

AMENDED

CORRECTIVE ACTION PLAN

With TRANSITION PLAN

Aspen Meadows Neighborhood

50 21st Avenue
Longmont, CO 80501



For: Housing Authority of the City of Longmont
350 Kimbark Street
Longmont, CO 80501

ADA Compliance by Whiteley Consulting, LLC
7242 S. Allison Way
Littleton, CO 80128
Donald E. (Leo) Whiteley, P.E., Assoc. AIA, LEED AP

February 22, 2022
Amended January 13, 2023



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EXECUTIVE SUMMARY

BACKGROUND

On January 14, 2022, a representative of ADA COMPLIANCE by Whiteley Consulting, LLC undertook a physical accessibility survey of the Aspen Meadows Neighborhood, located at 50 21st Avenue in Longmont, Colorado. Exterior and interior common use areas and the designated dwelling units for persons with mobility impairment were surveyed for conformance with the Uniform Federal Accessibility Standards (UFAS.) In addition, the covered dwelling units for persons with mobility impairment were surveyed for conformance to the design and construction requirements of the Fair Housing Act. Photographs and measurements were taken of potential non-compliance items in accordance with the UFAS and the Fair Housing Act.

ITEMS NOT IN COMPLIANCE

Based on the field measurements and the review of the UFAS and the Fair Housing Act, a number of items were found to be non-compliant with the UFAS and the Fair Housing Act. These items are summarized in the Needs Assessment section.

ESTIMATED CONSTRUCTION COSTS

Based on current construction industry standards, and the latest labor rates, the estimated construction costs to address the non-compliant items surrounding and within the Aspen Meadows Neighborhood is \$7,560.00. Architectural Design services and contingency is not included. A transition plan to address the non-compliant items to be distributed over the next seven (7) calendar years is included in the Needs Assessment and Transition Plan section of this report.

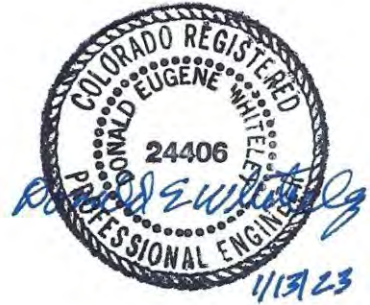
CERTIFICATION

I have surveyed the exterior and interior common use areas and the designated dwelling units for compliance with the UFAS and the design and construction requirements of the Fair Housing Act.

ADA Compliance by Whiteley Consulting, LLC

Donald E Whiteley

Donald E. (Leo) Whiteley, P.E., ASSOC AIA, LEED AP
President



INTRODUCTION

UFAS AND THE FAIR HOUSING ACT COMPLIANCE

The Housing Authority of the City of Longmont (LHA) owns, operates, or controls a public housing program, consisting of housing and non-housing programs that includes, but is not limited to: common entrances, management offices, laundry rooms, common areas, corridors, hallways, elevators, and community programs. LHA receives federal financial assistance from the U.S. Department of Housing and Urban Development (HUD) through the Office of Public and Indian Housing (PIH) to fund its low-income public housing program, Section 8 Housing Choice Voucher (HCV) Program, and Capital Fund Program. LHA uses HUD's financial assistance to operate and maintain its low-income public housing and Section 8 programs, and to make capital improvements to LHA properties.

Based on a review of LHA's properties, a Voluntary Compliance Agreement was entered into to address the issues raised in the Department's Letter of Findings and to ensure compliance with its responsibilities under Section 504, and the implementing regulations. The physical accessibility survey of LHA's properties is to utilize the Uniform Federal Accessibility Standards (UFSA) and the design and construction requirements of the Fair Housing Act. Based on the survey of the LHA's properties per the UFSA and the Fair Housing Act, a Corrective Action Plan is to be developed to set out how the LHA will remedy the UFAS and Fair Housing Act deficiencies identified in the physical accessibility survey.

This amended report addresses both the Needs Assessment portion of the Corrective Action Plan, along with the Transition Plan, and contains the following information:

1. the specific action the LHA will take to address all UFAS and Fair Housing Act deficiencies in each unit and related common areas.
2. Estimated cost of modifications and/or acquisitions.

Based on the Needs Assessment portion of the Corrective Action Plan, the Transition Plan has been developed to address in detail the proposed efforts to make LHA's housing programs accessible to and usable by individuals with disabilities.

SECTION 504; 24 C.F.R. §§ 8.22 AND 8.23

§ 8.22 - New construction - housing facilities.

...a minimum of five percent of the total dwelling units or at least one unit in a multifamily housing project, whichever is greater, shall be made accessible for persons with mobility impairments... An additional two percent of the units (but not less than one unit) in such a project shall be accessible for persons with hearing or vision impairments.

§ 8.23 Alterations of existing housing facilities.

...Once five percent of the dwelling units in a project are readily accessible to and usable by individuals with mobility impairments, then no additional elements of dwelling units, or entire dwelling units, are required to be accessible under this paragraph...

PERCENTAGE CALCULATIONS

The percentage calculations to determine the number of units for both persons with mobility impairments and persons with hearing or vision impairments is based on the total number of dwelling units managed by the Longmont Housing Authority. LHA manages nine (9) apartment buildings with a total of 462 dwelling units. Thirty-one (31) of these dwelling units are designated and designed for persons with mobility impairments, which results in a percentage of 6.7%.

- ❖ For the Aspen Meadows Neighborhood, the following units have been designated for persons with mobility impairment:

Dwelling Unit #C1; 2-bedroom

Dwelling Unit #C6; 2-bedroom

No additional dwelling units for persons with mobility impairments need to be provided for the Aspen Meadows Neighborhood.

- ❖ For The Aspen Meadows Neighborhood with 28 dwelling units, 2 percent of units for persons with hearing or vision impairment = $28 \times 0.02 = 0.56$ units. (Use 1 unit). Presently The Aspen Meadows Neighborhood has no units designated for persons with hearing or vision impairments.

TRANSITION PLAN

Transition Plans are developed to fulfill the required comprehensive planning for UFAS and Fair Housing Act compliance by identifying and planning for the removal of the items found to be non-compliant. These items are summarized in the Needs Assessment section.

Periodic updates to the Transition Plan are required in order to ensure on-going compliance with UFAS and Fair Housing Act requirements. Self-evaluation activities consisting of reviews of the Transition Plan should be undertaken to determine the level of compliance and determine if any additional areas of update are needed. If deficiencies are identified, these should be catalogued, and the Transition Plan updated to detail how and when the barriers would be removed.

In order to be effective, the Transition Plan needs to be utilized in yearly planning of projects and funding decisions, and also needs to be periodically reviewed for compliance and validity. The Transition Plan should be viewed as a “living document” and updated regularly to reflect changes in real world conditions and to address any possible areas of noncompliance. Regular updates to the plan will also result in monitoring compliance and the effectiveness of priorities set in the Plan itself.

The Aspen Meadows Neighborhood Needs Assessment with Transition Plan

										Timeline						
UFAS §§	Heading	Requirement	Non-Conforming Description	Photo #	Recommendation	Full and Fair Cash Value for Replacement Cost (2022 Estimate)	Cost	Immediate 2022	Year 1 2023	Year 2 2024	Year 3 2025	Year 4 2026	Year 5 2027	Year 6 2028	Year 7 2029	Complete? Insert name and date
Exterior Accessible Parking Spaces and Accessible Routes																
4.7.2, 4.8.2, and 4.8.6	Curb Ramp-Slope	Slope of curb ramps shall comply with 4.8.2 and 4.8.6.	The running and cross slopes of the curb ramp at the western accessible parking space exceed the allowable slopes.	AMN #1, AMN #2, AMN #3, & AMN #4	Remove and replace the existing concrete curb ramp.	The estimated material cost to install a new curb ramp is \$850.00. The labor to remove the existing curb ramp and install a new curb ramp is 8 hours for a labor cost of \$560.00. Therefore, the material and labor estimated construction cost would be \$1,410.00.	\$1,410	\$1,410								
Accessible Dwelling Unit; Guest Room #C1; 2-Bedroom																
4.25.3 and 4.2.6	Storage - Height	Clothes rods shall be a maximum of 54" from the floor.	The measured top of the clothes rod was 65 1/2".		The existing clothes rod is to be lowered to not more than 54" above the floor.	The labor to relocate the clothes rod is approximately 1 hour for a labor cost of \$70.00.	\$70	\$70								
4.16.5	Water Closets - Flush Controls	Controls for flush valves shall be mounted on the wide side of toilet areas	The flush control valve is located on the wall side of the water closet.	AMN #5	Remove and replace water tank on the water closet with flush control on wide side of water closet.	The estimated cost of a new "right hand" water tank is \$75.00. The labor to replace the water tank is approximately 1 hour for a labor cost of \$70.00. Therefore, the parts and labor estimated construction cost would be \$145.00.	\$145	\$145								
4.34.5.2 (3), 4.26, and Fig. 29	Rear Wall Grab Bar	The rear wall grab bar is no more than 6 inches from the side wall and 32 inches long.	The measured distance from the side wall to the rear edge of the rear wall grab bar is 3". The measured distance from the side wall to the far edge of the rear wall grab bar is 33". A 30 inch long rear grab bar has been installed.		A new 32" long rear wall grab bar is to be installed with the rear edge 6" from the side wall.	The estimated cost of the new rear wall grab bar is \$50.00. The labor to remove the existing grab bar and install the new rear wall grab bar is approximately 5 hour for a labor cost of \$350.00. Therefore, the parts and labor estimated construction cost would be \$400.00.	\$400	\$400								
Accessible Dwelling Unit; Guest Room #C6; 2-Bedroom																
4.25.3 and 4.2.6	Storage - Height	Clothes rods shall be a maximum of 54" from the floor.	The measured top of the clothes rod exceeded 54".	AMN #6 & AMN #7	The existing clothes rod is to be lowered to not more than 54" above the floor.	The labor to relocate the clothes rod is approximately 1 hour for a labor cost of \$70.00.	\$70	\$70								
4.34.5.2 (3), 4.26, and Fig. 29	Rear Wall Grab Bar	The rear wall grab bar is no more than 6 inches from the side wall and 32 inches long.	The measured distance from the rear edge of the rear wall grab bar is 3". The measured distance from the side wall to the far edge of the rear wall grab bar is 33". A 30 inch long rear grab bar has been installed.	AMN #8, AMN #9, & AMN #10	A new 32" long rear wall grab bar is to be installed with the rear edge 6" from the side wall.	The estimated cost of the new rear wall grab bar is \$50.00. The labor to remove the existing grab bar and install the new rear wall grab bar is approximately 5 hour for a labor cost of \$350.00. Therefore, the parts and labor estimated construction cost would be \$400.00.	\$65	\$65								
4.34.6.5(8)	Kitchen Sink	There shall be no sharp or abrasive surfaces under sinks. Hot water and drain pipes under sinks shall be insulated or otherwise covered.	The piping beneath the kitchen sink is exposed.	AMN #11	The piping underneath the kitchen sink is to be covered with an insulating material.	The estimated cost of a new insulation cover is \$30.00. The labor to install the insulation cover is approximately 1/2 hour for a labor cost of \$35.00. Therefore, the parts and labor estimated construction cost would be \$65.00.	\$5,000	\$5,000								
24 C.F.R §§ 8.22 & 8.23																
	Dwelling Units for persons with hearing or visual Impairment.	2% of 28 units = 0.56 units (use 1 unit)	No dwelling units for persons with hearing or vision impairment have been designated.		(1) Dwelling unit should be provided for persons with hearing or vision impairment.	Estimated cost to renovate (1) existing dwelling units to be acceptable for person with hearing or vision impairment is \$5,000.00 per unit	\$7,560.00	\$205.00	\$945.00	\$1,410.00	\$5,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
							TOTAL									

PHOTO LOG

Photo AMN1 – Curb ramp at accessible parking space at west end of complex.



Photo AMN2 – Running slope on one side of curb ramp at 10.1%.



Photo AMN3 – Side running slope on other side of curb ramp at 9.8%.



Photo AMN4 – Cross slope of curb ramp at 2.1%.



Photo AMN5 – Dwelling Unit C1 - Flush control on wall side of water closet.



Photo AMN6 – Dwelling Unit C6 - Closet with clothes rod.



Photo AMN7 – Dwelling Unit C6 - Measured height of clothes rod at 65 1/2”.

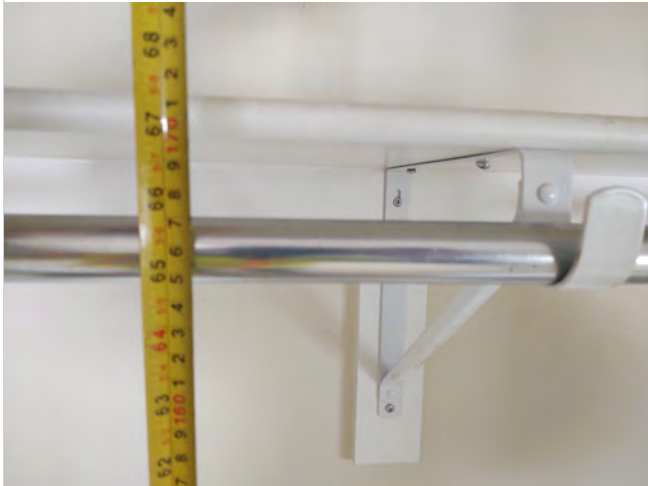


Photo AMN8 – Dwelling Unit C6 - Water closet with grab bars.

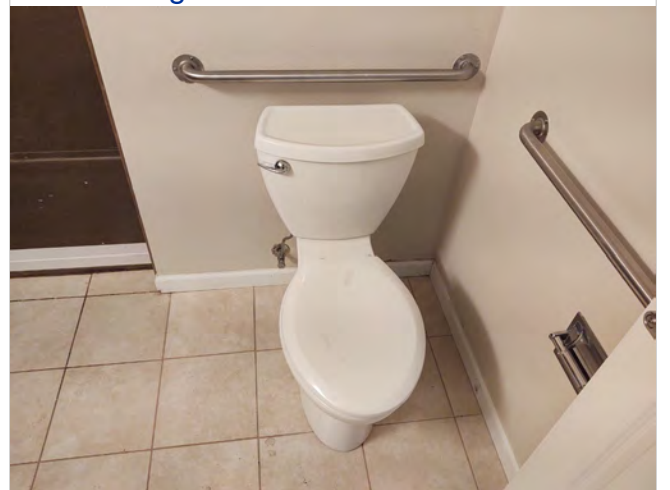


Photo AMN9 – Dwelling Unit C6 - Measured dimension to near edge of rear grab bar at 3” from the side wall.



Photo AMN10 – Dwelling Unit C6 - Measured dimension to far edge of rear grab bar at 33” from the side wall.



Photo AMN11 – Dwelling Unit C6 - Exposed piping beneath kitchen sink.

