

CITY OF CORONA



2011

RESIDENTIAL ANTIDISPLACEMENT AND RELOCATION ASSISTANCE PLAN (RARAP)

**CITY OF CORONA RESIDENTIAL ANTI-DISPLACEMENT AND
RELOCATION ASSISTANCE PLAN**

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RESIDENTIAL ANTIDISPLACEMENT AND RELOCATION ASSISTANCE PLAN
(RARAP)**

This Residential Anti-displacement and Relocation Assistance Plan (RARAP) is prepared by the City of Corona in accordance with the Housing and Community Development Act of 1974 (Act) (42 U.S.C. § 5301 et seq.), as amended; and U.S. Department of Housing and Urban Development (HUD) regulations at 24 Code of Federal Regulations part 42.325 and is applicable to our CDBG¹ and HOME-assisted projects.

HUD-assisted programs and projects are subject to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, chapter 61 of title 42 of the United States Code (URA) (42 U.S.C. 4601 et seq.), and implementing regulations issued by the Department of Transportation at 49 Code of Federal Regulations part 24.

In addition to the URA, the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs are also subject to section 104(d) of the Act (42 U.S.C. § 5304(d)).

MINIMIZE DISPLACEMENT

Consistent with the goals and objectives of activities assisted under the Act, the City of Corona will take the following steps to minimize the direct and indirect displacement of persons from their homes:

- Coordinate code enforcement with rehabilitation and housing assistance programs.
- Evaluate housing codes and rehabilitation standards in redevelopment and target areas to prevent undue financial burden on established owners and tenants.
- Stage rehabilitation of apartment units to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first.
- Arrange for facilities to house persons who must be relocated temporarily during rehabilitation.
- Adopt policies to identify and to mitigate displacement resulting from intensive public investment in neighborhoods.
- Adopt policies which provide reasonable protections for tenants faced with conversion to a condominium or cooperative.
- Establish counseling centers to provide homeowners and tenants with information on assistance available to help them remain in their neighborhood in the face of gentrification.
- Where feasible, give priority to rehabilitation of housing, as opposed to demolition, to avoid displacement.

¹ CDBG programs include: Entitlement Community Development Block Grant (CDBG) Program, State CDBG Program, CDBG Small Cities Program, Section 108 Loan Guarantee Program, CDBG Special Purpose Grants Program, and the Neighborhood Stabilization Program (NSP).

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- If feasible, demolish or convert only dwelling units that are not occupied or vacant occupiable dwelling units (especially those units which are "lower-income dwelling units" (as defined in 24 CFR § 42.305)) or structures that have not been used for residential purposes.
- Target only those properties deemed essential to the need or success of the project.

RELOCATION ASSISTANCE TO DISPLACED PERSONS

The City of Corona will provide relocation assistance for lower-income tenants who, in connection with an activity assisted under the CDBG and/or HOME Programs, 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 Code of Federal Regulations 42.350 or the URA, as the lower-income tenant may choose. A displaced person who is not a lower-income tenant, will be provided relocation assistance in accordance with the URA, as amended, and implementing regulations at 49 Code of Federal Regulations part 24.

ONE-FOR-ONE REPLACEMENT OF LOWER-INCOME DWELLING UNITS

The City of Corona will replace all occupied and vacant occupiable lower-income dwelling units demolished or converted to a use other than lower-income housing in connection with a project assisted with funds provided under the CDBG and/or HOME Programs in accordance with 24 Code of Federal Regulations part 42.375.

Before entering into a contract committing the City of Corona to provide funds for a project that will directly result in demolition or conversion of lower-income dwelling units, the City of Corona will make public by publishing in the Press Enterprise, a local newspaper of general circulation; including in a display ad in the City's online newsletter, The Inner Circle; and posting to the City's Web site at www.coronansp.com; and submit to the HUD regional field office the following information in writing:

- 1) A description of the proposed assisted project;
- 2) The address, number of bedrooms, and location on a map of lower-income dwelling units that will be demolished or converted to a use other than as lower-income dwelling units as a result of an assisted project;
- 3) A time schedule for the commencement and completion of the demolition or conversion;
- 4) To the extent known, the address, number of lower-income dwelling units by size (number of bedrooms) and location on a map of the replacement lower-income housing that has been or will be provided. NOTE: See also 24 Code of Federal Regulations part 42.375(d).
- 5) The source of funding and a time schedule for the provision of the replacement dwelling units;
- 6) The basis for concluding that each replacement dwelling unit will remain a lower-income dwelling unit for at least 10 years from the date of initial occupancy; and

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- 7) Information demonstrating that any proposed replacement of lower-income dwelling units with smaller dwelling units (e.g., a 2-bedroom unit with two 1- bedroom units), or any proposed replacement of efficiency or single-room occupancy (SRO) units with units of a different size, is appropriate and consistent with the housing needs and priorities identified in the HUD-approved Consolidated Plan and 24 Code of Federal Regulations part 42.375(b).

To the extent that the specific location of the replacement dwelling units and other data in items 4 through 7 are not available at the time of the general submission, the City of Corona 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.

QUALITY OF REPLACEMENT HOUSING

Persons displaced shall be relocated into comparable replacement housing that is:

- 1) decent, safe and sanitary;
- 2) adequate in size to accommodate the occupants;
- 3) functionally equivalent; and
- 4) in an area not subject to unreasonably adverse environmental conditions.

REPLACEMENT NOT REQUIRED BASED ON UNIT AVAILABILITY

Under 24 Code of Federal Regulations part 42.375(d), the City of Corona may submit a request to HUD (or to the State, if funded by the State) for a determination that the one-for-one replacement requirement does not apply based on objective data that there is an adequate supply of vacant lower-income dwelling units in standard condition available on a non-discriminatory basis within the area.

CONTACTS

The City's Housing Manager is responsible for tracking the replacement of lower income dwelling units and ensuring that they are provided within the required period.

The City's Housing Manager is responsible for providing relocation payments and other relocation assistance to any lower-income person displaced by the demolition of any dwelling unit or the conversion of lower-income dwelling units to another use.

The Housing Manager may be contacted at 951-736-2260.

LOCAL RELOCATION ASSISTANCE AND ANTI-DISPLACEMENT POLICIES

The City of Corona has adopted the following local policies to guide relocation assistance and anti-displacement efforts.

Occupancy

The City will apply the "2 plus 2" rule to determine the *minimum* size of the home for the purposes of replacement housing and relocation assistance. This rule holds that a household is adequately

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housed in a home if the number of bedrooms in the home multiplied by 2 plus 2 does not exceed the number of persons in the household. For example a 3 bedroom house could adequately house an 8 person family ($3*2=6$, $+2=8$). A household of more than 8 persons would be considered to be overcrowded in a 3 bedroom home.

The City will apply the "1 plus 1" rule to determine the *maximum* size of the home appropriate to house a displaced household. This rule holds that a household is in a home that exceeds the household's requirements if the home has more bedrooms than number of persons plus one. For example, a 3 bedroom home would exceed the needs for a 3 person household ($3+1=4$ persons).

Lump Sum Payment

Unless specifically stated otherwise in writing, relocation assistance payments originating from the City or a city-sponsored project will be made in three (3) installments. The first payment will be made upon acceptance of the offer of relocation assistance by the displaced resident and agreement to move to replacement housing. The second payment will be made establishing residency in the replacement unit. The third payment will be made within 60 days or less after establishing residency in the replacement unit. Residency will be established by executing a lease or other commonly accepted proof of possession.

If a displaced tenant selects a onetime payment for home purchase they will receive one lump payment upon acceptance of the offer of relocation assistance by the displaced resident and agreement to move to replacement housing.

Citizen or Legal Residency Requirements

Pursuant to Public Law 105-117, displaced persons not lawfully present in the United States are not eligible for relocation assistance. In order for a household to be determined to be eligible for relocation assistance, all persons in a displaced household must certify that he or she is a citizen or an alien legally present in the United States.

An exception may be granted based on hardship if the household is comprised of one or more native born dependent children born to parents who are not lawfully present in the United States.

Hardship is defined as

- a significant and demonstrable adverse impact on the health or safety of the alien's spouse, parent or child; or
- a significant and demonstrable adverse impact on the continued existence of the family unit of which such spouse, parent or child is a member; or
- any other impact that the City/Agency determines will have a significant and demonstrable adverse impact on such spouse, parent, or child.

Hardship will be determined on a case-by-case basis. Hardship must be documented to be exceptional and extremely unusual.

Income Standards

For the purposes of determining eligibility for assistance, income will be determined using the "Part 5" method as described at 24 Code of Federal Regulations part 5 subpart F and in

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general accordance with the "Technical Guide for Determining Income and Allowances for the HOME Program, Third Edition – January 2005."

Income will be projected forward based on current income. Homeowners with irregular or seasonal income will have income documented and a projection created based on a longer period. The length of period should encompass a period that is most likely to reflect total annual earning.

Income will be stated in terms of gross annual income. Income inclusions and exclusions will be those of the Part 5 method.