



# **RESIDENTIAL ANTIDISPLACEMENT AND RELOCATION ASSISTANCE PLAN**

**CITY OF ROCKFORD  
COMMUNITY AND ECONOMIC DEVELOPMENT**

**Effective July 7, 2025**

**CITY OF ROCKFORD  
COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS  
RESIDENTIAL ANTIDISPLACEMENT AND RELOCATION ASSISTANCE PLAN**

## **Overview**

This Residential Antidisplacement and Relocation Assistance Plan (“RARAP”) is required by federal law that applies to projects funded completely or in part by the City of Rockford (City) Community Development Block Grant (CDBG), regulated by 24 CFR Part 570, and/or HOME Investment Partnerships Program (HOME), regulated by 24 CFR Part 92. The Plan outlines reasonable steps the City will take to minimize displacement of persons from their homes (and neighborhoods) due to a CDBG and/or HOME funded project.

### **Steps to Minimize Displacement**

The City shall take the following steps to minimize displacement:

- 1) As the City develops plans, including but not limited to, the City’s Consolidated Plan, Annual Action Plan, Analysis of Impediments, Comprehensive Plan, and Housing Strategy Framework, the City will take all reasonable steps to minimize the displacement of persons.
- 2) The City will maintain and follow policies and procedures to ensure compliance with Section 104(d) of the Housing and Community Development Act of 1974 (HCDA), 42 U.S.C. §5304(d), as amended, and the HUD regulations at 24 CFR 42.325 – RARAP, as amended.
- 3) Owners/developers submitting applications to the City to finance projects affecting occupied residential dwelling units will be required to provide project details, including a relocation plan if applicable, so that the City can assess the potential impact of the proposed project and encourage processes, such as completing the project in phases, so that displacement, if any, is minimized.
- 4) The City reserves the right to deny an application for funding if it would result in significant displacement of residents.
- 5) The City reserves the right to provide additional relocation assistance above and beyond what is required in the regulations in accordance with section 105(a)(11) of the HCDA, 42 U.S.C. §5305(a)(11), if deemed appropriate.
- 6) Where feasible, the City will only allow for demolition or conversion of dwelling units that are not occupied, especially those units that house low-to-moderate income households.

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

The City will provide relocation assistance for eligible beneficiaries who, in connection with an activity assisted with CDBG and/or HOME funds, are required to move permanently or move personal property from real property as a direct result of the demolition or the conversion of a dwelling unit. Depending upon their status, a displaced person may qualify for assistance under either the Uniform Relocation Assistance and Real Property Acquisitions Act (“URA”) and its implementing regulation at 49 CFR 24 or under Section 104(d) of the HCDA. Relocation assistance may include the following, as set forth in 24 CFR 42.350: advisory services, reasonable moving expenses, reestablishment expenses such as security deposits and credit check charges, interim living costs, and replacement housing assistance.

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

The City will comply with Section 104(d), as implemented in 24 CFR 42.375, which requires one-for-one replacement of all occupied or vacant occupiable lower-income dwelling units that are demolished or converted to a use other than as lower-income dwelling units in connection with a HOME or CDBG-funded project, unless HUD makes a determination that the one-for-one replacement requirement does not apply pursuant to Section 104(d)(3) and 24 CFR 42.375(d). The City reserves the right to 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.

Before entering into a contract committing City CDBG and/or HOME funds to a project that will directly result in demolition or conversion of lower-income dwelling units, the City will provide Public Notice and submit information required by 24 CFR 42.375(c) to HUD. The Notice will be published in one or more newspapers of general circulation within the City or by following other acceptable means approved by HUD.

### **Appeals Process**

Any person who disagrees with the City's determination of eligibility for benefits or the amount of relocation assistance for which the person is eligible may file a written appeal to the City. An appeal must be filed within sixty (60) days of the City's determination and must be directed to the City of Rockford Community & Economic Development Department, Attention: Sarah Leys, 425 E State St (2<sup>nd</sup> floor – City Hall), Rockford IL 61104. The appeals process will follow the URA requirements at 49 CFR 24.10. If the appeal is denied in whole or in part, the person who requested the appeal is entitled to seek judicial review of the City's determination.