

**CITY OF BRADFORD
RESIDENTIAL ANTI-DISPLACEMENT AND
RELOCATION ASSISTANCE PLAN FOR
CDBG AND HOME PROGRAMS**

This Residential Anti-Displacement and Relocation Assistance Plan (RARAP) is prepared by the City of Bradford in accordance with Section 104 (d) of the Housing and Community Development Act of 1974, as amended; and HUD regulations at 24 CFR 570.606 and is applicable to our CDBG and/or HOME-assisted projects.

Minimize Displacement

Consistent with the goals and objectives of activities assisted under the Act, the City of Bradford 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 reinvestment areas to prevent undue financial burden on established owners and tenants.
- Arrange for facilities to house persons who must be relocated temporarily during rehabilitation.
- Where feasible, give priority to rehabilitation of housing, as opposed to demolition, to avoid displacement.
- 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).
- Target only those properties deemed essential to the need or success of the project.
- Provide counseling and referral services to assist those displaced in finding alternative housing in the community.

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

The City of Bradford 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 Program (s) in accordance with 24 CFR 42.375.

Before entering into a contract committing to provide funds for a project that will directly result in demolition or conversion of occupied and vacant occupiable lower-income dwelling

units, the City of Bradford will make public and submit to the PA Department of Community and Economic Development (DCED) and/or HUD 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 provided or will be provided.
5. The source of funding and a time schedule for the provision of the replacement dwelling units.
6. The basis of concluding that each replacement dwelling unit will remain a lower-income dwelling unit for at least ten years from the date of initial occupancy.
7. Information demonstrating that any proposed replacement of lower-income dwelling units with smaller dwelling units, or any proposed replacement of efficiency or single room occupancy (SRO) units of a different size, is appropriate and consistent with the housing needs and priorities identified in DCED's Consolidated Plan and 24 CFR 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 Bradford 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.

Replacement Housing

Replacement housing provided by the City of Bradford shall:

1. To the extent feasible and consistent with other statutory priorities, the units shall be located in the same neighborhood (first priority) or within the community as the units replaced.
2. The units shall be sufficient in number and size to house no fewer than the number of occupants housed in the units that are demolished or converted.
3. The units provided shall be in standard condition (see definition below). Replacement LMI dwelling units may include units that have been raised to standard from substandard condition if:

- (a) No person was displaced from the unit as a direct result of an assisted activity.
 - (b) The unit was vacant for a least three months before execution of the Agreement between the City and property owner.
4. The units initially made available for occupancy at any time beginning one year before the City's submission of information to DCED/HUD and ending three years after the commencement of the demolition or rehabilitation related to the conversion.
 5. The units must be designed to remain low and low/moderate income dwelling units for at least ten years from the date of initial occupancy. Replacement dwelling units may include public housing or existing housing receiving Section 8 project based assistance.

Definitions of Housing Conditions

- “Standard Condition” means a dwelling unit that meets all City housing codes.
- “Substandard Condition” means units while they may be structurally sound, they do not provide safe and adequate shelter, and in their present condition endanger the health, safety or well-being of the occupants. Such housing has one or more defects, or a combination of potential defects in sufficient number or extent to require considerable repair or rebuilding, or is of inadequate original construction. The defects are either so critical or so widespread that the structure should be extensively repaired or demolished. The estimated cost of the rehabilitation should normally not be less than 25 percent of the value of the property (including land) after rehabilitation. The rehabilitation should be of such scope that, when completed, all the components in the house are operable and should not be anticipated to require any work or major expense over and above normal maintenance for the next five years.
- “Substandard Condition Suitable for Rehabilitation” means a dwelling unit that will have a fair market value, greater than the cost of rehabilitation to make the unit standard. The estimated cost of rehabilitation should normally not be less than 25 percent of the value of the property (including land) after rehabilitation. The rehabilitation should be of such scope that, when completed, all the components in the house are operable and should not be anticipated to require any work or major expense over and above normal maintenance for the next five years.
- “Vacant Occupiable Dwelling Unit” means a vacant dwelling unit that is in standard condition; or a vacant dwelling that is in substandard condition, but is suitable for rehabilitation; or a dwelling unit in any condition that has been occupied (except by a squatter) at any time within the period beginning one year

before the execution of the agreement by the City of Bradford covering the rehabilitation or demolition.

Replacement Not Required

Under 24 CFR 42.375 (d), the City of Bradford may request to DCED/HUD for a determination that the one for one replacement requirement does not apply based upon objective data that there is an adequate supply of vacant lower-income dwelling units in standard condition available on a non-discriminatory basis with the City.

Relocation Assistance to Displaced Persons

The City of Bradford will provide relocation assistance for lower income tenant, who in connection with an activity assisted under the CDBG and/or HOME Program (s), move permanently or move personal property from real property as a direct result of the demolition of any dwelling 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 and Real Property Acquisition Policies Act of 1970, as amended and implementing regulation at 49 CFR Part 24.

Relocation Assistance - Appeals Procedure

Where a claim for relocation assistance under the denied by the City of Bradford, the claimant may appeal to the DCED or appropriate state official and the decision of the DCED or appropriate state official shall be final unless a court determines the decision was arbitrary and capricious.

Plan Exemptions

The City of Bradford's CDBG demolition program provides for the following documentation for each property related to exempting this federally assisted activity from the requirements of the Section 104 (d):

1. The property has been certified as vacant for more than one year.
2. Code violations are documented and presented to the City's Board of Health.
3. City's Board of Health issues an order to the property owner to repair or demolish the property within thirty days.
4. City documents that the cost to rehabilitate exceeds 25 percent of the fair market value of the property and executes a Clearance Economic Viability Certification.

Contact Information

The City of Bradford's Office of Economic and Community Development (OECD) is responsible for tracking the replacement of lower income dwelling units and ensuring that they are provided within the required period. The OECD is also 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. Please contact the Executive Director of the OECD by phone at 368-7170, by mail at PO Box 490, Bradford, PA 16701 or e-mail at sandrews@bradfordpa.org for further information.

Adopted on the 14th day of November 2017 by City Council Resolution No. _____.

CITY ADMINISTRATOR

MAYOR

