

CHFA Capital Needs Assessment and Replacement Reserve Analysis

Prepared for:

Connecticut Housing Finance Authority
999 West Street
Rocky Hill, CT 06067

and

Recap Real Estate Advisors
38 Chauncy Street, Suite 600
Boston, MA 02111



38 Chauncy Street, Suite 600 | Boston, MA 02111
T: 617.338.9484 | F: 617.338.9422

on-site-insight.com



Catherine McKeen E-19

CHFA #85101D

Milford Redevelopment and
Housing Partnership

Milford, CT

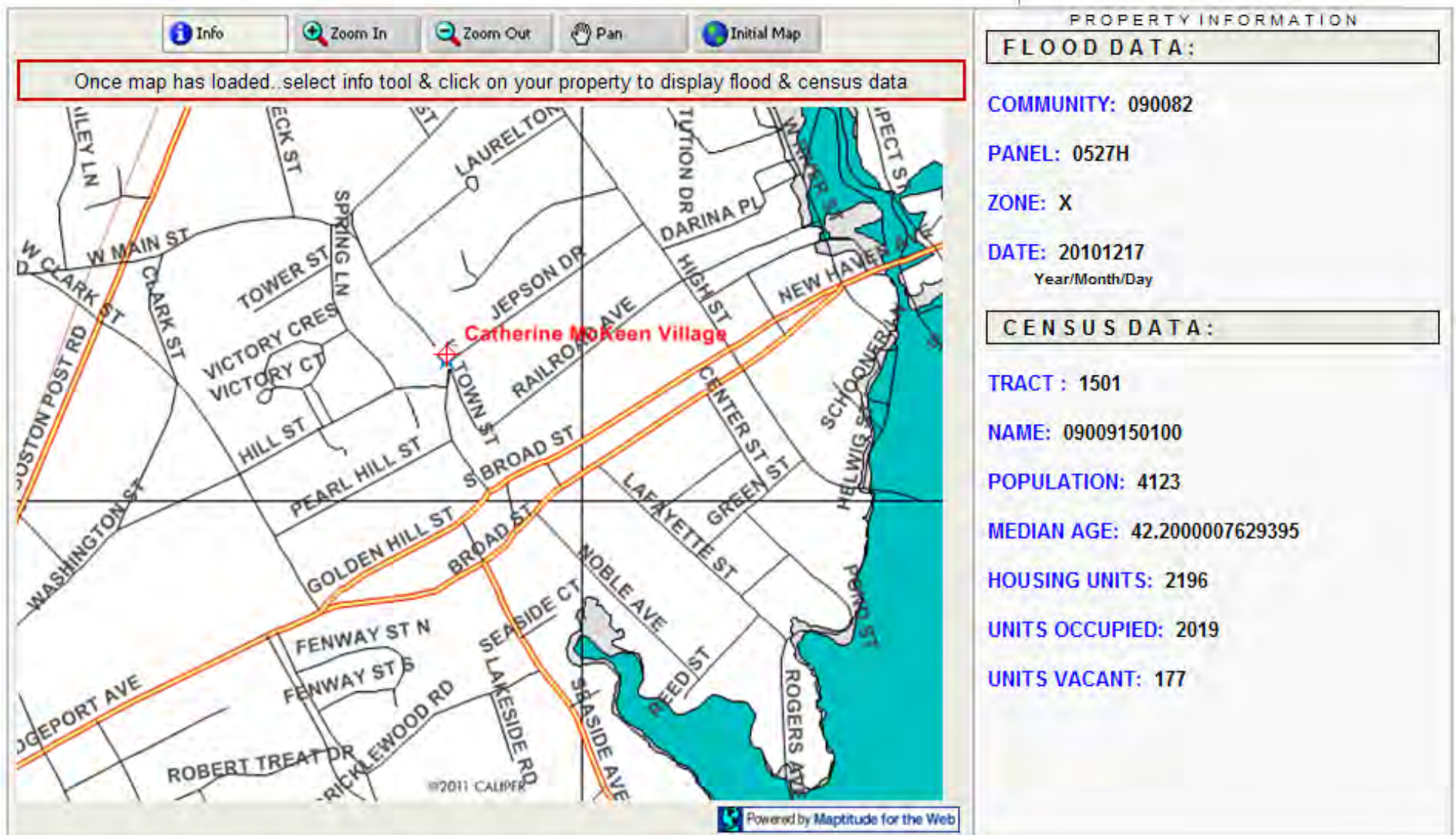
April 30, 2013

Final Report



Catherine McKeen Village

45-111 Jepson Drive
Milford, CT 06460



Catherine McKeen Village

45-111 Jepson Drive
Milford, CT 06460

Zone C = Outside the 500-year floodplain and
Outside the 1% and 0.2% annual chance floodplains

Executive Summary

Catherine McKeen Village E-19

Milford, CT

Catherine McKeen Village E-19 is a residential development for the elderly that is comprised of 25 units in 6 one-story, vinyl-faced buildings on a sloping site. The site is adjacent to a Federal development that provides the residents of the Village with meals, a laundry room, and the full spectrum of social services. Three four-unit buildings front on the street at the intersection of Jepson Drive and West Town Street. One four-unit and one six-unit building frames an asymmetric residential courtyard to the south and a parking courtyard to the north. The buildings have vinyl siding and trim with ornamental shutters. The pitched roofs have asphalt shingles. The development includes 8 one-bedroom units, and 17 efficiency units, none of which are designated as accessible. There are 14 parking spaces in the courtyard behind the buildings at the corner. There are continuous walks from the parking lot to the unit entries.

Original occupancy of Catherine McKeen Village E-19 was 1970. The building roofs and windows were replaced in 2012 and the electric baseboard heating system was replaced in 2013 with a conversion to an all-electric UI program utilizing Hubbell hot water heaters. Asphalt parking and drives, siding and doors, and kitchens and baths are all generally original.

Overall the development is in good condition. As shown on the attached capital needs worksheets, the development faces significant capital needs throughout the assessment period. Based on the reported annual contributions, the development is seen as requiring an adjustment to current replacement reserve funding and/or an infusion of additional capital.

Key findings identified by this assessment of Catherine McKeen Village E-19 include the following:

- Asphalt paving at the drive and parking is shown with crack repair and sealcoating periodically over the plan.
- Asphalt paving at drives and parking is shown to be overlaid early and late in the plan.
- Concrete walks and front and rear door stoops are shown to be replaced mid-term.
- Trip hazards at the concrete walks and stoops are shown to be eliminated in Year 1.
- New site light poles, and repairs to the dumpster screening and storage enclosures at each building are shown in Year 1.
- Cleaning and miscellaneous repairs of the vinyl siding at all buildings is shown periodically throughout the plan.
- Unit exterior and storm door replacement at all of the buildings is shown early in the plan.
- Vinyl siding and soffit replacement at all of the buildings is shown early in the plan.
- New roofing is shown at the end of the plan based on EUL and condition.
- Upgrades to the building fire alarm systems are shown in Year 1, and upgrades to the security system are shown early in the plan.
- The replacement of light fixtures at all exterior doors and new cabinets for the electric meters and cable service is shown in Year 1.
- Unit wall and ceiling finishes are in good condition. Painting at unit turn-over is funded from operating accounts.
- Interior hung and bi-pass doors in the units are shown to be replaced early in the plan.
- Accessible route improvements to and through 3 units, and vinyl tile asbestos abatement at 23 units is shown in Year 1.
- Vinyl flooring in the unit living areas is shown to be replaced early and late in the plan.
- Bathroom vinyl flooring, fixtures, accessories, lights, and exhaust fans are shown to be replaced in Year 1 based on EUL.
- Enlargement and renovation of 3 bathrooms to make them fully accessible is shown in Year 1.
- Kitchen appliances, cabinets, counters, and sinks are shown to be replaced early in the plan and GFCI outlets in Year 1.
- Kitchen vinyl flooring is shown to be replaced early and late in the plan.
- The Hubbell electric hot water heaters for each unit are provided by UI at no cost. New thermostats are shown to be provided in Year 1.
- The replacement of emergency call devices is shown early and late in the plan. Smoke and heat detectors are shown early and mid-plan.
- The replacement of the unit electric service panels is shown in Year 1.
- Through wall air conditioners are the responsibility of the residents.

Additional Notes:

1. The Physical Assessment of the property was conducted on Wednesday, March 27th, 2013. Additional information was provided to ON-SITE INSIGHT by site staff and others. OSI was represented on this assignment by Brian Ameche, Principal of Clearstory LLC. We would like to thank site staff for their assistance.
2. Cost estimates used in this assessment are based on data from *RS Means Facilities and Construction Cost Data*. These cost estimates have been applied uniformly across the entire study portfolio to help ensure consistency of future projections. Actual owner and/or site pricing could vary significantly.
3. Unless required by fire, safety, or accessibility codes, items are typically shown being replaced in kind and do not include any planned upgrades or potential upgrade opportunities.
4. Regular updates of this plan are recommended to ensure careful monitoring of major building systems and to adjust the program to accommodate unanticipated circumstances surrounding the buildings, operations, and/or occupants.
5. This report is delivered subject to the conditions on Appendix A, *Statement of Delivery*.



Concrete walks site-wide are in generally fair condition.



Typical trip hazard at concrete walks and stoops should be eliminated.



Historic cracking in asphalt paving at sub-base failure.



Community Center at the Federal property between Catherine McKeen E-19 to the west and Catherine McKeen E-68 to the east is used by all residents.



New windows installed in 2012. New shutters and vinyl siding are shown to be replaced.



Entry doors and storm doors are well worn and shown to be replaced.



Sill at entry and storm doors has two inch lip and requires a ramp to be part of accessible route.



Electric meters, alarm, and cable box are shown to have weather tight enclosure constructed at each building in Year 1.



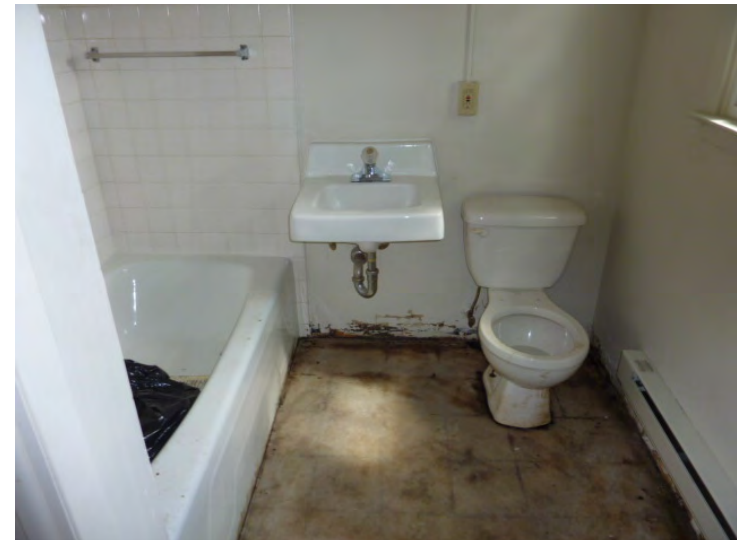
Typical living area in 1-bedroom apartment.



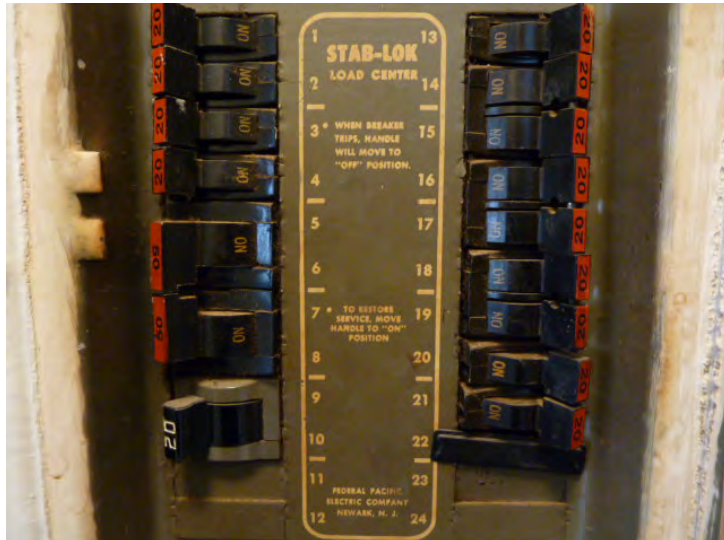
Typical bedroom in 1-bedroom apartment.



Typical renovated kitchen in 1-bedroom apartments.



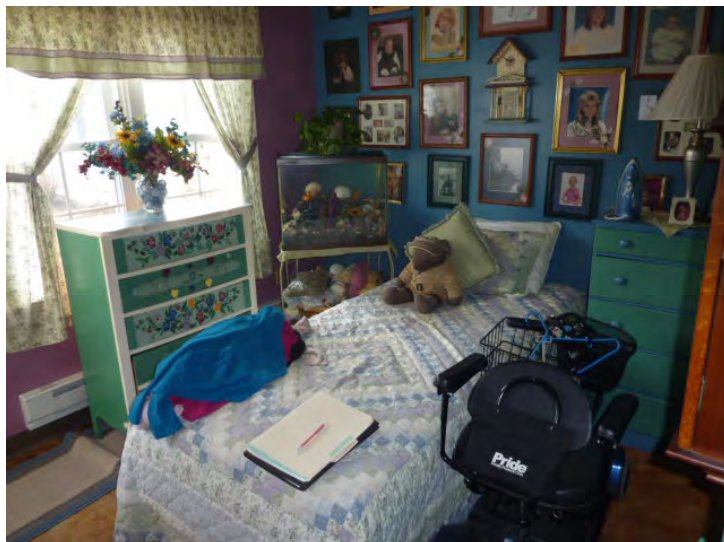
Typical bathroom in 1-bedroom apartments.



Typical electric panel is shown to be replaced in Year 1.



Typical living, dining and kitchen in efficiency apartments.



Typical sleeping area in efficiency apartments.



Typical bathroom in efficiency apartments.

Comprehensive Capital Needs Assessment Schedule

Summary

Owner Sponsor Name:	Milford Redevelopment and Housing Partnership
Project Name:	Catherine McKeen Village E-19
Project City / Town:	Milford

Current Year:	2013
Budget Effective Date:	January 1, 2013
Report Date:	March 29, 2013

Number of Units:	25
Total Square Feet:	12,964
Default Inflation Rate:	3.0%

Beginning Replacement Reserve Balance:	\$41,009
Annual Replacement Reserve Contribution:	\$7,226
Additional Misc. Contribution:	\$0

	Component	Total Planned Expenditures by Year																						
		Emergency	Deferred	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	Revitalization
				2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	
1	Site Improvements	0	5,000	46,460	0	0	0	0	110,742	0	0	0	0	6,729	0	0	0	0	14,033	0	0	0	75,331	0
2	Building Exterior	0	0	151,680	0	0	0	0	7,669	0	0	0	0	8,890	0	0	0	0	10,306	0	0	0	0	0
3	Roofing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	107,151	0
4	Lobby - Mail Area	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Community Room	0	0	3,500	0	0	0	0	1,607	0	488	0	0	4,233	0	0	0	0	5,453	0	656	0	0	0
6	Common Hallways	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	Common Stairways	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	Common Laundry	0	0	713	0	0	0	0	0	0	0	650	0	0	0	0	0	0	312	823	0	0	0	0
9	Common Area Restrooms	0	0	45,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Building Boilers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Building Mechanical	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	Building Electrical	0	0	77,350	0	0	0	39,393	0	0	0	0	0	0	0	0	0	0	0	0	0	0	94,689	0
13	Building Elevator	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Building Structural	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Unit Living	0	111,624	0	0	30,403	0	25,479	0	0	0	0	0	0	0	0	0	0	0	0	47,367	0	0	0
16	Unit Kitchens	0	24,000	80,770	37,363	0	0	0	0	0	0	0	0	0	0	0	0	0	14,832	26,879	0	0	0	0
17	Unit Bathrooms	0	60,000	107,687	0	0	0	0	0	0	0	0	0	5,499	0	0	0	0	8,764	0	0	0	0	0
18	Unit Electrical	0	30,625	21,750	0	0	0	0	0	0	0	0	0	19,151	0	0	0	0	11,685	0	0	0	0	0
19	Unit Mechanical	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	Annual Planned Expenditures	0	231,249	534,910	37,363	30,403	0	64,872	120,018	0	488	650	0	44,503	0	0	0	0	65,384	27,702	48,023	0	277,171	0
21	Annual Provision (indexed at 3%)			7,226	7,443	7,666	7,896	8,133	8,377	8,628	8,887	9,154	9,428	9,711	10,002	10,303	10,612	10,930	11,258	11,596	11,943	12,302	12,671	
22	Outside Capital			1,300,000																				
23	Cumulative Reserve Balance	41,009	(190,240)	582,076	552,156	529,419	537,315	480,575	368,935	377,563	385,962	394,466	403,894	369,103	379,105	389,408	400,020	410,950	356,824	340,718	304,638	316,940	52,440	

Site Improvements

Number of Units:	25
Total Square Feet:	12,964
Default Inflation Rate:	3.0%

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Building Exterior

Number of Units:	25
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Roofing

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[illegible]

Lobby / Mail Area

Owner Sponsor Name:	Milford Redevelopment and Housing
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[illegible]

Community Room

Owner Sponsor Name:	Milford Redevelopment and Housing
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Current Year:	2013
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Number of Units:	25
Total Square Feet:	12,964
Default Inflation Rate:	3.0%

	Component	Current Total Replacement Cost	Expected Annual Rate of Inflation	Current Age	Total Expected Useful Life	Initial Replacement Year	Planned Expenditures by Year																												
							Code	Emergency	Code	Deferred	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	Revitalization				
											2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032					
1	Floor	3,500		15	15	2013				3,500	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
2	Kitchen Cabinets / Sink	3,150		10	20	2023				0	0	0	0	0	0	0	0	0	0	4,233	0	0	0	0	0	0	0	0	0						
3	Kitchen Appliances					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
4	Furnishings					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
5	Refrigerator	670		10	15	2018				0	0	0	0	0	777	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
6	Range	435		10	15	2018				0	0	0	0	0	504	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
7	Painting - Walls	397		3	10	2020				0	0	0	0	0	0	488	0	0	0	0	0	0	0	0	0	0	656	0	0						
8	Range Hood	281		10	15	2018				0	0	0	0	0	326	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
9	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
10	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
11	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
12	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
13	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
14	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
15	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
16	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
17	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0						
18																																			
19																																			
20																																			
21																																			
22																																			
23																																			
24																																			
25																																			
26																																			
27	Annual Planned Expenditures						0	0	3,500	0	0	0	0	0	1,607	0	488	0	0	4,233	0	0	0	0	0	5,453	0	656	0	0	0				
28	Cumulative Reserve Balance						41,009	(190,240)	582,076	552,156	529,419	537,315	480,575	368,935	377,563	385,962	394,466	403,894	369,103	379,105	389,408	400,020	410,950	356,824	340,718	304,638	316,940	52,440							

Common Hallways

Number of Units:	25
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Common Stairways

Number of Units:	25
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Common Laundry

Number of Units:	25
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Common Area Restrooms

Number of Units:	25
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[illegible]

Building Boilers

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Building Mechanical

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Building Electrical

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Comprehensive Capital Needs Assessment Schedule

Building Elevator

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[illegible]

Building Structural

Number of Units:	25
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Unit Living

Number of Units:	25
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	Component	Current Total Replacement Cost	Expected Annual Rate of Inflation	Current Age	Total Expected Useful Life	Initial Replacement Year	Planned Expenditures by Year																												
							Code	Emergency	Code	Deferred	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	Revitalization				
											2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032					
1	Interior Doors					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
2	Walls					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
3	Ceilings					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
4	Interior Stairs					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
5	Floors					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
6	AC Sleeve					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
7	Electrical Outlets					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
8	Lighting Fixtures					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
9	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
10	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
11	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
12	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
13	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
14	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
15	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
16	Other					2013				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
17	New Vinyl Floors	28,658		varies	15	2015				0	0	30,403	0	0	0	0	0	0	0	0	0	0	0	0	0	47,367	0	0							
18	New Interior Hung Doors	11,880		45	35	2017				0	0	0	0	13,371	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
19	New Interior Bi-pass Doors	10,758		45	35	2017				0	0	0	0	12,108	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
20	Accessible Route Improvements at 3 Units	36,000		1	1	2013		4	36,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
21	Asbestos Abatement at 23 Remaining Units	75,624		1	1	2013		4	75,624	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
22																																			
23																																			
24																																			
25																																			
26																																			
27	Annual Planned Expenditures						0	111,624	0	0	30,403	0	25,479	0	0	0	0	0	0	0	0	0	0	0	0	47,367	0	0	0						
28	Cumulative Reserve Balance						41,009	(190,240)	582,076	552,156	529,419	537,315	480,575	368,935	377,563	385,962	394,466	403,894	369,103	379,105	389,408	400,020	410,950	356,824	340,718	304,638	316,940	52,440							

Unit Kitchens

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1	Walls					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
2	Ceilings					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
3	Floors					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
4	Cabinets					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
5	Countertops					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
6	Sink					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
7	Kitchen Exhaust Fan					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
8	GFI Outlet					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
9	Vent Hood					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
10	Refrigerators					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
11	Stove					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
12	Range					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
13	Dishwasher					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
14	Disposal					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
15	Other					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
16	Other					2013			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
17	New Vinyl Floors	9,520		varies	15	2013			9,520	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14,832	0	0	0	0							
18	Refrigerators	16,750		varies	15	2014			0	17,253	0	0	0	0	0	0	0	0	0	0	0	0	0	0	26,879	0	0	0								
19	Cabinets/Countertop/Sink	67,500		45	25	2013			67,500	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
20	Range	12,500		varies	20	2014			0	12,875	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
21	Rangehood	7,025		varies	20	2014			0	7,236	0	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0								
22	3 Kitchens-Accessible Sink, Cabinet,Work Area,Appliances	24,000		1	1	2013		4	24,000		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
23	New GFCI Outlets	3,750		45	30	2013			3,750	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0								
24																																				
25																																				
26																																				
27	Annual Planned Expenditures						0	24,000	80,770	37,363	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14,832	26,879	0	0	0	0						
28	Cumulative Reserve Balance						41,009	(190,240)	582,076	552,156	529,419	537,315	480,575	368,935	377,563	385,962	394,466	403,894	369,103	379,105	389,408	400,020	410,950	356,824	340,718	304,638	316,940	52,440								

Unit Electrical

Number of Units:	25
Total Square Feet:	12,964
Default Inflation Rate:	3.0%

[illegible]

Unit Mechanical

Owner Sponsor Name:	Milford Redevelopment and Housing
Project Name:	Catherine McKeen Village E-19
Project City / Town:	Milford

Current Year:	2013
Budget Effective Date:	January 1, 2013
Report Date:	March 29, 2013

Number of Units:	25
Total Square Feet:	12,964
Default Inflation Rate:	3.0%

[illegible]

Appendix A: Statement of Delivery

Our Capital Needs Assessment (the "CNA" or the "Report") on the subject property is delivered subject to the following terms and conditions:

1. This report and analysis are based upon observations for the visible and apparent condition of the building and its major components on the date of the fieldwork. Although care has been taken in the performance of this assessment, ON-SITE INSIGHT, Inc. (and/or its representatives) makes no representations regarding latent or concealed defects that may exist and no warranty or guarantee is expressed or implied. This report is made only in the best exercise of our ability and judgment.
2. We have undertaken no formal evaluation of environmental concerns, including but not limited to asbestos containing materials (ACMs), lead-based paint, chlorofluorocarbons (CFCs), polychlorinated biphenyls (PCBs), and mildew/mold.
3. Conclusions in this report are based on estimates of the age and normal working life of various items of equipment and/or statistical comparisons. Actual conditions can alter the useful life of any item. When an item needs immediate replacement depends on many factors, including previous use/misuse, irregularity of servicing, faulty manufacture, unfavorable conditions, Acts of God and unforeseen circumstances. Certain components that may be working when we made our inspection might deteriorate or break in the future without notice.
4. To prepare this report, we used historic data on capital activities and costs, blueprints (when available), and current prices for capital actions. We have not independently verified this information, have assumed that it is reliable, but assume no responsibility for its accuracy.
5. Unless otherwise noted in the report, we assume that all building components meet code requirements in force when the property was built.
6. If accessibility issues are referenced in the report, the site elements, common areas, and dwelling units at the development were examined for compliance with the requirements of the Uniform Federal Accessibility Standards (UFAS), and for Massachusetts properties, the Massachusetts Architectural Accessibility Board (AAB). The methodology employed in undertaking this examination is adapted from a Technical Assistance Guide (TAG-88-11) titled "Supplemental Information About the Section 504 Transition Plan Requirements" published by the Coordination and Review section of the U.S. Department of Justice Civil Rights Division, and the AAB Rules and Regulations, 521 CMR effective July 10, 1987. The Guide also incorporates the requirements of UFAS, published April 1, 1988 by the General Services Administration, the Department of Defense, the Department of Housing and Urban Development, and the U.S. Postal Service. Changes in legislation and/or regulations may make some observations moot.
7. Response Actions and estimated costs of responses were developed by ON-SITE INSIGHT, Inc. If additional structural work is necessary, costs for some Response Actions may exceed estimates. Whenever the Response Action is to remove, reposition, or modify walls, a competent structural engineer should be retained before any work is done, because such investigation may disclose that a Response Action is either more costly than estimated, or is not possible.
8. Conclusions reached in this report assume current and continuing responsible ownership and competent property management.
9. Regular updates of this plan are recommended to ensure careful monitoring of major building systems and to adjust the program to accommodate unanticipated circumstances surrounding the buildings, operations, and/or occupants.