

# AMENDED

## CORRECTIVE ACTION PLAN

### With TRANSITION PLAN

## Aspen Meadows Apartments

70 21<sup>st</sup> 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

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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 Apartments located at 70 21<sup>st</sup> 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 and hearing or vision 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 Apartments is \$640.00. 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.

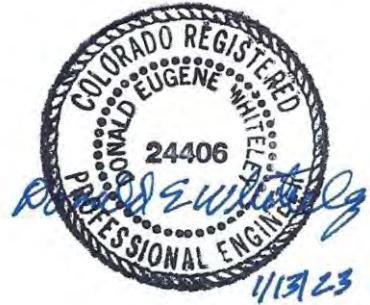
## CERTIFICATION

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

Dwelling Unit #101; 2-bedroom

Dwelling Unit #104; 1-bedroom

Dwelling Unit #115; 1-bedroom

Dwelling Unit #203; 1-bedroom

Dwelling Unit #214; 1-bedroom

Dwelling Unit #304; 1-bedroom

Dwelling Unit #315; 1-bedroom

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

- ❖ For the Aspen Meadows Apartments 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 Aspen Meadows Apartments designates 3 units for persons with hearing or vision impairments.

Dwelling Unit #103; 1-bedroom

Dwelling Unit #203; 1-bedroom

Dwelling Unit #305; 1-bedroom

No additional dwelling units for persons with hearing or vision impairment impairments need to be provided for the Aspen Meadows Apartments.

## **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.



# Aspen Meadows Apartment 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
<b>Exterior Accessible Parking Spaces and Accessible Routes</b>														
4.1.1(7)(c) and 4.30.5	Entrance Signage	If not all common use entrances are accessible, the accessible entrances and the non-accessible entrances shall be identified.	The front entrance to the housing units is accessible but the (2) side entrances are not accessible.	AM #1, AM #2 & AM #3	Signage indicating accessibility are to be installed at the front entrance. Signage indicating non-accessibility are to be installed adjacent to the non-accessible side entrances.	The estimated cost of the 1 new accessible sign is \$30.00. The estimated cost of the 2 new signs indicating non-accessibility with posts is \$120.00. The labor to install the 3 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							
<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 69 1/2"	AM #4 & AM #5	<b>Residents with disabilities can request the U.S. Postal Service to accommodate their disability by assigning them a mailbox on the bottom row.</b>	No cost	\$0						Completed	
<b>First Level Public Unisex Toilet Room</b>														
4.2.5, 5(a), 4.2.6, and Fig. 6(e)	Forward Reach and Side Reach	The maximum high forward reach allowed shall be 48" above the floor. The maximum high side reach allowed is 54" above the floor.	The coat hook is located 62" above the floor.	AM #6	The existing coat hook is to be relocated to be not more than 48" above the floor.	The labor to relocate the coat hook is approximately 1/2 hour for a labor cost of \$35.00.	\$35							
<b>Second Level Public Women's Toilet Room</b>														
4.2.5, 5(a), 4.2.6, and Fig. 6(a)	Forward Reach and Side Reach	The maximum high forward reach allowed shall be 48" above the floor. The maximum high side reach allowed is 54" above the floor.	The coat hook is located 60" above the floor.	AM #7	The existing coat hook is to be relocated to be not more than 48" above the floor.	The labor to relocate the coat hook is approximately 1/2 hour for a labor cost of \$35.00.	\$35							
<b>Accessible Dwelling Unit; Guest Room #104; 1-Bedroom</b>														
4.2.5.3 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 67".	AM #8	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							
<b>Accessible Dwelling Unit; Guest Room #115; 1-Bedroom</b>														
4.34.5.2(a) 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 42" from the back wall.	AM #9	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							
<b>TOTAL</b>							\$640.00	\$640.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

## PHOTO LOG

Photo AM1 – Front accessible entrance without signage.



Photo AM2 – Non-accessible side door.



Photo AM3 – Non-accessible side door.



Photo AM4 – Mailbox bank in front lobby.

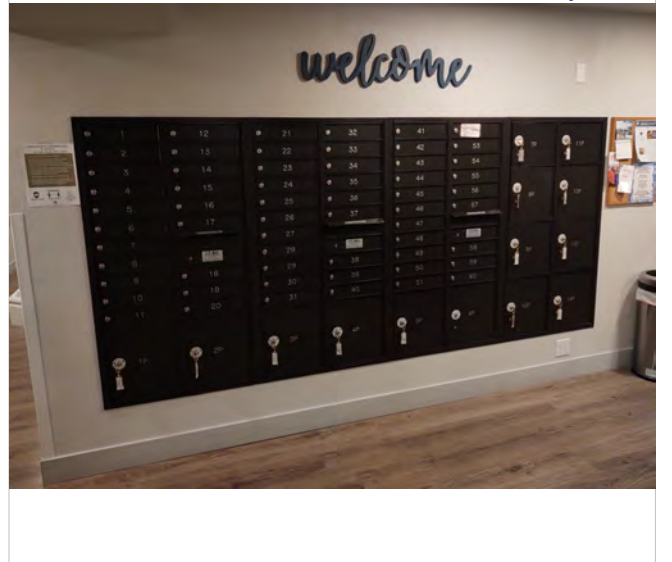


Photo AM5 – Measured height of 69 ½” to top of mailbox bank.



Photo AM6 – Unisex Toilet Room – Measured height of 62” to coat hook.



Photo AM7 – Women’s Toilet Room – Measured height of 60” to coat hook.



Photo AM8 – Dwelling Unit #104 – Measured height of 67” to top clothes rod.



Photo AM9 – Dwelling Unit #115 – Measured distance of toilet paper dispenser exceeds 36” to far edge.

