

# Residential Anti-displacement and Relocation Plan under Section 104(d) of the Housing and Community Development Act of 1974, as amended.

*The purpose of this policy is to regulate situations involving the expenditures of Community Development Block Grant (CDBG) funds. This policy does not apply to any other County action.*

## ***Minimize Displacement***

Consistent with the goals and objectives of activities assisted under the Act, if Grand Traverse County undertakes any activities that result in displacement of lower income tenants and demolition or conversion of low and moderate income housing then Grand Traverse County will take the following steps to minimize the displacement of persons from their homes:

- A. Coordinate code enforcement with rehabilitation and housing assistance programs.
- B. Evaluate housing codes and rehabilitation standards in reinvestment areas to prevent their placing undue financial burden on long-established owners or tenants of multi-family buildings.
- C. Stage rehabilitation of apartment units to allow tenants to remain during and after rehabilitation by working with empty units or buildings first.
- D. Establish facilities to house persons who must be relocated temporarily during rehabilitation.
- E. Adopt public policies to identify and mitigate displacement resulting from intensive public investment in neighborhoods.
- F. Adopt policies which provide reasonable protections for tenants faced with conversion to a condominium or cooperative.
- G. Adopt tax assessment policies such as deferred tax payment plans to reduce impact or rapidly increasing assessments on low income owner occupants or tenants in revitalizing areas.
- H. Establish counseling centers to provide homeowners and renters with information on the assistance available to help them remain in their neighborhood in the face of revitalization pressures.

## ***Relocation Assistance to Displaced Persons***

If Grand Traverse County undertakes any activities that result in displacement of lower income tenants and demolition or conversion of low and moderate income housing ***when expending CDBG funds*** then Grand Traverse County will provide relocation assistance for lower-income tenants who, in connection with an activity assisted under the CDBG Program, move permanently or move personal property from real property as a direct result of the demolition of any dwelling unit or the conversion of a lower-income dwelling unit in accordance with the requirements of 24 CFR 42.350. A displaced person who is not a lower-income tenant, will be provided relocation assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR Part 24.

## ***One-for-One Replacement of Lower-Income Dwelling Units***

If Grand Traverse County undertakes any activities housing ***when expending CDBG funds*** that result in displacement of lower income tenants and demolition or conversion of low and moderate income housing then Grand Traverse County will replace all occupied and vacant occupiable low and moderate income dwelling units demolished or converted to a use other than as low and moderate income housing in connection with an activity assisted

with funds provided under the Housing and Community Development Act of 1974, as amended, as described in 24 CFR 570.488 (c) in Subpart I.

Before entering into a contract committing Grand Traverse County to provide funds for an activity that will directly result in demolition or conversion, Grand Traverse County will make public in a publication in a newspaper of general circulation and submit to Grants Administration the following information in writing:

- A. A description of the proposed assisted activity;
- B. The location on a map and number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than as low and moderate income dwelling units as a direct result of the assisted activities;
- C. A time schedule for the commencement and completion of the demolition or conversion;
- D. The location on a map and the number of dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units. If such data are not available at the time of the general submission, the [jurisdiction] will identify the general location on an area map and the approximate number of dwellings units by size and provide information identifying the specific location and number of dwelling units by size as soon as it is available;
- E. The source of funding and a time schedule for the provision of the replacement dwelling units;
- F. The basis for concluding that each replacement dwelling unit will remain a low and moderate income dwelling unit for at least 10 years from the date of initial occupancy;
- G. Information demonstrating that any proposed replacement of dwelling units with smaller dwelling units (e.g., a 2-bedroom unit with two 1-bedroom units) is consistent with the housing needs of lower income households in the jurisdiction.

***Contacts***

To the extent that the specific location of the replacement units and other data in items D-G are not available at the time of the general submission, Grand Traverse County will identify the general location of such dwelling units on a map and complete the disclosure and submission requirements as soon as the specific data is available.

Grand Traverse County Deputy County Administrator Christopher J. Forsyth, 231 922-4780 is responsible for tracking the replacement of housing and ensuring that it is provided within the required period.

Grand Traverse County Deputy County Administrator Christopher J. Forsyth, 231 922-4780 is responsible for ensuring requirements are met for notification and provision of relocation assistance, as described in 570.488 (c), to any lower income person displaced by the demolition of any dwelling unit or the conversion of a low and moderate income dwelling unit to another use in connection with an assisted activity.