

ANTI-DISPLACEMENT AND RELOCATION PLAN  
City of Warren Department of Community Development  
418 Main Avenue SW, Warren Ohio 44481



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## INTRODUCTION

The City of Warren Community Development Department, administrator of Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) programs for the City of Warren, will comply with all federal regulations governing residential anti-displacement and relocation assistance as they pertain to the above programs. Specifically, the department will act in accordance with Section 104(d) of the Housing and Community Development Act (1974) and National Affordable Housing Act (1991), implementing all regulations at 24 CFR Part 42 (CDBG) and 24 CFR Part 92 (HOME).

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## ANTIDISPLACEMENT AND RELOCATION

The department will replace all occupied low- and moderate-income dwelling units demolished or converted to a use other than low-income housing as a direct result of any activity associated with or assisted with funds under the above-stated programs.

Pursuant to 24 CFR Part 42.375(c), before entering into any contract committing the City of Warren to provide funds for a project that will directly result in demolition or conversion, the Community Development Department will make public through publication in a newspaper of general circulation and submit to HUD the following information in writing:

1. A description of the proposed assisted activity;
2. 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 for low- and moderate-income dwelling units as a result of the assisted activity;
3. A time schedule for the commencement and completion of demolition or conversion;
4. 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 submission will identify the general location on an area map and the approximate number of dwelling units by size, and information identifying the specific location and number of dwelling units by size will be submitted and disclosed to the public as it becomes available;
5. The source of funding and time schedule for the provision of replacement units;
6. The basis for concluding that each replacement dwelling unit will remain a low- and moderate-income unit for at least ten years from the date of initial occupancy; and
7. Information demonstrating that any proposed replacement of dwelling units with smaller dwelling units (e.g., a two-bedroom unit with two one-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 as identified in the approved Consolidated Plan.

To the extent that the specific location of the replacement housing and other data in items four through seven are not available at the time of the general submission, the Community Development Department will identify the general location of such housing on a map and complete the disclosure and submission requirements as soon as specific data are available.

The Community Development Department, 418 Main Avenue SW, Warren, Ohio 44481, 330-841-2595, is responsible for and will perform the following duties:

- Track replacement of low- and moderate-income dwelling units and ensuring that all documentation is provided within the required period;
- Provide relocation assistance, as in 24 CFR Part 42, Subpart C: Requirements under Section 104(d) of the Housing and Community Development Act of 1974, to each low- and moderate-income person who, in connection with an activity assisted under any program subject to this subpart, permanently moves from real property or permanently moves personal property from real property as a direct result of the demolition or conversion of a low- or moderate-income dwelling; and
- Provide relocation payments and other assistance to any low- or moderate-income person displaced by the demolition of any dwelling units or the conversion of low- and moderate-income dwelling units to another use.

Consistent with the goals and objectives of activities assisted under Section 104(d) of the Housing and Community Development Act of 1974, as amended, the City of Warren Community Development Department will take the following steps to minimize the direct and indirect displacement of persons from their homes:

1. In structuring proposed projects for funding consideration, the Community Development Department will (a) make an assessment of the potential displacement which might occur from the project as proposed, (b) consider alternatives which would minimize displacement, and (c) select the most feasible alternative which both meets project goals and minimizes displacement.
2. For programs assisted through CDBG or HOME resources in which a property owner voluntarily seeks such assistance (such as a rehabilitation loan), the Community Development Department will assess the potential displacement which may result from the project and the costs associated with such displacement, and advise the property owner. The property owner shall be further advised of his/her responsibility to pay for such costs. The Community Development Department will provide technical assistance to owners regarding methods of minimizing permanent displacement (and therefore costs) such as scheduling construction activities in phases to allow tenants to temporarily move and thereby avoid permanent displacement, referring eligible tenants to assistance programs in order to stabilize the tenant's rent, or other alternatives appropriate to the assisted activity.
3. For major publicly initiated programs where the displacement assessment indicates that substantial direct or indirect displacement may occur, the Community Development Department will prepare a project-specific displacement mitigation or relocation plan in order to ensure execution consistent with HUD regulations.
4. Stage rehabilitation of apartment units to allow tenants to remain in the building or complex during and after the rehabilitation by working on empty units first.
5. Arrange for facilities to house those persons who must be relocated temporarily during rehabilitation.