



**NC DEPARTMENT**  
*of* **COMMERCE**  
COMMUNITY REVITALIZATION



North Carolina Department of Commerce  
Division of Community Revitalization  
Residential Anti-displacement and Relocation Assistance Plan  
(RARAP)

Version 1.0 – January 27, 2026

# Revision History

VERSION	DATE	REVISION DESCRIPTION
1.0	1/27/2026	Initial Version

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## Overview

This RARAP (or Plan) is prepared by the Division of Community Revitalization (DCR) in accordance with section 104(d) of the Housing and Community Development Act of 1974, as amended (42 U.S.C. 5304(d)) (HCDA), and its implementing regulations at 24 CFR Part 42.325; the Uniform Relocation and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601 *et seq.*) (URA), and its implementing regulations at 49 CFR Part 24; Community Development Block Grant Disaster Recovery (CDBG-DR) program requirements related to displacement, relocation, acquisition, and replacement of housing (24 CFR 570.488 and 570.606); and as modified by the waivers or alternative requirements set forth in HUD's Revised Universal Notice, Section III.B.15. The Plan is applicable to all DCR CDBG-DR projects and activities.

## Policy on Relocation Assistance under the URA

DCR intends to minimize displacement; however, it realizes that some displacement may occur through the provision of its disaster recovery programs. When displacement is required, DCR will provide the relocation assistance required by the URA and any applicable HUD policies. Under the URA, relocation assistance to eligible persons includes advisory services, reasonable moving and re-establishment expenses such as security deposits and credit check charges, and replacement housing assistance. Additionally, DCR will follow its policies regarding the implementation of relocation assistance included in its URA Policy Manual. URA policies may be revised intermittently and will be available for public review on DCR's website.

DCR will also ensure that all subrecipients or project development partners will provide relocation assistance for lower-income tenants who, in connection with a CDBG-DR project or activity, move permanently or move personal property from real property as a direct result of the demolition of any dwelling unit or the conversion of a lower-income dwelling unit in accordance with the requirements of the URA. A displaced person who is not a lower-income tenant will be provided relocation assistance in accordance with the URA and implementing regulations at 49 CFR Part 24.

Applicants to programs supported by CDBG-DR funding will be required to certify they will follow DCR's RARAP and the related requirements of the URA. DCR's contracts and agreements may also contain conditions relating to adherence with these relocation requirements. Each program's application will include information seeking to alert DCR to activities that may trigger compliance with federal relocation law. Among other things, contract conditions or application checklists will help ensure that any persons eligible for relocation benefits due to CDBG-DR activities will receive their proper benefits.

## Steps to Minimize Displacement

Consistent with the goals and objectives of projects or activities receiving CDBG-DR assistance, DCR will take the following steps to minimize the direct and indirect displacement of persons from their homes:

1. Evaluate impacts to renters separate from owners when establishing unmet needs and connecting unmet needs to program design.
2. Where feasible, and reasonable and appropriate considering all risk factors, give priority to the rehabilitation of housing, as opposed to demolition, to avoid permanent displacement.
3. Where feasible, and reasonable and appropriate considering all risk factors, demolish or convert only dwelling units that are not occupied or vacant occupiable dwelling units, especially dwelling units that house lower-income households.
4. Include relocation requirements or considerations in competitive program selection and evaluation criteria and give weight to projects that maintain or increase the total quantity of occupied or occupiable dwelling units and stage rehabilitation of apartment units to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first.
5. Encourage all direct-selected development partners or subrecipients to also stage rehabilitation of apartment units when feasible, working with empty units, if any, first.
6. Require all subrecipients to adopt specific relocation plans for programs and projects which could trigger relocation activities prior to release of funds for those funded activities.
7. Offer assistance to subrecipients and development partners with relocation notifications and locating comparable temporary and/or permanent relocation housing for impacted persons.
8. Require documentation of relocation notices for proposed activities in funding applications which could trigger relocation of existing persons.
9. Coordinate program projects and activities with applicants, contractors, local code enforcement officials, and the tenants affected by acquisition, rehabilitation, or demolition of program-assisted housing to provide timely program notifications and minimize displacement.
10. Regularly monitor construction progress and other relevant applicant activities, advising on matters impacting displacement and enforcing compliance with applicable relocation regulations, including the URA and this RARAP.

# Waivers

## Relocation by Subrecipients

HUD has waived the regulations at 24 CFR 570.606(d) to the extent that they require optional relocation policies to be established at the grantee level.

Nevertheless, DCR requires subrecipients to adopt its RARAP rather than be allowed to develop and adopt their own plan. DCR further will require that the subgrantee or subrecipient comply with the URA for any household, regardless of income, which is involuntarily displaced.

## URA Regulations Apply

HUD has waived section 104(d) of the HCDA and 24 CFR 42.350 to the extent that the relocation assistance a displaced person is eligible to receive does not align with the types and amounts provided under the URA and its implementing regulations at 49 CFR Part 24. This waiver does not impact a person's eligibility as a displaced person under section 104(d), rather it limits the amounts and types of relocation assistance under section 104(d) to the amounts and types of assistance for displaced persons under the URA, as amended.

DCR commits to implementing the requirements at 49 CFR Part 24 in its administration of URA assistance.

## One-for-One Replacement

All occupied and vacant occupiable lower-income dwelling units that are demolished or converted to a use other than as lower-income dwelling units in connection with a CDBG-DR assisted project or activity must ordinarily be replaced with comparable lower-income dwelling units, in compliance with 24 CFR 42.375 and HUD guidance. HUD permits the waiver of this requirement upon the submission of a good cause justification that includes a data-driven analysis that indicates that there is an adequate supply of vacant lower-income dwelling units in standard condition that will be available to meet the housing needs of low- to moderate-income owners and tenants in the MID areas or surrounding communities.

In the absence of such a submission, DCR will ensure that it and all subrecipients of CDBG-DR funds replace all occupied and vacant occupiable lower-income dwelling units demolished or converted to a use other than lower-income housing in accordance with 24 CFR 42.375. Additionally, before entering into a contract committing the funds for a project that will directly result in the demolition or conversion of lower-income dwelling units, DCR will (or will require its subrecipient or project development partner to) make public by publication in a newspaper of

general circulation, local posting, and submitting to HUD, the preliminary information required by 24 CFR 42.375(c). To the extent certain information is not available at the time of the general submission, DCR will complete the disclosure and submission requirements as soon as the specific data are available.

## Lump Sum Rental Assistance Payments

HUD has waived the requirements of 42 U.S.C. 3537(c) to the extent necessary to permit a grantee to make lump-sum relocation rental assistance payments to displaced residential tenants. Waiving this requirement allows DCR to provide lump sum rental assistance payments to displaced residential tenants, thereby reducing grantees' administrative burden of disbursing installment payments, in addition to accelerating the availability of the rental assistance, to displaced disaster survivors.

## Section 414 of the Stafford Act

Section 414 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5181) (Section 414) provides that "Notwithstanding any other provision of law, no person otherwise eligible for any kind of replacement housing payment under the [URA] . . . shall be denied such eligibility as a result of [their] being unable, because of a major disaster as determined by the President, to meet the occupancy requirements set by such Act." Accordingly, displaced homeowner occupants and tenants who would otherwise not have been displaced may become eligible for a replacement housing payment notwithstanding their inability to meet occupancy requirements prescribed in the URA.

HUD has waived Section 414 and its implementing regulations to the extent that they would apply to real property acquisition, rehabilitation, or demolition of real property undertaken by a grantee or subrecipient for a CDBG-DR funded project commencing more than one year after the date of the applicable Presidentially declared disaster, provided that the project was not planned, approved, or otherwise underway before the disaster.

For purposes of this waiver, a CDBG-DR funded project shall be determined to have commenced on the earliest of: (1) the date of an approved Release for Request of Funds (RROF) and certification; (2) the date of completion of the site-specific review when a program utilizes tiering; or (3) the date of sign-off by the approving official when a project converts to exempt under 24 CFR 58.34(a)(12). This waiver does not apply to persons that meet the occupancy requirements to receive a replacement housing payment under the URA nor does it apply to persons displaced or relocated temporarily by other HUD-funded programs or projects. DCR will ensure that such

persons' eligibility for relocation assistance and payments under the URA is not impacted by this waiver.

## Certification

DCR commits to implementing this RARAP and certifies that it: (1) will comply with the acquisition and relocation requirements of the URA and implementing regulations at 49 CFR Part 24, as such requirements may be modified by waivers or alternative requirements; and (2) has in effect and will follow this RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR Part 42, and 24 CFR Part 570, as amended by waivers and alternative requirements.

## Contacts

The current names and contact information for individuals responsible for tracking the replacement of lower-income dwelling units and for providing relocation payments and other relocation assistance can be provided upon request to DCR.