

AMENDED

CORRECTIVE ACTION PLAN

With TRANSITION PLAN

Briarwood Apartments

1227 Kimbark Street
Longmont, CO 80501



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

ADA Compliance by Whiteley Consulting, LLC
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EXECUTIVE SUMMARY

BACKGROUND

On January 11, 2022, a representative of ADA COMPLIANCE by Whiteley Consulting, LLC undertook a physical accessibility survey of the Briarwood Apartments located at 1227 Kimbark Street 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 Briarwood Apartments is \$39,760.00. 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.

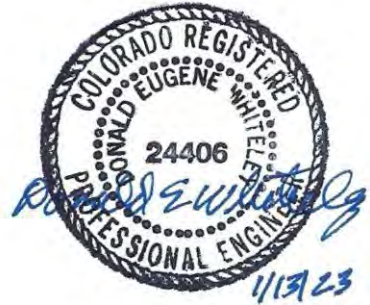
CERTIFICATION

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 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 Briarwood Apartments, the following unit has been designated for persons with mobility impairment:

Dwelling Unit #104 – Studio

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

- ❖ For the Briarwood Apartments with 10 dwelling units, 2 percent of units for persons with hearing or vision impairment = $10 \times 0.02 = 0.02$ units. (Use 1 Unit.) Presently the Briarwood 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.

The Briarwood 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	
								Year 1 2023	Year 2 2024	Year 3 2025	Year 4 2026	Year 5 2027	Year 6 2028		Year 7 2029
	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. (1) Accessible parking space for each accessible dwelling unit plus (1) accessible parking space for 18 visitor parking spaces = 2 total required.]	(1) Accessible parking space has been provided on site. B #1		(1) Additional accessible parking space is to be provided closest to the accessible entrance. (1) Additional accessible parking space sign is to be provided. The existing accessible parking sign and "van accessible" sign is to be relocated to be a minimum of 60 inches above the ground. B #1	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	\$1,600							
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.	The signage in front of the accessible parking space is measured to be approximately 41 1/2" above the ground. B #1		(1) Additional accessible parking space sign is to be provided. The existing accessible parking sign and "van accessible" sign is to be relocated to be a minimum of 60 inches above the ground. B #2	The estimated cost of the (1) new accessible sign is \$30.00. The labor to relocate the existing signs and install the new sign is approximately 1 hour for a labor cost of \$70.00. Therefore, the parts and labor estimated construction cost would be \$100.00.	\$100	\$100							
4.8.2, 4.8.6, and 4.8.7	Ramps - Slope and Rise, Cross Slopes and Surfaces, & Edge Protection	Maximum running slope of a ramp shall be 1:12 (8.3%), maximum cross slope shall be 1:50 (2.0%), and edge protection shall be provided.	The running and cross slopes of the ramp exceed the allowable slopes. No compliant edge protection and landings have been provided. B #3, B #4, B #5, & B #6		Remove and replace the existing concrete ramp and handrails. The ramp should tie into the accessible routes at both the top and bottom of the ramp. B #3, B #4, B #5, & B #6	The estimated material cost to construct a new 60 foot long ramp with landings and handrails is \$15,000.00. The labor to construct a new 60 foot long ramp with landings and handrails is approximately 250 hours for a labor cost of \$17,500.00. Therefore, the material and labor estimated construction cost would be \$32,500.00.	\$32,500	\$32,500							
4.8.4	Ramps - Landings	Ramps shall have landings at the bottom and top of each run. The landing length shall be a minimum of 60 inches and at the change in directions, the landing shall be a minimum of 60" by 60".	No landing has been provided at the change of direction on the ramp. The length of the landing at the bottom of the ramp is approximately 44 inches in length. B #7, B #8, & B #9		Construction of the landings to be connected with the concrete ramp in Section 4.8.2 above..	Refer to item 4.8.2 above for the cost to construct the integral landings.	\$0.00	\$0							
Interior and Common Spaces															
4.2.6	Mailboxes - Side Approach	The maximum high side reach allowed is 54" above the floor or ground.	The height to the top of the exterior mail boxes is 63". B #10 & B #11		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	\$0							
Accessible Dwelling Unit; Guest Room #104 - Studio															
4.3.4.5.2(3), 4.2.6, and Fig. 29	Side Wall Grab Bar	The side wall grab should be no more than 12 inches from the back wall and 42 inches long.	The measured distance from the back wall to the near edge of the side wall grab bar is 5". The measured distance from the back wall to the far edge of the side wall grab bar is 47". B # 12 & B #13		The existing 42" long side wall grab bars is to be relocated to have the near edge 12" from the back wall.	The labor to re-position the existing side wall grab bar is approximately 3 hours for a labor cost of \$210.00.	\$210	\$210							

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
4.34.5.2(3), 4.26, and Fig. 29	Rear Wall Grab Bar	The rear wall grab bar should be no more than 6 inches from the side wall and 32 inches long. Starting at the edge farthest from the back wall, the toilet paper dispenser is no more than 36" from the back wall.	The measured distance from the side wall to the rear edge of the rear wall grab bar is 2". The measured distance from the side wall to the far edge of the rear wall grab bar is 38".	B # 14 & B # 15	The existing 36" long rear wall grab bar is to be relocated to have the rear edge 6" from the side wall.		\$210		\$210							
4.34.5.2(4) and Fig. 47(b)	Toilet Paper Dispenser		The edge of the toilet paper dispenser is greater than 36 inches from the back wall.	B # 16	The existing toilet paper dispenser is to be located so the farthest edge is not more than 36" from the rear wall.		\$140		\$140							
24 C.F.R §§ 8.22 & 8.23																
	Dwelling Units for persons with hearing or visual Impairment.	2% of 10 units = 0.2 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 unit to be acceptable for persons with hearing or vision impairment is \$5,000.00 per unit.	\$5,000				\$5,000					
TOTAL							\$39,760.00	\$100.00	\$2,160.00	\$32,500.00	\$5,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

PHOTO LOG

Photo B1 – Accessible parking space and adjacent access aisle.



Photo B2 – Measured height to bottom of “Van Accessible” sign is 41 ½”



Photo B3 – Ramp at Accessible Route to lower level of dwelling units.



Photo B4 – Ramp at Accessible Route to lower level of dwelling units.



Photo B5 – Measured running slope of accessible route ramp is 13.9%



Photo B6 – Measured cross slope of accessible route ramp is 6.2%



Photo B7 – Curve at middle of accessible route ramp.



Photo B8 – Landing at bottom of accessible route ramp.



Photo B9 – Measured length of landing at the bottom of the accessible route ramp is 44.”



Photo B10 – Exterior bank of Mailboxes.



Photo B11 – Measure height to top of exterior bank of mailboxes is 61.”



Photo B12 – Dwelling Unit #104 - Measured near end of the side wall grab bar is 5” from the back wall.



Photo B13 – Dwelling Unit #104 - Measured far end of the side wall grab bar is 47” from the back wall.



Photo B14 – Dwelling Unit #104 - Measured near end of the rear wall grab bar is 2” from the side wall.



Photo B15 – Dwelling Unit #104 - Measured far end of the rear wall grab bar is 38” from the side wall.



Photo B16 – Dwelling Unit #104 - Measured near edge of the toilet paper dispenser at 39” from the back wall.

