

**RESOLUTION ADOPTING UPDATED ANTI-DISPLACEMENT AND RELOCATION PLAN, PLANNING AND DEVELOPMENT OFFICE**

WHEREAS, the Ashtabula County Board of Commissioners on October 7<sup>th</sup>, 1991 adopted the Residential Anti-Displacement and Relocation Assistance Plan; and

WHEREAS, an update to that plan has been completed on July 10, 2023 and presented by Jake Brand, Director of the Planning and Development Office to the Board of Commissioners, recommending acceptance of the updated plan by the Board of County Commissioners; and

WHEREAS, the Ashtabula County Board of Commissioners having reviewed the updates to the plan as presented, concur and hereby adopt the updated Anti-Displacement and Relocation Plan for Ashtabula County; now

THEREFORE, BE IT RESOLVED, By the Board of Commissioners of Ashtabula County, Ohio, that the updated Anti-Displacement and Relocation Plan, as revised, is hereby adopted and shall be in effect on July 18, 2023.

**ASHTABULA COUNTY COMMISSIONERS  
CERTIFICATION PAGE**

**Resolution No. 2023-377**

**July 18, 2023**

**RESOLUTION ADOPTING UPDATED ANTI-DISPLACEMENT AND RELOCATION  
PLAN, PLANNING AND DEVELOPMENT OFFICE**

**Upon the motion of Kathryn L. Whittington, seconded by J.P. Ducro IV.**

**VOTE:**

<b>Casey R. Kozlowski</b>	<b>Aye</b>
<b>Kathryn L. Whittington</b>	<b>Aye</b>
<b>J.P. Ducro IV</b>	<b>Aye</b>

**CERTIFICATE OF CLERK**

IT IS HEREBY CERTIFIED that the foregoing is a true and correct transcript of a resolution acted upon and duly passed by the Board of County Commissioners of Ashtabula County, Ohio, on the date noted above.



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Lisa Hawkins, Clerk of the Board  
Board of County Commissioners  
Ashtabula County, Ohio



**RESIDENTIAL ANTI-DISPLACEMENT & RELOCATION ASSISTANCE PLAN**  
**Adopted: 7/18/23**  
**Resolution: 2023-xx**

**PURPOSE**

To provide a policy for minimizing the displacement of persons, families, households, businesses and/or non-profit organizations by projects assisted with Community Development Block Grant (CDBG) and/or HOME Investment Partnerships (HOME) funds. For this Plan, the term “persons” means any family, individual, household, business, or non-profit organization. This Plan constitutes Ashtabula County’s Residential Anti-displacement and Relocation Assistance Plan (RARAP). The Plan outlines measures to be taken by Ashtabula County to minimize displacement and defines the benefits and advisory services that are available when Ashtabula County uses CDBG and/or HOME funds in a project or activity that results in displacement due to the demolition of any unit or conversion of lower-income dwelling units to a use other than as low or moderate-income units.

**BACKGROUND**

The US Department of Housing and Urban Development (HUD) requires recipients of HUD funds to certify they have in effect and are following a RARAP as required by 24 CFR Part 42, Displacement, Relocation Assistance; Property Acquisition for HUD and HUD-Assisted Programs, as amended. The purpose of the RARAP is to ensure recipients that carry out HUD-assisted projects:

- Identify the reasonable steps it will take to minimize the displacement of persons from their homes as a result of a HUD-assisted project;
- Provide relocation assistance to low/moderate-income (LMI) households, including families and individuals displaced as a direct result of the conversion of an LMI dwelling or the demolition of any housing for a project.
- Replace all occupied and vacant occupiable LMI dwellings that are converted to a use other than LMI dwellings or LMI dwellings that are demolished for a project.

**POLICY AND PROCEDURES**

I. General Policy

A. Ashtabula County’s policy is that programs and projects assisted with HUD program funds will be undertaken in such a manner as to minimize the displacement of persons. In projects or activities that may be assisted by HUD program funds subject to 24 CFR Part 570, Community Development Block Grant (CDBG), and/or 24 CFR Part 92, HOME Investment Partnerships (HOME) Program, in which displacement is required, Ashtabula County and/or any Ashtabula County-sponsored developer, contractor, or agency will comply with 24 CFR Part 42, Displacement, Relocation Assistance, and Real Property Acquisition for HUD and HUD-Assisted Programs, as amended, as well as 49 CFR Part 24, Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally – Assisted Programs, as amended.

B. Relocation Assistance will not be provided when homeowner occupants voluntarily participate in Ashtabula County's CDBG and HOME programs' housing rehabilitation activities. Procedures will be established to ensure that persons participating in CDBG and HOME owner-occupied housing rehabilitation activities are informed that they will not be provided relocation assistance. Applicants for assistance will be required to sign a Notice of No Displacement for relocation payments as a prerequisite for participation in these voluntary programs for the benefit of the affected property owner. Tenants, if any, however, will be eligible for relocation benefits and protections.

## II. Applicability

A. This Plan applies to the Ashtabula County, hereafter referred to as "COUNTY," and/or any developer, contractor, or agency on projects sponsored by the "COUNTY" that are funded in whole or in part by HUD funds subject to the regulations at 24 CFR Part 570 and/or 24 CFR Part 92. Henceforth, the phrase "COUNTY" also includes any developer, contractor, or agency participating in HUD-funded projects or activities funded by the REPLACEMENT.

B. This Plan applies to any project sponsored by the "COUNTY," which is funded in whole or in part by HUD funds subject to the aforementioned regulations and requires displacement.

## III. Definitions

Definitions of terms used in this Plan or associated with this topic are found in applicable CDBG and HOME program regulations at 24 CFR 570 and 24 CFR 92. 49 CFR Part 24, Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally-Assisted Programs of 1970, as amended; 24 CFR Part 42, Requirements under Section 104(d) of the Housing and Community Development Act of 1974; and HUD Handbook 1378, Tenant Assistance, Relocation and Real Property Acquisition. If definitions are found to be contradictory, the most stringent definition will apply.

## IV. Minimize Displacement

Consistent with the goals and objectives of activities assisted under the CDBG and/or HOME programs, the "COUNTY" will take the following steps to minimize the direct and indirect displacement of persons from their homes:

- Evaluate Housing codes and rehabilitation standards and code enforcement in reinvestment 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 mitigate displacement resulting from intensive public investment in neighborhoods.
- Adopt policies that provide reasonable protections for tenants faced with conversion to a condominium or cooperative.
- Adopt tax assessment policies, such as deferred tax payment plans, to reduce the impact of increasing property tax assessments on low-income owner-occupants or tenants in revitalizing areas.
- Establish counseling centers to provide homeowners and tenants with information on assistance available to help them remain in their neighborhood in the face of revitalization pressures.

- Where feasible, give priority to rehabilitation of housing, as opposed to demolition, to avoid displacement.
- 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.

V. Relocation Assistance to Displaced Persons

The “COUNTY” 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 CFR 42.350. A displaced person who is not a low-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.

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

A. The “COUNTY” 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 CFR 42.375.

VII. Replacement not Required Based on Unit Availability

Under 24 CFR 42.375(d), the “COUNTY” may submit a request to HUD 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.

VIII. Contacts

Any questions, concerns, or requests for information should be directed to the “COUNTY,” Department of Planning and Development, Division of Community Development. The Community Development office can be reached via phone at 440-576-1530 or visited in person at 25 West Jefferson St., Jefferson, Ohio 44047.