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December 2017

Thomas Roach, Mayor
Members of the Common Council
City of White Plains
255 Main Street
White Plains, NY 10601

Report Number: S9-17-2

Dear Mayor Roach and Members of the Common Council:

A top priority of the Office of the State Comptroller is to help local government officials manage their resources efficiently and effectively and, by so doing, provide accountability for tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of local governments statewide, as well as compliance with relevant statutes and observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations and governance. Audits also can identify strategies to reduce costs and to strengthen controls intended to safeguard assets.

In accordance with these goals, we conducted an audit of six units (one authority and five cities) throughout New York State. The objective of our audit was to determine whether municipal parking structures are regularly inspected to identify repair needs and whether municipalities are ensuring repair needs are made to ensure public safety. We included the City of White Plains (City) in this audit. Within the scope of this audit, we examined the City's process for evaluating, monitoring and repairing parking structures for the period January 1, 2015 through October 5, 2016. We extended the scope of our audit back to the 2007-08 fiscal year to evaluate repairs made in response to the most recent inspections of four parking structures. This audit was conducted pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law.

This report of examination letter contains our findings and recommendations specific to the City. We discussed the findings and recommendations with City officials and considered their comments, which are included in Appendix B, in preparing this report. City officials generally agreed with our recommendations and indicated they plan to initiate corrective action. At the completion of our audit of the six entities, we prepared a global report that summarizes the significant issues we identified at all of the entities audited.

Summary of Findings

Parking Structures in the City do not have regular structural inspections by firms experienced in structural inspections. Instead, City officials periodically contract for structural inspections of parking structures when they deem necessary. During the last decade, four of the eight structures received a documented complete structural inspection. The most recent inspections were conducted at two structures in both 2008 and 2011. All four inspections reported no urgent repairs were necessary. However, there were 32 issues identified as high priority,¹ and 26 of those identified issues were repaired. City officials told us that one of the final 10 repairs identified as high priority were addressed. However, they were unable to provide documentation of these repairs. Additionally, officials disagreed with three issues and two additional items were designated as pending work commencement.

The City Elevator Senior Code Enforcement Officer is responsible for inspecting all of the 29 operational parking structure elevators. The City conducted elevator inspections in 2016, which showed that 20 elevators had violations or comments on identified issues, and one had no results of its inspection. Of the remaining elevators, seven were not inspected in 2016, and one had no documentation regarding the last time it was inspected.

The Commissioner of Public Works told us that they conduct structural inspections when the general engineer thinks an outside engineering inspection should be completed. There is no standardized policy to state when these inspections should be completed or who is to make the decision that one should be conducted. City officials told us that they discuss the identified issues in the structural inspections and determine how to proceed when inspections occur. However, there is no documentation to support whether or how officials prioritized the identified repairs. In addition, officials do not maintain documentation for repair statuses.

Lastly, we found the Capital Improvement Plan (CIP) created by City officials is not tied to regular inspections because they do not occur. The lack of consistent documented inspections prevents the program from ensuring it addresses all structural repairs. Regular inspections could increase the effectiveness of long-term capital planning.

Background and Methodology

The City is located in Westchester County and has approximately 56,850 residents. The City is governed by a seven-member Common Council (Council), composed of the Mayor, a President and five Council members. The Council is the legislative body responsible for setting the City's governing policies. The Mayor is the chief executive officer and is responsible, along with other administrative staff, for the City's day-to-day management. The City's 2016-17 budget totaled \$165.9 million, which includes the Department of Parking budget of \$17 million. The Department of Parking oversees the parking structure operations and is supervised by the Commissioner of Parking.

The City owns and operates eight parking structures with approximately 9,560 spaces (Figure 1). Parking structure revenues totaled \$11.2 million for the 2015-16 fiscal year.

¹ High priority are items that should be fixed as soon as possible however they are not considered an imminent threat.

Figure 1: Parking Structures		
Structure Name	Spaces	Year Built
Chester-Maple Garage	785	1967
Hamilton-Main Garage	998	1969
Lexington-Grove Garage	2,787	1980
Library Garage	557	1974
Longview-Cromwell Garage	761	2008
Lyon Place Garage	619	2014
TransCenter Garage	830	1987
White Plains Center Garage	2,220	2003

Parking structures are exposed directly to weather and other environmental conditions, such as extreme temperature changes, rain, snow, deicing salts, road grime and dampness, which directly influence their durability and have the potential to create performance problems. The potential severity of these problems will depend on the geographic location of the structure and local environmental conditions.

Municipalities have historically increased inspection mandates in response to parking structure failures. For example, in 1998, the City of Syracuse updated its Property Conservation Code to require annual inspections of parking structures in response to the MONY garage collapse of 1994. This structure failure was the result of a 115-foot portion of the second level collapsing down to the first. Prior to the 1994 collapse, a 1988 study of the garage stated the need for millions of dollars in repairs. However, these repairs were neglected and never completed. As another example, in 2009 the City of Rochester implemented a parking structure maintenance program that strives to have each City-owned parking structure inspected every two years in response to the 2006 South Avenue structure collapse. This structure failure was the result of rust within the steel cable and post system that supported the ramp.

To accomplish our audit objective, we interviewed City officials, Department of Public Works employees (DPW), Parking Department employees and Department of Building employees. We reviewed relevant laws, inspection reports and bidding documents. We performed walk-throughs of City parking structures. We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). More information on the standards and the methodology used in performing this audit are included in Appendix B of this report.

Audit Results

Good business practice dictates that an entity should regularly assess its capital assets. Local law² requires City code enforcement officials perform annual elevator inspections. Sound business practices include both long-term and short-term capital project planning, which serves to identify and prioritize anticipated needs based on a strategic plan.

Inspections – City officials do not require regular parking structural inspections. Instead, City officials periodically contract for structural inspections of their parking structures when they deem necessary. Officials told us they monitor the garages with their daily presence in the garages. The Commissioner of Public Works told us that a DPW mechanical engineer assesses issues brought to his attention and will decide when to contract for a structural inspection. Officials contracted with an engineering firm to perform structural condition inspections at four³ of the eight structures over the past decade. The inspections reported no urgent repairs were necessary. However, there were 32 issues identified that required high priority⁴ attention.

We reviewed capital project bid documents to determine the status of the identified repair issues (Appendix A, Figure 2); 26 identified issues had documentation of their repair. For the remaining six issues identified, the Commissioner of Parking told us:

- One issue, gutter replacement and pump capacity improvement, was partially repaired (gutter replacement). However, no documentation was provided to support this claim. Additionally, City officials determined the pump was sufficient and did not need improvement.
- Two issues' repairs were pending.
- Two waterproofing recommendations would make the issues worse.
- One item, repair of concrete slabs and beams, was inaccurate in the report because there are no beams in that location.

Elevators – Local law requires elevators be inspected annually by a City code enforcement officer. Elevator inspection reports cite elevators as having violations and comments. When an elevator has a violation that results in it failing inspection, it is shut-down. Such violations resulting in failure can include elevators that will not set in the safeties. Elevators also can have violations that do not necessarily mean they failed inspection. The inspection report could list them as a pass with violations. For example, replace hoisting ropes due to reduction diameter. Inspections can also include comments for items that need to be repaired that are not as high risk as violations. For example, oil and water on the pit floor is not an elevator violation, but can be listed on the inspection report as a comment. In the event of a failing inspection or violations, repairs should be made to ensure public safety.

² We are presuming that the local law applies ASME A17.1 - 2013 8.10.1 and appendix N.

³ Structural inspections were completed for the TransCenter and Library Garages in February 2008, Lexington-Grove in July 2011 and Chester Maple in May 2011. No other garages had documented inspections from July 2007 through November 2016.

⁴ High priority items should be fixed as soon as possible. However, they are not considered an imminent threat.

Unless elevators failed inspection, the inspection reports we reviewed did not contain sufficient detail to determine which repairs listed were violations or comments. Therefore, we grouped them together. The City inspects its own 31 parking structure elevators. Officials provided us with the most recent annual inspections. Two elevators are closed. The City had an inspection dates for 20 elevators indicating they had been inspected within a year. However, all had violations or comments, with a total of 56 issues (Appendix A, Figure 3). Officials were unable to provide documentation that repairs were made for these violations or comments. An additional elevator was inspected in the last year. However, City officials maintained a notice of inspection, but there is no documentation of the inspection results.

Seven elevators had not been inspected in 2016; their most recent inspection reports were dated between 19 and 31 months prior to our review. One elevator had no documentation regarding when it was last inspected, and no results of inspection. After we completed field work, officials provided elevator inspection cards. However, the cards do not indicate who inspected the elevator or the results (Figure 2). Therefore, we did not update our findings based on these cards.

Figure 2: Longview-Cromwell 1 Elevator

ELEVATOR INSPECTION CARD

Owner WP.Parking
 Address 11-Longview Tel. No. _____
 Elevator Maintained By TKE
 Address _____ *Sud. TRIP 400 - GEN TRIP 432* Tel. No. _____
 Ward _____ Block _____ Lot _____
 Manufactured by TKE Maximum Safe Load. 2500 lbs. Car Speed 350

INSPECTION AND VIOLATION RECORD				PAYMENT RECORD			
Date	Remarks	Date	Remarks	Date	Remarks	Date	Voucher
<u>3-16-09</u>	<u>Final Issued</u>						
<u>7-15-10</u>	<u>TEST</u>						
<u>3-8-11</u>	<u>TEST N/G</u>						
<u>3-7-12</u>	<u>TEST</u>						
<u>3-11-13</u>	<u>TEST</u>						
<u>3-5-14</u>	<u>TEST 5YR</u>						
<u>3-16-15</u>	<u>TEST</u>						
<u>4-26-16</u>	<u>TEST</u>						
<u>3-21-17</u>	<u>TEST</u>						

Test Due _____ Address 11 Longview City No. T-3377P Per. Due March

Two elevators are closed and require a capital project to be placed back in service. Without ensuring elevators are regularly inspected and violations and comments are corrected, there is an increased risk to public safety.

Documenting Decisions – Decisions made by City officials about which capital projects and inspection issues should be addressed would be more transparent to the Mayor, Common Council and community if the CIP was based off periodic engineering inspections. This information would

help ensure a better understanding of the costs and benefits of adequately maintaining the City's capital assets.

Officials told us they discuss the identified issues and determine how to proceed. While capital issues are being addressed, the Parking and DPW Departments discuss the status of the repairs during capital project bi-monthly meetings. The meeting minutes indicate structure, repair category, disposition, repair progression and current status, and includes previous meeting discussions for each category, making the active repair statuses more transparent. However, there is no documentation to support how officials prioritized the identified repairs or the disposition of repairs not undertaken. Once the issue is repaired, the DPW engineer will certify the work and notify the supervisor. However, neither the DPW engineer nor the supervisor maintain a log or documentation of certified work. As a result, the repair statuses of identified issues are not always documented. In addition, there is no documentation to support all City officials' decisions or the current status of some repairs.

Capital Planning – Sound business practices include both long-term and short-term capital project planning. Such planning serves to identify and prioritize anticipated needs based on a strategic plan. Effective capital project plans establish a clear project scope accompanied by detailed estimates of costs and timelines for project phases and final completion. Such planning not only establishes an entity's capital project needs, but helps establish overall budgetary control as well. Often, long-term capital plans range from three to five years and are supplemented by annual plans that distinguish short-term from long-term needs. Also, capital project plans should have the flexibility to address unexpected situations, including those impacting the health and safety of City staff and garage patrons.

On an annual basis, City officials prepare a seven-year CIP that includes planned spending on capital projects, including parking structures. Since the City does not have current structural inspections of all the parking structures, there is less assurance that the CIP contains all the top priority issues. As a result, the City is at increased risk that it may not be aware of all potential issues, and/or have sufficient resources available to address them.

Recommendations

City officials should:

1. Consider establishing regular inspection cycles for the parking structures.
2. Document the inspection decisions, priorities and dispositions of identified needed repairs and update as necessary.
3. Ensure operational elevators are inspected, as required, and meet minimum code requirements.
4. Develop CIPs based on inspection reports and documented decisions.

The Council has the responsibility to initiate corrective action. A written corrective action plan (CAP) that addresses the findings and recommendations in this report should be prepared and forwarded to our office within 90 days, pursuant to Section 35 of General Municipal Law. For

more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. We encourage the Council to make this plan available for public review in the Clerk's office.

We thank the officials and staff of the City for the courtesies and cooperation extended to our auditors during this audit.

Sincerely,

Gabriel F. Deyo
Deputy Comptroller

APPENDIX A

Figure 3: Engineer Identified Repairs February 2008 – July 2011		
Structure/ Inspection Date	Identified Repair Issue	Document – Date of Repair
Chester-Maple Garage/2011	Remove and replace expansion joint sealers - roof level	Repaired May 2016
Chester-Maple Garage/2011	Topping (including removal replacement) - roof level	Repaired May 2016
Chester-Maple Garage/2011	Replacement of waterproofing membrane - roof level	Repaired May 2016
Chester-Maple Garage/2011	Repair and replacement of curbs at floor drain - 2nd floor	Repaired May 2016
Chester-Maple Garage/2011	Replacement of deteriorated/broken face bricks/tiles	Repaired May 2016
Chester-Maple Garage/2011	Roof sealer, proposed downspouts at northeast and northwest corners of roof, replace gutter at northwest corner and place a new gutter at north east corner - Core A roof and exterior walls	Repaired May 2016
Chester-Maple Garage/2011	Attach the guide rail along south wall	Repaired May 2016
Chester-Maple Garage/2011	Stair slab under guiderail post - Core B	Repaired May 2016
Chester-Maple Garage/2011	Basement - Repair of ledge beams	Repaired May 2016
Chester-Maple Garage/2011	Basement and 1st floor - Repair of columns	Repaired May 2016
Chester-Maple Garage/2011	Concrete around floor drains (including removal and replacement)	Repaired May 2016
Chester-Maple Garage/2011	Epoxy coating of rebar around floor drains	Repaired May 2016
Chester-Maple Garage/2011	Replace rusted corrugated rails	Repaired May 2016
Chester-Maple Garage/2011	Concrete curb replacement	Repaired May 2016
Lexington-Grove Garage/2011	Double Tee - West - 3rd floor	Repaired August 2012
Lexington-Grove Garage/2011	Double Tee - West - 2nd floor	Repaired August 2012
Lexington-Grove Garage/2011	Double Tee - West - 2nd floor	Repaired August 2012
Lexington-Grove Garage/2011	Ledge Beam - West 2nd floor	Repaired August 2012
Lexington-Grove Garage/2011	Double Tee - West - 2nd floor	Repaired August 2012
Lexington-Grove Garage/2011	Ledge Beam - East - 3rd floor	Repaired August 2012

**Figure 3: Engineer Identified Repairs
February 2008 – July 2011**

Structure/ Inspection Date	Identified Repair Issue	Document – Date of Repair
Lexington-Grove Garage/2011	Ledge Beam - East 3rd floor	Repaired August 2012
Lexington-Grove Garage/2011	Exterior Doors Cores A & B - West – Core	Repaired August 2012
Library Garage	Repair of concrete slabs and beams above pump room	Officials told us this would not be repaired because the report is inaccurate
Library Garage/2008	Replacement of expansion joints at north-south - upper level	Repaired December 2015
Library Garage/2008	Installation of waterproofing joints - north retaining walls	Officials told us this repair would make issue worse.
Library Garage/2008	Installation of transverse drainage inlets in the retaining walls	Officials told us work was pending.
Library Garage/2008	Replacement of on grade slabs at northeast corners with waterproofing membrane	Officials told us repair would make issue worse.
Library Garage/2008	Replacement of gutters and improvement of pump capacity	Officials told us gutters were replaced and that the pump was sufficient.
TransCenter Garage/2008	Drainage assessment, design and retrofit	Conduit replaced October 2014
TransCenter Garage/2008	Retrofit expansion joints in the pedestrian bridges	Repaired February 2012
TransCenter Garage/2008	Verifying reinforcement in other concrete columns, and at end of double tee girders	Officials told us work would be started in August 2017.
TransCenter Garage/2008	Design, temporary support and retrofit of the concrete column in the utility room	Repaired March 2011

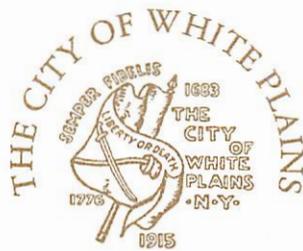
Figure 4: Elevator Inspection Results			
Elevator Location	Violations/Comments(s) 2016 Inspection	Most Recent Inspection	Time Since Last Inspection (in Months)
Chester-Maple 1	Lighting	July 2016	3
Chester-Maple 2	Oil Leak, Lighting, Communication, Fire Extinguisher, Floor Designation, Ventilation	July 2016	3
Chester-Maple 3	Sump Pump	July 2016	3
Chester-Maple 4	Oil Leak, Communication, Lighting (2), Signage, Fire Extinguisher	July 2016	3
Hamilton-Main 1	Out of Service	Out of Service	Out of Service
Hamilton-Main 2	No Inspection Results	May 2016	5
Hamilton-Main 3	Oil Leak	May 2016	5
Hamilton-Main 4	Oil Leak, Fire Service	May 2016	5
Lexington-Grove 1	Direction Limit, Fire Extinguisher, Car Top Cleaning	August 2016	2
Lexington-Grove 2	Oil Leak, Fire Extinguisher, Car Top Cleaning	August 2016	2
Lexington-Grove 3	Oil Leak	August 2016	2
Lexington-Grove 4	Generator Covers, Maintenance Logs, Car Top Cleaning, Fire Extinguisher, Repair Where Needed, Lighting, Fire Service	August 2016	2
Lexington-Grove 5	Out of Service	Out of Service	Out of Service
Lexington-Grove 6	Maintenance Logs, Smoke Head, Fire Extinguisher, Car Top Cleaning, Lighting	August 2016	2
Longview-Cromwell 1	No Inspection in 2016	March 2015 ^a	19
Longview-Cromwell 2	No Inspection in 2016	March 2015 ^a	19
Longview-Cromwell 3	No Inspection in 2016	March 2014 ^a	31
Longview-Cromwell 4	No Inspection in 2016	March 2015 ^a	19
Lyon Place 1	No Inspection in 2016	August 2014 ^a	26
Lyon Place 2	No Inspection in 2016	August 2014 ^a	26
Lyon Place 3	No Inspection in 2016	August 2014 ^a	26
TransCenter 1	Oil Leak, Intercom	August 2016	2
TransCenter 2	Fire Service	August 2016	2
TransCenter 3	Fire Service, Lighting, Intercom	August 2016	2
TransCenter 4	Fire Service, Lighting, Intercom, Oil Leak, Rust Accumulation (2), Drive Belt	August 2016	2
White Plains Center 1	Hoist Ropes, Lighting	August 2016	2
White Plains Center 2	Hoist Ropes	August 2016	2
White Plains Center 3	Not in Service on Day of Test	August 2016	2
White Plains Center 4	Lighting	August 2016	2
White Plains Center 5	Handrail	August 2016	2
White Plains Center 6	No Inspection Documentation	No Inspection	No Inspection

^a No documentation of pass/fail or failure reason, if applicable.

APPENDIX B

RESPONSE FROM CITY OFFICIALS

The City officials' response to this audit can be found on the following pages.



"THE BIRTHPLACE OF THE STATE OF NEW YORK"
OFFICE OF THE MAYOR

THOMAS M. ROACH
MAYOR

t: 914.422.1411
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September 27, 2017

Mr. Gabriel F. Deyo
Deputy Comptroller
Office of the State Comptroller
110 State Street
Albany, New York 12236

Re: Response
Report Number S9-17-2

Dear Deputy Comptroller Deyo:

I thank the State Comptroller's Office for its detailed review of the City of White Plains' program regarding the inspection of its municipal garages and for the recommendations contained in the Comptroller's report. I view these audits as an opportunity to improve our processes and procedures and appreciate the professional and collegial manner in which they are presented. Set forth below are the City's responses to the above-mentioned report, as well as the details of certain procedures the City has implemented or will implement in the near future.

The City regularly inspects parking structures prior to the development of its Capital Improvement Program. The inspecting team consists of the Commissioner of Public Works, in-staff engineers and, as needed, the Commissioner of Parking. In response to the Comptroller's recommendation that the City should consider establishing regular inspection cycles for parking structures, the Commissioner of Public Works will be responsible to have all municipal parking structures inspected on an annual basis.

In response to the Comptroller's recommendation that inspection decisions, priority and dispositions of identified needed repairs be documented and updated, as necessary, the Department of Public Works will document the findings of all annual inspections, as well as repairs made to the parking structures,

work required, priority of required repairs and completion dates. A file will be maintained for each parking structure that will include the aforementioned information.

In response to the Comptroller's recommendation that the Capital Improvement Plan be based on inspection reports and documented decisions, the reports referenced in the preceding paragraph will be utilized in developing recommendations for projects to be included in the Capital Improvement Program, and decisions of the Capital Projects Board will continue to be documented in meeting notes and the annual Capital Improvement Plan.

In response to the Comptroller's recommendation that City officials should ensure that operational elevators are inspected, as required, and meet minimum code requirements, the Commissioner of Building shall be responsible to see that elevators in municipal parking structures are inspected on an annual basis by qualified personnel and that a software system be utilized that will record all inspections made, inspector present and inspection results. This will ensure centralized and readily accessible records for all municipal elevators.

In summary, and as described above, the City will be implementing all four of the Recommendations contained in the Comptroller's Report.

I would like to commend the staff of the Comptroller's office on their thoroughness and professionalism during the audit process.

Very truly yours,

Thomas M. Roach

Mayor

APPENDIX C

AUDIT METHODOLOGY AND STANDARDS

To achieve our audit objective and obtain valid evidence, we performed the following procedures:

- We reviewed the Regulations set forth by New York State's 2010 Property Maintenance Code, General Municipal Law and the 2010 Fire Code, and applicable policies and procedures.
- We interviewed City officials and employees to determine the parking structure inspection and repair processes.
- We performed walk-through observations of parking structures.
- We reviewed parking structure and elevator inspection reports.
- We obtained contracts and bidding documents to determine whether identified repairs were made or scheduled to be repaired.
- We reviewed the 2015-16 Capital Improvement Plan for reasonableness and documentation to support anticipated projects.

We conducted this performance audit in accordance with GAGAS. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.