

AMENDED

CORRECTIVE ACTION PLAN

With TRANSITION PLAN

The Lodge at Hover Crossing

2127 18th 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 19, 2022, a representative of ADA COMPLIANCE by Whiteley Consulting, LLC undertook a physical accessibility survey of The Lodge at Hover Crossing located at 2127 18th 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 Lodge at Hover Crossing is \$11,715.00. 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.

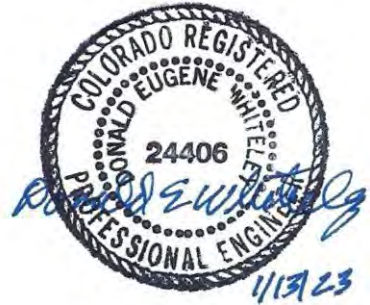
CERTIFICATION

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 Lodge at Hover Crossing, the following units have been designated for persons with mobility impairment:

Dwelling Unit 104 – 1 bedroom.

Dwelling Unit 106 – 1 bedroom.

No additional dwelling units for persons with mobility impairments need to be provided for the Lodge at Hover Crossing.

- ❖ For the Lodge at Hover Crossing with 50 dwelling units, 2 percent of units for persons with hearing or vision impairment = $50 \times 0.02 = 1.0$ units. (Use 1 unit). Presently the Lodge at Hover Crossing 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 Lodge at Hover Crossing Needs Assessment with Transition Plan

UFAS \$§	Heading	Requirement	Non-Conforming Description	Photo #	Recommendation	Full and Fair Cash Value for Replacement Cost (2022 Estimate)	Cost	Timeline						Complete? Insert name and date
								Immediate 2022	Year 1 2023	Year 2 2024	Year 3 2025	Year 4 2026	Year 5 2027	
Exterior Accessible Parking Spaces and Accessible Routes														
4.6.1, 4.1.1(5)(a) and 4.1.1(5)(d)(i)	Parking - Minimum Number and Accessible Sites	(1) Accessible parking space for each accessible dwelling unit plus 2% of the provided spaces for visitors. [(3) Accessible parking spaces for each accessible dwelling unit plus (2) accessible parking spaces for 39 visitor parking spaces = 5 total required.]	(3) accessible parking spaces have been provided on site.	L #1	(2) additional accessible parking spaces with access aisles are to be provided closest to the accessible entrance.	The estimated material cost to rework and restripe approximately 500 square feet of the asphalt parking lot is \$900.00. The labor to rework the asphalt parking lot is approximately 10 hours for a labor cost of \$700.00. Therefore, the material and labor estimated construction cost would be \$1,600.00.	\$1,600.00	\$1,600.00						
4.6.4 and 4.1.1(7)(a)	Parking - Signage and Accessible Sites	Accessible parking spaces shall be designated as reserved by a sign.	One of the signs in front of the existing accessible parking spaces is not compliant and is to be replaced.	L #2	(2) new accessible parking signs and (1) replacement sign are to be installed in front of the new accessible parking spaces.	The estimated cost of the 2 new posts is \$60.00. The estimated cost of the 3 new accessible signs is \$90.00. The labor to install the 2 new posts and install the new signs is approximately 3 hours for a labor cost of \$210.00. Therefore, the parts and labor estimated construction cost would be \$360.00.	\$360.00	\$360.00						
4.1.1(7)(G) and 4.30.5	Entrance Signage	If not all common use entrances are accessible, the entrances and the non-accessible entrances shall be identified.	The front and rear entrances to the housing units are accessible but the (2) side entrances are not accessible.	L #3, L #4, L #5, & L #6	Signage indicating accessibility are to be installed at the front and rear entrances. Signage indicating non-accessible are to be installed adjacent to the non-accessible side entrances.	The estimated cost of the 2 new accessible signs is \$60.00. The estimated cost of the 2 new signs indicating non-accessibility with posts is \$120.00. The labor to install the 4 new signs is approximately 4 hours for a labor cost of \$280.00. Therefore, the parts and labor estimated construction cost would be \$460.00.	\$460.00	\$460.00						
Interior and Common Spaces														
4.2.6	Mailboxes - Side Approach	The maximum high side reach allowed is 54" above the floor.	The height to the top of the mail boxes is 65 1/2"	L #7 & L #8	Residents with disabilities can request the U.S. Postal Service to accommodate their disability by assigning them a mailbox on the bottom row.	No cost	\$0.00	\$0.00						
4.34.6.5(5)	Community Kitchen - Sink	The base cabinet, if provided, shall be removable and the finished floor shall extend under the counter to the wall	The sink has a permanent base cabinet.	L #9	The base cabinet is to be removed and the finished floor constructed to the back wall.	The estimated material cost to finish the bottom and edges of the sink and extend the finish flooring to the wall is \$125.00. The labor to remove the existing cabinet and install new side cabinets and flooring is 8 hours for a labor cost of \$560.00. Therefore, the material and labor estimated construction cost would be \$685.00.	\$685.00	\$685.00						
4.34.6.5(6)	Community 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 hot water and drain piping are exposed.	L #10	Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00	\$60.00						

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
4.1.1(7) and 4.30.6	Sign Mounting Location and Height	Interior signage shall be located alongside the door on the latch side and shall be mounted at a height of between 54" and 66" above the finished floor.	The signage for the Community Room and for the Library are located over the doorway	L #11 & L #12,	Signage in conformance with Section 4.30 Signage is to be provided adjacent to the Community Room and Library doorways	The estimated cost of the 2 new identification signs is \$60.00. The labor to install the 2 new signs is approximately 1 hour for a labor cost of \$70.00. Therefore, the parts and labor estimated construction cost would be \$150.00.	\$150.00	\$150.00								
Accessible Dwelling Unit; Guest Room #104; 1-Bedroom																
4.2.5.3 and 4.2.6	Storage - Height	Clothes rods shall be a maximum of 54" from the floor	The measured dimension to the top of the clothes rod was 56".	L #13	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.	\$70.00	\$70.00								
4.34.5.2(4) and Fig. 47(b)	Water Closets - Dispensers	Starting at the edge farthest from the back wall, the toilet paper dispenser is no more than 36" from the back wall.	The far reach of the toilet paper dispenser is approximately 41" from the back wall.	L #14	Relocate the toilet paper dispenser to be within 36" from back wall.	The labor to remove and relocate the existing toilet paper dispenser is approximately 2 hours for a labor cost of \$140.00.	\$140.00	\$140.00								
4.34.6.5(5)	Bathroom Sink	The base cabinet, if provided, shall be removable and the finished floor shall extend under the counter to the wall	The sink has a permanent base cabinet.	L #15	The base cabinet is to be removed and the finished floor constructed to the back wall.	The estimated material cost to finish the bottom and edges of the sink and extend the finish flooring to the wall is \$125.00. The labor to remove the existing base cabinet and install new cabinet siding and flooring is 8 hours for a labor cost of \$560.00. Therefore, the material and labor estimated construction cost would be \$685.00.	\$685.00	\$685.00								
4.34.6.5(8)	Bathroom 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 hot water and drain piping are exposed.	L #16	Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00	\$60.00								
4.34.6.5(5)	Kitchen Sink	The base cabinet, if provided, shall be removable and the finished floor shall extend under the counter to the wall	The sink has a permanent base cabinet.	L #17	The base cabinet is to be removed and the finished floor constructed to the back wall.	The estimated material cost to finish the bottom and edges of the sink and extend the finish flooring to the wall is \$125.00. The labor to remove the existing base cabinet and install new cabinet siding and flooring is 8 hours for a labor cost of \$560.00. Therefore, the material and labor estimated construction cost would be \$685.00.	\$685.00	\$685.00								
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 hot water and drain piping are exposed.	L #18	Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00	\$60.00								
Accessible Dwelling Unit; Guest Room #106; 1-Bedroom																
4.2.5.3 and 4.2.6	Storage - Height	Clothes rods shall be a maximum of 54" from the floor	The measured dimension to the top of the clothes rod was 62".	L #19	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.	\$70.00	\$70.00								
4.34.5.2(4) and Fig. 47(b)	Water Closets - Dispensers	Starting at the edge farthest from the back wall, the toilet paper dispenser is no more than 36" from the back wall.	The far reach of the toilet paper dispenser is approximately 43" from the back wall.	L #20	Relocate the toilet paper dispenser to be within 36" from back wall.	The labor to remove and relocate the existing toilet paper dispenser is approximately 2 hours for a labor cost of \$140.00.	\$140.00	\$140.00								

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
4.34.6.5(5)	Bathroom Sink	The base cabinet, if provided, shall be removable and the finished floor shall extend under the counter to the wall	The sink has a permanent base cabinet.	L #21	The base cabinet is to be removed and the finished floor constructed to the back wall.	The estimated material cost to finish the bottom and edges of the sink and extend the finish flooring to the wall is \$125.00. The labor to remove the existing base cabinet and install new cabinet siding and flooring is 8 hours for a labor cost of \$560.00. Therefore, the material and labor estimated construction cost would be \$685.00.	\$685.00		\$685.00							
4.34.6.5(8)	Bathroom 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 hot water and drain piping are exposed.	L #22	Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00	\$60.00								
4.34.6.5(5)	Kitchen Sink	The base cabinet, if provided, shall be removable and the finished floor shall extend under the counter to the wall	The sink has a permanent base cabinet.	H #23	The base cabinet is to be removed and the finished floor constructed to the back wall.	The estimated material cost to finish the bottom and edges of the sink and extend the finish flooring to the wall is \$125.00. The labor to remove the existing base cabinet and install new cabinet siding and flooring is 8 hours for a labor cost of \$560.00. Therefore, the material and labor estimated construction cost would be \$685.00.	\$685.00		\$685.00							
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 hot water and drain piping are exposed.	L #24	Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00	\$60.00								
24 C.F.R. §§ 8.22 & 8.23																
	Dwelling Units for persons with hearing or visual Impairment.	2% of 50 units = 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 unit to be accessible for persons with hearing or vision impairment is \$5,000.00 per unit.	\$5,000.00				\$5,000.00					
					TOTAL		\$11,715.00	\$720.00	\$5,995.00	\$0.00	\$5,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

PHOTO LOG – THE LODGE AT HOVER CROSSING

Photo L1 – 3 Accessible parking spaces with access aisles.



Photo L2 – Faded accessible parking signage



Photo L3 – Front accessible entrance without signage.



Photo L4 – Rear accessible entrance without signage.



Photo L5 – Non-accessible side entrance door.



Photo L6 – Non-accessible side entrance door.



Photo L7 – Mailbox bank in lobby.



Photo L8 – Measured height to top of mailbox bank at 65 1/2”.



Photo L9 – Community Room – Kitchen sink with permanent base cabinet.



Photo L10 – Community Room – Exposed piping beneath kitchen sink.



Photo L11 – Signage for Community Room located over the doorway.



Photo L12 – Signage for Library Room located over the doorway.



Photo L13 – Dwelling Unit #104 – Measured height to top of clothes rod at 56”.



Photo L14 – Dwelling Unit #104 – Measured dimension of 36” to front edge of toilet paper dispenser.



Photo L15 – Dwelling Unit #104 – Bathroom sink with permanent base cabinet.



Photo L16 – Dwelling Unit #104 – Exposed piping beneath bathroom sink.



Photo L17 – Dwelling Unit #104 - Kitchen sink with permanent base cabinet.



Photo L18 – Dwelling Unit #104 - Exposed piping beneath kitchen sink.



Photo L19 – Dwelling Unit #106 - Measured height to top of clothes rod at 62”.



Photo L20 – Dwelling Unit #106 - Measured dimension of 37” to front edge of toilet paper dispenser.



Photo L21 – Dwelling Unit #106 - Bathroom sink with permanent base cabinet.



Photo L22 – Dwelling Unit #106 - Exposed piping beneath bathroom sink.



Photo L23 – Dwelling Unit #106 - Kitchen sink with permanent base cabinet



Photo L24 – Dwelling Unit #106 - Exposed piping beneath kitchen sink.

