



CAMBRIDGE TENANTS UNION

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MAY 28 PM 2:12
CAMBRIDGE MA.

Cambridge City Council
City Hall
795 Massachusetts Avenue
Cambridge, Mass. 02139

To the Honorable; the City Council:

On behalf of the Cambridge Tenants Union, I wish to take exception to the Memorandum of Terrence Morris, Executive Director of the Rent Control Board, regarding rent increases and rent levels at 19-25 Market Street, 266-270 Windsor Street, and 205-211 Harvard Street. This memorandum was transmitted to the City Council on May 18, 1992, and was prepared in response to a council order of February 3, 1992.

In our view, this memorandum does not respond to the inquiries made by the council in February. First of all, Mr. Morris does not provide any information about two of the properties: 266-270 Windsor Street and 205-211 Harvard Street. Instead, he asserts that the Market Street building is "representative" of "certain patterns" common to all three properties.

This is incorrect. The property at 205-211 Harvard Street was not owned by Chiccarelli Realty, nor had it been placed in receivership in 1979. That Mr. Steinbergh has also undertaken efforts to subdivide the Harvard Street property into four three-unit "properties" also suggests a somewhat different history for this property even after Mr. Steinbergh acquired the property.

Moreover, Mr. Morris is needlessly filtering information that the council requested. It seems to us that the council and the public ought to have the facts requested presented to them--then those facts can be interpreted.

Second, to the extent that Mr. Morris does discuss the history of rent increases and rent levels at the Market Street building, he fails to make clear that the huge increase in rent which has taken place is largely due to the special treatment Mr. Steinbergh received at the Rent Board.

Mr. Morris makes an inaccurate general link between past neglect and current high maintenance costs. As Mr. Morris surely

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knows, large expenditures to fix up buildings are generally factored into rents as "capital improvements", not as maintenance-and-repair "operating expenses". Where buildings have been neglected, as was certainly the case for the Market Street and Windsor Street properties, the Board could have disallowed large portions of the expenses claimed, because those expenses were for work which resulted from a failure to maintain.

Instead, the Board chose to incorporate Mr. Steinbergh's claims of large-scale maintenance expenses after acquisition into a large--and continuing--cost component for maintenance and repair in the rent. Thus the Board allowed \$25,265 for all maintenance categories among operating expenses in the tenants' rents, plus an additional allotment of \$8000 for "deferred maintenance" to be collected over three years.

As a result, this building, which tenants have described as still suffering from poor conditions, has rents which reflect operating expenses for maintenance that are extraordinarily high. Yet no one asserts that this building receives "luxury" maintenance. Meanwhile, the tenants' rents also include the amortized value of about \$5340/apartment in other capital expenditures.

Finally, we are dismayed by the lack of urgency with which this matter has been dealt. The council order of February 3, 1992, called for a response in two weeks. Instead, this memorandum was produced over three months later--and only after public pressure had been brought on the Board to respond.

In the meantime, Mr. Steinbergh and Resource Capital Group (RCG) continue to act as if the public hearing on February 3rd had never taken place. In April RCG filed yet another petition at the Rent Board to raise rents at 266-270 Windsor Street for purported capital improvements made in the last several years. A hearing on this proposed rent increase was held on May 27, 1992.

Tenants still living at Windsor Street are rightfully aghast. No effort has been made by the city to investigate the recurring charges of work not done or inflated expenses. Some of the tenants have conveyed to us their feeling that the city--both Rent Board and City Council--has abandoned them.

We note with appreciation that Councillor Duehay requested that Mr. Morris' memorandum be placed on the calendar for the

June 1st session, and ask that we be permitted to address this matter further at that time.

Respectfully submitted,

Michael Turk

Michael Turk,
Co-chair
Cambridge Tenants Union

Consent Communication # 20

Comm. from Mike Turk, Cambridge Tenants Union, regarding rent increases and rent levels at 19-25 Market Street, 266-270 Windsor Street and 205-211 Harvard Street.

In City Council,

June 1, 1992

*Referred to Unfinished
Biz # 5.*

MEMORANDUM

To: Robert Healy, City Manager
From: Terrence P. Morris, Executive Director
Re: Council Order #29 dated 2/3/92
Date: May 15, 1992

Please accept this report in response to the above-referenced order. In reviewing the history for this property, it is apparent that the reasons for the large rent increases are readily identifiable. Certain patterns emerge for all three properties. This memo will address 19-25 Market Street as representative of these patterns.

I have attached the rent history summaries for each of the units at the subject property. The most salient fact is that the current owner is fully knowledgeable concerning the rent adjustment process. As a result, he was able to take advantage of the prior owners' neglect of the property by filing for rent adjustments based on his actual operating expenses. These operating expenses increased dramatically driven by the high maintenance costs associated with the effects of the prior owners' neglect. (the neglect was so severe that the property was placed in receivership in the early '80's).

The individual rent adjustment petitions account for approximately sixty (60) percent of the increase since 1984. The remaining forty (40) percent of the increase is attributable to the annual general adjustments (GAs). The GA increases for all but one year were in line with inflation (3-5%). The 1991 GA increased the rents (12%) on all units from \$70-80 per month. The single most important factor in this increase was the water costs which rose from \$4,279 in 1990 to \$19,565 in 1991.

Additional supporting documentation is available for all three properties if required.

RENT ADJUSTMENT SUMMARY 19-25 MARKET ST.

This property was purchased by Resource Capital Group on December 31, 1986. Prior to the RCG purchase the previous landlord (Chiccarelli Realty) had filed two rent adjustment petitions. In the first petition filed by Chiccarelli Realty the existence of conditions was raised by the tenants. A Rent Board inspection confirmed that all conditions had been corrected and the rent increases went into effect.

In the second petition filed by Chiccarelli Realty conditions were also raised by the tenants. There is no information in the file to determine if the conditions were ever corrected. However, the Notice of Ruling in this case instructed the tenants to contact Inspectional Services if code violations existed. The Notice of Ruling did not delay collection of the rent increases until conditions were corrected.

Since RCG purchased the property there have been one RA6 and three RA2 rent adjustment petitions filed. The three RA2 cases reviewed the properties operating expenses and capital improvement expenditures. The RA6 rent adjustment petition reviewed only capital improvement expenditures. In all four cases the issue of conditions was raised by the tenants either at the hearing or through submission of a Tenant Response Form prior to the hearing.

There is no indication that the Rent Control Board allowed a rent increase to go into effect before conditions were corrected. The proper procedure was as follows: (1) the landlord notifies the Board that the conditions have been corrected; (2) the Board notifies the tenant that the landlord is claiming to have corrected the conditions; (3) the tenant disputes the claim; (4) the Board inspects. If the tenant does not dispute the claim, it is accepted as fact and the rents go into effect.

Most of the tenants never disputed the landlord's claim that the conditions had been corrected. Nonetheless, they would cite the same conditions at the next hearing after the landlord filed a subsequent rent adjustment petition. Tenants that did dispute the landlord's claim had their units reinspected. The process of landlord notification and tenant response continued until either the inspection confirmed that conditions had been corrected or the tenant(s) did not dispute the landlord's claim.

Individual Rent Adjustment History:

Rent as of:

	6-2-84	9-19-88	2-2-89	9-19-89	11-8-90
Case No:		<u>RA2-87-141</u>	<u>RA2-88-016</u>	<u>RA6-89-023</u>	<u>RA2-89-138</u>
Unit #					
19-1	272	422	466	500	597
19-2	248	419	472	490	592
19-3	248	414	463	514	602
19-4	318	450	485	531	588
21-1	318	450	485	531	588
21-2	318	459	485	604	631
21-3	248	415	472	515	633
21-4	337	462	494	567	633
23-1	290	433	473	576	665
23-2	304	442	478	520	606
23-3	290	433	472	584	628
23-4	290	433	472	584	628
25-1	304	442	478	589	624
25-2	327	304	442	478	607
25-3	248	407	455	503	598
25-4	323	458	493	538	601

These rents represent the expenditure of \$93,393 in capital improvements. It should also be noted that operating expenses for

this property increased from \$8,565 in 1967 to \$62,430 in 1989 (+629%); of this amount \$22,637 was for maintenance and repair.

General Adjustment History:

1984/85 GA: The property received a decrease in this GA.

1987 GA: Because of a pending Regulation 72 adjustment, the property did not receive this GA.

1989 GA (5%): Affidavits were filed for four units: 19#1, 19#2, 25 #1 and 25 #2. The landlord did not respond, and the GA was rescinded for all four units.

1990 GA (3%): An affidavit was filed for one unit: 25 #2. The occupant signed the Affidavit of Compliance and the GA went into effect in March.

1991 GA (12%): Affidavits were filed for six units: 19 #1, 19 #2, 19 #4, 21 #3, 21 #4 and 25 #1. The occupants of 19 #2 and 21 #4 signed the Affidavit of Compliance, and the GA went into effect in April. The occupant of 19 #1 did not sign the Affidavit of Compliance. An inspection was scheduled, but the occupant called to report that the conditions had been corrected; the GA went into effect in May. The other three units failed the initial inspection but passed the second inspection; the GA went into effect in June or July.

1992 GA (4%): Affidavits have been filed for eight units: 19 #1, 19 #2, 21 #2, 23 #2, 23 #3, 23 #4, 25 #1 and 25 #2.

Implementation of the 1992 GA has been deferred due to the fire.

Unit Rent History

Unit Rent History

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03-09-92 16:52

P#: 14910 (77 92 **)

016 Units, Addr: 19 MARKET ST

02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 002	Present Max -->>	01-01-92	GA92	687	
Apt#: 2		12-31-91	PGA92	661	
Status: C		12-30-91	RES91	661	
#Rooms: 05 (3BR 1BA 1KIT)		01-01-91	GA91	663	
Services: HT_HW_STV		12-31-90	PGA91	592	
Addl Chrgs: Furniture 0		11-08-90	R289138	592	
Parking 0		01-01-90	GA90	505	
Temp Rent: 0		12-31-89	PGA90	490	
		09-19-89	R689023	490	
		03-04-89	GA89	472	*
		03-03-89	PGA89	472	
		02-02-89	R288016	472	
		09-19-88	R287141	419	
		06-02-84	GA84	248	

Unit Rent History

Unit Rent History

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03-09-92 16:52

P#: 14910 (77 92 **)

016 Units, Addr: 19 MARKET ST

02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 001	Present Max -->>	01-01-92	GA92	694	
Apt#: 1		12-31-91	PGA92	667	
Status: C		12-30-91	RES91	667	
#Rooms: 05 (3BR 1BA 1KIT)		01-01-91	GA91	669	
Services: HT_HW_STV		12-31-90	PGA91	597	
Addl Chrgs: Furniture 0		11-08-90	R289138	597	
Parking 0		01-01-90	GA90	515	
Temp Rent: 0		12-31-89	PGA90	500	
		09-19-89	R689023	500	
		03-04-89	GA89	466	*
		03-03-89	PGA89	466	
		02-02-89	R288016	466	
		09-19-88	R287141	422	
		06-02-84	GA84	272	

Unit Rent History
Unit Rent History

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03-09-92 16:53

P#: 14910 (77 92 **)

016 Units, Addr: 19 MARKET ST

02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 003		01-01-92	GA92	699	
	Present Max -->>	12-31-91	PGA92	672	
Apt#: 3		12-30-91	RES91	672	
Status: C		01-01-91	GA91	674	
		12-31-90	PGA91	602	
#Rooms: 05 (3BR 1BA 1KIT)		11-08-90	R289138	602	
		01-01-90	GA90	529	
Services: HT_HW_STV		12-31-89	PGA90	514	
		09-19-89	R689023	514	
Addl Chrgs: Furniture 0		03-04-89	GA89	486	
Parking 0		03-03-89	PGA89	463	
		02-02-89	R288016	463	
Temp Rent: 0		09-19-88	R287141	414	
		06-02-84	GA84	248	

Unit Rent History
Unit Rent History

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03-09-92 16:54

P#: 14910 (77 92 **)

016 Units, Addr: 19 MARKET ST

02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 004		01-01-92	GA92	683	
	Present Max -->>	12-31-91	PGA92	657	
Apt#: 4		12-30-91	RES91	657	
Status: C		01-01-91	GA91	659	
		12-31-90	PGA91	588	
#Rooms: 05 (3BR 1BA 1KIT)		11-08-90	R289138	588	
		01-01-90	GA90	547	
Services: HT_HW_STV		12-31-89	PGA90	531	
		09-19-89	R689023	531	
Addl Chrgs: Furniture 0		03-04-89	GA89	509	
Parking 0		03-03-89	PGA89	485	
		02-02-89	R288016	485	
Temp Rent: 0		09-19-88	R287141	450	
		06-02-84	GA84	318	

Unit Rent History

Unit Rent History

TO SCROLL: <Prev Screen> or <Select>

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03-09-92 16:54

P#: 14910 (77 92 **)

016 Units, Addr: 21 MARKET ST

02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 005	Present Max -->>	01-01-92	GA92	733	
Apt#: 1		12-31-91	PGA92	705	
Status: C		12-30-91	RES91	705	
		01-01-91	GA91	707	
		12-31-90	PGA91	631	
#Rooms: 05 (3BR 1BA 1KIT)		11-08-90	R289138	631	
		01-01-90	GA90	622	
Services: HT_HW_STV		12-31-89	PGA90	604	
		09-19-89	R689023	604	
Addl Chrgs: Furniture 0		03-04-89	GA89	509	
Parking 0		03-03-89	PGA89	485	
		02-02-89	R288016	485	
Temp Rent: 0		09-19-88	R287141	459	
		06-02-84	GA84	318	

Unit Rent History

Unit Rent History

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03-09-92 16:56

P#: 14910 (77 92 **)

016 Units, Addr: 21 MARKET ST

02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 006	Present Max -->>	01-01-92	GA92	699	
Apt#: 2		12-31-91	PGA92	672	
Status: C		12-30-91	RES91	672	
		01-01-91	GA91	674	
		12-31-90	PGA91	602	
#Rooms: 05 (3BR 1BA 1KIT)		11-08-90	R289138	602	
		01-01-90	GA90	530	
Services: HT_HW_STV		12-31-89	PGA90	515	
		09-19-89	R689023	515	
Addl Chrgs: Furniture 0		03-04-89	GA89	496	
Parking 0		03-03-89	PGA89	472	
		02-02-89	R288016	472	
Temp Rent: 0		09-19-88	R287141	415	
		06-02-84	GA84	248	

Unit Rent History
Unit Rent History

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03-09-92 16:56

P#: 14910 (77 92 **) 016 Units, Addr: 21 MARKET ST 02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 007	Present Max -->>	01-01-92	GA92	735	
Apt#: 3		12-31-91	PGA92	707	
Status: C		12-30-91	RES91	707	
		01-01-91	GA91	709	
		12-31-90	PGA91	633	
#Rooms: 05 (3BR 1BA 1KIT)		11-08-90	R289138	633	
		01-01-90	GA90	584	
Services: HT_HW_STV		12-31-89	PGA90	567	
		09-19-89	R689023	567	
Addl Chrgs: Furniture 0		03-04-89	GA89	519	
Parking 0		03-03-89	PGA89	494	
		02-02-89	R288016	494	
Temp Rent: 0		09-19-88	R287141	462	
		06-02-84	GA84	337	

Unit Rent History
Unit Rent History

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03-09-92 16:57

P#: 14910 (77 92 **) 016 Units, Addr: 21 MARKET ST 02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 008	Present Max -->>	01-01-92	GA92	781	
Apt#: 4		12-31-91	PGA92	751	
Status: C		12-30-91	RES91	751	
		05-30-91	R689444	753	
		01-01-91	GA91	745	
#Rooms: 05 (3BR 1BA 1KIT)		12-31-90	PGA91	665	
		11-08-90	R289138	665	
Services: HT_HW_STV		01-01-90	GA90	593	
		12-31-89	PGA90	576	
Addl Chrgs: Furniture 0		09-19-89	R689023	576	
Parking 0		03-04-89	GA89	497	
		03-03-89	PGA89	473	
Temp Rent: 0		02-02-89	R288016	473	
		09-19-88	R287141	433	

Unit Rent History

Unit Rent History

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03-09-92 16:57

P#: 14910 (77 92 **)

016 Units, Addr: 23 MARKET ST

02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 009	Present Max -->>	01-01-92	GA92	690	
Apt#: 1		12-31-91	PGA92	663	
Status: C		12-30-91	RES91	663	
		01-01-91	GA91	665	
		12-31-90	PGA91	594	
#Rooms: 05 (3BR 1BA 1KIT)		11-08-90	R289138	594	
		01-01-90	GA90	536	
Services: HT_HW_STV		12-31-89	PGA90	520	
		09-19-89	R689023	520	
Addl Chrgs: Furniture 0		03-04-89	GA89	502	
Parking 0		03-03-89	PGA89	478	
		02-02-89	R288016	478	
Temp Rent: 0		09-19-88	R287141	442	
		06-02-84	GA84	304	

Unit Rent History

Unit Rent History

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03-09-92 16:58

P#: 14910 (77 92 **)

016 Units, Addr: 23 MARKET ST

02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 010	Present Max -->>	01-01-92	GA92	704	
Apt#: 2		12-31-91	PGA92	677	
Status: C		12-30-91	RES91	677	
		01-01-91	GA91	679	
		12-31-90	PGA91	606	
#Rooms: 05 (3BR 1BA 1KIT)		11-08-90	R289138	606	
		01-01-90	GA90	536	
Services: HT_HW_STV		12-31-89	PGA90	520	
		09-19-89	R689023	520	
Addl Chrgs: Furniture 0		03-04-89	GA89	502	
Parking 0		03-03-89	PGA89	478	
		02-02-89	R288016	478	
Temp Rent: 0		09-19-88	R287141	442	
		06-02-84	GA84	304	

Unit Rent History
Unit Rent History

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03-09-92 16:59

P#: 14910 (77 92 **)

016 Units, Addr: 23 MARKET ST

02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 011	Present Max -->>	01-01-92	GA92	737	
Apt#: 3		12-31-91	PGA92	709	
Status: C		12-30-91	RES91	709	
#Rooms: 05 (3BR 1BA 1KIT)		05-30-91	R689444	711	
Services: HT_HW_STV		01-01-91	GA91	703	
Addl Chrgs: Furniture 0		12-31-90	PGA91	628	
Parking 0		11-08-90	R289138	628	
Temp Rent: 0		01-01-90	GA90	602	
		12-31-89	PGA90	584	
		09-19-89	R689023	584	
		03-04-89	GA89	496	
		03-03-89	PGA89	472	
		02-02-89	R288016	472	
		09-19-88	R287141	433	

Unit Rent History
Unit Rent History

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03-09-92 16:59

P#: 14910 (77 92 **)

016 Units, Addr: 23 MARKET ST

02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 012	Present Max -->>	01-01-92	GA92	690	
Apt#: 4		12-31-91	PGA92	663	
Status: C		12-30-91	RES91	663	
#Rooms: 05 (3BR 1BA 1KIT)		01-01-91	GA91	665	
Services: HT_HW_STV		12-31-90	PGA91	594	
Addl Chrgs: Furniture 0		11-08-90	R289138	594	
Parking 0		01-01-90	GA90	536	
Temp Rent: 0		12-31-89	PGA90	520	
		09-19-89	R689023	520	
		03-04-89	GA89	502	
		03-03-89	PGA89	478	
		02-02-89	R288016	478	
		09-19-88	R287141	442	
		06-02-84	GA84	304	

Unit Rent History

Unit Rent History

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03-09-92 17:00

P#: 14910 (77 92 **)

016 Units, Addr: 25 MARKET ST

02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 013	Present Max -->>	01-01-92	GA92	725	
Apt#: 1		12-31-91	PGA92	697	
Status: C		12-30-91	RES91	697	
#Rooms: 05 (3BR 1BA 1KIT)		01-01-91	GA91	699	
Services: HT_HW_STV		12-31-90	PGA91	624	
Addl Chrgs: Furniture 0		11-08-90	R289138	624	
Parking 0		01-01-90	GA90	607	
Temp Rent: 0		12-31-89	PGA90	589	
		09-19-89	R689023	589	
		03-04-89	GA89	478	*
		03-03-89	PGA89	478	
		02-02-89	R288016	478	
		09-19-88	R287141	442	
		06-02-84	GA84	304	

Unit Rent History

Unit Rent History

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03-09-92 17:01

P#: 14910 (77 92 **)

016 Units, Addr: 25 MARKET ST

02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 014	Present Max -->>	01-01-92	GA92	706	
Apt#: 2		12-31-91	PGA92	679	
Status: C		12-30-91	RES91	679	
#Rooms: 05 (3BR 1BA 1KIT)		05-30-91	R689444	681	
Services: HT_HW_STV		01-01-91	GA91	670	
Addl Chrgs: Furniture 0		12-31-90	PGA91	598	
Parking 0		11-08-90	R289138	598	
Temp Rent: 0		01-01-90	GA90	518	
		12-31-89	PGA90	503	
		09-19-89	R689023	503	
		03-04-89	GA89	455	*
		03-03-89	PGA89	455	
		02-02-89	R288016	455	
		09-19-88	R287141	407	

Unit Rent History
Unit Rent History

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03-09-92 17:01

P#: 14910 (77 92 **) 016 Units, Addr: 25 MARKET ST 02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 015	Present Max -->>	01-01-92	GA92	690	
Apt#: 3		12-31-91	PGA92	663	
Status: C		12-30-91	RES91	663	
#Rooms: 05 (3BR 1BA 1KIT)		01-01-91	GA91	665	
Services: HT_HW_STV		12-31-90	PGA91	594	
Addl Chrgs: Furniture 0		11-08-90	R289138	594	
Parking 0		01-01-90	GA90	535	
Temp Rent: 0		12-31-89	PGA90	519	
		09-19-89	R689023	519	
		03-04-89	GA89	501	
		03-03-89	PGA89	477	
		02-02-89	R288016	477	
		09-19-88	R287141	437	
		06-02-84	GA84	290	

Unit Rent History
Unit Rent History

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0 MORE units for this property

03-09-92 17:02

P#: 14910 (77 92 **) 016 Units, Addr: 25 MARKET ST 02139

		Rent History			
		Date	Reason	Rent	Res
Ser#: 016	Present Max -->>	01-01-92	GA92	698	
Apt#: 4		12-31-91	PGA92	671	
Status: C		12-30-91	RES91	671	
#Rooms: 05 (3BR 1BA 1KIT)		01-01-91	GA91	673	
Services: HT_HW_STV		12-31-90	PGA91	601	
Addl Chrgs: Furniture 0		11-08-90	R289138	601	
Parking 0		01-01-90	GA90	554	
Temp Rent: 0		12-31-89	PGA90	538	
		09-19-89	R689023	538	
		03-04-89	GA89	518	
		03-03-89	PGA89	493	
		02-02-89	R288016	493	
		09-19-88	R287141	458	
		06-02-84	GA84	323	



CITY OF CAMBRIDGE
CAMBRIDGE, MASSACHUSETTS 02139

TEL. 349-4300
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EXECUTIVE DEPARTMENT
ROBERT W. HEALY
City Manager

RICHARD C. ROSSI
Deputy City Manager

May 18, 1992

To the Honorable, The City Council:

In response to Awaiting Report Item No. 18, regarding inspections and rent increases at the premises numbered 266-270 Windsor Street and 19-25 Market Street and 205-211 Harvard Street, please find attached a response from Terrence P. Morris, Executive Director of the Rent Control Board.

Very truly yours,

Robert W. Healy
City Manager

RWH/dls
enclosure

Consent Agenda # 5

S-630

Awaiting Report Item Number 18, regarding inspections and rent increases at the premises numbered 266-270 Windsor Street and 19-25 Market Street and 205-211 Harvard Street.

6/1/92 Referred to the
Rent Control Committee

In City Council,

In City Council,

May 18, 1992

Placed on the Calendar
for 6/1/92

Referred to Rent
Control Committee
Copy sent to Rent Control
Committee 5/26/92 (dc)