I. INTRODUCTION

In recognition of the need to preserve housing for low- and very low-income families within the City of Flint, Michigan area, Flint Housing Commission (“FHC”) has created a plan for the redevelopment of Atherton East, a low-income housing complex that has deteriorated as a result of age and extensive deferred maintenance related to cash flow deficiencies. Atherton East was built in a flood plain and is cut off from services, and the redevelopment plan constructs new units within Flint that will replace all 192 public housing units of Atherton East in more accessible and suitable locations. FHC has selected Norstar Development USA, L.P. (“Norstar”) as its co-developer. Norstar is a development, construction and property management company based in Buffalo, New York. The following plan demonstrates how FHC intends to comply with the regulatory requirements, as well as the spirit and intent of the Uniform Relocation Act.

Atherton East currently (as of April 16, 2018) contains a total of 192 apartment units of which, 100 are currently occupied. FHC plans to replace the existing 192 units. The affordability of the units will be preserved using project based rental assistance obtained through a Rental Assistance Demonstration (RAD) conversion. It is anticipated that the construction of the first phase of the project (including 39 replacement units) will begin by February 1, 2019.

All households must be temporarily relocated to an Atherton East replacement unit off site or will be provided the option of tenant based assistance through the Housing Choice Voucher Program. FHC, or its designee, will provide assistance to these families in locating comparable housing, but none of these families will be subject to involuntary permanent displacement. A Relocation Coordinator will survey all households at Atherton East to determine the preferences of each individual household. In accordance with PIH Notice 2016-17, for families electing to move off site permanently, informed written consent will be obtained.

Households who select Housing Choice Voucher assistance will receive assistance from a Norstar-hired contractor who will act as a case manager as well as Relocation Coordinator. This contractor has provided case management in various capacities through her professional life and as a Flint resident has created a network of local contacts. She will utilize her past experience to navigate the housing market in Flint to locate suitable housing, assist residents in completing paperwork, and negotiate with landlords. As of the date of this plan, the Relocation Coordinator, with the help of FHC and Norstar, is conducting outreach to Atherton East. A log is being maintained to document these efforts.

The combined rents and utilities for units at the Flint Housing Commission are determined based upon 30% of the household’s adjusted income, so all units are considered affordable. The vouchers that the FHC is providing also cover the difference between the market rent and utilities and 30% of the tenant’s income so that the tenant will pay the same portion of their income for rent with the voucher as they are in the FHC units. The FHC will help tenants locate a comparable unit within the FHC’s payment standard so that the tenant does not pay more than 30% of their income on rent and utilities. Tenants may voluntarily choose a unit that exceeds the FHC payment standard and pay up to 40% of their income on rent and utilities and the FHC would not cover the additional cost of rent if a comparable unit is available within the payment standard. If the only comparable units are above the FHC’s payment standard, then when necessary, the FHC will make relocation payments to cover the differences in rents for tenants who are relocated temporarily off-site so that they continue to pay 30% of their income on rent and utilities.
FHC anticipates that the number of families to be temporarily relocated off site will be 100 households. There are 0 anticipated voluntary move outs between May 1 and February 1. FHC is not filling vacancies and there are currently 92 vacancies at this site.

The residential unit breakdown after completion of redevelopment will be as follows:

<table>
<thead>
<tr>
<th>Unit Size</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 bedroom</td>
<td>52</td>
</tr>
<tr>
<td>3 bedroom</td>
<td>100</td>
</tr>
<tr>
<td>4 bedroom</td>
<td>40</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>192</strong></td>
</tr>
</tbody>
</table>

The first phase of the Atherton East redevelopment is scheduled to commence in February 2019, pending finalization of all funding sources. Under FHC’s redevelopment plan, the replacement Atherton East units will be preserved as affordable housing with project based rental assistance with a minimum term of twenty years, with required renewal if funding is available.

FHC has determined that no resident will be displaced because all residents will have the right to return to a redeveloped unit. In accordance with PIH Notice 2016-17, if a properly sized unit is not available or the household is otherwise ineligible to return (for example, being over income as per the applicable LIHTC Income limit), the affected households shall have the right to review and object to housing plans. All affected households will be made offers of other comparable replacement housing and shall be given 30 days to consider the offer. The acceptance of the offer of other housing shall be obtained in writing after the 30-day period. If a household is unwilling to accept an offer of alternative housing, project plans will be adjusted to accommodate the household. Voluntarily displaced households will be provided benefits in accordance with the Uniform Relocation Act.

All households will be surveyed regarding their relocation preference. For families that prefer to relocate from the site to another FHC site or with a Housing Choice Voucher will be allowed to do so to the extent that there is an applicable sized unit or a voucher available. In the event there are more families that prefer to permanently relocate than available units or vouchers, preference shall be given based upon a lottery.

II. SCOPE OF WORK

The following items are intended to guide the redevelopment effort. All Affected Households will be given notifications regarding the initial relocation process, and when it is time to relocate.

The following steps will be implemented during the relocation process:

*Relocation Staff*

Implementation of this Relocation Plan will be the responsibility of FHC and Norstar project managers, and the Relocation Case Manager. Norstar will be responsible for preparing and distributing all required relocation notices, maintaining the original relocated household list, establishing a recordkeeping system.
and monitoring the Relocation Case Manager’s maintenance of this system, identifying replacement units and ensuring the relocation of Affected Households within the required timelines. The Relocation Case Manager will be the primary contact person for the residents (and communicate these questions to the Norstar project managers to ensure correct responses), they will maintain the recordkeeping system, and they will work with each tenant to assure and assist in completion of all tasks required to successfully relocate.

**Develop Individual Move Plans with each Head-of-Household**

The Relocation Case Manager will meet with individual residents in all Affected Households to confirm their relocation plans prior to the transfer and will provide all necessary assistance. Prior to relocation, the Relocation Case Manager will do the following:

- Assist residents with the completion of any necessary forms, whether for assistance or otherwise
- Identify an appropriate replacement unit that meets other funding agency occupancy requirements which is suitable in its living conditions and has comparable amenities to the current unit;
- Conduct relocation information sessions with each head-of-household;
- Work with Norstar project managers and FHC to facilitate and schedule resident moves, and assist with utility transfers, completion of change of address forms, etc.

It is FHC and Norstar’s intent to hire one moving company for all temporary relocations.

**Occupied Units as of 4/20/18**

**ADD CHART**

**III. DEFINITIONS**

1. **Affected Households** - Affected Households are up to 100 households of Atherton East that will be temporarily transferred to other units off-site or will be offered the opportunity to receive assistance under the Housing Choice Voucher Program. This term shall not apply to any household or resident who violates or has violated the applicable lease agreement and is subsequently evicted.

2. **Atherton East** - is currently owned by the Flint Housing Commission (FHC) and is managed by FHC. Once funding of this project is closed, the replacement units will be built in four phases and they will be owned by Norstar affiliates (the first phase, Clark Commons Phase I, will be owned by Clark Commons LDHA, LLC) and managed by Premier Property Management.

3. **Redevelopment** - The act or process of the redevelopment of 192 existing units of the Atherton East site into various new construction sites within the City of Flint.

4. **HUD** - The United States Department of Housing and Urban Development.

5. **Program** - A program or project undertaken by Flint Housing Commission to rehabilitate Atherton East.
6. **Relocation** - A transfer from one unit to another, evictions and voluntary move outs notwithstanding, as a result of a program initiated by Flint Housing Commission.

7. **Relocation Case Manager** – A contractor of Norstar Development, whose specific task, as a result of the redevelopment, is to work with representatives of FHC and Norstar to relocate each resident, monitor and coordinate all relocation activity, and implement the relocation plan to ensure compliance with applicable relocation regulations, guidelines and laws.

8. **Elderly Person** - A person who is 62 years of age or older.

9. **Persons with Disabilities** - A family whose head or spouse or dependent or sole member is a person with mobility, sight, hearing, or other impairment.

### IV. RELOCATION SCHEDULE

The relocation schedule is designed to provide minimum disruptions to residents without compromising the redevelopment. The original tenant informational sessions were held on Oct. 12, 2017 at Mince Manor and Atherton East Community Rooms. The relocation effort, beginning with distribution of relevant mandatory notifications to all Affected households, began with the issuance of the General Information Notice on October 4, 2017. Moves are anticipated to commence no earlier than June 1, 2019 with notice provided at least 90 days in advance.

### V. MOVING ASSISTANCE

Moving assistance will be provided to the Affected Households when an appropriate unit is identified, or when construction of a new unit appropriate for the family is completed. This assistance includes:

1. Transportation of the Affected Households and any personal property;

2. Packing, crating, uncrating and unpacking of personal property for Elderly and Persons with Disabilities;

3. Disconnecting, dismantling, removing, reassembling, and reinstalling relocated household appliances and other personal property as long as they have been installed with the approval of management and in compliance with the lease;

4. Reinstallation of utilities and/or services, i.e. telephone, gas and cable service;

5. Insurance for the replacement value of the property in connection with the move and necessary storage;

6. The replacement value of property lost, stolen or damaged in the process of moving (not through the fault or negligence of the displaced person) where insurance covering such loss, theft or damage is not reasonably available;
7. Packing boxes and bags for tenant belongings

8. Other moving related expenses deemed reasonable by the Relocation Coordinator.

9. When required, as a result of a voluntary permanent displacement, the project will pay the reasonable increased housing costs, in accordance with the URA for up to 42 months, with a maximum of $7,200. Each voluntarily permanently displaced household will have the option of receiving (1) reimbursement for actual out of pocket expenses, (2) a fixed moving reimbursement payment established by the U.S. Department of Transportation (DOT) moving allowance schedule, or (3) a combination of both actual and fixed. Listed below is the current DOT Fixed Residential Moving Cost Schedule, which can be found at http://www.fhwa.dot.gov/real_estate/practitioners/uniform_act/relocation/moving_cost_schedule.cfm

<table>
<thead>
<tr>
<th>Occupant Owns Furniture</th>
<th>Occupant does not own furniture</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Rooms of Furniture</td>
<td>Add’l room</td>
</tr>
<tr>
<td>1 room</td>
<td>700</td>
</tr>
<tr>
<td>2 rooms</td>
<td>950</td>
</tr>
<tr>
<td>3 rooms</td>
<td>1150</td>
</tr>
<tr>
<td>4 rooms</td>
<td>1300</td>
</tr>
<tr>
<td>5 rooms</td>
<td>1450</td>
</tr>
<tr>
<td>6 rooms</td>
<td>1600</td>
</tr>
<tr>
<td>7 rooms</td>
<td>1750</td>
</tr>
<tr>
<td>8 rooms</td>
<td>1900</td>
</tr>
</tbody>
</table>

VI. RELOCATION SERVICES

Through the Relocation Case Manager, FHC and Norstar, the following services will be provided to all Affected Households prior to the commencement of the redevelopment of the property:

- One-on-one meetings with the Affected Households to identify household needs and preferences;
- Identifying and responding to special needs and reasonable accommodation issues;
- Identifying available units that meet the needs of the Affected Households;
- Ensuring decent, safe and sanitary conditions in replacement dwellings;
- Scheduling moves and working closely with moving contractors to ensure moves are completed on schedule;
- Delivering all relevant relocation notices required in accordance with applicable federal, state and local regulations and maintaining all required documentation in household relocation files;
- Providing referrals to social service provider(s) as needed to address social service-related barriers to relocation.
- While no persons with Limited English Proficiency Needs have been identified at this time, if a future need is determined, translation services will be provided on a case by case basis.
VII. SERVICES FOR PERSONS RELOCATED OFF SITE

In addition to the services listed above, in Section VI., the Relocation Coordinator will provide affect households with assistance in identifying suitable comparable housing off site that meets each family’s individual needs.

VIII. RIGHT TO RETURN

Because this site has been approved for a conversion of assistance under the RAD program, the permanent involuntary displacement of residents previously assisted by public housing subsidy is prohibited. Any individual or family temporarily relocated due to rehabilitation or construction shall have a right to return to the project.

Prioritization to return will be based upon term of lottery.
CERTIFICATION

The URA (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR part 24, apply to acquisition of real property and displacement of persons from real property occurring as a direct result of acquisition, rehabilitation or demolition of real property, for a project that receives federal financial assistance, including Section 8 PBV assistance or PBRA. For purposes of the URA, the term “project” is defined at 49 CFR 24.2(a)(22).

By submission of this plan, FHC hereby certifies that URA requirements will be implemented in compliance with all applicable fair housing and civil rights laws, including but not limited to, Title VI of the Civil Rights Act of 1964 Section 504 of the Rehabilitation Act of 1973, and the obligation to affirmatively further fair housing.

Pursuant to Title VI, FHC will take reasonable steps that ensure meaningful access to programs and activities by persons who, as a result of national origin, have limited English proficiency (LEP).

No resident will be subject to a permanent involuntary displacement. Any family temporarily relocated due to rehabilitation or construction shall have a right to return to the project.

No households will be displaced or made to permanently relocate as part of the conversion, nor will they be subject to a rent increase as a result of the conversion.

________________________  ____________
Eboni Nugin    Date
Interim Executive Director, FHC