceiling	105 CMR 410.500
	Kitchen – countertop laminate broken and seam lifting	105 CMR 410.100
	Kitchen – cabinets and drawers broken	105 CMR 410.100
	Chimney – needs flashing replacement	105 CMR 410.500
	Cellar – filled with clutter	105 CMR 410.602
47A Joseph Fern Court	Cellar – hole in cellar floor as well as protruding concrete above cellar floor line	105 CMR 410.504
	Bedroom #1 – holes in door	105 CMR 410.500
	Bedroom #2 – stress crack in wall	105 CMR 410.500
	Bedrooms #1 & 2 – exposed wiring running between the two rooms	105 CMR 410.256
	Kitchen – Refrigerator in need of repair	105 CMR 410.100
	Kitchen – countertop laminate is broken	105 CMR 410.100
	Kitchen – backsplash de-laminating	105 CMR 410.100

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	Front Door – blocked with rubbish bags	105 CMR 410.451
	Cellar – clutter blocking top of stairs	105 CMR 410.451
	Cellar – stress cracks cover the floor	105 CMR 410.500
	Cellar – damp smell	105 CMR 410.750
	Common Hallway – clutter blocking the door	105 CMR 410.451
	Clutter at entrance door	105 CMR 410.451
67A Joseph Fern Court	Bedroom #1 – door broken and loose door knob	105 CMR 410.480
	Bedroom #1 – no electric cover plate	105 CMR 410.351
	Bedroom #2 – no door	105 CMR 410.480
	Living Room – warped and lifting floor	105 CMR 410.504
	Living Room – holes in ceiling	105 CMR 410.500
	Kitchen – counter top has broken laminate	105 CMR 410.100
	Bathroom – floor tiles broken	105 CMR 410.504
	Banister – loose with broken support braces	105 CMR 410.503
	1 <sup>st</sup> floor to 2 <sup>nd</sup> floor – exposed cable wire	105 CMR 410.256
	1 <sup>st</sup> floor – smoke detector is missing	105 CMR 410.482
	2 <sup>nd</sup> floor smoke detector is hanging by its wires	105 CMR 410.482
	Cellar – clutter on stairwell	105 CMR 410.451
	Cellar – light fixture's globe is missing	105 CMR 410.253
	Cellar – clutter blocking the door to the common hallway	105 CMR 410.451
31 Memorial Drive	Bathroom – tile lifting	105 CMR 410.504

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	Bedroom #3 – the addition to the original floor has dropped	105 CMR 410.504
	Refrigerator – seals are gone	105 CMR 410.100
	Kitchen – cabinet door is broken	105 CMR 410.100
	Kitchen – countertop is broken, backsplash is de-laminating	105 CMR 410.100
	Roof – chimney needs flashing	105 CMR 410.500
	Cellar – needs lighting	105 CMR 410.253
	Cellar – filled with clutter	105 CMR 410.451
109B Memorial Drive	Kitchen – floor is lifting	105 CMR 410.504
	Kitchen – missing part of back splash behind stove	105 CMR 410.100

### **667-1 Elderly Development**

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
6 C Calnan Circle	Bathroom – no electrical outlets	105 CMR 410.252
	Living Room, Kitchen, Bathroom, Bedroom – windows very difficult to open	105 CMR 410.500
	Kitchen – countertop laminate burnt and bubbled	105 CMR 410.100
	Common Area – broken window screen	105 CMR 410.551
	Common Area – window cracked and very difficult to open	105 CMR 410.500
	Hallway – littered with trash	105 CMR 410.602
	Sidewalks – breaking, water pooling	105 CMR 410.750
	Grounds – littered with newspapers	105 CMR 410.602
22 B Calnan Circle	Bathroom – no electrical outlets	105 CMR 410.252
	Living Room – wind-blown rain entering the window causing paint to lift	105 CMR 410.501

	Bedroom – wind blown rain entering the window causing paint to lift and the floor to get wet	105 CMR 410.501
22 B Calnan Circle	Kitchen – stove needs a new door gasket	105 CMR 410.100
	Common Areas – hallway contains storage of tenant possessions	105 CMR 410.451
10 A Calnan Circle	Living Room, Kitchen, Bathroom, Bedroom – windows very difficult to open	105CMR 410.500
	Bathroom – 4-inch hole in ceiling	105 CMR 410.500
	Kitchen – countertop is broken and discolored	105 CMR 410.100
	Bathroom – toilet does not work	105 CMR 410.150
25 A Calnan Circle	Living Room, Kitchen, Bathroom, Bedroom – windows very difficult to open	105CMR 410.500
	Living Room – wind drafts	105 CMR 410.501
	Bathroom – no vent for moisture over tub and shower	105 CMR 410.280
	Hallways – front and back door locks broken	105 CMR 410.480
<b><u>667-2 Elderly Development</u></b>		
49 A Harrington Circle	Bathroom – no electrical outlets	105 CMR 410.252
	Kitchen – door is blocked by tenant possessions	105 CMR 410.451
	Sidewalks – concrete curbing is breaking and deteriorating, sidewalks are lifting	105 CMR 410.750

6 C Harrington Circle	Bathroom – no electrical outlets	105 CMR 410.252
	Kitchen – nails protruding from linoleum floor	105 CMR 410.504
	Living Room – window rattles and wind draft	105 CMR 410.501
	Hallway – littered with clutter	105 CMR 410.602
	Concrete curbing breaking and deteriorating	105 CMR 410.750
10 D Harrington Circle	Bathroom – no electrical outlets	105 CMR 410.252
	Living Room – broken door casing	105 CMR 410.500
	Kitchen – nails protruding through linoleum floor, plywood floor beneath sink needs replacement	105 CMR 410.504
	Hallways – littered with clutter	105 CMR 410.602
	Concrete curbing breaking and deteriorating	105 CMR 410.750
14A Harrington Circle	Bathroom – no electrical outlets	105 CMR 410.252
	Hallways – littered with clutter	105 CMR 410.602
	Concrete curbing breaking and deteriorating	105 CMR 410.750

**667-3 Elderly Development:**

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
506 Pope Towers	Kitchen, Bathroom – vents not working	105 CMR 410.280
	Bathroom – water stain on ceiling	105 CMR 410.500
	Stove/oven (25 years old) not working	105 CMR 410.100
	Hallways – littered with clutter	105 CMR 410.602
	Roof – water pooling and separated flashing	105 CMR 410.500
	Siding – cracking and pulling away from building	105 CMR 410.500
	Sidewalk – Concrete sidewalk broken, trip hazard	105 CMR 410.750

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	Heating Boilers – boilers 1 and 2 are misfiring and replacement parts are not readily available	105 CMR 410.200
	Roof – vent motors do not remove moisture	105 CMR 410.280
	Front Door – Handicapped/security door broken (splintered glass)	105 CMR 410.500
	Air handler not changing air in 7-story building	105 CMR 410.280
507 Pope Towers	Bedroom, Living Room, Kitchen, Entryway – water-stained ceilings	105 CMR 410.500
	Kitchen and Bathroom vents not working	105 CMR 410.280
	Hallway – tenant possessions blocking all room entrances	105 CMR 410.451
209 Pope Towers	Kitchen – water damage to the ceiling - from the 4 <sup>th</sup> floor to the 1 <sup>st</sup> floor.	105 CMR 410.500
	Kitchen – countertops are broken	105 CMR 410.100
201 Pope Towers	Living Room – water stains on window frame from wind-blown rain	105 CMR 410.501
	Kitchen and bathroom vents do not work	105 CMR 410.280
	Bathroom – ceiling has water stain due to moisture problem	105 CMR 410.500
	Stove/oven (over 25 years old) – does not work	105 CMR 410.100
701 Pope Towers	Kitchen and bathroom vents do not work	105 CMR 410.280
	Hallway – ceiling stained due to	105 CMR 410.500

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	roof leaks	
	Common Areas – tenant storage in hallway	105 CMR 410.451
403 Pope Towers	Living Room – two holes in the walls	105 CMR 410.500
	Kitchen and bathroom vents do not work	105 CMR 410.280
	Kitchen – base shelf under sink is water-damaged	105 CMR 410.100

## APPENDIX II

### Photographs of Conditions Found

200-1 Family Housing Development, 67A Joseph Fern Court

Living Room – Warped and Lifting Floor



667-3 Elderly Housing Development, 506 Pope Towers

Cracked and Deteriorated Sidewalk



667-3 Elderly Housing Development, 506 Pope Towers  
Building –Roof Vents Do Not Remove Moisture



667-3 Elderly Housing Development, 506 Pope Towers  
Building – Separated Flashing



667-3 Elderly Housing Development, 507 Pope Towers  
Living Room – Stained Ceiling

