

April 5, 2004

Matthew Hogan  
Housing Authority of Champaign County  
205 West Park Avenue  
Champaign, IL 61820

Dear Mr. Hogan:

On behalf of the City of Urbana, please accept the following comments on the Draft Lakeside Terrace Relocation Plan, dated March 4, 2004.

The relocation plan should state that one of top priority goals for the Housing Authority is to achieve a mixed income development at the Lakeside Terrace site. Therefore, most residents (or a specific percent) will not be able to move into the redeveloped units. Resident have inferred from statements made by the HACC staff that every one of them will be able to return to the new development.

The relocation plan should include a statement of non-discrimination, including the specific provisions of the Urbana Civil Rights Ordinance

Page 1, paragraph 3 Introduction

This paragraph notes that all families currently residing at Lakeside Terrace will be provided Section 8 Tenant-Based Housing Subsidies. This paragraph should note that such an offer is contingent on the HACC receiving the number of replacement and relocation vouchers requested. However, such a contingency would not be necessary if the HACC is prepared to utilize their existing vouchers for relocation, should the amount of vouchers requested not be provided by HUD.

Page 1, paragraph 4 Introduction

This paragraph makes reference of the Uniform Relocation Assistance and Real Property Acquisition (URA), Section 104 (d) of the Community and Housing Development Act (Section 104 (d)), and HUD Handbook 1378 Chg-4. In that these documents are the foundation for the Relocation Plan, they should be

provided as attachments to the Plan or at a minimum should be readily available to anyone that desires a copy of the documents.

Page 2, item IV. Statement of Anti-Displacement

This statement is too vague to provide adequate meaning. This section might be improved by referencing specific laws, policies and guidelines that HACC will pursue in order to minimize displacement, rather than mentioning “reasonable steps”.

Page 2, Item V.A. Major Components of the Relocation Process

It seems the last sentence of this paragraph should indicate that contact information “will be” given rather than “was” given, since this appears to be a future action.

Page 3, Item V.G. Major Components of the Relocation Process

This item notes that that Relocation Officer and the Housing Manager will assist displaced residents in the lease-up of replacement housing. Considering that Burch Village and Lakeside Terrace residents might be pursuing relocation within the same timeframe, do these two (2) positions provide adequate staff to deliver the level of assistance necessary accommodate all tenants?

Page 4, Item VII. Survey

A copy of the Resident Need Survey should be attached to the Relocation Plan.

Page 5, Item VIII. C. Advisory Services

Considering the rather tight timeline between relocation and demolition, is it in the best interest of the Housing Authority to rent to new tenants that will likely have to vacate the facility in a few months? It would seem more appropriate to not rent the Lakeside Terrace facility once the General Information Notice has been sent.

Page 7, Item XI. B. Comparable Units

The Replacement Housing Payment form HUD-40061 should be attached to the Relocation Plan.

Page 8, Item XI. C 2 Comparable Units

Are persons who receive a Section 8 Tenant Voucher subject to the payment limit referenced in this section? If yes, this seems contrary to the concept of the holder of a Section 8 Tenant Voucher living where they want. It would seem that the only restriction for a Section 8 Tenant Voucher holder is that rent would not exceed HUD Fair Market Value rent.

Page 9, Item XII. B 4 Replacement Housing Payment

Claim form HUD 40053 should be attached to the Relocation Plan.

Page 9, Item XIII. Paragraph 1. Tenant Based Assistance

The provision that the HACC, not the tenant, will decide if the displaced tenant receives tenant-based assistance or a replacement housing payment seems contrary to other provisions for relocation assistance. Please provide a citation to the Federal code and/or guideline that provides for such an arrangement.

Page 13, Item XV. Last Paragraph Actual Reasonable Moving and Relocation Expenses  
HUD form 40056 and HUD form 40054 should be attached to the Relocation Plan.

Page 13, Item XVI. Paragraph 1. Security Deposits

Is the HACC confident that one (1) month's contract rent will be sufficient to pay for security deposits that will be required to accommodate all the tenant choices for replacement housing?

Further, should a tenant select a replacement housing unit that requires a security deposit that is more than one (1) month's contract rent, could not the HACC waive the Section 8 Administrative Plan rule to accommodate relocation cases or create a relocation provision in the Section 8 Administrative Plan?

Page 13, Item XVII Procedures for Reimbursement

HUD form 40058 should be attached to the Relocation Plan.

Thank you in advance for your consideration of these comments.

Questions regarding this correspondence should be directed to Bob Grewe, Manager, Grants Management Division at 217.384.2441 or [bpgrewe@city.urbana.il.us](mailto:bpgrewe@city.urbana.il.us).

Sincerely,

Tod Satterthwaite, Mayor  
City of Urbana

cc:  
Edward Bland Jr.