



RESIDENTIAL ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE PLAN (RARAP)

**COMMUNITY DEVELOPMENT BLOCK GRANT – DISASTER RECOVERY
(CDBG-DR)**



PROGRAM OVERVIEW

Program Name:	CDBG-DR	
Grantee Name:	City of Little Rock (CLR)	
Entity Designated to Administer the Funds	City of Little Rock	
Amount of funds allocated in the action plan:	\$20,895,000.00	
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VERSION POLICY & CHANGE CONTROL

This document is subject to version control. Policy updates may be necessary throughout the life of the Program to clarify, add, or remove requirements governing program operations. All policy decisions will be formally documented and incorporated into the relevant program materials. Unless explicitly stated otherwise, revisions apply prospectively and become effective upon approval of the updated document.

All versions and publication dates are recorded in the Version History Table, along with a brief description of changes. Revisions that reflect a substantive change in policy will result in the issuance of a new major version number (for example, Version 1.0 to Version 2.0). Updates that do not alter policy intent, such as editorial revisions, clarifications, or formatting changes, will be reflected through minor version updates (for example, Version 2.1 or 2.2).

Version	Date	Description
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ACRONYMS

Acronym	Meaning
ADA	Americans with Disabilities Act
ADFA	Arkansas Development Finance Authority
CFR	Code of Federal Regulations
CDBG	Community Development Block Grant
CDBG-DR	Community Development Block Grant–Disaster Recovery
CLR	City of Little Rock
DOB	Duplication of Benefits
DSS	Decent, Safe, and Sanitary
FEMA	Federal Emergency Management Agency
FHEO	Office of Fair Housing and Equal Opportunity
HCDA	Housing and Community Development Act of 1974, as amended
HUD	U.S. Department of Housing and Urban Development
LEP	Limited English Proficiency
LMI	Low- and Moderate-Income
ORA	Optional Relocation Assistance
RARAP	Residential Anti-Displacement and Relocation Assistance Plan
SBA	U.S. Small Business Administration
SHPO	State Historic Preservation Office
URA	Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended

DEFINITIONS

Term	Definition
Duplication of Benefits (DOB)	Financial assistance received from multiple sources for the same purpose that exceeds the total need for recovery.
Acquisition	The purchase or obtaining of real property, or any interest therein, for a federally assisted project through voluntary transaction or other lawful means, in accordance with applicable federal requirements.
Advisory Services	Services provided to displaced persons to explain their rights, assist in locating comparable replacement housing, coordinate relocation activities, and obtain available relocation assistance, as required under the URA.
CDBG-DR	The Community Development Block Grant–Disaster Recovery (CDBG-DR) program administered by HUD to support long-term recovery, restoration, and resilience following a Presidentially declared disaster.
Comparable Replacement Dwelling	A dwelling that is decent, safe, and sanitary; functionally equivalent to the displacement dwelling; adequate in size; reasonably accessible to employment, schools, public services, and commercial facilities; and available at a cost within the financial means established under the URA.
Conversion	The change of a lower-income dwelling unit to a use other than housing for lower-income households.
Decent, Safe, and Sanitary (DSS)	Housing that meets the standards established under the URA and applicable state and local housing codes, providing safe, habitable, and sanitary living conditions.
Displaced Person	A person who permanently moves from, or moves personal property from, real property as a direct result of the acquisition, rehabilitation, demolition, or conversion of real property for a federally assisted project, and who meets the definition of a displaced person under the URA or Section 104(d), as applicable.
General Information Notice (GIN)	A written notice informing occupants of a proposed federally assisted project, their potential eligibility for relocation assistance, and advising them not to move before receiving additional information.
Initiation of Negotiations (ION)	The date used to determine eligibility for relocation assistance under the URA, as defined in 49 CFR Part 24.
Lower-Income Dwelling Unit	A dwelling unit occupied by, or available for occupancy by, a lower-income household, as defined in Section 104(d) and 24 CFR Part 42.
Notice of Non-Displacement (NND)	A written notice informing occupants that they will not be permanently displaced as a result of the federally assisted project, provided they continue to meet applicable occupancy requirements.
Notice of Eligibility (NOE)	A written notice informing an eligible displaced person of their entitlement to relocation assistance, available benefits, advisory services, and appeal rights under the URA.
One-for-One Replacement	The requirement under Section 104(d) that each occupied and vacant occupiable lower-income dwelling unit demolished or converted in connection with certain federally assisted activities be replaced with another lower-income dwelling unit, unless waived or modified by HUD.
Optional Relocation Assistance (ORA)	Relocation assistance a grantee may elect to provide under 24 CFR § 570.606(d) to persons who are not eligible displaced persons under the URA or in amounts exceeding the minimum federal requirements.

Permanent Displacement	Relocation in which a displaced person is not expected to return to the original dwelling or business following completion of a federally assisted project.
Project Sponsor	The City, subrecipient, developer, contractor, nonprofit organization, or other entity responsible for carrying out a CDBG-DR-assisted activity.
Reasonable Accommodation	A modification or adjustment to policies, practices, procedures, or services that enables a qualified individual with a disability to participate fully in a program or activity, unless doing so would impose an undue financial or administrative burden or fundamentally alter the nature of the program.
Relocation Assistance	Financial payments, advisory services, and other assistance provided to eligible displaced persons under the URA, Section 104(d), or an approved Optional Relocation Assistance policy.
Replacement Housing Payment (RHP)	A payment made to an eligible displaced homeowner or tenant to assist in obtaining comparable replacement housing in accordance with the URA.
Residential Anti-Displacement and Relocation Assistance Plan (RARAP)	The policy document required under Section 104(d) of the Housing and Community Development Act that establishes the City's strategy for minimizing displacement and providing relocation assistance.
Section 104(d)	Section 104(d) of the Housing and Community Development Act of 1974, which establishes residential anti-displacement, relocation assistance, and one-for-one replacement requirements for certain federally assisted housing activities.
Temporary Relocation	The short-term relocation of occupants during construction or rehabilitation with the expectation that they will return to the original dwelling upon completion of the project.
Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA)	The federal law (42 U.S.C. § 4601 et seq.) establishing uniform requirements for the fair and equitable treatment of persons displaced by federally assisted programs or projects.
Voluntary Acquisition	The acquisition of real property in which the owner voluntarily agrees to sell the property without the use or threat of eminent domain, consistent with applicable federal requirements.

1. INTRODUCTION AND BACKGROUND

The City of Little Rock receives and administers funds through the Community Development Block Grant–Disaster Recovery (CDBG-DR) program, authorized under Title I of the Housing and Community Development Act of 1974¹. CDBG-DR supports long-term recovery in communities affected by major disasters, with a focus on restoring housing, infrastructure, and economic stability for low- to moderate-income (LMI) residents.

CLR is committed to administering these funds with integrity, accountability, and efficiency, using creative and effective approaches that address the state’s unique recovery and housing needs. All activities will be guided by strong safeguards to prevent waste, fraud, and abuse.

The City is dedicated to innovation, flexibility, and responsiveness in program design and implementation to ensure that unmet recovery and resilience needs are addressed equitably and sustainably.

1.1. Background on CDBG-DR Funding

The CDBG-DR program is a special allocation of federal funding provided by the U.S. Department of Housing and Urban Development (HUD) to assist communities in recovering from disasters declared by the President. These funds are intended to support long-term recovery efforts in areas where the scale of damage exceeds the capacity of local resources and traditional disaster response programs, such as those offered by the Federal Emergency Management Agency (FEMA) or the Small Business Administration (SBA).

CDBG-DR is not an emergency response program. Instead, it is designed to address the unmet needs (see City of Little Rock (CLR) Action Plan) that remain after initial disaster relief has been provided. These needs often include rebuilding homes, restoring infrastructure, revitalizing local economies, and supporting vulnerable populations through public services. While CDBG-DR funds are flexible and can be used for a wide range of recovery activities, all funded activities must be directly tied to disaster-related impacts and must meet one of HUD’s three National Objectives:

- Benefit to LMI Persons – This is the primary objective of the CDBG-DR Program. At least 51% of the beneficiaries of an activity are low- and moderate-income (LMI) individuals or households.
- Prevention or Elimination of Slums or Blight – Activities aimed at reducing, preventing, or eliminating conditions of slum or blight in a designated area, or on a spot basis (e.g., demolition of a dangerous, deteriorated building).
- Urgent Need – May be used when an activity addresses a serious and immediate threat to the health or welfare of the community and no other financial resources are available.

Congress appropriates CDBG-DR funds through special legislation in response to major disasters. Once funding is approved, HUD allocates the funds to eligible states, cities, or counties based on the

¹ <https://www.govinfo.gov/content/pkg/COMPS-10382/pdf/COMPS-10382.pdf>

severity of damage and the extent of unmet needs. HUD also issues detailed guidance, through Federal Register Notices and the CDBG-DR Universal Notice, that outlines how the funds must be used. This includes requirements for public engagement, financial oversight, civil rights compliance, and environmental review.

In January 2025, HUD allocated \$20,895,000 in CDBG-DR funding to the City of Little Rock (City or CLR) to support recovery from the March 31, 2023, EF-3 tornado. This funding is governed by the requirements outlined in the Federal Register (90 FR 4759) and the CDBG-DR Universal Notice (90 FR 1754), as amended by Memorandum 2025-02. These documents establish the rules, waivers, and alternative requirements that grantees must follow to ensure that funds are used effectively, equitably, and in compliance with federal law.

The City's CDBG-DR program includes several components — housing, infrastructure, economic revitalization, mitigation, and public services — all designed to help the community recover and build resilience against future disasters. The Housing Programs described in this Plan represent a major component of the City's long-term recovery strategy and focus on stabilizing impacted neighborhoods, supporting homeowners, and increasing the supply of affordable, resilient housing.

1.2. Purpose and Applicability

This Residential Anti-Displacement and Relocation Assistance Plan (RARAP or Plan) is adopted by the City of Little Rock in accordance with Section 104(d) of the Housing and Community Development Act of 1974, as amended (42 U.S.C. § 5304(d)), and its implementing regulations at 24 CFR Part 42; the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended (42 U.S.C. § 4601 et seq.), and its implementing regulations at 49 CFR Part 24; and the Community Development Block Grant–Disaster Recovery (CDBG-DR) requirements governing displacement, relocation, acquisition, and replacement housing at 24 CFR §§ 570.488 and 570.606, as modified by applicable HUD waivers and alternative requirements.

This Plan establishes the City's policies and procedures for minimizing the displacement of persons and households resulting from CDBG-DR-assisted activities and for providing relocation assistance when displacement cannot be avoided. This Plan applies to all CDBG-DR-assisted housing, infrastructure, mitigation, economic revitalization, public services, and other eligible activities administered by the City of Little Rock in connection with the March 31, 2023 EF-3 tornado disaster recovery effort. The requirements of this Plan apply to the City, its subrecipients, contractors, consultants, developers, and other authorized partners administering CDBG-DR funds on the City's behalf. As required by HUD, this Plan shall be adopted, maintained on file, and made available to the public, HUD, and other interested parties. All entities administering CDBG-DR-assisted activities are responsible for complying with the requirements of this Plan and all applicable federal relocation laws and regulations.

The City will carry out this Plan for the following purposes:

- To identify the reasonable steps the City will take to minimize the displacement of persons from their homes as a result of a CDBG-DR-assisted project.

- To identify plan to minimize adverse effects of displacement where minimizing displacement is not reasonable, feasible or cost efficient and would not prevent future loss (e.g. buyouts) with special considerations to the challenges displaced persons and vulnerable population.
- To provide relocation assistance to all persons displaced as a direct result of a CDBG-DR-assisted activity, including the acquisition, rehabilitation, or demolition of housing, or the conversion of a low- and moderate-income (LMI) dwelling unit to another use.
- To replace all occupied and vacant occupiable LMI dwelling units that are demolished or converted to a use other than LMI housing in connection with a CDBG-DR-assisted activity, except as waived by HUD for CDBG-DR-funded activities.

1.3. Governing Authority

This Plan has been developed in accordance with the following federal statutes, regulations, and notices, as amended:

- Section 104(d) of the Housing and Community Development Act of 1974, as amended (42 U.S.C. § 5304(d)), and its implementing regulations at 24 CFR Part 42.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. § 4601 et seq.) (URA), and its implementing regulations at 49 CFR Part 24.
- CDBG-DR program requirements governing displacement, relocation, acquisition, and replacement of housing at 24 CFR §§ 570.201, 570.208, 570.488, and 570.606.
- Federal Register Notice 90 FR 4759 (January 16, 2025), “Allocations for Community Development Block Grant Disaster Recovery Funds and Implementation of the Community Development Block Grant Disaster Recovery Program.”
- The CDBG-DR Universal Notice, 90 FR 1754, as amended by HUD Memorandum 2025-02 (March 19, 2025), “Revisions to the Universal Notice.”

This Plan will be updated as needed to reflect subsequent Federal Register Notices, HUD memoranda, or waivers applicable to the City's CDBG-DR allocation.

2. CDBG-DR Activities That May Trigger Displacement

Pursuant to its CDBG-DR award, the City anticipates undertaking the following programs and activities that may directly or indirectly cause temporary or permanent displacement:

- Clearance and demolition of unsafe, blighted, or disaster-damaged residential structures pursuant to 24 CFR § 570.201(d).
- Acquisition, rehabilitation, reconstruction, and new construction of owner-occupied housing under 24 CFR § 570.201(a) and (b).
- Acquisition, rehabilitation, or new construction of rental housing under 24 CFR § 570.201(a) and (b).

- Voluntary acquisition and buyout activities, where authorized under the City's CDBG-DR programs, that may result in the permanent relocation of property owners or tenants in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and applicable HUD requirements.
- Public facilities and infrastructure improvements, including water and sewer line extensions, stormwater management systems, and utility hardening, under 24 CFR § 570.201(c).
- Associated public improvements directly related to housing development.

The City does not anticipate the use of eminent domain in connection with CDBG-DR-funded activities and, consistent with the strategies described in Section 3 below, will design programs to avoid or minimize displacement to the greatest extent feasible.

3. Strategies to Minimize Displacement

CDBG-DR Housing Programs are designed to avoid or minimize displacement to the greatest extent feasible. The City will prioritize project design strategies that reduce displacement, including rehabilitation of occupied housing where feasible, sequencing construction activities to allow continued occupancy, and avoiding demolition or conversion of occupied units whenever practicable. The City will take the following steps, organized by program category, to minimize displacement and its impacts on affected households:

3.1. Project Selection and Planning

- Prior to committing CDBG-DR funding to a project, the City will collect information on project site occupants to assess the potential impact of the proposed project on occupants.
- The City will evaluate alternatives to project design, construction sequencing, and site selection to avoid or minimize temporary and permanent displacement whenever feasible.
- Non-buyout activities requiring significant displacement of residents will not be considered competitive for funding.
- Where feasible, priority will be given to projects that expand the available stock of affordable housing rather than requiring demolition or conversion of housing.
- Relocation impacts will be considered during project selection, funding decisions, and environmental review, as applicable.
- Where feasible, the City will limit demolition or conversion to dwelling units that are unoccupied or vacant occupiable units, particularly “lower-income dwelling units” as defined at 24 CFR § 42.305.
- The City will target only those properties deemed essential to the need or success of the project.
- The City may provide technical assistance and guidance to subrecipients, contractors, consultants, and development partners regarding compliance with this Plan, the Uniform

Relocation Assistance and Real Property Acquisition Policies Act (URA), Section 104(d), required notices, relocation planning, and other applicable federal requirements.

3.2. Housing Rehabilitation and Residential Projects

- Where current tenants must move as part of a rehabilitation project, the City will encourage sponsors to provide eligible tenants an opportunity to rent a unit in the rehabilitated property upon completion.
- For projects requiring temporary relocation of residential tenants, the City will encourage project sponsors to minimize the amount of time tenants are required to relocate.
- Construction will be phased, to the extent feasible, to allow tenants to remain in their units as long as possible, with particular attention to ensuring tenants with disabilities do not lose access to needed accommodations, even temporarily.
- The City will assist displaced persons in identifying safe, decent, sanitary, and, where applicable, accessible temporary replacement housing during the period of temporary relocation.
- Persons who are temporarily relocated will be able to return to their original unit at a similar rental rate for at least one year after project completion.
- All occupants of properties assisted with CDBG-DR funds will be provided appropriate advisory services and relocation assistance as required by the URA and Section 104(d), unless waived by HUD.
- Where temporary or permanent relocation is contemplated, the City will require the project sponsor to submit a detailed relocation plan describing the relocation process, responsible parties, replacement housing, and funding source for relocation activities.

3.3. Infrastructure and Public Facility Projects

- During design, the City will evaluate alternative alignments, siting, and design options to avoid or minimize displacement of households, businesses, and community facilities.
- The City will encourage early coordination and communication among property owners, occupants, contractors, utility providers, local officials, and other stakeholders throughout project planning and implementation to identify potential displacement impacts, provide timely information, and implement strategies to avoid or minimize displacement whenever feasible.
- Construction phasing for infrastructure improvements in residential areas will be coordinated to maintain access to homes and services and to avoid unnecessary temporary displacement.
- For projects affecting small businesses or nonprofits, the City will identify early communication and mitigation strategies, such as temporary access accommodations, signage, or scheduling adjustments.

- The City will coordinate with property owners, residents, businesses, utility providers, and other stakeholders throughout project planning and construction to minimize disruptions and displacement.
- The City will not use eminent domain for CDBG-DR-funded projects.

3.4. Acquisition Activities

- Any acquisition activities will be designed to be voluntary, and participants will be fully informed of available options and assistance before agreeing to sell their property.
- Property owners and tenants will receive timely information regarding their rights, available relocation assistance, and applicable URA requirements before any acquisition decisions are finalized.
- Where voluntary buyout programs are implemented, participation will be entirely voluntary, and no property owner will be required to participate as a condition of receiving other disaster recovery assistance unless otherwise required by law.
- Where feasible, the City will provide relocation counseling and information on comparable replacement housing, ensuring displaced homeowners and tenants have opportunities to relocate to housing that meets their accessibility, affordability, and proximity needs.
- The City will work to maintain community ties by prioritizing relocation within the same jurisdiction or school district, where consistent with program objectives.

3.5. Monitoring and Oversight

- The City will monitor projects throughout planning, design, construction, and closeout to identify potential displacement issues as early as possible.
- The City will provide technical assistance to subrecipients, contractors, and development partners regarding compliance with this Plan and applicable URA requirements.
- The City will review project-specific relocation plans, where required, to ensure compliance with federal requirements before relocation activities begin.
- The City will maintain documentation demonstrating the measures taken to avoid or minimize displacement and will monitor compliance with this Plan as part of its overall CDBG-DR oversight responsibilities.

4. Relocation Assistance (URA and Section 104(d) Compliance)

In accordance with Section 104(d), the City will ensure that lower-income households are protected from displacement resulting from demolition or conversion of LMI dwelling units. Where applicable, the City will comply with one-for-one replacement requirements and provide relocation assistance consistent with Section 104(d) regulations at 24 CFR Part 42, in addition to any applicable URA requirements. The City will track and document all one-for-one replacement requirements in

accordance with 24 CFR Part 42 and ensure replacement units are provided within required timeframes.

If temporary or permanent displacement cannot be avoided, the City will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended, and its implementing regulations at 49 CFR Part 24, as well as applicable HUD guidance and 24 CFR § 570.606. All displaced persons will be provided relocation assistance at the levels and in the manner required under federal law. Where both URA and Section 104(d) apply, the City will provide the greater level of assistance required under federal law. The City will make every reasonable effort to coordinate relocation activities with construction schedules so that temporary relocation periods are as short as practicable and permanent displacement is avoided whenever feasible.

All occupants of properties assisted with CDBG-DR funds will receive required written notices informing them of their rights under URA. At a minimum, notices may include a General Information Notice, Notice of Eligibility, Notice of Non-Displacement (when applicable), and any other notices required by federal regulation. No person will be required to move without proper written notice and explanation of available assistance.

The City will provide relocation assistance through a structured process that includes: (1) timely issuance of required notices; (2) eligibility determination in accordance with 49 CFR Part 24; (3) provision of advisory services to support households in understanding their rights and identifying comparable replacement housing; (4) calculation of relocation benefits using federally prescribed methodologies; and (5) timely payment or reimbursement of eligible relocation expenses. All relocation activities will be coordinated by designated City staff or authorized representatives to ensure consistency, compliance, and responsiveness to the needs of displaced persons.

If temporary relocation is necessary to complete construction activities, affected households will be provided temporary relocation assistance consistent with URA requirements and City policy. Temporary assistance may include reimbursement for reasonable out-of-pocket expenses such as moving costs, increased housing costs during the temporary period, and storage, as applicable. Households temporarily relocated will be allowed to return to the assisted property once construction is complete, where feasible and consistent with program requirements.

If permanent displacement occurs, affected tenants or homeowners will be provided relocation assistance in accordance with 49 CFR Part 24. Assistance may include advisory services, moving expense payments, and replacement housing payments based on the cost of comparable replacement housing for the applicable period required by regulation.

Consistent with this Plan, relocation assistance will be provided as follows:

- Lower-income households displaced as a direct result of CDBG-DR-assisted activities will receive relocation assistance in accordance with applicable federal requirements, including URA standards.

- Displaced persons who do not qualify as lower-income households will also receive relocation assistance in accordance with URA and 49 CFR Part 24.

In addition to URA requirements, the City may apply an optional relocation policy in accordance with 24 CFR § 570.606(d), when applicable, to address gaps or provide additional assistance not otherwise covered under URA. This policy may provide relocation payments or other assistance to: (1) persons displaced by activities not otherwise subject to URA requirements; or (2) persons eligible under URA, at levels exceeding minimum federal requirements. Any optional relocation assistance will be governed by a written policy that is publicly available and applied consistently within each class of displaced persons. The policy will describe the types of assistance available, eligibility criteria, and payment standards, and will ensure that assistance does not result in a duplication of benefits (DOB) and is coordinated with all other sources of disaster assistance and complies with applicable DOB requirements.

Tenants occupying properties assisted with CDBG-DR funds will be protected from involuntary displacement except as permitted under federal law. No tenant may be displaced solely for the purpose of making a property eligible for assistance. The City will ensure that relocation assistance is provided in a timely manner and that displaced persons are treated fairly, consistently, and without discrimination.

The City will maintain complete documentation of all relocation determinations, notices issued, eligibility calculations, and payments made to ensure full compliance with URA and applicable federal requirements.

4.1.1. Special Considerations for Vulnerable Populations

The City recognizes that certain individuals and households may require additional assistance to ensure equal access to relocation services. Consistent with applicable federal civil rights, fair housing, and accessibility requirements, the City will take reasonable steps to accommodate the needs of vulnerable populations throughout the relocation process. As appropriate, the City will:

- Provide advisory services in a manner that is accessible to persons with disabilities and individuals with limited English proficiency (LEP), including the provision of auxiliary aids, language assistance, or other reasonable accommodations, as needed.
- Assist displaced persons in identifying safe, decent, sanitary, and, where applicable, accessible replacement housing that meets the household's needs.
- Provide referrals to legal services, housing counseling, social service providers, or other community resources, as appropriate, to assist displaced persons in understanding their rights and successfully completing the relocation process.
- Provide reasonable accommodations for elderly individuals, persons with disabilities, and households with young children throughout the relocation process, as appropriate.

- Coordinate with project sponsors, service providers, and community organizations, where appropriate, to identify additional supportive services that may reduce barriers to successful relocation.
- Administer all relocation activities in a manner consistent with applicable fair housing, civil rights, and nondiscrimination requirements.

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

The City will comply with the one-for-one replacement requirements of Section 104(d) of the Housing and Community Development Act and 24 CFR § 42.375 for all occupied and vacant occupiable lower-income dwelling units demolished or converted to a use other than lower-income housing in connection with a CDBG-DR-assisted activity, unless waived or otherwise modified by HUD. Where replacement housing is required, the City will monitor replacement housing activities to ensure compliance with applicable location, affordability, timing, and occupancy requirements.

Replacement dwelling units will:

- Be located within the same jurisdiction and, where feasible and consistent with other statutory priorities, within the same neighborhood as the demolished or converted dwelling units.
- Be provided in standard condition.
- Remain affordable to lower-income households for at least 10 years from the date of initial occupancy.
- Be comparable in size, function, and accessibility, as required by applicable federal regulations.

Before committing CDBG-DR funds to any project that will directly result in the demolition or conversion of lower-income dwelling units, the City will provide public notice in accordance with Section 104(d), 24 CFR Part 42, and applicable HUD requirements. At a minimum, the notice will include:

1. A description of the proposed assisted activity.
2. The address, number of bedrooms, and location on a map of dwelling units that will be demolished or converted to a use other than lower-income housing as a direct result of the assisted activity.
3. A time schedule for the commencement and completion of the demolition or conversion.
4. The address, number of bedrooms, and location of the replacement dwelling units, to the extent known. If this information is not yet available, the City will identify the anticipated location, approximate number of replacement units by bedroom size, and provide updated information as it becomes available.
5. The source of funding and time schedule for the provision of replacement dwelling units.

6. The basis for 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 dwelling units with smaller units (e.g., a two-bedroom unit replaced with two one-bedroom units) is consistent with the housing needs identified in the City's Consolidated Plan.

The required public notice will be issued before the commitment of CDBG-DR funds and in accordance with the City's established public notice procedures and applicable HUD requirements.

5.1. Replacement Not Required Based on Unit Availability

Pursuant to 24 CFR § 42.375(d), the City may request that HUD determine the one-for-one replacement requirement does not apply when objective data demonstrates an adequate supply of vacant lower-income dwelling units in standard condition is available on a nondiscriminatory basis within the affected area. The City will maintain documentation supporting any such request and will not rely on this exception unless approved by HUD, as applicable.

5.2. Units Not Suitable for Rehabilitation

Consistent with applicable HUD waivers, the City may determine that a disaster-damaged, owner-occupied lower-income dwelling unit is not suitable for rehabilitation, and therefore not subject to one-for-one replacement, including, but not limited to, the following circumstances:

- The property has been declared a total loss by its insurer;
- The cost of repairs would exceed 50% of the cost of reconstruction;
- The cost of repairs exceeds \$50,000; or
- The home cannot be rehabilitated or reconstructed in place under existing program policies and award caps due to legal, engineering, environmental, or site-specific constraints, including permitting limitations, extraordinary site conditions, historic preservation requirements, or other circumstances that make rehabilitation infeasible or not cost reasonable under program requirements.

The City may approve exceptions to program award limits on a case-by-case basis when necessary to address documented conditions that prevent rehabilitation within standard program limits. Any exception shall be supported by written documentation demonstrating that the additional assistance is necessary, reasonable, and consistent with applicable program requirements.

5.3. Tracking Compliance

The City will maintain records sufficient to demonstrate compliance with Section 104(d), the URA, and applicable HUD requirements. At a minimum, the City will track:

- demolished or converted lower-income dwelling units;
- replacement housing obligations and completion status;

- public notices issued;
- relocation determinations;
- relocation payments and advisory services provided;
- HUD approvals or waivers, where applicable; and
- supporting documentation demonstrating compliance with one-for-one replacement requirements.

5.4. Monitoring

The City will monitor CDBG-DR-assisted projects throughout implementation to ensure compliance with the one-for-one replacement requirements of Section 104(d), applicable HUD waivers, and this Plan. Monitoring activities may include file reviews, progress reports, site visits, and verification that replacement housing obligations are completed within the required timeframes.

6. Waivers and Alternative Requirements

HUD's Federal Register Notices governing the City's CDBG-DR allocation, including 90 FR 4759 and the Universal Notice at 90 FR 1754 (as amended by Memorandum 2025-02), provide certain waivers and alternative requirements applicable to relocation, displacement, and one-for-one replacement obligations. The following waivers and alternative requirements are particularly relevant to the City's anti-displacement, relocation, and one-for-one replacement responsibilities under this Plan. Nothing in this section shall be interpreted to reduce or eliminate any relocation assistance required by federal law. Where multiple federal requirements apply, the City will provide the greater level of assistance required.

6.1. 6.1 Section 104(d) Relocation Assistance for CDBG-DR Activities

The relocation assistance requirements at Section 104(d)(2)(A)(iii) and (B) of the HCDA and 24 CFR § 42.350 are waived to the extent that an eligible displaced person, as defined at 24 CFR § 42.305, may choose to receive assistance under either the URA and its implementing regulations at 49 CFR Part 24, or Section 104(d) and its implementing regulations at 24 CFR § 42.350. This waiver does not affect a person's eligibility as a displaced person under Section 104(d); it limits the amounts and types of relocation assistance available under Section 104(d) to those required under the URA, as modified by applicable waivers and alternative requirements for disaster recovery activities.

6.2. URA Replacement Housing Payments for Tenants

The requirements of Sections 204 and 205 of the URA (42 U.S.C. §§ 4624, 4625) and 49 CFR §§ 24.2(a)(6)(vii), 24.2(a)(6)(ix), and 24.402(b) are waived to the extent necessary to permit the City to meet all or a portion of its replacement housing payment obligation to a displaced tenant by offering rental housing through a rental housing program subsidy (including, but not limited to, a housing choice voucher), provided that comparable replacement dwellings are made available to the tenant in

accordance with 49 CFR § 24.204(a), the property owner is willing to participate in the program, and the period of authorized assistance is at least 42 months.

6.3. Section 414 of the Stafford Act

Section 414 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5181) provides that no person otherwise eligible for a replacement housing payment under the URA shall be denied such eligibility due to an inability, because of a major disaster, to meet URA occupancy requirements. This section and its implementing regulation at 49 CFR § 24.403(d)(1) are waived to the extent they would apply to real property acquisition, rehabilitation, or demolition activities commencing more than one year after the date of the applicable Presidentially declared disaster, provided the activity was not planned, approved, or otherwise underway before the disaster. For purposes of this waiver, a CDBG-DR-assisted activity is considered to commence upon the earliest applicable project approval or environmental review milestone identified by HUD.

6.4. One-for-One Replacement Waiver

Consistent with applicable HUD waivers and alternative requirements, the one-for-one replacement requirement does not apply to owner-occupied lower-income dwelling units damaged by the disaster and determined not suitable for rehabilitation, consistent with the criteria described in Section 5.2 of this Plan. Where a lower-income dwelling unit does not meet the definition of “not suitable for rehabilitation,” the one-for-one replacement requirements and implementation procedures described in Section 5 apply.

6.5. Optional Relocation Assistance

Consistent with 24 CFR § 570.606(d), the City may offer Optional Relocation Assistance (ORA) to program participants and other persons displaced by CDBG-DR-funded activities who do not meet the URA definition of “displaced person” and would therefore not otherwise be eligible for URA relocation assistance. Any ORA policy adopted by the City will be in writing, publicly available, and applied consistently within each class of displaced persons, consistent with Section 4 of this Plan.

6.6. Subrecipient Relocation Plans

Subrecipients and development partners undertaking CDBG-DR-funded activities that may result in displacement are required to adopt this Plan in its entirety or, where permitted by the City, develop and adopt their own relocation plan. Any subrecipient-developed plan must be submitted to the City for review and approval and made available to the public, HUD, and other agencies as applicable. Regardless of which plan is adopted, subrecipients and development partners must comply with the URA for any household, regardless of income, that is involuntarily and permanently displaced by a CDBG-DR-funded activity, and with Section 104(d) where applicable.

The City will administer this Plan in accordance with any future HUD waivers, alternative requirements, or guidance applicable to its CDBG-DR allocation. To the extent a future HUD waiver or

alternative requirement conflicts with this Plan, the City may amend this Plan as necessary to maintain compliance with federal requirements.

7. Complaints and Appeals

All persons displaced or otherwise affected by a CDBG-DR-assisted activity have the right to file a complaint or appeal regarding actions taken under this Plan. Appeals related to relocation assistance shall be processed in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), including the requirements of 49 CFR § 24.10, and the City's applicable CDBG-DR appeals procedures. Information regarding appeal rights and procedures will be included in all required URA notices.

The City will accept complaints and appeals in writing. When necessary, complaints and appeals may also be accepted verbally or through other reasonable means. If the City determines that an individual is unable to submit a written complaint or appeal due to a disability, limited English proficiency, or other communication barrier, the City will provide reasonable assistance, either directly or through an appropriate third party, to prepare the complaint or appeal at no cost to the individual.

The City will acknowledge and respond to complaints and appeals in writing within fifteen (15) working days, whenever practicable.

Complaints and appeals should be submitted to:

Tracey Shine
City of Little Rock
Housing & Neighborhood Programs
500 W. Markham Street, Suite 120
Little Rock, AR 72201

Phone: (501) 371-6825

Email: tshine@littlerock.gov

Individuals who believe they have been subjected to discrimination or that the City has failed to comply with Title VI of the Civil Rights Act of 1964, Executive Order 13166 (Improving Access to Services for Persons with Limited English Proficiency), or other applicable federal civil rights requirements may file a complaint with the U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity (FHEO) or the Arkansas Fair Housing Commission.

U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity – Southwest Region
819 Taylor Street
Fort Worth, TX 76102
Phone: (817) 978-5965
Fax: (817) 978-5876
Toll-Free: (888) 560-8913
TTY: (800) 877-8339 (*Federal Relay Service*)

Arkansas Fair Housing Commission
Toll-Free: (800) 340-9108

8. Recordkeeping and Monitoring

The City will maintain complete documentation of all relocation determinations, notices issued, eligibility calculations, payments made, and one-for-one replacement housing activities to ensure full compliance with the URA, Section 104(d), and applicable federal requirements. The City will require subrecipients and development partners to maintain equivalent documentation and will monitor subrecipient compliance with this Plan as part of its overall CDBG-DR program oversight responsibilities.

9. Contact Information

Questions regarding this Plan, or requests for relocation assistance information, may be directed to cdbg@littlerock.gov.