

**RELOCATION PLAN FOR
TENANT “IN-PLACE” REHABILITATION
HARBOR COVE APARMENTS
GAINESVILLE, FLORIDA**

SEPTEMBER, 2022

Project Description

Orbach Affordable Housing Solutions, LLC (Developer) intends to rehab all of the 208 apartments. The majority of the Rehabilitation work will be completed with residents in place; however, it will be necessary for all of the residents to be displaced during normal working hours but will have the ability to return to their homes each day.

The proposed project does not require permanent relocation by any resident. There will also be no economic displacement of the current resident base. The proposed project does not require permanent relocation by any resident. There will also be no economic displacement of the current resident base.

The primary role of the Orbach Affordable Housing Solutions staff is to assist in the relocation of the residents as needed during the conversion and renovations. Residents will remain onsite in our community center during the renovation process and be provided with necessary comforts during construction. The well-being of the residents will be our priority by providing them guidance, moving assistance, and daily communications.

1. Meet the team members as a whole.
2. Explain specific policy regarding overall relocation expenses. ie. (per diem/or catered food, how many meals, activities, etc.).
3. Location for residents to gather during the renovation process will be located in the vacant apartment within the property. (They will be provided with multiple seating areas, TV's, beverages and snacks). All COVID-19 precautions will be implemented in accordance with the CDC.
4. Develop Fact Sheet in Question and Answer Form for distribution to Residents.
5. When necessary procure a moving contractor as supplement to resident move.
6. Develop a plan with the Property Manager to ensure that daily operations continue with minimal interruption to the residents.
7. Establish schedule for Harbor Cove Apartments Resident Interview.
8. Create Harbor Cove Resident worksheet and case folders; input data for status report.
9. Meet with contractors, residents, and management team, to discuss moving

procedures.

10. Meet with Residents at-large.

During Initial Interviews with the Residents they will be asked to complete a Needs Assessment Questionnaire. The NAQ will help define what their daily needs are and how we can best accommodate them.

11. Explain how the renovation/relocation process will work and the role of residents for a successful and complete process.

- Provide assistance to residents on a daily basis to ensure that the schedule and requirements of the contract are met.
- Communicate the daily process and provide the guidance for successfully navigating the moves of each resident and their personal belongings.
- Coordinate socialized services for elderly and/or disabled residents
- Meet with owner/management re: scheduled moves, building/property security, etc.

The rehabilitation work will be done with residents remaining in place. Each resident household will need to vacate their unit for eight hours and return at the end of each day for two separate five day intervals. Construction phasing is planned to minimize the time a resident is away from home. Additionally, no permanent relocation will be required for the improvements made to the exterior or common areas of the building.

ASSESSMENT OF RELOCATION NEEDS

PROJECT CHARACTERISTICS AND NEEDS

For the purposes of this Plan's initial preparation, on-site interviews will be conducted. Interviews will be conducted prior to the commencement of construction. Follow-up interviews with all project households will be conducted prior to the issuance of relocation notices of eligibility.

The interviews will consist of gathering information on all household occupants including demographic information (age, sex, and lawful presence), income and employment information, housing unit information (number of rooms to be moved and condition of unit), rent and utility information, and criteria for replacement or temporary housing (location, amenities, and special facilities/features).

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The Project consists of a total of 208 units; 208 resident occupied units.

The presence of disabilities in the building is being assessed at this time but it will be considered prior to the commencement of construction to the extent it may affect the physical move. The Developer pledges to appropriate special care for households requiring additional assistance due to potential disabilities.

The ethnic distribution in the Project is unknown at this time and will be verified at the time of personal surveys with Project households, as will be primary household language and possible disabilities affecting the relocation process.

The standard housing density utilized is two persons per bedroom and one person in a common living area for resident occupied units although this can be adjusted to include two persons in the common living area. There are no households requiring larger units based on this occupancy standard.

Relocation activities will consider individual household needs to be close to public transportation, employment, schools, public/social services and agencies, recreational

services, parks, community centers, or shopping.

Relocation assistance information and counseling will be provided in the primary language of the displaced occupants, in order to assure that all temporarily displaced occupants obtain a complete understanding of the relocation program and eligible benefits

HOUSING RESOURCES

Rehabilitation work in the Project will result in no permanent relocations. Any temporary relocation needs that arise will be met by utilizing available hotel or motel units within a four-mile radius or a per diem amount may be provided to secure housing during the rehabilitation period for residents moving off-site for the duration of the rehabilitation, which is not expected to exceed seven (7) days.

A survey will be conducted during the month of January to determine the availability of hotel and motel resources within a two-mile radius from the Project to satisfy the temporary housing needs of the residents. Should the need arise for households to stay in a hotel or motel for numerous weeks, then the extended stay accommodations with kitchenettes may be considered.

HARBOR COVE RELOCATION PROGRAM

The Developer's planned rehabilitation and scope of work will require ten households (ADA units) to temporarily relocate into nearby hotels/motels for approximately three months. (Four ADA units will be out at one time.) A market survey was conducted to identify available motels/hotels within an ten-mile radius.

Transportation will be coordinated by staff for residents (as needed) to the hotel/motel. The residents will bring clothing, personal items, toiletries, etc. for the hotel stay. (Dishes and cookware will be transported for them as well, if the temporary unit is lacking these items.)

At any given time during the phased relocation activities, multiple temporary units will be required weekly. The Developer plans to negotiate the rental of all rooms needed over the rehabilitation period with the owner(s) of the hotel/motel(s), where residents can be rotated in and out of the rented rooms at the same facility(ies) on an as needed basis.

From 8:00am – 5:00pm, for approximately five days tenants in the remaining units will need to be out of their units during the day. There will be provisions during these hours in the leasing office building to minimize the inconvenience to the residents.

All tenants to be temporarily displaced will continue to pay their rent and utilities to the Developer for the tenants' current units, and the Developer will pay the full housing cost of the temporary units. After rehabilitation has been completed, qualified tenants will move back to their original unit.

As an alternative to temporarily staying in a nearby hotel/motel, the Developer will offer each of the ten households, who must temporarily vacate their units, a stipend, if they choose to stay with friends or family for the few weeks they are required to be out of their units.

All temporary housing will be inspected to assure it is decent, safe and sanitary and meets the needs of the residents regarding mobility challenges. If residents receive services or are normally transported to off-site facilities during the days they will be in temporary housing, arrangements will be made to continue the services and/or transportation of the resident to and from the temporary housing.

The Developer understands that if the tenants are required to be out of a Project unit for more than one year, permanent relocation benefits must be offered to them under federal and state relocation regulations with no reduction for temporary relocation benefits previously paid. Rehab activities are anticipated to be completed within twenty four (24) months.

PROGRAM ASSURANCES AND STANDARDS

There are adequate funds available to temporarily relocate all households. Services will be provided to ensure that displacement does not result in different, or separate treatment of households based on race, nationality, color, religion, national origin, sex, marital status, familial status, disability, or any other basis protected by the Federal Fair Housing Amendments Act; the Americans with Disabilities Act; Title VI of The Civil Rights Act of 1964; Title VII of The Civil Rights Act of 1964; Title VIII of The Civil Rights Act of 1968.

Households which may be temporarily displaced will receive at the minimum a General Information Notice (GIN) and a minimum of a ninety (90)-day notice prior to their need to move.

The relocation program to be implemented by the Developer conforms with the standards and provisions set forth in URA, Government Code section 7260 et seq., if applicable, and all other applicable regulations and requirements.

RELOCATION ASSISTANCE PROGRAM

A representative from Orbach Affordable Housing Solutions will assist the residents to be temporarily displaced as a consequence of the Project. Orbach Affordable Housing

Solutions staff will maintain personal contact with them until the relocation process has been completed. Orbach Affordable Housing Solutions staff can be reached at (201) 248-4800, which is attended to from 8:00 a.m. to 5:00 p.m., Monday through Friday

As a function of the overall relocation assistance program, technical and advisory assistance will be provided to all residents by the Developer. The following services and tasks will be undertaken:

1. Each displaced household will be personally interviewed to gather information appropriate to determine needs and preferences with regard to the replacement of existing accommodations. Inquiries made of residential occupants by relocation personnel will cover the following areas: family size, ethnic background, immigration status, age and health considerations, current employment status, family income, transportation needs, and preferences relative to replacement housing.
2. As soon as feasible, the relocation representative shall explain the relocation payments and other assistance for which households and individuals may be eligible, including Orbach Housing Solutions eligibility requirements and the procedures for obtaining such assistance.
3. Assistance will be provided to complete appropriate forms and coordinate moving arrangements. Displaces will be kept informed of Project timing and receive appropriate notice to prepare for required moves. Claims for compensable expenses associated with the move will be processed expeditiously.
4. Special assistance in the form of referrals to governmental and social service agencies will be made, as appropriate.
5. Bilingual assistance will be provided, as needed.
6. Distribution of informational brochures to residential residents;
7. Timely referrals to at least three comparable replacement units and, if necessary, transportation will be provided to inspect potential replacement units.

RELOCATION BENEFIT CATEGORIES - TEMPORARY

Eligibility requirements and benefit plans will be discussed with all temporary displaced residents. In the course of personal interviews and follow-up visits, each displaced resident will be counseled as to available options and the consequences of any choice with respect to housing choices and potential financial assistance.

The Developer staff will assume responsibility for lodging payment requests in order to alleviate hardships for residents who do not have access to sufficient funds to pay for their accommodations even though they would later get reimbursed.

The relocation process includes: household interviews; needs analyses; appropriate replacement housing referrals; preparation and service of appropriate notices; file documentation, eligibility determinations, processing of claims; moving coordination; and other general services intended to assist displaced residents.

Temporary displaced residents will be entitled to compensation for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation including, but not limited to, the cost of moving to and from the temporarily occupied motel unit, furniture storage or security for personal property left at the Project site, any temporary costs for utilities (such as phone service) to essentially duplicate the living arrangements of households at their Project units, reasonable food allowance for the duration of displacement.

The Developer will make arrangements for all lodging and meals and transportation and will insure that the residents have no out of pocket expenses resulting from the temporary relocation.

Regardless of the displacement lodging option the residents choose, the Developer will provide taxi service to and from the displacement unit, if needed, as well as security guards to attend to personal property left on site while the residents are temporarily displaced.

No permanent displacements are expected by this project. Should permanent relocation be needed, this plan will be revised to include provisions for permanent relocation assistance.

PAYMENT OF RELOCATION BENEFITS

Relocation benefit payments will be made expeditiously. Claims and supporting documentation for relocation benefits must be filed with the Developer within 18 months from:

- i) the date the claimant moves from the acquired property; or,
 - ii) the date on which final payment for the acquisition of real property is made,
- whichever is later.

Procedures for preparing, and filing of claims and processing and delivering of payments.

RELOCATION TAX CONSEQUENCES

In general, relocation payments are not considered income for the purpose of Division 2 of the Internal Revenue Code of 1954, which has been re-designated as the Internal Revenue Code of 1986 (Title 26, U. S. Code), or for the purpose of determining the eligibility or the extent of eligibility of any person for assistance under the Social Security Act (42 U. S. Code 301 et seq.) or the Personal Income Tax Law, Part 10 (commencing with Section 17001) of the Revenue and Taxation Code, or the Bank and Corporation Tax Law, Part II (commencing with Section 23001) of Division 2 of the Revenue and Taxation Code. The above statement on tax consequences is not intended as tax advice by the Developer. Displaced residents are responsible for consulting with their own tax advisors concerning the tax consequences of relocation payments.

GRIEVANCE PROCEDURES

Any displaced Resident will have the right to ask for review when there is a perceived grievance regarding any of their rights to relocation and relocation assistance, such as a determination as to eligibility, the amount of payment, or the failure to provide a comparable replacement housing referral.

EVICITION POLICY

Eviction for cause must conform to applicable state and local law. Any person, who occupies the real property and is in lawful occupancy on the date of the initiation of negotiations, is presumed to be entitled to relocation payments and other assistance, unless the Developer determines that:

1. The person received an eviction notice prior to the initiation of negotiations and as a result of that notice is later evicted, or
2. The person is evicted after the initiation of negotiations for serious or repeated violation of material term(s) of the lease or occupancy agreement, and,
3. In either case, the eviction was not undertaken for the purpose of evading the obligation to make available the payments or other assistance to which a person may otherwise be entitled.

PROJECTED DATES OF DISPLACEMENT

It is anticipated that notices of Non-displacement will not be issued until at least May 2023 with rehabilitation work scheduled to commence in July 2023

CITIZEN PARTICIPATION

The Developer will fully meet its obligations under the Relocation Guidelines with respect to the following activities:

1. Full and timely access to documents relevant to the relocation program;
2. Provision of technical assistance necessary to interpret elements of the Relocation Plan and other pertinent materials;
3. Distribution of a general notice concerning the availability of this Plan for public review, as required, 30 days prior to its proposed adoption. Notice to recipients will include affected Project residents and all other interested parties;
4. The opportunity to submit written or oral comments concerning the Plan and to have these comments attached to the Plan when it is forwarded to the New Jersey Regional HUD Office.
5. Final review of Plan to ensure its feasibility, compliance with applicable environmental standards and compatibility with the relocation guidelines.

ESTIMATED RELOCATION COSTS

The Project will be funded with Tax Exempt Bonds and Low Income Housing Tax Credits; neither of which trigger the requirement to pay relocation assistance, however, the Developer will provide assistance during the temporary relocation period to help mitigate any financial hardship realized by the residents.

The estimated relocation budget does not include consideration of relocation administrative services nor any Orbach Housing Solutions consulting services which may be necessary for the implementation of the Plan and Project.

If the Project is implemented, and circumstances arise that should change either the number of permanent or temporary occupants, or the type of their tenancy, the Developer will authorize any additional funds that may need to be appropriated. The Developer pledges to appropriate, on a timely basis, the funds necessary to ensure the

successful completion of the Project, including funds necessary for last resort housing to meet its obligation under the relocation regulations.

Claims and supporting documentation for relocation benefits must be filed with the Developer within 18 months from:

- The date the claimant moves from the acquired property; or,
- The date on which final payment for the acquisition of real property is made, whichever is later.

The procedure for the preparation and filing of claims, and the processing and delivery of payments will be as follows:

1. Claimant(s) will provide all necessary documentation to substantiate eligibility for assistance.
2. Assistance amounts will be determined in accordance with the provisions of the Law.
3. Required claim forms will be prepared by relocation personnel in conjunction with claimant(s). Signed claims and supporting documentation will be submitted by relocation personnel to the Developer.
4. The Developer will review and approve claims for payment or request additional information.
5. The Developer will issue benefit checks which will be available at the Developer's offices for pick-up, unless circumstances dictate otherwise.
6. Final payments will be issued after confirmation that the Project area premises have been completely vacated, and actual residency at the replacement unit is verified.
7. Receipts of payment will be maintained in the relocation case file.