RESOLUTION TO ADOPT AN AUTHORITY RESIDENT RELOCATION INCONVENIENCE AWARD POLICY AND TO APPROVE THE UPDATED RELOCATION PLAN DATED JANUARY 2022 FOR THE JORDAN DOWNS REDEVELOPMENT PROJECT PREPARED IN ACCORDANCE WITH THE REQUIREMENTS OF CALIFORNIA RELOCATION ASSISTANCE LAW, GOVERNMENT CODE SECTION 7260 ET SEQ. (“ACT”) AND THE RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION GUIDELINES ADOPTED BY THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT, TITLE 25, CALIFORNIA CODE OF REGULATIONS, SECTION 6000 ET SEQ. (“GUIDELINES”) AND TO UNDERTAKE VARIOUS ACTIONS IN CONNECTION THEREWITH

Douglas Guthrie  
President and CEO

Geoffrey Moen  
Director of Development Services

Purpose: To adopt an Authority resident relocation Inconvenience Award Policy and approve the updated Relocation Plan dated January 2022 (“Updated Plan”) for the Jordan Downs Redevelopment Project (“Project”) and to undertake various actions in connection therewith. The Plan is prepared in accordance with the requirements of California Relocation Assistance Law, Government Code Section 7260 et seq. (the "Act") and the Relocation Assistance and Real Property Acquisition Guidelines adopted by the California Department of Housing and Community Development, Title 25, California Code of Regulations, Section 6000 et seq. (the "Guidelines"). The Updated Plan is also intended to comply with the federal relocation laws, as applicable to the Project, including, but not limited to, HUD Notice H-2019-09 PIH-2019-23 (HA) (September 5, 2019), HUD Notice H-2016-17 PIH-2016-17 (HA) (November 10, 2016), the U.S. Housing Act of 1937, as amended, 24 CFR Part 970, 24 CFR Part 982, 24 CFR Part 983, the Uniform Relocation Assistance and Real Property Acquisition Act (“URA”) as amended, 49 CFR Part 24, Section 104(d) of the Housing and Community Development Act of 1974, as amended, and 24 CFR Part 42 (collectively, the “Legal Requirements”).

Regarding: On December 22, 2016, the Board of Commissioners (“Board”) approved (Resolution No. 9326) adopting the initial Relocation Plan for the Project to facilitate the redevelopment of Jordan Downs Public Housing and the 9901 Alameda Street in multiple phases.

At its meeting in November 2017, the Board approved (Resolution No. 9395) a $760,000 contract with Del Richardson and Associates (“DRA”) for resident relocation services associated with Phase I of the Project.
At its meeting on May 24, 2018, the Board approved (Resolution No. 9438) initiating the first update to the Relocation Plan.

At its meeting on August 26, 2021, the Board approved (Resolution No. 9732) a not-to-exceed contract in the amount of $650,000 with DRA to provide resident relocation planning services associated with Phase II of the Project.

**Issues:**

**Background:** The Housing Authority of the City of Los Angeles (“HACLA” or “Authority”) has invested significant capital and effort to realize the vision of a redeveloped Jordan Downs through a “Build First” model. This strategy for redevelopment and relocation allows the site to be built out in phases without displacing existing households from Jordan Downs. HACLA’s intent is to sequence the delivery of new units with demolition of existing units, so as to avoid the need for temporary relocation. Any demolition of units triggers the requirement to adopt a relocation plan. The initial Jordan Downs Relocation Plan was adopted on December 22, 2016. The Relocation Plan received its first update on May 24, 2018 and this action represents the second update to the Relocation Plan.

As of the date of the Updated Plan, there are 405 occupied public housing units in the undeveloped portion of Jordan Downs, which is referred to as Legacy Jordan Downs. During Phase I of the Project, 187 households were relocated. Of the residents who relocated, most residents (84%) elected to move on-site to a new replacement unit at Jordan Downs, 13% of households elected to take Housing Choice Vouchers (“HCVs”), and 3% elected to transfer to another public housing property. Relocation activities for Phase II of the redevelopment have begun and will include relocating approximately 254 households over approximately two years.

**Inconvenience Award Policy:**

Presented for Board adoption is an Inconvenience Award Policy to be applied in situations where a household must move more than once through no fault of their own to accommodate redevelopment efforts moving forward. This Policy sets forth a uniform process for HACLA to determine the eligibility of an Impacted Family for an Inconvenience Award and disburse an Inconvenience Award to an eligible Impacted Family.

HACLA uses best efforts to apply a “build first” approach to multiphase redevelopment Projects. Under the build first approach, new replacement units at a Project are constructed prior to the demolition of existing occupied public housing units. The objective of the build first approach is to limit, to the extent feasible, the number of times a family is required to move by allowing the family to move directly from an existing unit to a new unit. In practice, the build first model minimizes the
number of families that are moved or relocated multiple times to advance development of a Project.

Despite HACLA’s use of the “build-first” approach, there are circumstances in which a family (an “Impacted Family”) may be required to temporarily relocate on-site or off-site to a unit other than a newly constructed unit at Jordan Downs (a “Temporary Unit”) to allow for phased demolition or for the Project to otherwise proceed. When a New Unit is available, the Impacted Family will then move or relocate an additional time from the Temporary Unit to the New Unit. HACLA recognizes the inconvenience that moving multiple times may cause an Impacted Family. In appreciation of an Impacted Family’s cooperation with and dedication to HACLA’s redevelopment efforts, staff are recommending the Board of Commissioners consider establishing an Inconvenience Award Policy to provide eligible Impacted Families a one-time monetary award. If adopted, this policy will be attached to the Updated Plan and applied to other relocation projects at existing and future redevelopment sites.

In brief, the Policy states that an Impacted Family which temporarily moves or relocates away from an Existing Unit to a Temporary Unit (on-site or off-site) due to any of the following circumstances is eligible for an Inconvenience Award:

- **Early Project Site Clearance.** HACLA requires the Impacted Family to move to a Temporary Unit to demolish the Existing Unit or otherwise permanently vacate the Existing Unit for a Project. The Impacted Family Moves to a Temporary Unit because a New Unit is not available.

- **Offer of a New Unit is Retracted.** HACLA offers and the Impacted Family accepts a New Unit. Prior to the Impacted Family moving to the New Unit, HACLA retracts the New Unit offer because the Impacted Family cannot be accommodated in the New Unit or any other New Unit at the target Project.

- **Extenuating Circumstances.** HACLA requires an Impacted Family to move to a Temporary Unit based on unique and extenuating circumstances that pose significant hardship to an Impacted Family.

An Impacted Family determined eligible under Section III of the policy (see Attachment 6) will receive an Inconvenience Award as a one-time, nonrecurring, lump-sum award of (a) $2,000 for an Impacted Family that is expected to move to a temporary Unit for one year or less or (b) $4,000 for an Impacted Family that is expected to move to a Temporary Unit for more than one year.

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**Summary of Relocation Plan updates:**

{D1215094.DOCX / 1 DC114-106}
Also, presented for Board approval is a further update to the Plan to accommodate various program and phasing changes since the last update in 2018. Specifically, the Updated Plan dated January 2022 encompasses the following:

- Updated Project Phasing plan and site descriptions to reflect the current status of the site development and reconfiguration of some of the future phases.
- Updated Project Funding sources, to reflect the myriad of anticipated funding sources, some of which were not available during the last Relocation Plan update in 2018.
- Updated policies and procedures based on new relocation requirements imposed by the Choice Neighborhood Implementation Grant (“CNI”) awarded to the Project on August 12, 2020.
- Updated general demographic and housing characteristics of the City of Los Angeles and impacted Census tract based on the 2019 Census data.
- Updated assessment of impacted residents and relocation needs.
- Assistance options and an updated housing search regarding availability of housing that will accept HCVs.
- Extended right to return offered to households moving off-site as an Emergency Transfer under Violence Against Women Act (“VAWA”) and all households choosing to take a Section 8 voucher or move to other public housing as their relocation preference. The plan dictates that as long as tenants maintain good-standing, they will have the “right-to-return” as required by both the RAD and CNI programs and are eligible to move into newly constructed replacement housing units at Jordan Downs if there are no remaining households at Legacy Jordan Downs to fill these replacement units.

Community Outreach:

Extensive community outreach occurred in the development of the Relocation Plan in 2016, subsequent update in 2018 and the current Updated Plan in 2022 which is the subject of this report.

In order to prepare the initial Plan, the Authority held six resident meetings on site between March 2016 and July 2016 and interviewed 537 households to discuss the Project plans, relocation process and choices available to the residents. At the 2018 plan update, 203 households were surveyed to update the Plan, HACLA and DRA targeted households that had not responded to the original household surveys in 2016 between March and April 2018. With active relocation on-site in the last couple of years and the institution of the CNI grant, resident interviews take place every year. In these interviews, questions are asked about relocation preferences as well as service needs. The last set of interviews took place between November 2021 and January 2022, reaching 224 households. Additionally, staff
maintains ongoing dialogue with community households in anticipation of eminent relocation. These interviews informed revisions to the Updated Plan.

The draft Updated Plan was translated into Spanish, posted and made available for public comment as of January 27, 2022, on HACLA’s website. Residents are able to review a copy of the Updated Plan at the Jordan Downs Management Office and Jordan Downs WorkSource bungalow located at 10222 Juniper Street. A letter was sent to residents on January 22nd informing them of the availability of the draft for their review and comment. The Updated Plan was presented in detail at the December 17th Jordan Downs RAC meeting where residents had the opportunity to provide feedback. An additional two meetings were held on February 15th, and Feb 17th to further inform residents and gather additional feedback. Availability of the Updated Plan was published for a week in La Opinion and the LA Sentinel. All comments received by February 21st, 2022, and their responses will be incorporated as an exhibit to the final Updated Plan.

All residents were provided with General Information Notices (“GIN”) in 2016 and all new households executing leases are provided with a GIN at the time of lease execution. In addition, all residents have been provided a RAD Resident Information Notice (“RIN”).

The RAD program requires housing authorities to treat existing residents the same for purposes of relocation rights and benefits regardless of whether or not they are designated to move into a RAD or Project Based Voucher unit. The Authority follows this policy, adopted as part of its FY2017 Agency Plan and FY2017 Section 8 Administrative Plan, includes the right to return if a tenant is in good standing, with no rescreening, relocation assistance, and resident choices regarding replacement housing for Jordan Downs Redevelopment.

*Right to Return:*

Residents will not be involuntarily displaced and all residents at Jordan Downs who are in “good standing” under their current leases, that is, the household is not evicted or terminated from housing assistance, will be afforded the right to return. Jordan Downs residents have the following choices: i) move into new units once the new construction is complete or ii) move off-site into another public housing development if an appropriately sized unit is available or iii) move to another residence in a community of their choice with a tenant-based Section 8 voucher under the HCV program.

HACLA will continue to provide counseling through many outlets to help families during the entire relocation process, from initial briefings through the re-occupancy period. A Relocation Consultant is assigned to each household prior to their scheduled relocation and works with each household throughout the relocation process. In addition, during the transition to new housing, case managers assist
families with coordination of services, referrals to community resources as needed, and coordination with the local schools.

Residents receive assistance with their new housing search if they elect to move from the Jordan Downs development via the HCV program. The Relocation Consultant will ensure that residents receive multiple referrals, and at least one referral within a HUD-defined Area of Opportunity. HACLA provides a moving allowance or provides actual movers for the move to a new unit as part of the relocation process.

**Vision Plan:** **PLACE Strategy #1: Stabilize the physical and financial viability of the conventional public housing portfolio.**
The updated relocation plan allows for a fair and equitable plan necessary for the relocation of existing residents in order to demolish and newly construct housing units necessary to stabilize the physical and financial viability of the existing legacy Jordan Downs redevelopment Project.

**Funding:**
The Chief Administrative Officer confirms the following:

*Source of Funds:*
The adoption of the Relocation Plan does not require a funding commitment. When each phase is ready for relocation, the Authority staff will procure relocation assistance services and obtain appropriate authorization for funding needed to carry out those activities at that time.

*Budget and Program Impact:*
It is anticipated that adoption of the Inconvenience Payment Policy will increase the cost of HACLA’s relocation programs at all its redevelopment sites. However, given the limited number of households anticipated to be eligible for the payments and the limited size of payments, the costs can be easily absorbed into the department’s annual budgets.

**Environmental Review:**
Not applicable. No new Environmental Review is necessary for this action.

**Section 3:**
Not applicable for this action. All Jordan Downs redevelopment activities, including implementation of the Updated Plan, shall comply with the Section 3 commitments set forth in that certain Master Development Agreement for the Redevelopment of the Jordan Downs Public Housing Community dated August 1, 2012, as may be amended from time to time.

**Attachments:**
1. Resolution
2. Updated Draft Relocation Plan for Jordan Downs
3. Comments received on the Updated Draft Relocation Plan as of 2/21/2022
4. Draft Inconvenience Award Policy
ATTACHMENT 1

RESOLUTION
RESOLUTION NO. __________

RESOLUTION TO ADOPT AN AUTHORITY RESIDENT RELOCATION INCONVENIENCE AWARD POLICY AND TO APPROVE THE UPDATED RELOCATION PLAN DATED JANUARY 2022 FOR THE JORDAN DOWNS REDEVELOPMENT PROJECT PREPARED IN ACCORDANCE WITH THE REQUIREMENTS OF CALIFORNIA RELOCATION ASSISTANCE LAW, GOVERNMENT CODE SECTION 7260 ET SEQ. (“ACT”) AND THE RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION GUIDELINES ADOPTED BY THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT, TITLE 25, CALIFORNIA CODE OF REGULATIONS, SECTION 6000 ET SEQ. (“GUIDELINES”) AND TO UNDERTAKE VARIOUS ACTIONS IN CONNECTION THERewith

WHEREAS, the Housing Authority of the City of Los Angeles (“Authority”) intends to transform the Jordan Downs public housing community into a mixed-income, mixed-use, environmentally friendly, vibrant urban village, conducive to healthy living and economically progressive conditions;

WHEREAS, the Authority has committed to a “Build First” strategy for redevelopment and relocation, through which the redevelopment of Jordan Downs will proceed in phases, which will allow new construction work to begin without relocating existing households;

WHEREAS, in 2016, the Authority worked with Overland, Pacific & Cutler, Inc. (“OPC”) to prepare a Relocation Plan for the Jordan Downs redevelopment project (“Project”);

WHEREAS, in December 2016 by Resolution No. 9326, the Authority’s Board of Commissioners (“Board”) approved a Relocation Plan for the Project;

WHEREAS, in May 2018 by Resolution No. 9438, the Board approved an updated Plan for the Project;

WHEREAS, between November 2021 and January 2022, additional interviews with residents were conducted to assess their relocation needs, which informed revisions to a further updated Plan (“Updated Plan”);

WHEREAS, the Updated Plan includes updates to the project phasing plan, project funding sources, general demographic and housing characteristics data, updated assessment of impacted residents and relocation needs, extended right to return language, and an inconvenience award policy;

WHEREAS, a draft Updated Plan was made available on January 27, 2022, for public comment, availability of the Updated Plan was published in La Opinion and the LA Sentinel, and a letter was sent to all residents on January 22nd informing them of the availability of the draft for their review and comment, the Authority will take these comments under consideration, and will provide written responses and attach them as an exhibit to the Updated Plan;

WHEREAS, under the Updated Plan, no resident will be involuntarily displaced and all residents at Jordan Downs who are in “good standing” under their current leases, that is, the
household has not been evicted or otherwise terminated from housing assistance, will be afforded the right to return and be eligible to move into a new unit once the new construction has been completed, or provided a choice to move off-site into another public housing development or given a tenant-based Section 8 voucher to move to another community of their choice;

WHEREAS, residents will be provided with many counseling opportunities during the entire relocation process, from initial briefings through the re-occupancy period and a Relocation Consultant will be assigned to each household prior to their scheduled relocation;

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners:

(I) Approves the Updated Plan for the Jordan Downs Redevelopment Project prepared in accordance with the requirements of California Relocation Assistance Law, Government Code Section 7260 et seq. (the "Act") and the Relocation Assistance and Real Property Acquisition Guidelines adopted by the California Department of Housing and Community Development, Title 25, California Code of Regulations, Section 6000 et seq. (the "Guidelines") and in compliance with the federal and state laws applicable to the Project, including, but not limited to HUD Notice H-2019-09 PIH-2019-23 (HA) (September 5, 2019), HUD Notice H-2016-17 PIH-2016-17 (HA) (November 10, 2016), the U.S. Housing Act of 1937, as amended, 24 CFR Part 970, 24 CFR Part 982, 24 CFR Part 983, the Uniform Relocation Assistance and Real Property Acquisition Act (URA), 49 CFR Part 24, Section 104(d) of the Housing and Community Development Act of 1974, as amended, and 24 CFR Part 42 (collectively, “Legal Requirements”), and approves the taking of such other actions by HACLA staff and the execution by the HACLA President and CEO (“CEO”) or the Designated Officers (defined below) if delegated by the CEO, of such other related documents as may be necessary to effectuate the actions described above or as contemplated in this Resolution, subject to review and approval by legal counsel.

(II) Approves and adopts an Inconvenience Award Policy as presented to be applied to all existing and future HACLA redevelopment projects

BE IT FURTHER RESOLVED that the “Designated Officers” of HACLA referred to above are as follows:

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Douglas Guthrie</td>
<td>President and Chief Executive Officer</td>
</tr>
<tr>
<td>Marlene Garza</td>
<td>Chief Administrative Officer</td>
</tr>
<tr>
<td>Jenny Scanlin</td>
<td>Chief Strategic Development Officer</td>
</tr>
<tr>
<td>Margarita Lares</td>
<td>Chief Programs Officer</td>
</tr>
</tbody>
</table>
BE IT FURTHER RESOLVED that this Resolution shall take effect immediately

HOUSING AUTHORITY OF THE
CITY OF LOS ANGELES

By: ___________________________
   Cielo Castro, Chairperson

APPROVED AS TO FORM:

BY: ___________________________
   James Johnson, General Counsel

DATE ADOPTED: __________________
ATTACHMENT 2

UPDATED DRAFT RELOCATION PLAN
JANUARY 2022
JORDAN DOWNS
RELOCATION PLAN
ADDENDUM

Prepared by:
THE HOUSING AUTHORITY OF
THE CITY OF LOS ANGELES

PREPARED
JANUARY 2022
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1. **INTRODUCTION**

The Housing Authority of the City of Los Angeles (HACLA) is in the process of revitalizing the Jordan Downs community, an obsolete 700-unit public housing community located between Grape and Alameda, and 97th and 103rd Streets in the City of Los Angeles. HACLA is developing a newly revitalized mixed-income community with a highly organized recreation and enrichment center that will offer quality education and exceptional training and employment opportunities to support the residents and their families. The revitalized community is expected to house approximately 1,569 units of rental and owner occupied residential units, 120,000+ square feet of retail space, as well as approximately nine acres of open-air green space. HACLA has selected Michaels Development Company and BRIDGE Housing Corporation as its co-developers.

HACLA has committed to a “Build First” strategy for redevelopment and relocation. The redevelopment will proceed in phases which will allow new construction work to begin without impacting existing households. It is the intent to sequence the delivery of new units with the demolition of existing obsolete units, to avoid the need for temporary relocation. HACLA is committed to a sensitive and choice-based relocation process. All applicable relocation options are available to the families at the site, whether they choose to move into a newly constructed unit or take the opportunity to move permanently off-site. The updated current phasing Plan anticipates the ability to manage a build-first approach throughout construction. The updated Project Phasing Plan (see Attachment 1) is now divided into seven phases. This Phasing Plan may change based upon the pattern of building vacancies and tenant absorption. The first phase of construction began in May 2017. As of October 2021, relocation activity has been successfully completed in the Phase 1 areas. As of January 2022, leasing activities are beginning, kicking off new relocation activities for Area H, S2 and S3 over the next few years.

In April 2018, a Relocation Plan (Plan) was prepared to thoroughly describe the relocation program and redevelopment plans at Jordan Downs and to demonstrate how HACLA intends to comply with the regulatory requirements, as well as the spirit and intent of the Uniform Relocation Act. The Project is now underway, and updates to the Plan are required to document the current status of The Project and future progress toward completion. This Addendum to the Relocation Plan (Addendum) has been prepared to provide these needed updates as of January 2022. This Addendum only includes information that has changed from the last update of the Plan.

The updated Project Plan (see Attachment 1) is now divided into seven phases. This phasing Plan may change based upon the pattern of building vacancies and tenant absorption. The first phase of construction began in May 2017, and as of October 2021, relocation activity has been successfully completed in the Phase 1 areas, and occupancy is at capacity. As of January 2022, leasing activities are beginning in Area H, commencing relocation activities for Areas H, S2 and S3.

California Relocation Assistance Law, Government Code Section 7260 et seq. (the "Act") and the Relocation Assistance and Real Property Acquisition Guidelines adopted by the California
Department of Housing and Community Development, Title 25, California Code of Regulations, Section 6000 et seq. (the "Guidelines"). The Plan and this Addendum are intended to comply with the federal and state laws applicable to the Project, including, but not limited to HUD Notice H-2019-09 PIH-2019-23 (HA) (September 5, 2019), HUD Notice H-2016-17 PIH-2016-17 (HA) (November 10, 2016), the U.S. Housing Act of 1937, as amended, 24 CFR Part 970, 24 CFR Part 982, 24 CFR Part 983, the Uniform Relocation Assistance and Real Property Acquisition Act (URA), 49 CFR Part 24, Section 104(d) of the Housing and Community Development Act of 1974, as amended, and 24 CFR Part 42 (collectively, “Legal Requirements”). In the event of a conflict between the Plan and/or this Addendum and any Legal Requirements, the Legal Requirements shall govern.
2. UPDATED PROJECT FUNDING

Funding for the Project has changed, and the programs currently being utilized includes: federal (9% and 4%) and state low-income housing tax credits (LIHTC), tax-exempt bonds, conventional loans, private and public grants including competitive State and Federal grants such as Affordable Housing Sustainable Communities funds (AHSC), Infill Infrastructure Grant (IIG), Multifamily Housing Program funds (MHP), Choice Neighborhood Implementation grants (CNI), Rental Housing Demonstration Program (RAD), and HUD Replacement Housing Factor funds, Public Housing Capital funds, Demolition or Disposition Transitional Funding, and HUD Project-Based Section 8 vouchers (PBV).

On August 12, 2020, HACLA was awarded a 35 Million Dollar CNI Grant. In Compliance with Grant requirements. In addition, HACLA utilizes Section 8 Project Based vouchers available upon the conversion of public housing units at the Project under the Rental Assistance Demonstration (RAD) program.
3. **UPDATED PROJECT PHASING SITE DESCRIPTION**

The site is a 700-unit public housing development located between Grape and Alameda, and 97th and 103rd Streets in the City of Los Angeles (See Figure 1 Updated Project Site Plan). Demolition and redevelopment activity began at the site in 2016, and as of October 2021, 158 Jordan Downs households have moved into the replacement housing units available in Phase 1. Phase 1 involved vacating and demolishing 30 of the original 700 units. Construction is currently underway in Area H, Phase S2, and Phase S3. HACLA has committed to a “Build First” strategy for redevelopment and relocation. The redevelopment will proceed in phases which will allow new construction work to begin without dislocating existing households. The delivery of new units will be sequenced with the demolition of existing obsolete units, to avoid the need for temporary relocation. If a household cannot move to the new phase for some reason, they will be temporarily moved on-site until their unit is ready. All applicable relocation options are available to the families at the site, whether they choose to move into a newly constructed unit or take the opportunity to move permanently off-site.

Further details regarding updated construction phasing are provided in Attachment 1.

*Figure 1 Updated Project Site Plan*
4. UPDATED GENERAL DEMOGRAPHIC AND HOUSING CHARACTERISTICS

Details from the 2020 Census have not been released however, according to the 2019 Census estimates, the population of the City of Los Angeles is 3,966,936, and the population of the impacted Census Tract, Tract 2421 is 2,582 (see Table 1). Corresponding ACS data concerning the housing mix is shown in Table 2. Updated data concerning vacant units for sale or rent is unavailable in the 2019 ACS 5-Year Estimates. Please refer to Table 2 in the Plan for these numbers.

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<tr>
<th>Table 2: Population and Race, 2019 American Community Survey 5-Year Estimates – City of Los Angeles &amp; Impacted Tract</th>
</tr>
</thead>
<tbody>
<tr>
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</tr>
<tr>
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</tr>
<tr>
<td>Total Population</td>
</tr>
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Source: U.S. Census Bureau, 2019 American Community Survey 5-Year Estimates, Table DP05

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<th>Table 3: Housing Units, 2019 American Community Survey 5-Year Estimates – City of Los Angeles &amp; Impacted Tract</th>
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</tr>
<tr>
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<td>Vacant Housing Units</td>
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Source: U.S. Census Bureau, 2019 American Community Survey 5-Year Estimates, Table DP04.
5. UPDATED ASSESSMENT OF IMPACTED RESIDENTS AND RELOCATION NEEDS

a) Survey Method
Information necessary for the preparation of the 2018 Amendment to the Relocation Plan was obtained through personal interviews conducted with the residents of Jordan Downs between Mid-2017 and April 10, 2018, as well as electronic resident data provided by HACLA. During the initial Relocation Plan development, approximately 207 residents were interviewed and at the 2018 update, 309 households were surveyed. With active relocation on-site and the institution of the Choice Neighborhood Implementation Grant, resident interviews take place every year. In these interviews, questions are asked about relocation preferences as well as service needs. The last set of interviews took place between November 2021 and January 2022 touching 294 households. Additionally, staff interview maintains ongoing dialogue with community households in anticipation of eminent relocation. This allows staff to have a clear sense of the needs and preferences of residents. Interviews of residential occupants generated information pertaining to; household size and composition, income, monthly rent obligation, length of occupancy, ethnicity, home language, disabilities/health problems, transportation needs, pets, U.S. residential status. Additionally, general information regarding the resident’s attitudes towards the Jordan Downs community and their desire to either remain within the community or relocate to a different development was shared.

b) Project Survey Data
As of January 2022, there are currently 405 occupied units in the original Jordan Downs site consisting of 1,274 total occupants. Most tenants are currently paying 30% of their gross household monthly income towards rent, with the balance of the rent subsidized, excepting certain mixed families as defined in HACLA’s Admissions and Continued Occupancy Plan

I. Housing Mix
The table below outlines the existing breakdown of units by bedroom size occupied in the original buildings at Jordan Downs. As of the last update to the original Plan, 666 units were occupied. Currently, 405 units are occupied, as relocation activity has commenced and is in process at the site. The unit breakdown of the 405 currently occupied units is shown in the table below.

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<th>Three</th>
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<td># of Units</td>
<td>40</td>
<td>146</td>
<td>186</td>
<td>27</td>
<td>6</td>
<td>405</td>
</tr>
</tbody>
</table>
II. Income
Income information was obtained via household interviews and information provided by HACLA. According to income standards for the County of Los Angeles (Attachment 2) adjusted for family size as published by the Department of Housing and Urban Development (HUD) in April 2021, project household incomes are represented in the table below.

<table>
<thead>
<tr>
<th>Income Level</th>
<th>Extremely Low</th>
<th>Very Low</th>
<th>Low</th>
<th>Above Low</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td># Households</td>
<td>332</td>
<td>28</td>
<td>36</td>
<td>9</td>
<td>405</td>
</tr>
</tbody>
</table>

III. Ethnicity/Language
Ethnicity and preferred language reported amongst the households interviewed and data provided by HACLA is summarized in Table 5: Ethnicity and Table 6: Language. The majority of the residents within Jordan Downs Public Housing community are Hispanic/Latino. The balance of the population is comprised of two other distinct ethnic groups the larger is African American and the “other’ consists of Asian American.

<table>
<thead>
<tr>
<th>Table 5: Ethnicity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Hispanic / Latino</td>
</tr>
<tr>
<td>Tenants</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Table 6: Language</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preferred Language</td>
</tr>
<tr>
<td>Households</td>
</tr>
</tbody>
</table>

All required notices and assistance will be provided in the language understood by the household or translation services will be provided by HACLA.

IV. Senior/Handicapped Households
Based on the 309 interviews conducted between June 2018 and December 2021 and data provided by HACLA, there are 71 remaining known senior households (head of household or spouse 62 years or older) and 99 remaining households that have a member with physical and/or psychological disabilities that need to be considered in the relocation process. Care will be taken to meet the special needs of each household, particularly as these needs may involve physical access to accommodations. HACLA will take into consideration the number of replacement units needed to house all families with
approved Reasonable Accommodations. In all cases involving physical or mental impairments, extra efforts will be made to provide close individual case management and monitoring.

In addition, HACLA will:

• Ensure that persons with hearing, vision, speech, manual, and other communication-related disabilities can obtain information concerning the Relocation Plan and implementation;

• Provide appropriate auxiliary aids, where necessary, to afford an individual with a disability an equal opportunity to participate in, and benefit from, the Relocation Plan and implementation;

• Provide forms, notices, and other information in alternative formats, as requested for individuals who are blind, have low vision, or have cognitive disabilities for all print materials distributed, posted, or made available to residents concerning the Relocation Plan and its implementation

• Provide the phone numbers for accessing the Telecommunication Device for the Deaf (TDD) or the California Relay Service.

6. RELOCATION PROGRAM UPDATES

a) Assistance Options and Updated Housing Search

As previously noted, HACLA has designed the Phasing Plan for the Jordan Downs redevelopment to keep existing residents on-site during the rebuilding process. HACLA’s “build-first” Plan intends to move families on-site only once – from the old unit to the newly constructed unit. However, circumstances may arise that would require households who wish to remain at Jordan Downs to move on-site twice. Households are being offered advisory, housing, and moving assistance to prevent the households from incurring out-of-pocket expenses related to the relocation. At the beginning of the redevelopment effort, HACLA made a commitment to the residents of Jordan Downs. This policy dictates that as long as tenants maintain good-standing, they will have the “right-to-return” and are eligible to move into the newly constructed units at Jordan Downs once complete (see Attachment 4). In addition, HACLA is participating in two HUD programs RAD and CNI that provide residents with the “right-to-return.” See Attachment 5 for more details on the “right to return” under those programs.

The Relocation Program outlined in the original Plan is currently being implemented at Jordan Downs. This Plan adheres to the requirements of the URA, HUD Handbook 1378, CRAL, Title 25, and RAD Guidelines. Further details regarding the assistance being offered are available in the original Plan on the HACLA website.
Due to the interplay between the RAD Program, the CNI Program, and HUD rules concerning public housing demolition, the Relocation Program for Phase S2 and future Phases utilizing CNI funds is governed by and conforms with the requirements of Section 18 of the Housing Act of 1937, as amended, and in accordance with 24 CFR Part 970 (“HUD Demolition Relocation Requirements”), and [California Government Code 7260, and Title 25 of the California Code of Regulation.] More information on HUD Disposition Relocation Requirements see Attachment 7.

As new units come online all households in the next affected demolition footprint are offered three options for replacement housing:

- A newly constructed replacement unit at Jordan Downs
- Transfer to another HACLA public housing property
- A Section 8 Housing Choice Voucher (HCV)

Of the residents who moved, most residents (85%) have elected to move on-site to a new replacement unit at Jordan Downs, approximately 11% of households have elected to take HCVs and 4% have elected to transfer to another public housing property. HACLA has been providing households with counseling and assistance throughout the process through various outlets, including Relocation Consultants, HACLA case managers, on-site service providers, and other community resources. Households electing to relocate off-site have been receiving assistance from a relocation consultant with their housing search through referrals, transportation assistance, and assistance with other steps in the HCV process. If households are unable to locate units using their HCV, HACLA allows the household to re-select another housing option.

An updated housing search for locations that will accept an HCV has been completed as of January 2022. The results of this housing search are detailed below in Table 7: Available Section 8 Listings. Listings were identified in Los Angeles and surrounding communities including Bell Gardens, Bellflower, Compton, Downey, Hawthorne, Inglewood, Long Beach, Lynwood, Paramount, San Gabriel, Santa Fe Springs, Southgate, and Torrance. Of the 114 total units identified, 63 are located in Los Angeles. For the units located in Los Angeles, median rent for the studio is $1,642, $1,757 for a one-bedroom, $2,053 for a two-bedroom, $2,749 for a three-bedroom, and $3,078 for a four bedroom. Table 7 reflects currently available units. While they might not be available at the time of displacement, they reflect section 8 availability in the surrounding area and is an indicator of housing availability to HCV holders in the future.

<table>
<thead>
<tr>
<th>Unit Size</th>
<th>Number of Units</th>
<th>Rent Minimum</th>
<th>Rent Maximum</th>
<th>Median Rent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>1</td>
<td>$1,642.00</td>
<td>$1,642.00</td>
<td>$1,642.00</td>
</tr>
<tr>
<td>1 BR</td>
<td>23</td>
<td>$1,150.00</td>
<td>$1,926.00</td>
<td>$1,650.00</td>
</tr>
<tr>
<td>2 BR</td>
<td>52</td>
<td>$1,600.00</td>
<td>$2,700.00</td>
<td>$2,000.00</td>
</tr>
<tr>
<td>3 BR</td>
<td>24</td>
<td>$1,895.00</td>
<td>$2,962.00</td>
<td>$2,707.00</td>
</tr>
<tr>
<td>4 BR</td>
<td>14</td>
<td>$2,600.00</td>
<td>$3,226.00</td>
<td>$3,199.50</td>
</tr>
</tbody>
</table>

Table 7: Available Section 8 Listings
HACLA has been offering units to households and as much as possible, giving them choice in the unit they ultimately accept to move to. Individual household circumstances are considered on a case-by-case basis to identify the unit that best suits the family’s needs with respect to income, family size, and program preferences.

Despite HACLA’s use of the “build-first” approach, there are circumstances in which a family (an “Impacted Family”) may be required to temporarily relocate on-site or off-site to a unit other than a newly constructed unit at Jordan Downs (a “Temporary Unit”) to allow for phased demolition or the Project to otherwise proceed. When a New Unit is available, the Impacted Family will move or relocate an additional time from the Temporary Unit to the new unit. HACLA recognizes the inconvenience that moving multiple times may cause an Impacted Family. In appreciation of an Impacted Family’s cooperation with and dedication to HACLA’s redevelopment efforts, HACLA has established an Inconvenience Award Policy (the “Inconvenience Policy”) to provide eligible Impacted Families a one-time monetary award (an “Inconvenience Award”). The Inconvenience Policy sets forth a uniform process for HACLA to determine the eligibility of an Impacted Family for an Inconvenience Award and distribute an Inconvenience Award to an eligible Impacted Family. The full policy can be found in Attachment 6.

b) Resident and Community Engagement

As part of the CNI Grant that The Project is receiving, HACLA is partnering with the City of Los Angeles, City of Los Angeles Mayor’s Office of Economic Opportunity, Jordan Downs Community Partners, LLC (a joint venture of The Michaels Development Company and BRIDGE Housing Corporation), and Children’s Institute, Inc., along with other neighborhood organizations participating in the Watts Rising Collaborative. The HACLA relocation team has partnered with residents and community coaches to provide a transparent relocation assistance program that is based on a design-build concept of “People first, process second.” The relocation office is located on-site and has drop-in hours in addition to regularly scheduled work hours.

Counseling and support will be provided to residents before and up to three years after relocation to ensure that all residents can maintain lease compliance to retain eligibility and transition back to the neighborhood easily. In addition, there will be collaboration with property management to ensure that case management support is offered to residents to avoid eviction.

The relocation team has participated in community events, such as holiday giveaways, back-to-school events, and educational events. As part of this ongoing partnership, the relocation team is part of a network of social service providers that meet bi-monthly to discuss cases at Jordan Downs that have special needs, lack resources, or have parenting and/or mental health challenges. DRA provides trauma-informed services, so that the approach to relocation is based on the person’s level of understanding, avoiding personal triggers as they navigate residents through the relocation process.

The relocation program has facilitated several workshops on the following topics:
• Relocation benefits and relocation processes
• Meets and greets with landlords
• Move Preparation
• Housing Search Assistance

The Relocation Team presented the current Plan and explained that updates to the Plan are required at this time due to new funding sources and changes in the phasing plan and construction schedule. It was explained to the residents that this update to the Relocation Plan would be a separate document (Addendum) only including changes since the writing of the current Plan. The Addendum will be made available for public comment and a community meeting will be held to review the changes to the Plan.

7. RELOCATION SCHEDULE
The relocation schedule is designed to minimize the impact on residents while being governed by the redevelopment construction timelines. Following receipt of all necessary HUD approvals, all households will receive notices on a rolling basis as determined by when their units are scheduled to be demolished or when new units become available for occupancy within the Phasing Plan. All relocation for Phases 1A and 1B was complete as of October 2021, and initial resident relocation work has begun for Area H which is expected to be fully occupied by May 2022. (See Attachment 1).

The Project is expected to take approximately six years from 2022 to complete.

Although only 37% of the replacement units will be RAD units, all Project households have received a RAD Relocation Notice and at least 90 days written notice to vacate per RAD and URA requirements. The proposed redevelopment is both a RAD conversion, CNI conversion and a Section 18 disposition, therefore HACLA has adopted the policy of following the RAD and CNI guidelines and providing relocation assistance as required to all Project occupants.
8. **EXTENDED RIGHT TO RETURN- VAWA AND OTHER OFF-SITE TRANSFERS**

Residents that move off-site upon selection of the HACLA relocation option of either moving to another public housing site or taking a Sec 8 HCV shall be extended the right-to-return to the newly developed site. In addition, residents that transfer due to a Violence Against Women Act (VAWA) approved request or other emergency transfer, as determined by HACLA, shall be extended the right to return to the newly developed site. To date, VAWA transfers have impacted ten households previously living at Jordan Downs. (See Attachment 5 - Right to Return Policies of the RAD and CNI)

If multiple residents have transferred off-site: Then priority of units will be first to VAWA transfers and then based on the earliest date of occupancy for their prior unit at the redeveloped site.

If a resident was transferred due to a fear for their health and safety, such as VAWA, the resident must show and/or attest to the fact that the issue has been resolved and the situation no longer is deemed a threat to the well-being of the resident or other members of the household if the resident returns to the Jordan Downs community. Relocation benefits, such as moving expenses back to the redeveloped site, and utility reconnection fees, will be paid from the Relocation benefits for residents returning to the redeveloped site.

9. **COVID-19 PROTOCOLS**

The Relocation Consultant has developed a comprehensive Plan to relocate residents that has been reviewed and approved by Colden Corporation. Colden is a team of Certified Industrial Hygienists, Certified Safety Professionals, Certified Professional Environmental Auditors, and doctoral-trained environmental and occupational health scientists highly trained in the latest techniques, procedures, and laws to help ensure a safe and healthy workplace. Due to current concerns regarding COVID-19 the following protocols will be taken to minimize risk and exposure at Jordan Downs during the renovations:

1. DRA staff and all on-site property management and ownership staff will always wear Personal Protective Equipment (PPE) while at Jordan Downs. They will minimize close and face to face interactions by using large meeting spaces, meeting in outdoor spaces and meet via phone/internet.

2. During any agency provided moves, residents will be required to wear a face covering and keep at least six feet of distance between themselves and movers. DRA may set up a day space they can relax in during the move to maintain safe distance during the move.

3. Self-certification forms may be required and used by contractors and other vendors on-site.
As the CDC, state and local officials release additional guidance, the Jordan Downs team will monitor and adjust this Plan accordingly. Residents will be provided with information about these protocols prior to their relocation.

10. SUMMARY

This Addendum will be made available to each household and the public for the mandatory thirty (30) day review period. Comments to this Addendum will be included as an attachment prior to submission to the HACLA Board of Commissioners for its review and approval. A copy of the approved Plan will be forwarded to the California Department of Housing and Community Development (HCD).

HACLA is in the process of revitalizing the aging Jordan Downs development via the new construction of sustainable subsidized housing units within an expanded existing Project site. A variety of funding sources, including CNI and the RAD program, will be utilized to convert the public housing units to a mixed-finance housing development.

HACLA and its co-developers have adopted a build-first program, which is intended to minimize the need for existing Project residents to relocate temporarily. Residents will, to the extent feasible, move one time into a newly constructed Project unit, or they may choose to move off-site into another public housing development or via a tenant-based Section 8 voucher (HCV) to another community of their choice. Moving assistance and advisory services will be provided to all Project occupants.

All relocation noticing and relocation activities will be conducted in compliance with Legal Requirements. A qualified relocation consultant will be hired to provide relocation assistance services to The Project residents via the relocation program and The Plan described herein.

Residents who are relocated under temporary, extended temporary or voluntary permanent relocation, because of the rehabilitation shall be relocated to other decent, safe, sanitary, and affordable housing (at rents no higher than permitted under the Act). While most households are being moved only one time, in some cases, temporary relocations may occur if a household wishes to move into a newly constructed unit at Jordan Downs and one is not yet available (See Attachment 8). Such relocations must be conducted on a non-discriminatory basis without regard to race, color, religion, creed, national origin, handicap, age, familial status, sex, sexual preference, sexual orientation, or gender identity and in compliance with Federal, State and Local laws.
ATTACHMENT 1 – UPDATED REDEVELOPMENT PHASING PLAN
Illustrative Site Plan: 1,569 Units Full Build-out

The overall number of units shall be 1,569 replacing 700 existing public housing units while respecting the scale and character of the surrounding neighborhoods.
PHASE 7: S8+SO2, HO2

UNIT COUNT
NEW CONSTRUCTION THIS PHASE 190 HO2, S8, SO2
CUMULATIVE TOTAL (NEW) 1569
UNITS VACATED AND DEMOLISHED 0
CUMULATIVE TOTAL (DEMO) 700
Attachment 2 – HUD Income Limits

2021 HUD Income Limits
Los Angeles County

The following figures are approved by the U. S. Department of Housing and Urban Development (HUD) for use in the County of Los Angeles to define and determine housing eligibility by income level.

<table>
<thead>
<tr>
<th>Family Size</th>
<th>Extremely Low</th>
<th>Very Low</th>
<th>Low</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Person</td>
<td>24,850</td>
<td>41,400</td>
<td>66,250</td>
</tr>
<tr>
<td>2 Person</td>
<td>28,400</td>
<td>47,300</td>
<td>75,700</td>
</tr>
<tr>
<td>3 Person</td>
<td>31,950</td>
<td>53,200</td>
<td>85,150</td>
</tr>
<tr>
<td>4 Person</td>
<td>35,450</td>
<td>59,100</td>
<td>94,600</td>
</tr>
<tr>
<td>5 Person</td>
<td>38,300</td>
<td>63,850</td>
<td>102,200</td>
</tr>
<tr>
<td>6 Person</td>
<td>41,150</td>
<td>68,600</td>
<td>109,750</td>
</tr>
<tr>
<td>7 Person</td>
<td>44,000</td>
<td>73,300</td>
<td>117,350</td>
</tr>
<tr>
<td>8 Person</td>
<td>46,800</td>
<td>78,050</td>
<td>124,900</td>
</tr>
</tbody>
</table>

Figures are per the U.S. Department of Housing and Urban Development (HUD), updated in April 2021.
ATTACHMENT 3 – SAMPLE RIGHT TO RETURN CERTIFICATE
Attachment 4 – Sample Right of Return Certificate

```
Declaration of Right to Retain Tenancy

GRANTED THIS DAY, AUGUST 15, 2016, THE HOUSING AUTHORITY OF THE CITY OF LOS ANGELES DECLARES YOUR HOUSEHOLD IS ELIGIBLE TO RETURN TO THE NEWLY REDEVELOPED JORDAN DOWNS.

HEAD OF HOUSEHOLD:

• This certificate provides your household the right to a new unit in the redeveloped Jordan Downs with the number of bedrooms you are eligible for at the time of move-in and your payment toward rent will continue to be based on 30% of your adjusted income.
• The right is retained as long as your household is not evicted or terminated from housing assistance.
• The right is transferable only through a HACLA-approved change in the head of household.
• This right means that you will not be “re-screened” for any reason as a condition to your return, although you may be requested to update your income information for record-keeping purposes.
• The right will apply to the rental housing developed by the Master Developer and its affiliates under its Master Development Agreement for Jordan Downs.
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Attachment 4 - Right to Return Policies of the RAD and CNI Program
Attachment 4
Right to Return Policies of the RAD and CNI Program

Phases 1A, 1B, and S3 and Area H were redeveloped using the RAD Program, which provides as follows:

The Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions, Notice H 2016-17 PIH 2016-17 (HA) issued and effective on November 15, 2016, and Rental Assistance Demonstration – Final Implementation, Revision 4, Notice H-2019-09 PIH-2019-23 (HA) issued September 5, 2019, govern RAD right to return requirements.

Resident households may not be denied relocation housing or the right to return based on rescreening, income eligibility, or income targeting. PHAs may only offer housing options with screening, income eligibility or income targeting requirements if the impacted residents meet the admission and occupancy policies applicable to such housing. However, whether or not in a temporary relocation situation, the household remains subject to the applicable program policies regarding continued occupancy of an assisted unit by a resident of the unit.

Any resident that may need to be temporarily relocated to facilitate rehabilitation or construction has a right to return to an assisted unit at the project once rehabilitation or construction is completed. Permanent involuntary displacement of residents may not occur as a result of a project’s conversion of assistance, including, but not limited to, as a result of a change in bedroom distribution, a de minimis reduction of units, the reconfiguration of efficiency apartments, or the repurposing of dwelling units in order to facilitate social service delivery. Residents will have the right to reside in an assisted unit at the site once rehabilitation or construction is complete.

Phase S2 and future Phases will be redeveloped using the funding available under a HUD Choice Neighborhood Implementation (CNI) Grant Agreement. CNI provides as follows:

Each existing Jordan Downs household who moves off-site and wishes to return to the on-site replacement housing may return if the household was lease-compliant at the time of off-site relocation and remained lease-compliant throughout the relocation period. A returning household shall be provided a preference for occupancy of on-site replacement units before such units are made available to any other eligible households (the “Return Preference”). Such returning household also has the option to forgo an on-site replacement unit and may retain tenant-based housing choice voucher assistance (HCV), subject to federal appropriations. The Return Preference applies to residents that were relocated due to the redevelopment activity and remains available until the initial lease-up of the new units. Moreover, the Return Preference is retained even if the resident has previously received permanent relocation benefits.

Households that voluntarily move off-site prior to HACLA-required relocation do not have the Return Preference. In other words, if a household vacates their unit for reasons not related to the redevelopment (for example to live closer to work) before HACLA has issued a notice to vacate (typically a 30 day or 90 day notice), such household does not retain the Return Preference. If a household is “rightsized” (e.g. splits into two separate households) through the relocation resulting from a CNI redevelopment the original head of household will have the Return Preference. Once
all of the original heads of household have been housed, HACLA will offer the second household initial occupancy of any replacement unit that may be available. If no units are available, then the second household will be moved to the top of the waiting list. Both the original household and the second household are required to be lease-compliant at the time of relocation and throughout relocation period.
CHAPTER 201:11 **

VIOLENCE AGAINST WOMEN ACT PROCEDURES

The Violence Against Women Act (VAWA) prohibits denying admission, denying assistance, terminating participation, or evicting on the basis or as a direct result of the fact that an applicant or resident is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or resident otherwise qualifies for admission, assistance, participation, or occupancy.

VAWA also protects residents against denial of tenancy or occupancy rights solely on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking if the criminal activity is engaged in by a member of the household, any guest, or other person under the control of the resident and the resident or an affiliated individual of the resident is the victim or threatened victim.

Lastly, an incident of actual or threatened domestic violence, dating violence, sexual assault, or stalking shall not be construed as a serious or repeated violation of the lease or good cause for terminating the assistance, tenancy, or occupancy of the victim or threatened victim of such incident.

I. DEFINITIONS

A. Domestic violence: Felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction. The term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by:

1. The length of the relationship.
2. The type of the relationship.
3. The frequency of interaction between the persons involved in the relationship.

B. Dating violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim and where the existence of such a relationship shall be determined based on a consideration of the following factors:

1. The length of the relationship.
2. The type of relationship.
3. The frequency of interaction between the persons involved in the relationship.
CHAPTER 201:11 **

VIOLENCE AGAINST WOMEN ACT PROCEDURES

C. Sexual assault: Any nonconsensual sexual act prescribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.

D. Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

1. Fear for the person’s individual safety or the safety of others; or

2. Suffer substantial emotional distress.

E. Affiliated individual: With respect to an individual, means:

1. A spouse, parent, brother, sister, or child of that individual, or a person to whom that individual stands in the place of a parent or guardian (for example, the affiliated individual is a person in the care, custody, or control of that individual); or

2. Any individual, tenant, or lawful occupant living in the household of that individual.

II. NOTIFYING APPLICANTS AND RESIDENTS OF THEIR VAWA RIGHTS

A. HACLA must provide to all applicants and residents the Notice of Occupancy Rights under the Violence Against Women Act (form VAWA-100) and the certification form Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation (form HUD-5382) during the following times:

1. At the time an applicant is denied assistance or admission.

2. At the time the applicant is provided assistance or is admitted to the program.

3. With any initial notification of eviction or notification of termination of assistance.

4. During a 12-month period following the implementation of this requirement, at the time of the annual reexamination or lease renewal.

B. HACLA staff must also provide forms VAWA-100 and HUD-5382 to its applicants and participants at other pertinent times (e.g. when victimization is reported).

C. The following documents must be available at the Management Office for public review:

1. Federal Register — Violence Against Women Reauthorization Act of 2013: Implementation in HUD Housing Programs

2. Notice of Occupancy Rights under the Violence Against Women Act (VAWA-100)

3. Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation (HUD-5382)
CHAPTER 201:11 **

VIOLANCE AGAINST WOMEN ACT PROCEDURES

4. Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (VAWA-200)

5. Local Organizations Offering Assistance to Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (VAWA-300)

III. PROTECTIONS AGAINST ADVERSE ACTIONS

A. An applicant for assistance or resident assisted may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the housing on the basis or as a direct result of the fact that the applicant or resident is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or resident otherwise qualifies for admission, assistance, participation, or occupancy.

B. An applicant or resident can document that they are a victim of domestic violence, dating violence, sexual assault, or stalking and therefore eligible for VAWA protections by providing HACLA one of the following forms of documentation. The applicant or resident decides which of the following to provide.

1. A complete Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation (HUD-5382)

2. A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders.

3. A statement from an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, "professional") from whom the applicant/resident sought assistance in addressing domestic violence, dating violence, sexual assault, stalking, or the effects of abuse. The statement must be signed by the applicant/resident and the professional must also sign it attesting under penalty of perjury that he or she believes that the incident(s) of domestic violence, dating violence, sexual assault, or stalking occurred and is/are grounds for protections.

C. Staff cannot require the victim to provide police reports, restraining orders, or similar documentation.

D. If the resident requests VAWA protections but does not provide one of the forms of documentation listed above, staff must request the documentation in writing using form Request for Documentation to Determine Eligibility for Protections under the Violence Against Women Act (form VAWA-400). The resident has 14 business days from the date of the request to submit the documentation.

E. The only time staff may require third party documentation is if the information provided contains conflicting information or if staff has information that contradicts the claim. Only
CHAPTER 201:11 **

VIOLENCE AGAINST WOMEN ACT PROCEDURES

then may the Site Manager require the resident to provide third party documentation as described under number (B)(2) or (B)(3) above.

F. The request for third party documentation must be made in writing by HACLA using form VAWA-400 and must allow 30 calendar days from the date of the request.

G. In addition to documenting that an incident occurred and the eligibility for protections, residents seeking protections must also provide enough information for staff to determine whether or not the adverse action is “on the basis” or as a “direct result” of the domestic violence, dating violence, sexual assault, or stalking.

H. HACLA staff must consider the resident’s statement(s) as well as any supporting documentation if available to make an objective and reasonable determination, based on all the circumstances, to conclude whether the adverse action is “on the basis” or as a “direct result” of the fact that resident or applicant is a victim.

I. If further information is needed to make the determination, staff may request additional documentation from the applicant or resident in writing using form VAWA-400. However, any request for additional documentation must:

1. Be in accordance with HACLA’s policies and practices regarding the collection of sensitive information.

2. Not require evidence of the incident of domestic violence, dating violence, sexual assault, or stalking.

3. Not violate confidentiality requirements or any other laws.

J. The resident has 14 business days from the date of the request to provide the supporting documentation.

IV. LIMITATION OF VAWA PROTECTIONS

A. VAWA regulations do not supersede any obligation HACLA may have under a court order with respect to the distribution or possession of property among members of the household or the rights of access or control of property, including civil protection orders issued to protect victims of domestic violence, dating violence, sexual assault, or stalking.

B. VAWA regulations do not limit any available authority HACLA has to evict or terminate assistance for any violation not premised on an act of domestic violence, dating violence, sexual assault, or stalking against the resident or an affiliated person of the resident, as long as HACLA does not subject that individual to a more demanding standard than other residents in determining whether to evict or terminate.

C. HACLA is not required to provide VAWA protections if HACLA can demonstrate an actual and imminent threat to other residents, employees, or those providing services to the property if the resident or lawful occupant is not evicted or terminated from
VIOLENCE AGAINST WOMEN ACT PROCEDURES

assistance. HACLA must also demonstrate that there is no other action it can take to reduce or eliminate the threat.

V. VAWA EMERGENCY TRANSFERS

A. Residents who are victims of domestic violence, dating violence, sexual assault, or stalking are eligible for emergency transfers if they meet the following requirements:

1. The resident requesting the transfer is eligible and documents eligibility for VAWA core protections as described above.

2. The resident expressively requests the transfer.

3. The resident reasonably believes there is a threat of imminent harm from further violence if the resident were to remain in the same dwelling unit.

4. Victims of sexual assault also qualify for an emergency transfer (even if a threat of further violence does not exist) if the sexual assault occurred on the premises during the 90-calendar day period preceding the resident’s request for the transfer.

B. The Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (form VAWA-200) explains the resident’s right to an emergency transfer under VAWA and must be provided to victims of domestic violence, dating violence, sexual assault, or stalking when a transfer is requested. Furthermore, this form must be made available upon request.

C. Residents seeking emergency transfers under VAWA must complete form Emergency Transfer Request due to Domestic Violence, Dating Violence, Sexual Assault, or Stalking (form HS-ETR-VAWA). With this form, the resident will certify that they meet the requirements listed above.

D. All emergency transfers must be done in accordance with Section VIII of the Admission and Continued Occupancy Policy (ACOP), the Emergency Transfer Request Procedures (Exhibit 201:1J), and all instructions provided via interoffice memorandum from the Director of Housing Services.

VI. ACTING ON A REQUEST FOR VAWA PROTECTIONS

A. Each request for VAWA protections will be reviewed on a case by case basis.

B. Upon request for VAWA protections the Site Manager is to:

1. If the request is for an emergency transfer, the procedures in section V above must be followed.

2. If the request is for something other than an emergency transfer (such as protections against an adverse action), upon receipt of all information and necessary documentation:
VIOLENCE AGAINST WOMEN ACT PROCEDURES

a. Scan an e-mail all pertinent documents to the Director of Housing Services, appropriate Assistant Director, and other administrative personnel as designated by any additional internal directive.

b. Prior to forwarding documentation to Housing Services Administration, all documents in languages other than English must be translated.

C. Any interactions with residents regarding VAWA protections must adhere to HACLA’s Limited English Proficiency Policy (LEP) (Chapter 121:1).

D. Staff is to obtain from residents seeking protections, a phone number or e-mail address for secure communication.

E. When leaving messages or sending e-mails, even to a secured number or e-mail address, staff must not make any reference to VAWA key words or specifics of the case.

F. Staff is to provide adequate notes/memos within the business system to record basic facts of any request for VAWA protections and actions taken.

VII. CONFIDENTIALITY

A. Any information submitted to HACLA including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, or stalking shall be maintained in strict confidence.

B. Access to this information shall be limited to individuals involved in processing the request or to individuals who need access to the information under applicable Federal, State, or local law.

C. The covered housing provider shall not enter confidential information into any shared database (other than HACLA’s internal business system) or disclose such information to any other entity or individual, except to the extent that the disclosure is:

1. Requested or consented to in writing by the individual in a time limited release.

2. Required for use in an eviction proceeding or hearing regarding termination of assistance.

3. Otherwise required by applicable law.
ATTACHMENT 6 – INCONVENIENCE AWARD POLICY
I. Background

The Housing Authority of the City of Los Angeles’ (“HACLA”) mission is, in part, to preserve, enhance, and expand deeply affordable housing. In support of this mission, HACLA is redeveloping various public housing projects in Los Angeles, California in multiple phases (each, a “Project”). Projects may be redeveloped utilizing federal preservation and repositioning programs, including, but not limited to, the United States Department of Housing and Urban Development (“HUD”) Rental Assistance Demonstration (“RAD”) program, demolition and disposition under Section 18 of the U.S. Housing Act of 1937, as amended, the Section 8 Project-Based Voucher program and funding available under the Choice Neighborhoods Implementation grant program. Projects may also receive funding under other federal, state and local programs such as the low-income housing tax credit program and State of California Department of Housing and Community Development grant and/or loan programs.

HACLA uses best efforts to apply a “build first” approach to multiphase redevelopment Projects. Under the build first approach, new replacement units at a Project (each, a “New Unit”) are constructed prior to the demolition of existing occupied public housing units (each, an “Existing Unit”). The objective of the build first approach is to limit, to the extent feasible, the number of times a family is required to move by allowing the family to move directly from an Existing Unit to a New Unit. In practice, the build first model minimizes the number of families that are moved or relocated multiple times to advance development of a Project.

Despite Hackle’s use of the build first approach, there are circumstances when an existing family may be required to temporarily move or relocate on-site or off-site (each, an “Impacted Family”) to a unit other than a New Unit (each, a “Temporary Unit”) to allow for Project-site demolition or a Project to otherwise proceed. When a New Unit is available, the Impacted Family will move or relocate an additional time from the Temporary Unit to the New Unit. HACLA recognizes the inconvenience that moving multiple times may cause an Impacted Family. In appreciation of an Impacted Family’s cooperation with and dedication to HACLA’s redevelopment efforts, HACLA is establishing this Inconvenience Award Policy (this “Policy”) to provide eligible Impacted Families a one-time monetary award (an “Inconvenience Award”). This Policy sets forth a uniform process for HACLA to determine the eligibility of an Impacted Family for an Inconvenience Award and distribute an Inconvenience Award to an eligible Impacted Family.

II. Compliance with Legal Requirements

This Policy is intended to comply with the federal and state laws applicable to each Project, including, but not limited to, the HUD Notice H-2019-09 PIH-2019-23 (HA) (September 5, 2019), HUD Notice H-2016-17 PIH-2016-17 (HA) (November 10, 2016), U.S. Housing Act of 1937, as amended, 24 CFR Part 970, 24 CFR Part 982, 24 CFR Part 983, the Uniform Relocation Assistance and Real Property Acquisition Act (URA), 49 CFR Part 24, Section 104(d) of the Housing and Community Development Act of 1974, as amended, and 24 CFR
Part 42 (collectively, “Legal Requirements”). In the event of a conflict between this Policy and any Legal Requirements, the Legal Requirements shall govern.

III. Impacted Family Eligibility

An Impacted Family that temporarily moves or relocates away from an Existing Unit to a Temporary Unit (on-site or off-site) due to any of the following circumstances is eligible for an Inconvenience Award:

**Early Project Site Clearance.** HACLA requires the Impacted Family to move to a Temporary Unit to demolish the Existing Unit or otherwise permanently vacate the Existing Unit for a Project. The Impacted Family Moves to a Temporary Unit because a New Unit is not available.

**Offer of a New Unit is Retracted.** HACLA offers and the Impacted Family accepts a New Unit. Prior to the Impacted Family moving to the New Unit, HACLA retracts the New Unit offer because the Impacted Family cannot be accommodated in the New Unit or any other New Unit at the target Project.

**Extenuating Circumstances.** HACLA requires an Impacted Family to move to a Temporary Unit based on unique and extenuating circumstances that pose significant hardship to an Impacted Family.

An Impacted Family is explicitly not eligible for an Inconvenience Award in the following circumstances:

**Electing to Change type of Housing Option.** When feasible and in accordance with the Legal Requirements, HACLA offers each family residing in an Existing Unit replacement housing options which may include a New Unit, a Section 8 Housing Choice Voucher (“HCV”) or an alternate public housing unit (each, a “Housing Option”). If an Impacted Family selects a Housing Option in writing and later requests an alternate Housing Option, which HACLA in its discretion determines to allow and that alternate Housing Option cannot be immediately accommodated resulting in the Impacted Family’s move to a Temporary Unit. For Example, an Impacted Family selects an HCV as its Housing Option but is unable to rent a unit in the private market, and subsequently requests an accommodation to change their Housing Option to a New Unit that is no longer available.

**Refusal to Move.** The Impacted Family meets the occupancy requirements for a New Unit offered by HACLA as a Housing Option. The Impacted Family refuses to communicate its selection of a Housing Option to HACLA in a timely fashion. Due to the delay, HACLA offers the New Unit to another family to meet Project requirements and the Impacted Family can no longer be accommodated in the New Unit or another New Unit in The Project.

**Delayed Move with Alternate Housing Option.** The Impacted Family selects a public housing unit or HCV as its Housing Option, and such selection is accepted by HACLA. Subsequently, the Impacted Family’s move to this alternate Housing Option is delayed and the Impacted Family is required to vacate the Existing Unit. The Impacted Family moves to a Temporary Unit until it moves to the alternate housing.
**Household Resizing.** The Impacted Family selects a New Unit as its Housing Option. HACLA offers the Impacted Family a New Unit based on the household size and applicable occupancy standards. The Impacted Family subsequently submits a request to add a household member(s), other than additions by marriage, birth, foster care or as a reasonable accommodation, and HACLA agrees to accommodate the increased household size. The Impacted Family no longer meets the occupancy standard for the New Unit. The Impacted Family is, therefore, ineligible for the New Unit and is required to move to a Temporary Unit.

The eligibility of an Impacted Family will be determined on a nondiscriminatory basis, without regard to race, color, religion, creed, national origin, handicap, age, familial status, or gender, and in compliance with the Legal Requirements. An Impacted Family’s New Unit and/or Temporary Unit bedroom size will be determined by the Impacted Family’s household composition on the date the Impacted Family submits an executed Housing Option selection to HACLA.

**IV. Inconvenience Award**

HACLA may, subject to the Legal Requirements, offer each Impacted Family determined eligible under Section III an Inconvenience Award as a one-time, nonrecurring, lump-sum award of (a) $2,000 for an Impacted Family that is expected to move to a Temporary Unit for one year or less or (b) $4,000 for an Impacted Family that is expected to move to a Temporary Unit for more than one year. The amount of the Inconvenience Award will not be adjusted or supplemented after the Inconvenience Award is accepted by the Impacted Family, regardless of the actual time in a Temporary Unit. If the URA applies to the relocation of the Impacted Family to a Temporary Unit, HACLA may structure the Inconvenience Award as a relocation payment or an award. If the URA does not apply to the relocation or move of the Impacted Family to a Temporary Unit, HACLA will provide the Inconvenience Award as an award.

Notwithstanding the foregoing paragraph, HACLA intends to structure any Inconvenience Award, to the extent feasible and subject to the Legal Requirements, in a manner that does not result in (a) an increase in an Impacted Family’s annual income for purposes of HUD rental subsidy programs or (b) federal or state tax liability to the Impacted Family. HACLA will inform each Impacted Family of the potential for any Inconvenience Award to be treated as annual income for HUD program purposes and taxable income for federal and state tax purposes. Further, HACLA will advise and encourage each Impacted Family to seek knowledgeable, professional guidance on annual income and tax implications of accepting the Inconvenience Award. HACLA will provide Inconvenience Awards from exclusively unrestricted non-federal funds.

**V. Inconvenience Award Letter**

Once HACLA has determined an Impacted Family is eligible for an Inconvenience Award in accordance with Section III and determined the amount of the Inconvenience Award in accordance with Section IV, HACLA will provide the Impacted Family an award letter (an “Inconvenience Award Letter”).

Each Inconvenience Award Letter will provide:

(a) the amount of the Inconvenience Award;
(b) that disbursement of the Inconvenience Award will occur not more than 30 days following an Impacted Family’s move to a Temporary Unit;
(c) a statement that acceptance of an Inconvenience Award may have annual income and tax liability implications;
(d) recommendation that the Impacted Family seek knowledgeable and professional guidance on the annual income and tax implications of the Inconvenience Award;
(e) a statement that no additional or supplemental Inconvenience Award will be provided based on the actual time the Impacted Family resides in a Temporary Unit;
(f) for the Impacted Family (or the head of household for the Impacted Family) to execute the Inconvenience Award Letter to signify acceptance of the Inconvenience Award;
(g) the Inconvenience Award is made solely at HACLA’s discretion and does not impose any obligation on HACLA;
(h) the Inconvenience Award Letter shall not be construed to create any legal right expressly or implicitly to payment of the Inconvenience Award or any substitute benefit; and
(i) additional information as HACLA deems appropriate with the advice of legal counsel.

HACLA will disburse the Inconvenience Award to the Impacted Household in accordance with the terms of the Inconvenience Award Letter. HACLA, Michaels, BRIDGE, and Relocation Consultant cannot advise on Federal, State, and Local tax law. Residents who receive an Inconvenience Award are encouraged to consult with independent tax advisors concerning the tax consequences of such awards. For purpose of determining income under HACLA’s public housing and HCV programs (including RAD), an Inconvenience Award shall be excluded from income as non-recurring temporary income.
ATTACHMENT 7 – HUD DEMOLITION RELOCATION REQUIREMENTS
1. **HUD Demolition Relocation Requirements**

The HUD Demolition Relocation Requirements provide that HACLA must:

1. **Relocate residents on a nondiscriminatory basis and provide relocation resources.** HACLA must offer each family displaced by demolition or disposition comparable housing that meets housing quality standards (HQS) and is located in an area that is generally not less desirable than the location of the displaced persons. The housing must be offered on a nondiscriminatory basis, without regard to race, color, religion, creed, national origin, handicap, age, familial status, or gender, in compliance with applicable Federal and state laws. For persons with disabilities displaced from a unit with reasonable accommodations, comparable housing should include similar accommodations. Such housing may include:

   (1) Tenant-based assistance, such as assistance under the HCV program, except that such assistance will not be considered “comparable housing” until the family is actually relocated into such housing;

   (2) Project-based assistance; or

   (3) Occupancy in a unit operated or assisted by HACLA at a rental rate paid by the family that is comparable to the rental rate applicable to the unit from which the family is vacated.

2. **Relocation notice.** HACLA is responsible for the following:

   (1) Notifying each family residing in the development of the proposed demolition 90 days prior to the displacement date, except in cases of imminent threat to health and safety. The notification must include a statement that:

      (i) The development or portion of the development will be demolished or disposed of;

      (ii) The demolition of the building in which the family resides will not commence until each resident of the building has been relocated;

      (iii) Each family displaced by such action will be provided comparable housing, which may include housing with reasonable accommodations for disability, if required under section 504 of the Rehabilitation Act of 1973 and HUD's regulations in 24 CFR part 8;

   (2) Providing for the payment of the actual and reasonable relocation expenses of each resident to be displaced, including residents requiring reasonable accommodations because of disabilities;

   (3) Ensuring that each displaced resident is offered comparable replacement housing; and

   (4) Providing any necessary counseling for residents that are displaced.

Under the HUD Demolition Relocation Rules, HACLA may consolidate occupancy within or among buildings of a development, or among developments, or with other housing for the purposes of improving living conditions of, or providing more efficient services to residents, pursuant to its Admissions and Continued Occupancy Plan.
PRIMARY CONTACTS

The Housing Authority City of Los Angeles (HACLA)
John King, Community Relations Officer
(213) 252-5464
john.king@hacla.org

BRIDGE Housing
Van Scott, Director Jordan Downs,
(310) 422-2561
vscott@bridgehousing.com
Kassie Bertumen, Community Development Manager
(415) 989-1111
kbertumen@bridgehousing.com

Michaels Development Company
Kecia Boulware, Vice President of Development
(213) 392-7745
kboulware@tmo.com

Mary Keshishian, Regional Vice President
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(916) 883-1100
mkeshishian@themichaelsorg.com

Relocation Consultant (Del Richardson & Associates, Inc.)
Del Richardson, Relocation Program Director
(310) 645-3729
del.richardson@drainc.com
ATTACHMENT 3

COMMENTS RECEIVED ON THE UPDATED DRAFT RELOCATION PLAN

PENDING- ATTACHMENT WILL BE PROVIDED PRIOR TO BOARD MEETING DATE
ATTACHMENT 4

Draft Inconvenience Award Policy
HOUSING AUTHORITY OF THE CITY OF LOS ANGELES
INCONVENIENCE AWARD POLICY

I. Background

The Housing Authority of the City of Los Angeles’ (“HACLA”) mission is, in part, to preserve, enhance, and expand deeply affordable housing. In support of this mission, HACLA is redeveloping various public housing projects in Los Angeles, California in multiple phases (each, a “Project”). Projects may be redeveloped utilizing federal preservation and repositioning programs, including, but not limited to, the United States Department of Housing and Urban Development (“HUD”) Rental Assistance Demonstration (“RAD”) program, demolition and disposition under Section 18 of the U.S. Housing Act of 1937, as amended, the Section 8 Project-Based Voucher program and funding available under the Choice Neighborhoods Implementation grant program. Projects may also receive funding under other federal, state and local programs such as the low-income housing tax credit program and State of California Department of Housing and Community Development grant and/or loan programs.

HACLA uses best efforts to apply a “build first” approach to multiphase redevelopment Projects. Under the build first approach, new replacement units at a Project (each, a “New Unit”) are constructed prior to the demolition of existing occupied public housing units (each, an “Existing Unit”). The objective of the build first approach is to limit, to the extent feasible, the number of times a family is required to move by allowing the family to move directly from an Existing Unit to a New Unit. In practice, the build first model minimizes the number of families that are moved or relocated multiple times to advance development of a Project.

Despite HACLA’s use of the build first approach, there are circumstances when an existing family may be required to temporarily move or relocate on-site or off-site (each, an “Impacted Family”) to a unit other than a New Unit (each, a “Temporary Unit”) to allow for Project-site demolition or a Project to otherwise proceed. When a New Unit is available, the Impacted Family will move or relocate an additional time from the Temporary Unit to the New Unit. HACLA recognizes the inconvenience that moving multiple times may cause an Impacted Family. In appreciation of an Impacted Family’s cooperation with and dedication to HACLA’s redevelopment efforts, HACLA is establishing this Inconvenience Award Policy (this “Policy”) to provide eligible Impacted Families a one-time monetary award (an “Inconvenience Award”). This Policy sets forth a uniform process for HACLA to determine the eligibility of an Impacted Family for an Inconvenience Award and distribute an Inconvenience Award to an eligible Impacted Family.

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Requirements”). In the event of a conflict between this Policy and any Legal Requirements, the Legal Requirements shall govern.

III. Impacted Family Eligibility

An Impacted Family that temporarily moves or relocates away from an Existing Unit to a Temporary Unit (on-site or off-site) due to any of the following circumstances is eligible for an Inconvenience Award:

**Early Project Site Clearance.** HACLA requires the Impacted Family to move to a Temporary Unit to demolish the Existing Unit or otherwise permanently vacate the Existing Unit for a Project. The Impacted Family Moves to a Temporary Unit because a New Unit is not available.

**Offer of a New Unit is Retracted.** HACLA offers and the Impacted Family accepts a New Unit. Prior to the Impacted Family moving to the New Unit, HACLA retracts the New Unit offer because the Impacted Family cannot be accommodated in the New Unit or any other New Unit at the target Project.

**Extenuating Circumstances.** HACLA requires an Impacted Family to move to a Temporary Unit based on unique and extenuating circumstances that pose significant hardship to an Impacted Family.

An Impacted Family is explicitly not eligible for an Inconvenience Award in the following circumstances:

**ELECTING TO CHANGE TYPE OF HOUSING OPTION.** When feasible and in accordance with the Legal Requirements, HACLA offers each family residing in an Existing Unit replacement housing options which may include a New Unit, a Section 8 Housing Choice Voucher (“HCV”) or an alternate public housing unit (each, a “Housing Option”). If an Impacted Family selects a Housing Option in writing and later requests an alternate Housing Option, which HACLA in its discretion determines to allow and that alternate Housing Option cannot be immediately accommodated resulting in the Impacted Family’s move to a Temporary Unit. For Example, an Impacted Family selects an HCV as its Housing Option but is unable to rent a unit in the private market, and subsequently requests an accommodation to change their Housing Option to a New Unit that is no longer available.

**Refusal to Move.** The Impacted Family meets the occupancy requirements for a New Unit offered by HACLA as a Housing Option. The Impacted Family refuses to communicate its selection of a Housing Option to HACLA in a timely fashion. Due to the delay, HACLA offers the New Unit to another family to meet Project requirements and the Impacted Family can no longer be accommodated in the New Unit or another New Unit in the Project.

**Delayed Move with Alternate Housing Option.** The Impacted Family selects a public housing unit or HCV as its Housing Option and such selection is accepted by HACLA. Subsequently, the Impacted Family’s move to this alternate Housing Option is delayed and
the Impacted Family is required to vacate the Existing Unit. The Impacted Family moves to a Temporary Unit until it moves to the alternate housing.

**Household Resizing.** The Impacted Family selects a New Unit as its Housing Option. HACLA offers the Impacted Family a New Unit based on the household size and applicable occupancy standards. The Impacted Family subsequently submits a request to add a household member(s), other than additions by marriage, birth, foster care or as a reasonable accommodation, and HACLA agrees to accommodate the increased household size. The Impacted Family no longer meets the occupancy standard for the New Unit. The Impacted Family is, therefore, ineligible for the New Unit and is required to move to a Temporary Unit.

The eligibility of an Impacted Family will be determined on a nondiscriminatory basis, without regard to race, color, religion, creed, national origin, handicap, age, familial status, or gender, and in compliance with the Legal Requirements. An Impacted Family’s New Unit and/or Temporary Unit bedroom-size will be determined by the Impacted Family’s household composition on the date the Impacted Family submits an executed Housing Option selection to HACLA.

**IV. Inconvenience Award**

HACLA may, subject to the Legal Requirements, offer each Impacted Family determined eligible under Section III an Inconvenience Award as a one-time, nonrecurring, lump sum award of (a) $2,000 for an Impacted Family that is expected to move to a Temporary Unit for one year or less or (b) $4,000 for an Impacted Family that is expected to move to a Temporary Unit for more than one year. The amount of the Inconvenience Award will not be adjusted or supplemented after the Inconvenience Award is accepted by the Impacted Family, regardless of the actual time in a Temporary Unit. If the URA applies to the relocation of the Impacted Family to a Temporary Unit, HACLA may structure the Inconvenience Award as a relocation payment or an award. If the URA does not apply to the relocation or move of the Impacted Family to a Temporary Unit, HACLA will provide the Inconvenience Award as an award.

Notwithstanding the foregoing paragraph, HACLA intends to structure any Inconvenience Award, to the extent feasible and subject to the Legal Requirements, in a manner that does not result in (a) an increase in an Impacted Family’s annual income for purposes of HUD rental subsidy programs or (b) federal or state tax liability to the Impacted Family. HACLA will inform each Impacted Family of the potential for any Inconvenience Award to be treated as annual income for HUD program purposes and taxable income for federal and state tax purposes. Further, HACLA will advise and encourage each Impacted Family to seek knowledgeable, professional guidance on annual income and tax implications of accepting the Inconvenience Award. HACLA will provide Inconvenience Awards from exclusively unrestricted non-federal funds. HACLA, Michaels, BRIDGE, and Relocation Consultant cannot advise on Federal, State, and Local tax law. Again, residents who receive an Inconvenience Award are encouraged to consult with independent tax advisors concerning the tax consequences of such awards. For purpose of determining income under HACLA’s public housing and HCV programs (including RAD), an Inconvenience Award shall be excluded from income as non-recurring temporary income.
V. Inconvenience Award Letter

Once HACLA has determined an Impacted Family is eligible for an Inconvenience Award in accordance with Section III and determined the amount of the Inconvenience Award in accordance with Section IV, HACLA will provide the Impacted Family an award letter (an “Inconvenience Award Letter”).

Each Inconvenience Award Letter will provide:

(a) the amount of the Inconvenience Award;
(b) that disbursement of the Inconvenience Award will occur not more than 30 days following an Impacted Family’s move to a Temporary Unit;
(c) a statement that acceptance of an Inconvenience Award may have annual income and tax liability implications;
(d) recommendation that the Impacted Family seek knowledgeable and professional guidance on the annual income and tax implications of the Inconvenience Award;
(e) a statement that no additional or supplemental Inconvenience Award will be provided based on the actual time the Impacted Family resides in a Temporary Unit;
(f) for the Impacted Family (or the head of household for the Impacted Family) to execute the Inconvenience Award Letter to signify acceptance of the Inconvenience Award;
(g) the Inconvenience Award is made solely at HACLA’s discretion and does not impose any obligation on HACLA;
(h) the Inconvenience Award Letter shall not be construed to expressly or implicitly create any legal right to payment of the Inconvenience Award or any substitute benefit; and
(i) additional information as HACLA deems appropriate with the advice of legal counsel.

HACLA will disburse the Inconvenience Award to the Impacted Household in accordance with the terms of the Inconvenience Award Letter.