

# AMENDED

## CORRECTIVE ACTION PLAN

### With TRANSITION PLAN

# Fall River Apartments

321 Homestead Parkway  
Longmont, CO 80504



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

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March 10, 2022  
Amended January 13, 2023



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## **EXECUTIVE SUMMARY**

### **BACKGROUND**

On January 18, 2022, a representative of ADA COMPLIANCE by Whiteley Consulting, LLC undertook a physical accessibility survey of the Fall River Apartments located at 321 Homestead Parkway 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 with 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 Fall River Apartments is \$20,295.00. 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.

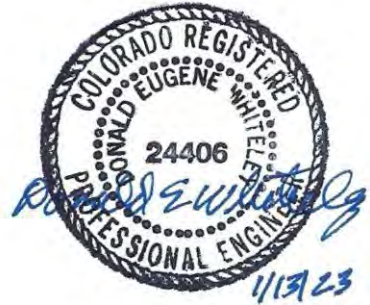
## CERTIFICATION

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 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 Fall River Apartments, the following units have been designated for persons with mobility impairment:

Dwelling Unit #107; 2-bedroom

Dwelling Unit #207; 2-bedroom

Dwelling Unit #212; 1-bedroom

Dwelling Unit #414; 1-Bedroom

No additional dwelling units for persons with mobility impairments need to be provided for the Fall River Apartments.

- ❖ For the Fall River Apartments with 60 dwelling units, 2 percent of units for persons with hearing or vision impairment =  $60 \times 0.02 = 1.2$  units. (Use 2 units)  
Presently the Fall River Apartments 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.



# Fall River Apartments 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	
<b>Exterior Accessible Parking Spaces and Accessible Routes</b>													
4.6.1, 4.1.1(5)(a) and 4.1.1(5)(d)(i)	Parking - Minimum and Accessible Sites	(1) Accessible parking space for each accessible dwelling unit plus 2% of the provided spaces for visitors. [(6) Accessible parking spaces for each accessible dwelling unit plus (3) accessible parking spaces for 60 visitor parking spaces = (9) total required.]	(4) accessible parking spaces have been provided on site. FR #1		(5) additional accessible parking spaces with access aisles are to be provided closest to the accessible entrance.	The estimated material cost to restripe approximately 1,500 square feet of the asphalt parking lot is \$400.00. The labor to restripe the asphalt parking lot is approximately 4 hours for a labor cost of \$280.00. Therefore, the material and labor estimated construction cost would be \$680.00.	\$680	\$680					
4.6.3	Parking Spaces	Parking spaces and access aisles shall be level with surface slopes not exceeding 1:50 in all directions.	A slope of 3.2% was measured at the accessible parking spaces. FR #2		Portions of the pavement at the accessible parking spaces and access aisles that exceed 2.0% should be reworked to have a slope less than 2%.	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	\$680					
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.	Signage is to be provided in front of the (5) new accessible parking spaces.		(5) accessible parking signs and (1) "van accessible" sign is to be installed in front of the accessible parking spaces.	The estimated cost of the 5 new posts is \$150.00. The estimated cost of the 5 new accessible signs and the 1 new "van accessible" sign is \$180.00. The labor to install the 5 new posts and install the new signs is approximately 1 hour per post for a labor cost of \$350.00. Therefore, the parts and labor estimated construction cost would be \$680.00.	\$680	\$680					
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 cross slope of the curb ramp at the front accessible route is measured at 2.4%.	FR #3 & FR #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 cut 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					
<b>Interior and Common Spaces</b>													
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 68 1/2"	FR #5 & FR #6	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(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.	FR #7	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	\$60					
<b>First Level Public Unisex Toilet Room</b>													
4.13.11	Door Opening Force	The maximum force for pulling open an interior hinged door is 5 lbf	The force to open the first level unisex rest room door is 6.23 lbs.	FR #8	The door closing mechanism is to be adjusted to allow the door to be opened with 5 lbs. maximum force.	The labor to adjust the door closing mechanism is approximately 1/2 hour for a labor cost of \$35.00.	\$35	\$35					

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
<b>Second Level Unisex Toilet Room</b>																
4.16.2 and Fig. 28	Clear Floor Space	The center line of the water closet is to be located between 17" and 19" from the side wall.	The center line of the water closet was measured to be 15" from the side wall.	FR #9	Remove and replace water closet so that the center line of the water closet is 18" from the side wall.	The estimated material cost to relocate the water closet is \$180.00. The labor to remove and replace the water closet is approximately 11 hour for a labor cost of \$770.00. Therefore, the parts and labor estimated construction cost would be \$950.00.	\$950			\$950						
<b>Third Level Unisex Toilet Room</b>																
4.13.11	Door Opening Force	The maximum force for pulling open an interior hinged door is 5 lbf	The force to open the third level unisex rest room door is 6.21 lbs.	FR #10	The door closing mechanism is to be adjusted to allow the door to be opened with 5 lbs. maximum force.	The labor to adjust the door closing mechanism is approximately 1/2 hour for a labor cost of \$35.00.	\$35	\$35								
4.16.2 and Fig. 28	Clear Floor Space	The center line of the water closet is to be located between 17" and 19" from the side wall.	The center line of the water closet was measured to be 16 1/2" from the side wall.	FR #11	Remove and replace water closet so that the center line of the water closet is 18" from the side wall.	The estimated material cost to relocate the water closet is \$180.00. The labor to remove and replace the water closet is approximately 11 hour for a labor cost of \$770.00. Therefore, the parts and labor estimated construction cost would be \$950.00.	\$950	\$950								
<b>Fourth Level Unisex Toilet Room</b>																
4.13.11	Door Opening Force	The maximum force for pulling open an interior hinged door is 5 lbf	The force to open the third level unisex rest room door is 6.63 lbs.	FR #12	The door closing mechanism is to be adjusted to allow the door to be opened with 5 lbs. maximum force.	The labor to adjust the door closing mechanism is approximately 1/2 hour for a labor cost of \$35.00.	\$35	\$35								
4.16.2 and Fig. 28	Clear Floor Space	The center line of the water closet is to be located between 17" and 19" from the side wall.	The center line of the water closet was measured to be 16" from the side wall.	FR #13	Remove and replace water closet so that the center line of the water closet is 18" from the side wall.	The estimated material cost to relocate the water closet is \$180.00. The labor to remove and replace the water closet is approximately 11 hour for a labor cost of \$770.00. Therefore, the parts and labor estimated construction cost would be \$950.00.	\$950	\$950								
<b>Third Level Laundry Room</b>																
4.13.11	Door Opening Force	The maximum force for pulling open an interior hinged door is 5 lbf	The force to open the first level unisex rest room door is 5.23 lbs.	FR #14	The door closing mechanism is to be adjusted to allow the door to be opened with 5 lbs. maximum force.	The labor to adjust the door closing mechanism is approximately 1/2 hour for a labor cost of \$35.00.	\$35	\$35								
<b>Accessible Dwelling Unit; Guest Room #107; 2-Bedroom</b>																
4.17.6, 4.26, Fig. 29, and Fig. 30(c)	Rear Grab Bar	Rear grab bars shall be provided between 33 and 36" above the floor and shall be 36" in length.	No rear grab bar has been provided.	FR #15	A new 36" long grab bar installed.	The estimated cost of the new rear wall grab bar is \$50.00. The labor to install a new rear wall grab bar is approximately 4 hour for a labor cost of \$280.00. Therefore, the parts and labor estimated construction cost would be \$330.00.	\$330	\$330								
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.	FR #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	\$60								
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.	FR #17	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	\$60								
<b>Accessible Dwelling Unit; Guest Room #207; 2-Bedroom</b>																
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 69".	FR #18	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								

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
4.16.5	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.	FR #19	Remove and replace water tank 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								
4.34.6.5(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.	FR #20	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	\$60								
4.23.7, 4.27, 4.2.5 and 4.2.6	Dispensers and Other Elements	Coat hooks shall be a maximum of 54" from the floor	The measured dimension to the top of the coat hook is 66"	FR #21	Another coat hook is to be installed to not more than 54" above the floor.	The estimated cost of a new coat hook is \$25.00. The labor to install the new coat hook is approximately 1/2 hour for a labor cost of \$35.00. Therefore, the parts and labor estimated construction cost would be \$60.00.	\$60	\$60								
<b>Accessible Dwelling Unit; Guest Room #212; 1-Bedroom</b>																
4.25.3 and 4.2.6	Storage - Height	Clothes rods shall be a maximum of 54" from the floor	The top of the clothes rod exceeded 54".	FR #22	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								
4.16.2 and Fig. 28	Clear Floor Space	The center line of the water closet is to be located between 17" and 19" from the side wall	The center line of the water closet was measured to be 16 1/2" from the side wall.	FR #23	Remove and replace water closet so that the center line of the water closet is 18" from the side wall.	The estimated material cost to relocate the water closet is \$180.00. The labor to remove and replace the water closet is approximately 11 hour for a labor cost of \$770.00. Therefore, the parts and labor estimated construction cost would be \$950.00.	\$950	\$950								
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.	FR #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	\$60								
<b>Accessible Dwelling Unit; Guest Room #414; 1-Bedroom</b>																
4.16.2 and Fig. 28	Clear Floor Space	The center line of the water closet is to be located between 17" and 19" from the side wall	The center line of the water closet was measured to be 16" from the side wall.	FR #25	Remove and replace water closet so that the center line of the water closet is 18" from the side wall.	The estimated material cost to relocate the water closet is \$180.00. The labor to remove and replace the water closet is approximately 11 hour for a labor cost of \$770.00. Therefore, the parts and labor estimated construction cost would be \$950.00.	\$950	\$950								
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.	FR #26	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	\$60								
24 C.F.R. §§ 8.22 & 8.23	Dwelling Units for persons with hearing or visual Impairment.	2% of 50 units = 1.2 unit (use 2 unit)	No dwelling units for persons with hearing or vision impairment have been designated.		(2) Dwelling units should be provided for persons with hearing or vision impairment.	Estimated cost to renovate (2) existing dwelling units to be acceptable for person with hearing or vision impairment is \$5,000.00 per unit for a total estimated cost of \$10,000.00	\$10,000	\$10,000			\$10,000					
							<b>TOTAL</b>	\$20,295.00	\$825.00	\$8,440.00	\$10,000.00	\$0.00	\$0.00	\$0.00	\$0.00	

## PHOTO LOG

Photo FR1 – (4) Accessible parking spaces near front entrance.



Photo FR2 – Measured slope of 3.2% at accessible parking space.



Photo FR3 – Curb ramp on accessible route to front entrance.



Photo FR4 – Measured cross slope of 2.4% at curb ramp on accessible route to front entrance.





Photo FR5 – Mailbox bank in front lobby.



Photo FR6 – Measured height of 68 ½” to top of mailbox bank.



Photo FR7 – Community Room – Kitchen sink with exposed piping.



Photo FR8 – First Level Unisex Toilet Room – Measured door pull of 6.23 lbs.



Photo FR9 – Second Level Unisex Toilet Room – Measured dimension of 15” to centerline of water closet.



Photo FR10 – Third Level Unisex Toilet Room – Measured door pull of 6.21 lbs.



Photo FR11 – Third Level Unisex Toilet Room - Measured dimension of 16 ½” to centerline of water closet.



Photo FR12 – Fourth Level Unisex Toilet Room - Measured door pull of 6.63 lbs.



Photo FR13 – Fourth Level Unisex Toilet Room - Measured dimension of 16" to centerline of water closet.



Photo FR14 – Third Level Laundry Room – Measured door pull or 5.32 lbs.



Photo FR15 – Dwelling Unit #107 – Bathroom with no rear grab bar.



Photo FR16 – Dwelling Unit #107 - Exposed piping and flooring beneath bathroom sink.

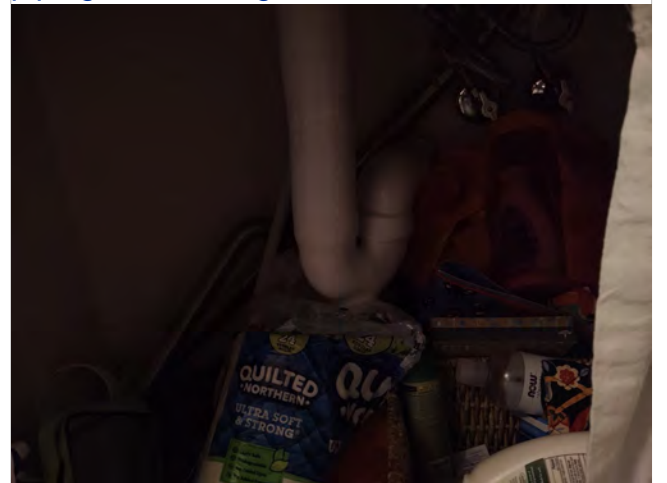




Photo FR17 – Dwelling Unit #107 - Exposed piping beneath kitchen sink.



Photo FR18 – Dwelling Unit #207 - Measured height of 69” at clothes rod.



Photo FR19 – Dwelling Unit #207 - Flush control on wall side of water closet.



Photo FR20 – Dwelling Unit #207 - Exposed piping and flooring beneath bathroom sink.





Photo FR21 – Dwelling Unit #207 - Measured height of 66" at coat hook.



Photo FR22 – Dwelling Unit #212 – Clothes rod exceeds 48".

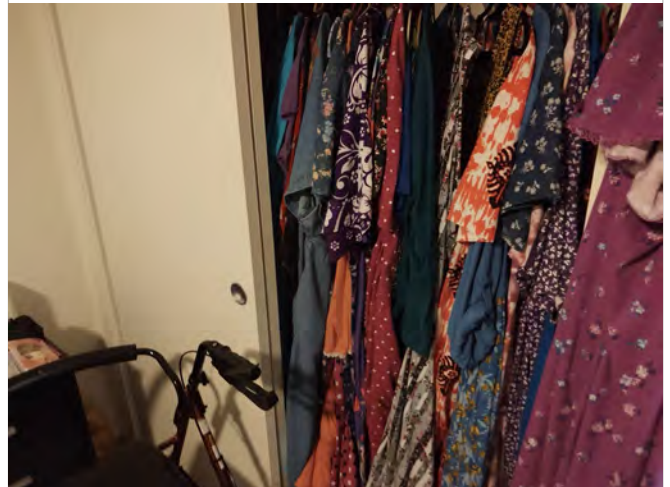


Photo FR23 – Dwelling Unit #212 - Measured dimension of 16 1/2" to centerline of water closet.



Photo FR24 – Dwelling Unit #212 - Exposed piping and flooring beneath Kitchen sink.



Photo FR25 – Dwelling Unit #414 - Measured dimension of 16" to centerline of water closet.



Photo FR26 – Dwelling Unit #414 - Exposed piping and flooring beneath Kitchen sink.

