



July 27, 2017

Sacramento Housing and
Redevelopment Commission
Sacramento, CA

Honorable Members in Session:

SUBJECT:

Award of Project Based Vouchers to House Homeless Families and Individuals

SUMMARY

The attached report is submitted to you for review prior to submission to the County of Sacramento.

RECOMMENDATION

Staff recommends approval of the recommendations outlined in this report.

Respectfully submitted,


LA SHELLE DOZIER
Executive Director

Attachment

**COUNTY OF SACRAMENTO
CALIFORNIA**

For the Agenda of:
August 22, 2017

To: Housing Authority of the County of Sacramento

From: Sacramento Housing and Redevelopment Agency

Subject: Award Of Project Based Vouchers To House Homeless Families And Individuals

Supervisorial
District: All

Contact: La Shelle Dozier, Executive Director, Sacramento Housing and Redevelopment Agency, 440-1319
Sarah Thomas, Assistant Director, Housing Choice Voucher Program, 449-6346

Overview

The Sacramento Housing and Redevelopment Agency (SHRA) issued a Request for Proposals (RFP) on June 9, 2017 to solicit interest from owners and developers interested in receiving an award of Project-Based Vouchers (PBV) to serve homeless families and individuals. The RFP listed two deadlines: June 26, 2017 and July 17, 2017. SHRA planned to award up to 200 vouchers through this process but reserved the right to award more than 200 based on the response to the RFP. Twelve (12) proposals were received that together requested a total of 484 vouchers. A review panel recommended awarding eight (8) proposals, totaling 368 vouchers. This report provides an update on the proposals that were awarded project-based vouchers through this competitive process.

Recommendations

Adopt the attached Housing Authority resolution authorizing the Executive Director to:

- award a total of 368 project based vouchers, exceeding the previously authorized amount of 300 project-based vouchers, and
- execute all required contracts and agreements with the property owners for project-based vouchers.
- Make related findings.

Measures/Evaluation

368 homeless families will receive housing through project-based vouchers.

Fiscal Impact

This action does not add additional vouchers to those already authorized by HUD. The Housing Authority has discretion to use vouchers for project based units.

BACKGROUND

On March 15, 2017, Staff held a public hearing at the meeting of the Sacramento Housing and Redevelopment Commission (Commission) and presented a report outlining a three-year initiative to serve homeless individuals and families with Housing Authority resources. This report was also presented to the Board of Supervisors and City Council (acting as the County and City of Sacramento Housing Authority Boards) on March 21, 2017. The governing bodies approved the Implementation Plan outlined below, which included the allocation of up to 375 Project Based Vouchers (PBV) over a three-year period to create affordable housing units to serve homeless families and individuals.

Three Year Implementation Plan

	Preference Option	Year 1	Year 2	Year 3	Total
Housing Choice Voucher Program	Limited Allocation	150	150	150	450
	Project Based Vouchers (PBV)	175*	100	100	375
	Move On Allocation	0	25	25	50
	Homeless Youth (P3)	50	25	25	100
PBV Leverage**		100	100	100	300
Public Housing Program	Homeless Preference (City)	160	160	160	480
	TOTAL	635	560	560	1,755

**Includes 75 HUD-Veterans Assistance Supportive Housing (VASH) vouchers*

***For every Project Based Voucher awarded, SHRA may leverage construction funding to create additional affordable homeless units.*

SHRA applied for and was awarded 75 competitive Veteran Affairs Supporting Housing (VASH) Vouchers from the United States Department of Housing and Urban Development (HUD) in late 2016. In May, 2017, HUD approved awarding:

- Mercy Housing California – 25 vouchers for Mather Veteran’s Village Phase III;
- Jamboree – 25 vouchers for studios at Hotel Berry; and
- McCormack Baron and Salazar (MBS)– 25 vouchers for Twin Rivers Phase I.

Fifty (50) of these vouchers were for new construction and 25 were for existing units.

Award Of Project Based Vouchers To House Homeless Families And Individuals

Page 3

On June 9, 2017, SHRA issued a Request for Proposals (RFP) for owners and developers interested in receiving Project-Based Vouchers (PBV) to serve homeless families and individuals. The RFP listed two deadlines: June 26, 2017 and July 17, 2017. SHRA planned to award up to 200 vouchers through this process but reserved the right to award more than 200 based on the response to the RFP.

Twelve (12) proposals were received requesting a total of 484 vouchers. It is recommended that SHRA award 368 vouchers and execute the related agreements. The proposed awards are listed below:

Project Name	Owner name	Housing Type	Number of vouchers awarded	Total number of rental units
Mather Veterans Village Phase III	Mercy Housing	New construction	25	50
Serna Village	Mercy Housing	Existing	35	80
Martin Luther King Village	Mercy Housing	Existing	60	80
Shasta Hotel	Shasta Hotel Housing Association	Existing	56	80
Courtyard Inn	Mercy Housing	New construction	92	92
Saybrook Apartments	Pacific Housing	Existing	60	60
Victory Townhomes	Mutual Housing	Existing	20	76
Lavender Courtyard	Mutual Housing	New construction	20	53
		Total	368	

Of the 368 vouchers allocated, 137 are for new construction projects and 231 are for existing units which are now dedicated to serving homeless individuals and families for the next 20 years.

It is anticipated that the existing units will be available to homeless individuals and families within six months and the earliest newly constructed projects will be available starting in 2019. In March 2017, SHRA committed to project basing a total of 375 units of housing over 3 years and is now bringing a plan to project base a total of 443 families in the first year.

COMMISSION ACTION

At its meeting of August 2, 2017, the Sacramento Housing and Redevelopment Commission considered the staff recommendation for this item. The votes were as follows:

AYES:

NOES:

ABSENT:

FINANCIAL ANALYSIS

This action does not add additional vouchers to those already authorized by HUD. The Housing Authority has discretion to use vouchers for project based units.

POLICY CONSIDERATIONS

The Housing Authority continues to work towards reducing homelessness in Sacramento utilizing all available HUD resources. With the Shelter Plus Care and HUD-VASH programs, the Housing Authority is currently serving over 1,000 veterans and their families on an annual basis in the effort to eliminate veteran homelessness in Sacramento. Project basing additional vouchers conforms to the local effort to eliminate homelessness. This effort is in line with local policies as outlined in the Housing Choice Voucher (HCV) Program Administrative Plan.

ENVIRONMENTAL REVIEW

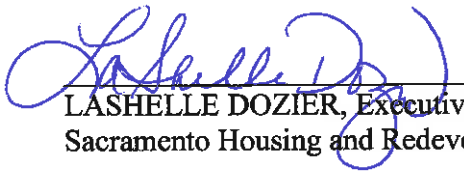
California Environmental Quality Act: The award of project based-vouchers to existing units is considered an administrative activity which does not have the potential to result in a direct or indirect physical change in the environment, and therefore is not considered a project pursuant to the California Environmental Quality Act (CEQA) per Guidelines Section 15378(b). For the projects which are new construction (Mather Veterans Village Phase III, Lavender Courtyard, and Courtyard Inn), environmental review has already been completed and the projects have been approved. Project construction is not contingent on award of the vouchers, and therefore the addition of project-based vouchers is considered an administrative activity and is not considered a project pursuant to CEQA per Guidelines Section 15378(b).

National Environmental Policy Act: The award of project based-vouchers to existing units is categorically excluded pursuant to the National Environmental Policy Act (NEPA) per 24 CFR 58.35(a)(5). For the projects which are new construction (Mather Veterans Village Phase III, Lavender Courtyard, and Courtyard Inn), environmental review has already been completed and the projects have been approved. Project construction is not contingent on award of the vouchers, and therefore the addition of project-based vouchers is categorically excluded pursuant to NEPA per 24 CFR 58.35(a)(5).

M/WBE/SECTION 3 AND CONSIDERATIONS

Not applicable.

Respectfully submitted,



LASHELLE DOZIER, Executive Director
Sacramento Housing and Redevelopment Agency

APPROVED
NAVDEEP S. GILL
County Executive

By: _____
ADMINISTRATOR
Deputy County Executive

Attachments:
RES – HACOS Resolution



July 27, 2017

Sacramento Housing and
Redevelopment Commission
Sacramento, CA

Honorable Members in Session:

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LA SHELLE DOZIER
Executive Director

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REPORT TO HOUSING AUTHORITY
City of Sacramento
915 I Street, Sacramento, CA 95814-2671
www.CityofSacramento.org

Informational
August 22, 2017

Chair and Members of the Housing Authority Board

Title: Award of Project Based Vouchers to House Homeless Families and Individuals

Location/Council District: City-wide

Recommendation: No specific recommendation - for information only.

Contact: La Shelle Dozier, Executive Director, 440-1319
Sarah Thomas, Assistant Director, Housing Choice Voucher Program, 449-6346

Presenters: Not applicable.

Department: Sacramento Housing and Redevelopment Agency

Description/Analysis

Issue: On March 15, 2017, Staff held a public hearing at the meeting of the Sacramento Housing and Redevelopment Commission (Commission) and presented a report outlining a three-year initiative to serve homeless individuals and families with Housing Authority resources. This report was also presented to the Board of Supervisors and City Council (acting as the County and City of Sacramento Housing Authority Boards) on March 21, 2017. The governing bodies approved the Implementation Plan outlined below, which included the allocation of up to 375 Project Based Vouchers (PBV) over a three-year period to create affordable housing units to serve homeless families and individuals.

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Policy Considerations: Not applicable.

Economic Impacts: not applicable

Environmental Considerations: Not applicable.

Sustainability Considerations: not applicable

Commission Action: At its meeting on August 2, 2017, the Sacramento Housing and Redevelopment Commission approved staff recommendation, subject to each constituent member of SHRA consent and approval. The votes were as follows:

AYES

NOES


ABSENT

Rationale for Recommendation: Not applicable.

Financial Considerations: Not applicable.

LBE - M/WBE and Section 3 Considerations: not applicable

Respectfully Submitted by:



LA SHELLE DOZIER
Executive Director

Attachments

01 Description/Analysis and Background

August 2, 2017



Sacramento Housing and Redevelopment Commission
Sacramento, California

Honorable Members in Session:

SUBJECT Twin Rivers Relocation Plan

RECOMMENDATION

Staff requests that the Commission review the information documenting its response to Legal Services and recommend approval of the Relocation Plan for the Twin Rivers public housing site.

CONTACT PERSONS

La Tanna Jones, Assistant Director, 916-440-1334

BACKGROUND

This report is to memorialize additional information provided to the Sacramento Housing and Redevelopment Commission (Commission) for consideration of the Twin Rivers Relocation Plan (Plan). At the Commission meeting on July 19, 2017, the Sacramento Housing and Redevelopment Agency (SHRA) held a Public Hearing to discuss the regulations, benefits and actions to be taken to relocate public housing residents involved in the Twin Rivers Choice Neighborhood Initiative. The discussion provided clarity on the Relocation Plan and assured members of the Commission that all provisions under the Uniform Relocation Assistance Law of 1970 (URA), the California Relocation Assistance Law, and the California Relocation Assistance Guidelines would be pursued with the affected residents. The discussion made clear that all 218 public housing units demolished at Twin Rivers would be replaced one-for-one with United States Department of Housing and Urban Development (HUD) assisted housing that

SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY

Sacramento Housing and Redevelopment Commission
August 2, 2017
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would provide lease compliant residents with the protections and basic payment requirements currently under the conventional housing program.

In accordance with the URA, SHRA is required to release the Relocation Plan for public review and comment for 30 days. SHRA fulfilled this requirement by publicizing the Plan from June 12th 2017 – July 14, 2017. On Friday, July 14, 2017, SHRA received comments from one of the local agencies, Legal Services of Northern California (Legal Services) which was distributed to all Commissioners. Staff worked with Overland, Pacific, and Cutler, SHRA's Relocation Consultant, to provide a response and disseminated the information to the Commissioners at the July 19th meeting. Because of the short time between the receipt of the information and the meeting, some Commissioners expressed concern that they did not have enough time to be assured that the response adequately addressed the concerns raised by Legal Services. The Commissioners therefore decided to withhold their recommendation regarding the Relocation plan until all members had an opportunity to review SHRA's response to Legal Services.

The amended Plan and response to Legal Services are attached. Staff therefore request that the Commissioners review the information and support the staff recommendation to approve the Relocation Plan for the Twin Rivers public housing site.

FINANCIAL CONSIDERATIONS

Not applicable

POLICY CONSIDERATIONS

Not applicable.

ENVIRONMENTAL REVIEW

Not applicable

M/WBE AND SECTION 3 CONSIDERATIONS

Not applicable

SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY

Sacramento Housing and Redevelopment Commission

August 2, 2017

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Respectfully submitted,


LA SHELLE DOZIER
Executive Director

Attachments:

ATT 1- Revised Relocation Plan

ATT 2 - Response to Legal Services

ATT 3 – Response from Legal Services

Twin Rivers Redevelopment
DRAFT MASTER RELOCATION PLAN

Prepared For:

McCormack Baron Salazar

And the

Housing Authority of the County of Sacramento

Prepared By



Folsom, CA

July 2017

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INTRODUCTION

Twin Rivers ("Twin Rivers") is a public housing site located in the City of Sacramento, CA. It consists of two hundred eighteen (218) low-income public housing units presently owned and managed by the Housing Authority of the County of Sacramento ("HACOS" or "Authority") and a not for profit child care center. Twin Rivers is located in the Sacramento River District-Railyards Neighborhood ("Neighborhood"). Twin Rivers is proposed to be redeveloped by McCormack Baron Salazar ("MBS") to create new mixed-income community with public housing replacement, affordable, and market rate housing.

Figure 1 below provides the location of the Neighborhood in relation to the City of Sacramento and other neighborhoods. Figure 2 provides Twin River's approximate location in the neighborhood.

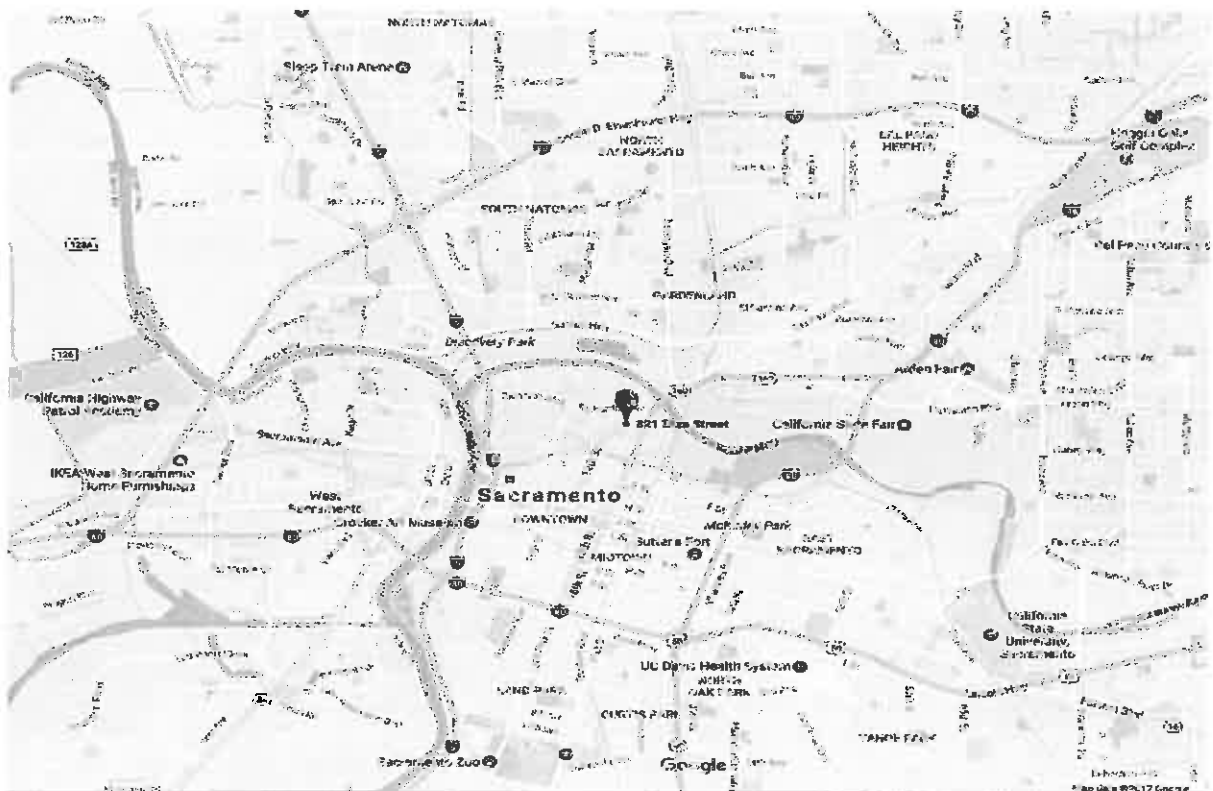


Figure 1: Area Map

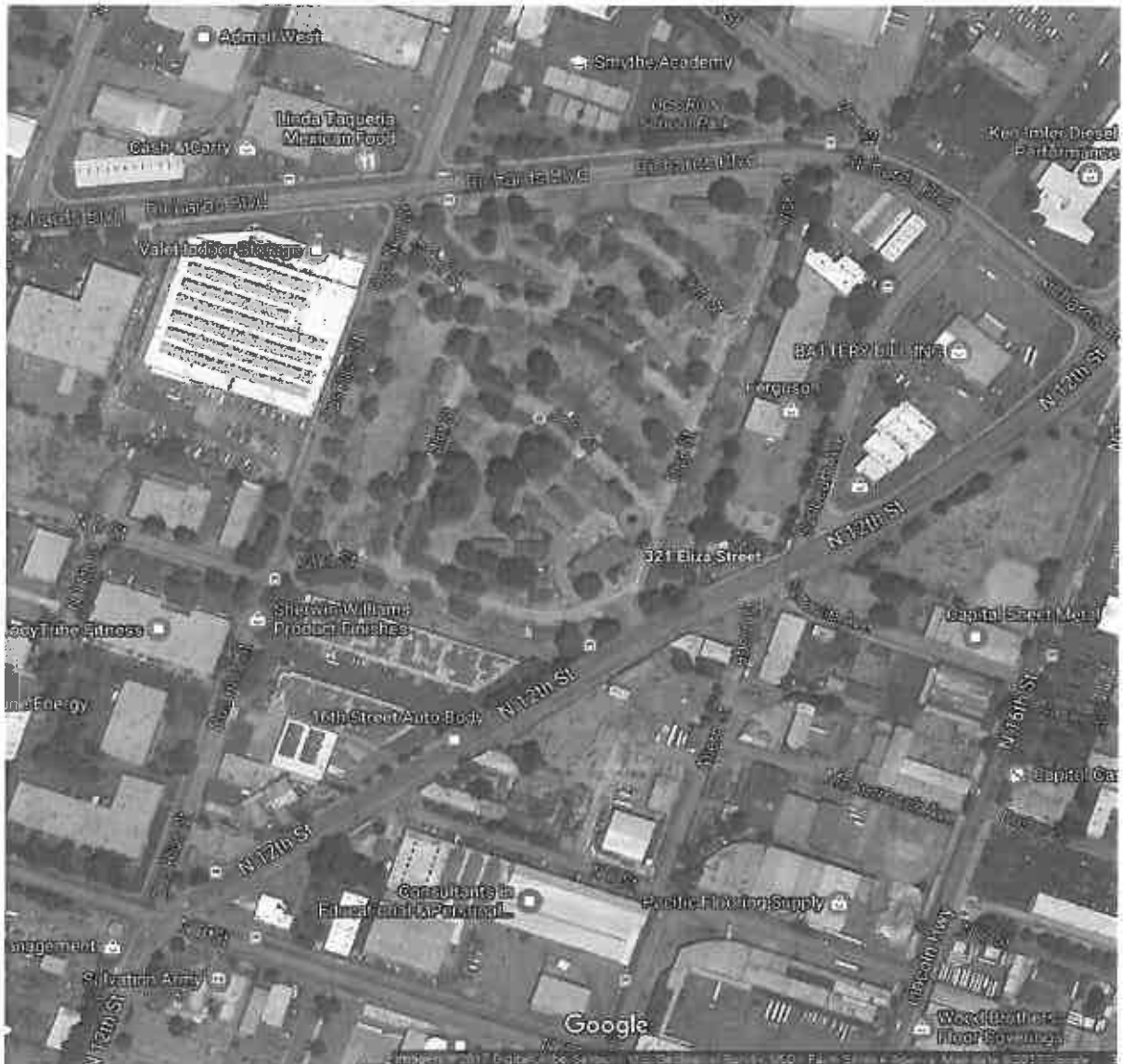


Figure 2: Subject Property Location Map

Project Overview

HACOS and the City of Sacramento (“City”) were selected for a U.S. Department of Housing and Urban Development (“HUD”) Choice Neighborhood Initiative (“CNI”) Grant for the planning of the redevelopment of Twin Rivers. The Project is intended to assist in the overall revitalization of the Neighborhood.

MBS (the "Developer") was selected to develop and carry out a revitalization plan for the Twin Rivers Redevelopment Project (the "Project"). The Project includes one-for-one replacement of the existing two hundred eighteen (218) public housing units.

The housing units will be demolished in two (2) phases. Demolition will occur after all units have been vacated for each phase. Construction is anticipated to take approximately two years to complete which will require that all Twin Rivers Households ("Households") relocate to other housing for at least the duration of construction. The requirement that all Households relocate from the Site for as long as 24-months constitutes a Permanent Displacement in accordance with both Federal and State Relocation Law. However, all remedies will be used to minimize displacement and ensure Households in good standing return to the Site if they choose to do so. HACOS intends to work with the Households to temporarily relocate on a long-term temporary basis. Households in good standing will have the Right-to-Return to the completed Twin Rivers Project.

An affiliate of MBS is a general partner of a Limited Partnership (L.P.) who will own and operate new housing at the site and lease the land from HACOS. There will be separate limited partnerships for each phase of the Twin Rivers redevelopment.

Households shall have the Right-to-Return to a new unit at Twin Rivers upon completion of new units.

To accomplish the revitalization and transformation of Twin Rivers, several steps are required:

1. Preparation of a Master Relocation Plan to address the relocation of the Households.
2. Release of this Plan for a period of thirty (30) calendar days for public review and written comment.
3. Evaluate written comments and revise this Plan accordingly.
4. Approval of this Plan by the Authority's Board of Commissioners (the "Board") and HUD.
5. Execution of a Master Development Agreement between HACOS and the Developer.

6. Approval of the ground leases between the Authority and the L.P. for the Phase I and Phase II sites.
7. Application and approval of the disposition and demolition application(s) by HUD.
8. Application, award, and closing on other financing for the Project;
9. Relocation of Households and non-residential (commercial) occupants in accordance with this Plan; and
10. Development of one for one replacement housing and other components of the Project.

The Developer has engaged residents by holding monthly informational meetings and providing individual case management provided through Urban Strategies. The Developer and HACOS shall continue to engage residents throughout the Project's development.

Proposed Project Funding Sources

The Developer expects to pursue Low Income Housing Tax Credits ("LIHTC") and other federal, state and private funding. The potential Federal, State and Local funds that MAY be used are listed below.

Federal:

- HUD CNI Grants;
- HUD Project Based Section 8;
- HUD HOME¹ and;
- HUD-U.S. Department of Veterans Affairs Supportive Housing (HUD-VASH)

State:

- State of California Department of Housing and Community Development ("HCD") Affordable Housing and Sustainable Communities Program ("AHSC")

Local:

- Funds provided by HACOS

¹ Note that HOME funds are only being considered at this time. No commitment for HOME has been made.

Scope of this Plan

Public agency participation (federal, state, and local) and the sources of project financing are critical in determining the rules and regulations to be followed in the relocation process. These rules and regulations establish the rights and assistance required to be provided to those persons impacted or displaced by the Project.

This Plan describes the roles and responsibilities of the Developer and HACOS. This Plan outlines the relocation rights and benefits of the Households. This Plan is limited to this scope, which is consistent with the guidance of both federal and state relocation guidelines.

Beyond being a legal requirement, a relocation plan is a communication and management tool for the stakeholders involved in the Project and the relocation process. Identified stakeholders include the Twin Rivers Households, HACOS and their Board of Supervisors, HUD, the City, community-based service organizations, housing counseling organizations, and other interested parties.

This Plan is **ONLY** intended to address issues related to residential relocation and provide the stakeholders with the following information and guidance:

1. Description of the Project that is requiring the relocation of the residential occupants, including its location, and financing;
2. Description and analysis of the laws, statutes and regulations governing the relocation of the Project occupants, including the requirements for a relocation plan;
3. Aggregate details regarding the persons impacted by the Project who shall be permanently relocated;
4. Description of the re-housing plan including the replacement housing resources available to re-house the residents;
5. Relocation program to be provided, including the rights of the Households, required notifications, benefits, and other services they are eligible to receive, and criteria for eligibility for assistance;
6. Responsibilities of the Developer and HACOS in the implementation of this Plan;
7. Process to develop, approve and update this Plan;
8. Process for any appeals of the relocation benefits and services provided;

9. Preliminary schedule of relocation activities and a cost estimate for relocation assistance.

Overview of Relocation Planning and Implementation

Overland, Pacific & Cutler, Inc., ("OPC"), a public real estate services consulting firm specializing in relocation planning and implementation services, was hired by the Developer to prepare this Plan on behalf of the Authority. This Plan serves as the master relocation plan for the Project.

HACOS has the responsibility to implement this Plan. HACOS will meet this obligation through an agreement with the Developer. The Developer will hire a relocation specialist. Overland, Pacific and Cutler, Inc. (OPC) will be procured to implement this Plan for the Developer and HACOS. The group that will be responsible for additional relocation planning and implementation of those plans, including HACO's, the Developer, and OPC is hereinafter referred to as the Relocation Team.

A draft version of this Plan was made available to Households for a period of thirty (30) calendar days on June 12, 2017 as discussed in Section N of this Plan.

Appendix A of this Plan provides definitions of many of the technical and regulatory relocation terms found in this Plan.

Special care and attention will be taken to ensure that all households are assisted in accordance with Section 504 of the Rehabilitation Act including that households are accommodated for meetings, enhancements needed to ensure replacement housing is accessible are made, and replacement housing is inspected to ensure it is decent, safe, and sanitary.

RELOCATION PLAN

A. REGULATORY FRAMEWORK AND REQUIREMENT ANALYSIS

The laws, regulations and statutes that may become applicable to the relocation of the Households at Twin Rivers are listed below.

- Section 18 of the United States Housing Act of 1937 ("Section 18");
- 24 CFR Part 970 – Public Housing Program – Demolition or Disposition of Public Housing Projects ("Part 970");
- 49 CFR Part 24 - Uniform Relocation and Real Property Acquisition Policies Act of 1970, as amended ("Part 24");
- Section 104(d) of the Housing and Redevelopment Act of 1974 (should HUD HOME be used in the Project this Plan will be updated to reflect 104(d) requirements);
- HUD Handbook 1378 - HUD's implementing guidelines of the URA;
- California Government Code Title 1, Chapter 16, Section 7260-7277 – State of California Relocation Assistance Law (the "CRAL");
- California Code of Regulations Title 25, Division 1, Chapter 6 - State of California Relocation Assistance and Real Property Acquisition Guidelines (the "Guidelines");

The primary relocation regulations that guide this Plan and the relocation process are the URA, the CRAL and the Guidelines. HACOS shall have the responsibility of making the final determination regarding the applicable laws, regulations and statutes that may be applicable to the Project.

Disposition of public housing projects is subject to the provisions of Section 18, and the implementing regulations of Part 970 (collectively, "Section 18"), and is not subject to the Uniform Relocation Act (46 U.S.C. §4600 et seq.) and the implementing regulations of Part 24 (collectively, the "URA").

However, the Project has used, and expects to utilize additional funds in the future, which triggers the URA. Pursuant to both the federal and state laws, relocation planning is required to minimize displacement of residents or minimize the impact of displacement on the residents of the Project.

HACOS is a local public agency in the State of California making the Project subject to the CRAL and the Guidelines.

The regulatory requirement for the preparation of a relocation plan, 30-day review and comment period, approval, and adoption of the plan by the appropriate local legislative body comes from the CRAL and the Guidelines.

The County Board of Supervisors Commissioners of the Authority ("Board") is the appropriate legislative body to approve this Plan, because it makes all legislative and policy decisions for the Authority, including those necessary and required for the disposition and demolition of the Project.

These regulations require that eligible persons relocated by a publicly-assisted project receive the following services and benefits, which are explained in detail throughout this Plan:

1. Minimum of 90-days' notice prior to a permanent displacement.
2. Written information statement describing their rights to relocation benefits and services for which they are eligible.
3. A Notice of Eligibility (NOE) explaining the benefits the residents are entitled to based on information gathered from tenants from the interview. In cases where a household may be long-term temporarily relocated, they will enter into a Memorandum of Understanding with HACOS.
4. Referral to at least one comparable replacement housing and on-going referrals to other potential replacement housing and coordination with community service resources, public housing, and other public services as needed.
5. Inspection of replacement dwelling to ensure unit is Decent, Safe and Sanitary (DS&S).
6. Assistance with moving to a DS&S residence by coordinating moving estimates as needed, paying for either actual moving cost by a professional company or a fixed moved payment, and assisting with claims.
7. Relocation replacement differential payment within the set limits of the NOE.
8. Right to return after completion of the new Twin Rivers Project. HACOS will provide appropriate assistance with the return move.
9. Right to appeal decisions made within the relocation program that affect them.
10. Other requirements under the URA and/or CRAL and Guidelines.

Appendix B of this Plan provides a side by side comparison of Section 18, the URA, and CRAL.

B. PROGRAM ASSURANCES AND STANDARDS

Adequate funds shall be made available for the relocation of all Households within the budget of the Project.

Relocation assistance services shall be provided to ensure that displacement does not result in different, or separate treatment of Households based on race, nationality, color, religion, national origin, sex, marital status, familial status, disability or any other basis protected by the federal Fair Housing Amendments Act, the Americans with Disabilities Act, Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, and the Unruh Act, as well as any otherwise arbitrary or unlawful discrimination. Relocation notices shall be provided in the primary language of each Household.

All eligible Households and non-residential occupants shall be provided relocation assistance and benefits under the URA. Where the Guidelines and/or the CRAL provide a higher level of benefit, the Households shall receive benefits under California relocation law.

The opportunity for review and to provide written comments to this Plan by the residents and other interested stakeholders for a period of no less than 30-days is required before any displacements may occur.

Each Household eligible for relocation assistance lawfully occupying a Twin Rivers unit as of the date of the initiation of negotiations ("ION) must be provided a Notice of Eligibility ("NOE") for relocation assistance prior to, or concurrently with, a 90-Day Notice. If a Household is deemed ineligible for relocation assistance, such household must be informed in writing of the reasons why such Household is not eligible to receive relocation assistance and the procedures to appeal this decision.

Any Household who disagrees with the determination of eligibility or ineligibility for relocation assistance, or the type and amount of relocation assistance that is being

offered, is afforded the right to appeal the decision per the process identified in Section K and Appendix G of this Plan.

The Authority and the Developer are committed to ensuring that persons with all manner of disabilities, language requirements other than English, and other special needs have full access and participation in the relocation program including but not limited to community meetings, individual meetings, written notification, relocation housing and moving assistance services. Specific measures are provided below

Meeting Accommodations - HACOS will ensure that all meetings are equipped, when needed, with language translation services including those services needed by persons who are hearing and visually impaired (HVI). HACOS will ensure that persons who are mobility impaired have adequate space and accessibility features available to them to access to private and public spaces used for meetings. HACOS will ensure that adequate transportation is available to persons who require it to access meetings. These provisions extend to community meeting, public hearing, one on one meeting, and other types of meetings where the relocation program and its assistance are discussed.

Replacement Housing – The Authority will ensure that all households are provided with replacement housing and moving assistance that is accessible to them and meets their needs. All measures will be taken to ensure that housing will accommodate the needs of disabled persons including but not limited those with mobility and hearing and visual impairment needs. Referrals to accessible permanent housing units will be made in cases necessary. Inquiry will be made to learn if a household has installed accessibility features at their own expense; if so those items will be moved and or replaced at HACOS expense. Should replacement housing not be within the households financial means, HACOS will ensure that last resort housing assistance is provided.

Fair Housing - The Authority will work to affirmatively further fair housing and other fair housing and civil rights obligations and to promote fair housing choice outside of areas of minority concentration including providing referrals to housing outside of areas with minority concentrations.

C. RELOCATION PLANNING AND NEEDS ASSESSMENT METHODOLOGY

Early Resident Outreach

Early resident outreach has included monthly community meetings and individual case management services for Twin River's residents. The Relocation Team in collaboration with Urban Strategies will work with all Households prior to their relocation to create an individual relocation plan for the household and then execute their relocation with them.

The questions, comments, and concerns raised during the engagement process will be documented by the Relocation Team and used to develop a list of policy questions for HACOS to consider. Documentation of the engagement process related to relocation is provided in Appendix D of the Plan and will be updated as necessary.

Analysis of Existing Data

A preliminary needs assessment will be conducted for the Developer prior to initiating the relocation by the Relocation Team. From the results of this assessment, the Relocation Team will ascertain household information such as the number of households, the ages of members of the households, and special needs. This data will be used to describe the impacted residential population and will be subsequently updated through the resident interview process as described below.

Resident Interview Process

An important process in relocation planning is collecting primary information from the impacted households. This typically occurs by conducting an interview with the household in their home or elsewhere at the project. Through these meetings, household composition, special needs, and specific concerns regarding relocation are gained, which shall be used to better plan for the household's relocation needs on an individual basis. The Relocation Team shall be responsible for conducting interviews with all households impacted no later than prior to issuing an NOE. Resident interviews typically take approximately one hour to complete. Resident interview services may be required in Arabic, American Sign Language (ASL), Hmong, Spanish, Vietnamese and other languages. The Relocation Team shall include assistance from personnel who

speaking languages other than English where necessary. Should additional languages be identified, services will be provided in those languages.

The Relocation Team shall use multiple methods to make contact with residents, including direct mailings, phone calls, and door-to-door outreach to make contact with the Households and conduct interviews. The Relocation Team shall document the interview in the relocation file of such Household, which shall be maintained by the Relocation Team.

Plan Preparation, Approval and Updates

In accordance with the Guidelines, this Plan shall be made available to the residents of the Project and other interested parties for a 30-day review and comment period prior to requesting approval of the Board and adoption of this Plan. Section N of this Plan describes the review and comment period in more detail. Adoption of this Plan is required before any notice to vacate can be served. No Household shall be served a 90-Day Notice to Vacate without being provided a relocation assistance eligibility letter (aka NOE), and at least one decent, safe and sanitary housing unit that meets the needs of the Household.

This Plan should be periodically reviewed for consistency with the goals and process of the Project as changes occur. Updates should be made to this Plan should major substantive changes occur in the Project such as, but not limited to, enhanced levels of resident information, housing resource alternatives identification, elimination of a phased approach to the relocation, and/or regulatory changes that impact relocation requirements.

In accordance with the Guidelines, should implementation of this Plan not occur within twelve (12) months of approval of this Plan, this Plan must be updated. If substantial changes are made to this Plan once it is approved, it may be necessary to recirculate this Plan for public comment and re-submit this Plan to the Board for approval.

D. GENERAL DEMOGRAPHICS AND OCCUPANT DATA & DESCRIPTIONS**General Demographics and Housing Characteristics**

According to the 2010 U.S. Census, the population of the City of Sacramento is 466,488, and the population of the census tract where Twin Rivers is located (53.01) is 1,823 (see **Table 1**). Corresponding U.S. Census data concerning the housing mix is shown in **Table 2**.

**Table 1: 2010 Census Population
City of Sacramento & Census Tract 53.01**

Population Characteristic	City Total	City % Of	Tract 53.01 Total	Tract 53.01 % Of
Total population	466,488	100.0	1,823	100.0
One Race	433,363	92.9	1,665	91.3
White	210,006	45.0	754	41.4
Black or African American	68,335	14.6	665	36.5
American Indian and Alaska Native	5,291	1.1	60	3.3
Asian	85,503	18.3	66	3.6
Asian Indian	8,514	1.8	4	0.2
Chinese	20,307	4.4	4	0.2
Filipino	13,468	2.9	14	0.8
Japanese	5,730	1.2	3	0.2
Korean	1,265	0.3	1	0.1
Vietnamese	6,682	1.4	21	1.2
Other Asian	29,537	6.3	19	1.0
Native Hawaiian and Other Pacific Islander	6,655	1.4	14	0.8
Native Hawaiian	346	0.1	2	0.1
Guamanian or Chamorro	366	0.1	0	0.0
Samoan	819	0.2	4	0.2
Other Pacific Islander	5,124	1.1	8	0.4
Some Other Race	57,573	12.3	106	5.8
Two or More Races	33,125	7.1	158	8.7
American Indian and Alaska Native	3,392	0.7	30	1.6
Asian	6,454	1.4	7	0.4
Black or African American	5,510	1.2	25	1.4
Some Other Race	4,794	1.0	16	0.9

Source: U.S. Census Bureau, 2010

**Table 2: 2010 Census Housing Units
City of Sacramento & Census Tract 53.01**

Population Characteristic	City Total	City % Of	Tract 53.01 Total	Tract 53.01 % Of
Total housing units	190,911	100.0	333	100.0
Occupied housing units	174,624	91.5	310	93.1
Vacant housing units	16,287	8.5	23	6.9
For rent	8,035	4.2	13	3.9
Rented, not occupied	262	0.1	1	0.3
For sale only	2,495	1.3	1	0.3
Sold, not occupied	479	0.3	0	0.0
For seasonal, recreational, or occasional use	872	0.5	0	0.0
Unclassified vacant units	4,144	2.2	8	2.4
Homeowner vacancy rate (percent)		2.8		3.6
Rental vacancy rate (percent)		8.3		4.4

Twin Rivers Household Demographic and Housing Characteristics

Based on the information provided by the Developer to OPC, the data presents a picture of the households impacted by the Project. This section will provide insight into the number of persons, and the age, gender, race/ethnicity, special needs, and languages spoken by Households at the Project.

The data provided in Tables 3-7 below represents the best available data at this time. The data shall be updated once the interview process described in Section C is completed.

Table 3: Needs Assessment Survey Results - Population

Data Point	Number of or %
Number of Households	218
Number of Persons	416
Average # of Persons Per Household	1.9
% Female	60.6%
% Male	39.4%

**Table 4: Needs Assessment Survey Results –
Age Distribution of Residents**

Age Cohorts (years)	Number of Residents	% of Residents
17 and Under	207	50
18-64	196	47
65+	13	3

Table 5: Needs Assessment Survey Results - Race Distribution of Households

Race	% of Households
Black/African American	58%
White	29%
Asian	3%
Other Races	9%

There are currently 5 languages other than English spoken at the site. Table 6 provides the breakout of languages spoken in the home.

**Table 6: Needs Assessment Survey Results –
Primary Language Spoken at Home**

Languages Spoken	# of Households
English	210
Spanish	1
Vietnamese	3
American Sign Language	1
Other Languages	3

**Table 7: Needs Assessment Survey Results –
Disabilities and Other Medical Conditions**

Mobility Impaired Persons	TBD
Sight Impaired Persons	TBD
Hearing Impaired Persons	TBD
Persons w/ Other Medical Conditions to Be Considered	TBD

Existing Low Income Public Housing Units

Table 8 below shows the unit mix of the existing units at Twin Rivers that are planned to be demolished. All units shall be replaced one-for-one as part of the Project.

Table 8: Units Existing to Be Demolished

Twin Rivers Units	
BR Size	# of Units
1 BR	52
2 BR	48
3 BR	58
4 BR	18
5 BR	42
Sub-Total	218

Description of Non-residential Occupants

There is one known non-residential occupant that utilizes space at Twin Rivers. The need to permanently relocate the business is to be determined.

E. RELOCATION ASSISTANCE ELIGIBILITY

Relocation Eligibility Under 24 CFR Part 970 and the URA

Part 970.5 (h) determines that it is the responsibility of HACOS to comply with the URA and to ensure compliance with the URA (not withstanding any third party contractual agreements). The Authority is responsible for meeting its obligations as the Displacing

Agency.

As applied to this project, 970.5 (i) defines a displaced person as any person (household, business or non-profit organization) that moves from Twin Rivers as a direct result of the demolition. Notwithstanding that definition, in accordance with 970.5 (i) (2) (v) (B) (3), a person does not qualify as a displaced person if they have been:

- Evicted for serious or repeated violation of the terms and conditions of their lease, violation of applicable federal, state or local law or other good cause, and HACOS determines that eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance;
- The person moved into the property after submission of the application for demolition or disposition and the person was informed of the impact the Project could have on them in writing (also referred to as a move-in notice); or
- The person is otherwise ineligible for relocation assistance under the URA as described in in 24.2 (9) (ii) of the URA.

All relocation programs must establish the date on which a person becomes eligible to receive relocation assistance. This date is known as the Initiation of Negotiations and is referred to herein as the ION. In accordance with the URA, the ION is the date the project agrees to accept federal assistance.

The ION date for this Project is the date that the CNI Award Agreement was signed, which was September 28, 2015. Households who were lawful tenants on this date shall be eligible to receive relocation assistance, so long as they are in Good Standing, did not sign a move in notice, and do not vacate the property prior to receiving a NOE from Relocation Team.

HACOS served the General Information Notice (the "GIN") to all Households and non-residential occupants on or after May 12, 2017. This notice will advise persons who may be displaced that displacement may be caused by the Project, their general relocation rights, and not to move until they receive further notice in order to not negate their right to relocation assistance as a persons who may become displaced. HACOS and OPC conducted a meeting to review and explain the GIN with residents on June 8, 2017.

Any Household or person who vacates after receiving this notice and prior to receiving

an NOE or notice of ineligibility shall not be eligible to receive relocation assistance. After HUD approves the demolition and disposition of the Project, the NOEs may be issued. The NOE shall be issued to each Household at least 90 calendar days prior to the date that the Household must vacate before demolition of the unit.

Non-residential Relocation Eligibility

There is currently one known non-residential occupant located at the Twin Rivers Project site. The need to permanently displace the business is to be determined. This plan does provide for the type of payments and expenses required should they be displaced. If they shall be temporarily relocated similar payments will be afforded to them.

Ineligibility for Relocation Assistance

ANY Household or non-residential occupant that has been evicted for cause, that voluntarily moves from the Project after receiving the GIN, or is not in lawful occupation of its unit, shall not be eligible to receive relocation assistance.

F. REPLACEMENT HOUSING NEEDS & RESOURCES

Replacement Housing Needs

All 218 existing Twin Rivers housing units shall be replaced one-for-one by the Project. All of the replacement units shall be constructed on the current location of the Project. The replacement units shall become Project Based Section 8 units operated under the HUD Section 8 program with similar long-term affordability and protections as Public Housing.

Replacement Housing and Re-housing Plan

All households in good standing will be offered the Right-to-Return to Twin Rivers upon completion. Should an eligible household choose to return to Twin Rivers upon completion, HACOS will provide a temporary offsite unit for the duration of construction. Should the Household choose not to exercise their Right-to-Return, the replacement housing the Household chooses within the limitations of the relocation program shall

become their permanent housing unit and HACOS shall have satisfied all of its relocation obligations. All eligible Households will also have the right to replacement housing assistance including a HUD Tenant Protection Vouchers (TPV), referrals to replacement housing, and assistance from the Relocation Team in securing new housing.

Replacement Housing to Be Developed

Table 9 below provides the anticipated mix of new housing units to be developed. The unit mix (number of units by size) may be adjusted to satisfy regulatory requirements.

Table 9: Total New Housing Units to Be Developed

Unit Size	# of Replacement Public Housing Units	Total # Proposed Housing Units *
1 BR	52	52
2 BR	86	86
3 BR	58	58
4 BR	18	18
5 BR	4	4
TOTAL	218	218

**Subject to change*

Replacement Housing Survey

To assess the current availability of potential off-site relocation housing units, OPC conducted a preliminary housing survey of units currently available in the City of Sacramento on June 2, 2017 prior to the release of this Plan for the comment period described in Section N. These units could be a resource for permanent off-site replacement housing units. The following Table 10 provides the results of this survey.

The Relocation Team shall conduct more in-depth replacement housing searches based on residents’ needs and requests prior to relocations as needed. Replacement housing referrals will be focused on units within their current neighborhood and the City of Sacramento. Extensive work will be done to identify affordable units available

throughout the Sacramento Area and those accepting Section 8. The Relocation Team will also assist Households pursue housing in locations outside of Sacramento if they specifically request it.

Table 10: Replacement Housing Survey Results

Unit Size	# Located	# Confirmed Accepting Section 8	Rental Range
1	65	12	\$705 -\$2,190
2	39	15	\$1,000-\$3,275
3	25	8	\$1,400-\$2,275
4	10	2	\$1,725-\$3,095
5	2	0	\$2,020-\$3,095

Relocation Resources

A listing of useful relocation resources will be provided in Appendix F of this Plan including listing of affordable housing properties with open waitlists, properties under construction that are expected to be taking applications, and other resources that households may find useful in addition to working with the Relocation Team.

G. RELOCATION ASSISTANCE PROGRAM

HACOS'S Responsibilities

HACOS is responsible to ensure the proper relocation assistance program is designed and implemented successfully. HACOS's primary responsibilities are as follows.

1. To Provide relocation advisory, moving services and benefits which will provide you with decent, safe and affordable housing.
2. Provide referral to a minimum of one replacement housing unit.
3. To Provide a minimum 90-Day written notice to vacate prior to requiring possession of the unit.

4. Ensure that replacement housing units are inspected are meet DS&S conditions.
5. To reimburse for moving expenses.
6. To Provide payments for added cost of renting or purchasing replacement housing.
7. To have a fair and open relocation process.
8. To keep you informed about the process and any changes that may occur.
9. To follow relocation policies and procedures.
10. To Adhere to all laws and regulations while providing the Services mentioned above.

In order to meet these responsibilities, HACOS will be supported by a Relocation Team.

Relocation Team Availability and Responsibilities

The Relocation Team will be available to assist any Household with questions about relocation and/or assistance in relocating. The Relocation Team shall provide all Households with the location and hours of operation of the relocation office at a later date. Close personal contact shall be maintained with each Household. Should the Relocation Team contact information change, this Plan shall be updated, and all Households shall receive a notice of the applicable changes.

Specific activities performed by Relocation Team shall include:

1. Interview all Households.
2. Develop a relocation needs assessment to inform them through the relocation process and provide exceptional service to the Households.
3. Deliver the GIN or verify delivery by HACOS.
4. Personally present and explain the Notice of Eligibility where possible.
5. Distribute the 90-Day Notice, and where applicable, a 30-Day Notice and other reminder notices related to the vacate date of each Household.
6. Provide referrals to replacement housing. A minimum of three replacement dwelling referrals will be made.
7. Inspect replacement housing to ensure the housing unit is DS&S - DS&S Housing is defined in Appendix A.
8. Provide the Households with relocation counseling services to assist them in making good decisions to plan their move.
9. Coordinate moves to Household's replacement housing.

10. Assist with the completion and filing of any needed relocation claims, rental applications, and appeals forms, if necessary.
11. Provide housing payment assistance as required under the applicable relocation requirements.
12. Other assistance that may be appropriate to ensure that each Household receives services and benefits that are reasonably permitted and/or required under the URA and necessary to ensure that hardships and impacts are reduced as much as possible in the relocation process.
13. Document receipt of all required notices, housing referrals provided, signed claims and receipts of payments, and demonstration of advisory services and relocation assistance provided to Households in the relocation file of each Household.

Household Responsibilities

The household, like HACOS and the Relocation Team have certain responsibilities. These include:

1. Make sure they are in, and remain in, "Good Standing"
2. No lease violations.
3. Report all changes in family composition and income (this can affect your benefits).
4. Update all your contact information.
5. Keep all notices sent to you by HACOS and the Relocation Team regarding relocation
6. Specify a housing preference when asked to do so
7. To move upon notice during the specific time period
8. Complete and return all forms sent to you by HACOS and the Relocation Team.
9. Ask questions if you do not understand any part of the relocation process.

Noticing

Notices may be personally served or mailed with a certified return receipt. All notices and proof of service shall be maintained in the Relocation Team's relocation case files.

At a minimum, each Household and non-residential occupant shall receive the following from Relocation Team. Samples for certain notices are provided on Appendix E.

1. A relocation assistance informational brochure or statement.
2. Notice of Eligibility ("NOE"). The NOE shall describe the relocation assistance each Household is eligible to receive and the respective rights and responsibilities of the Household and the Developer.
3. Any Household or person not eligible for relocation assistance shall receive a notice of ineligibility. The notice shall state why such Household or person is not eligible to receive relocation assistance. Note that households would have the right to appeal such a decision in accordance with the appeals process of this Plan.
4. A 90-Day Notice prior to the required vacation date. Such notice shall be mailed to each Household via certified mail/return receipt requested and first class mail with directions to contact Relocation Team to review the notice as needed. These notices may be served concurrently with the NOE or notice of ineligibility. A 30-Day Notice prior to the required vacation date. Such notice shall be mailed to each Household via certified mail/return receipt requested and first class mail with directions to contact the Relocation Team to review the notice as needed. NOTE: A 30-Day Notice shall only be served in cases where a Household is still occupying a unit thirty (30) calendar days prior to the expiration of the 90-Day Notice.
5. A move procedures guide that explains the details of move day activities and post move out procedures. The guide shall be served as needed with the 90-Day Notice, and its procedures shall be developed by Relocation Team at a later date when the final move program is defined.

Notices shall be provided to the Household in the primary language of such Household. All notices shall inform the Household of their right to request a reasonable accommodation.

Replacement Housing

Replacement housing will be comprised of units available on the market at the time the Household shall be relocated. For those households who elect to forfeit their Right-to-

Return to Twin Rivers, the Relocation Team shall provide referrals to permanent replacement housing units that meet the needs of the Household.

Should it be needed, the Relocation Team shall provide transportation services to the Households to view potential replacement sites and meet with landlords. HACOS shall also provide residents assistance to be placed on waiting lists for chosen properties and assist them with the application process.

Replacement Housing Assistance Payment:

Households who may be eligible to receive a TPV would be expected to have any increase to their total tenant payment covered by the TPV. However, should the Household realize an increase in out-of-pocket monthly housing cost, the Household would be eligible to receive a rent differential payment.

Should a Household not be eligible to TPV, they would also be eligible to receive a rent differential payment should their monthly out-of-pocket housing costs increase

In either case, where applicable, the rental differential payment shall be based on the monthly differential between the rent for a comparable replacement housing unit and the lesser of 30% of the gross income of such Household (ability to pay), or their displacement rent and utility costs at Twin Rivers. This monthly differential shall then be multiplied by forty-two (42) months to derive the maximum eligible replacement housing benefit. The actual rent differential payment the eligible Household would receive would be based on the differential between the actual contract rent and utilities' costs at the replacement unit and the lesser of 30% of the gross income of the Household or their displacement rent and utility costs. The following Table 11 provides a sample calculation of this payment.

Table 11: Example Computation of Rent Differential Payment *

1. Rent of Displacement Unit	\$800	Displacement Rent plus Utility Costs
Or		
2. Ability to Pay	\$750	30% of the Gross Household Income
3. Lesser of lines 1 or 2	\$750	
Subtracted From:		
4. Actual New Rent	\$950	Actual New Rent including Utility Allowance
Or		
5. Comparable Rent	\$1,000	Determined by Agency; <u>includes</u> Utility Allowance
6. <u>Lesser</u> of lines 4 or 5	\$950	
7. Yields Monthly Need:	\$200	Subtract line 3 from line 6
8. Rental Assistance	\$8,400	Multiply line 7 by 42 months

**Note: This is a sample case only and is not reflective of actual market conditions. Not all Households shall receive this type of relocation assistance. The Household should discuss their eligibility for this type of relocation assistance prior to making any decisions regarding their replacement housing options. This form of payment shall be provided based on need. This payment is limited to the forty-two (42) month period prescribed under the URA. Should Section 104(d) be triggered, this period shall be required to cover sixty (60) months versus 42. This Plan will be updated should Section 104(d) be triggered. It should be further noted that*

Additional Forms of Housing Assistance Payments

Security deposit and application fee assistance will be made available to all eligible households.

Security Deposit Assistance: Eligible households will be offered assistance to pay for the security deposit assistance at their relocation housing unit. The deposit amount

cannot exceed twice the contract rent for the unit. The deposit is expected to be made directly the tenants new landlord on their behalf. Both the tenant and landlord will be required to sign a promissory note that would return the deposit to HACOS upon the tenants move out of that unit in accordance with the terms of their lease at their relocation housing unit. Households will be responsible for paying any required pet deposits and/or non-refundable pet fees. All requests for deposits will be verified through review of lease documents, applications, or direct contact to the landlord. Undocumented deposit requests will not be assisted.

Application Fee Assistance: Eligible households may receive reimbursement of up to \$250 for application fees including background checks required by a new landlord. The household must provide receipts for all fees up to \$250 that they seek reimbursement for. On a case by case basis application fees in excess of \$250 may be considered for reimbursement so long as the claimant provides adequate receipts. Undocumented fees will not be reimbursed.

Moving Assistance

Under the URA, all Households are considered to be permanently relocated from Twin Rivers. Households will be able to choose between having a professional moving company perform their move at the Authority's expense, or receive a fixed payment to conduct a self-move. The Relocation Team shall meet with each Household to explain the moving assistance services that shall be made available to them. This section of the Plan may be expanded to serve additional needs identified in the relocation interview process.

Fixed Payment In-lieu of Actual and Reasonable Move Costs: As stated above, each Household shall have the option to receive a fixed move payment (the "FMP") based on the current number of moveable rooms containing personal property in their existing unit to conduct a self-move in lieu of having a professional mover relocate their personal property. The current federal FMP schedule for the state of California is presented in the following Table 12. A Household that elects to receive the FMP shall not receive moving compensation for costs such as labor, boxes and other packing materials, utility transfers, or other costs related to the physical move, because the intent of the FMP is to provide funds to the Household to pay for all costs associated with the move per the URA.

Table 12: Federal Fixed Move Payment Schedule

# of Moveable Rooms	Typical Unit Size Equivalent	Payment Amount
3 Rooms	Typical 1 BR	\$1,165
4 Rooms	Typical 2 BR	\$1,375
5 Rooms	Typical 3 BR	\$1,665
6 Rooms	Typical 4 BR	\$1,925
7 Rooms	Typical 5 BR	\$2,215
Additional Rooms	i.e. outdoor storage	\$265

Non-residential Occupant Moving Expense Payments

Relocation benefits shall be provided to any displaced non-residential occupants pursuant to federal and state relocation law. Eligible non-residential occupants may receive a relocation payment to cover the reasonable cost of moving their personal property from Twin Rivers to their replacement site.

The non-residential displacees shall have 2 options:

- (A) A payment for actual reasonable and necessary moving and related expenses;

Or,

- (B) A fixed payment in lieu not to exceed Forty Thousand and No/100ths Dollars (\$40,000).

Payment for Actual Reasonable and Necessary Moving and Related Expenses

This payment may include the following:

- a) Transportation of persons and property from the present location to the replacement location (transportation costs are limited to a distance of fifty (50) miles);
- b) Packing, crating, uncrating, and unpacking personal property;
- c) Disconnecting, dismantling, removing, reassembling, and installing relocated and substitute machinery, equipment and other personal

- property. This includes connection to utilities available nearby, and modifications necessary to adapt such property to the replacement structure, or to the utilities, or to adapt the utilities to the personal property;
- d) Storage of personal property generally for up to 12 months, at the Developer's discretion;
 - e) Insurance of personal property while in storage or transit and, the replacement value of property lost, stolen, or damaged (though not through the fault or negligence of the displaced person) in the process of moving;
 - f) Subject to certain limitations, any license, permit or certification required by the displaced business, to the extent that the cost is necessary for reestablishment at the replacement location;
 - g) Subject to certain limitations, reasonable and pre-authorized professional services, including architects', attorneys', engineers' fees and consultants' charges, necessary for: (1) planning the move of the personal property; (2) moving the personal property; or, (3) installing the relocated personal property at the replacement location;
 - h) Subject to certain limitations, the purchase and installation of substitute personal property limited to the lesser of: (1) the estimated cost to move the item to the replacement location; or, (2) the replacement cost, less any proceeds from its sale;
 - i) Subject to certain limitations, modifying the machinery, equipment or other personal property to adapt it to the replacement location or to utilities available at the replacement location or modifying the power supply.
 - j) Actual direct losses of tangible personal property resulting from moving, or discontinuing a business or non-profit organization, *not-to-exceed* the *lesser of*:
 - k) The fair market value of the tangible, personal property for continued use at its location prior to displacement; *or*,
An amount equal to the reasonable expenses that would have been required to relocate the property, as determined by HACOS, subject to certain limitations;
 - l) Actual, and reasonable expenses incurred in searching for a replacement business location, *not-to-exceed* Two Thousand Five Hundred and No/100ths Dollars (\$2,500.00).

- m) Actual, and reasonable expenses necessary to reestablish a displaced small business at its new location, *not-to-exceed* Twenty-Five Thousand and No/100ths Dollars (\$25,000.00). Examples of expenses that may be considered for reimbursement include advertising, redecoration and certain increased costs of operation at the new location.

Fixed Payment In Lieu of a Payment for Actual Reasonable Moving and Related Expenses

The amount of this payment shall be based on the *average, annual net* earnings of the business. The payment to an eligible business may neither be less than One Thousand and No/100ths Dollars (\$1,000.00), nor more than Forty Thousand and No/100ths Dollars (\$40,000.00). To qualify for this payment a displaced business:

- A) *Cannot* be a part of a commercial enterprise having *at least 3* other establishments which are *not* being displaced as part of the Project, and which is under the *same ownership* and engaged in the *same, or similar* business activities;
- B) Must *not* be able to relocate without substantial loss of patronage; and,
- C) *Must* have contributed *at least thirty-three percent (33%)* of the owner's total gross income during *each* of the 2 taxable years *prior to* displacement, *or* meet specific earnings criteria.

H. PAYMENT OF RELOCATION BENEFITS

Payment of relocation assistance to the Households or non-residential occupants shall be made expeditiously. In order to receive any applicable replacement housing payments, the Household must rent and occupy a decent, safe and sanitary replacement housing unit within 12 months after they vacate Twin Rivers. All Households eligible to receive a payment must submit claims and supporting documentation for relocation benefits to the Relocation Team no later than eighteen (18) months after the date they vacate the Twin Rivers in order to remain eligible for payment.

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

1. Claimant(s) shall provide all necessary documentation to substantiate eligibility for assistance;
2. Relocation Team shall review all necessary documentation before reaching a determination as to which expenses are eligible for compensation;
3. Required claim forms shall be prepared by Relocation Team and be presented to the claimant for review and signature. Signed claims and supporting documentation shall be returned to Relocation Team for processing of payment;
4. Relocation Team shall review and approve claims for payment or request additional information;
5. Relocation Team shall issue benefit checks to claimants in the most secure, expeditious manner possible;
6. Receipts of payment and all claims materials shall be maintained in the relocation case file;
7. In cases where the displacee disputes the amount of payment they are awarded in the claim, they may make a written appeal in accordance with the appeals process defined in Section K of this plan. Further details regarding the appeals process and a sample appeals request form is provided in Appendix G of this Plan.

I. LAWFUL PRESCENCE IN THE UNITED STATES

Federally-funded relocation projects require that all persons self-certify their lawfully present status in the United States in order to receive relocation assistance under the URA.

All eligible Households shall receive relocation assistance. In **cases** where a Household includes persons not lawfully present in the United States, such Household shall receive relocation assistance under the CRAL and the Guidelines.

J. EVICTION POLICY

It is recognized that eviction is permissible only as a **last resort** and that relocation records must be documented to reflect the specific circumstances surrounding any eviction. Eviction shall only take place in **cases** of nonpayment of rent; a serious

violation of the rental agreement; a dangerous or illegal act in the unit; violation of federal, state, or local laws; or, if the Household refuses all reasonable offers to move. Should an eviction occur, the persons lawfully evicted will no longer receive relocation assistance in accordance with the URA, however, in certain circumstances they may receive assistance under CRAL and the Guidelines.

K. APPEALS POLICY

The appeals policy and grievance procedures shall follow the standards described in the URA. Briefly stated, a displaced Household shall have the right to ask for review when there is a perceived grievance regarding the Household's rights to relocation assistance including the determination as to eligibility, the amount of payment, or the failure to provide a comparable replacement housing referral. Appendix F provides a full description of the appeals process.

L. PROJECTED RELOCATION SCHEDULE AND PHASING PLAN

Phasing Plan

Relocations shall occur in 2 phases. Figure 3 below provides a graphic description of the preliminary order of the phasing. Households at Twin Rivers shall be relocated in phases ahead of the commencement of each demolition phase.

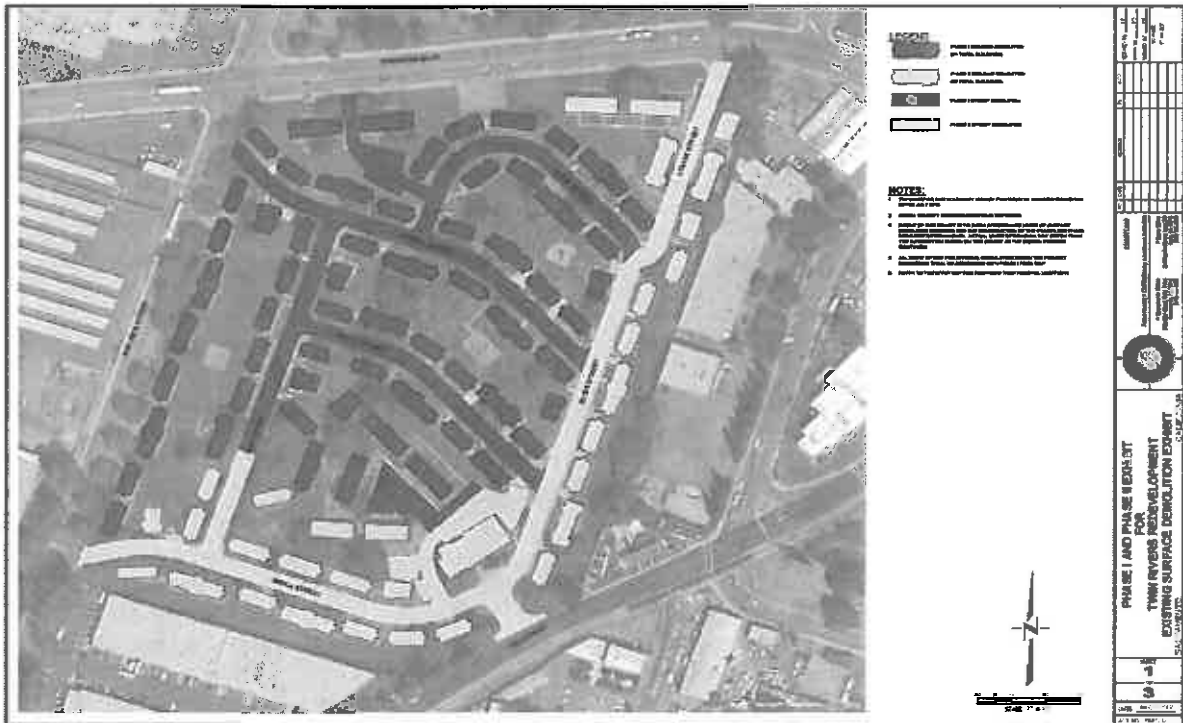


Figure 3: Project Phase Map

General Relocation Schedule

The general relocation planning and implementation schedule is shown below and will be updated as information becomes available. The relocation schedule is subject to change and shall be updated in future updates to this Plan *.

- Relocation Plan Development: January - June 2017
- Plan Public Comment Period: June 12- July 12, 2017
- Relocation Team Household Interviews: July 17 – August 16, 2017
- Issue Notices of Eligibility for Advanced Relocations – July 2017
- Board of Commissioners Public Hearing: July 19, 2017
- Board of Supervisors, Board of the Housing Authority of the County of Sacramento, and City Council Approval of Relocation Plan: August 22, 2017
- Issue Relocation Phase I 90-day Notices to Vacate – August 23, 2017
- Phase I Relocation: September 1 2017 – December 31 2017
- Phase II Relocations: August - December 2018 (*Anticipated dates, subject to change)

The relocation schedule shall be developed in greater detail by the Relocation Team upon greater detail being learned. The Relocation Team shall provide periodic schedule updates to the Households to keep them advised and informed of upcoming relocation activity that may affect them.

This Plan shall be updated if regulatory changes occur that impact the Project and relocation of the Households. The Relocation Team shall prepare phase specific relocation plans, which plans shall serve as the primary form of update and expansion of the content of this Plan.

M. ESTIMATED RELOCATION COSTS

The estimated relocation budget provided below is based on the best current available data related to the overall project schedule, potential number of relocations, and the estimated vendor costs as of June 1, 2017.

The budget is considered conservative at this time and should remain as such until certain factors are better understood and more easily controlled, including the number of permanent off-site relocations that may require additional relocation payments and the number of off-site long-term-temporary relocations that may be needed.

The approval of this Plan does not constitute the approval of the relocation budget for the purposes of determining maximum levels of eligible compensation. These maximums shall be based on actual data at the time of the preparation of an NOE in accordance with the URA. HACOS cannot offer lesser relocation payments than those required by the URA, the Guidelines or the CRAL in order to conform to the parameters of the preliminary budget that is included in the approved relocation plan.

This is an important Section of this Plan to be monitored and periodically updated. A twenty percent (20%) contingency has been used to mitigate against potential cost increases, including the provision of services not yet considered in this Plan, permanent relocations that require rent differential payments, moving cost increases based on formal bids and ultimate vendor contracts, and other unforeseen factors that could increase the cost of implementing this Plan. A twenty percent (20%) contingency is used, because there is a lengthy time horizon between its approval and actual implementation of relocation.

As the project variables become more reliable, updates to the budget shall be prepared. Table 13 below provides the preliminary proforma cost estimate for the Project. As stated, the cost estimate is subject to change as the project details are solidified in greater detail.

Table 13: Proforma Relocation Cost Estimate *

Cost Estimate Line Item	Estimated Cost
Residential Relocation Costs	\$4,078,176
Non-residential Relocation Costs	\$40,000.00
Total Relocation Cost Estimate	\$4,118,776

**Cost estimate is subject to change. Estimate is not an assumption of any cash payout to any Household.*

N. RESIDENT PARTICIPATION/PLAN REVIEW

The Plan and the general relocation program was introduced to the residents on June 8, 2017. In accordance with the Guidelines this Plan was made available to each Household for a thirty (30)-day review and comment period. A copy of this Plan is available for review at the following locations:

Hard Copy: *Twin Rivers Office at 321 Eliza Street, Sacramento, CA*

Electronic/On-line:

http://www.shra.org/Portals/0/pdf/public_housing/CNI%20TW/Relocation%20Plan-Twin%20Rivers.pdf?ver=2017-06-12-154646-803

Written comments were requested and were offered to be collected for review by the Authority. The plan review period started on June 12, 2017 and concluded on July 11, 2017. Four informational sessions to explain the Plan and the relocation program with the residents were conducted on July 10, 2017. A write up regarding these meetings is found in Appendix D. One set of written comments were received during the comment period. Please refer to Appendix H for the comments and responses to comments. OPC and HACOS staff reviewed comments with the commenter on July 27, 2017. This Plan will be presented to the Board for approval on August 22, 2017.

APPENDICES

A. RELOCATION TERMS GLOSSARY

GLOSSARY OF RELOCATION TERMS

90-Day Notice This is a notice that may be given to a person who shall be required to move a residence, business or personal property as a result of the agency's project. It informs the person that he or she must move the residence, business or personal property ninety (90) calendar days from the date of the notice. This notice can only be given after a relocation plan is approved and a Notice of Eligibility or other form of eligibility notice for relocation benefits has been given to the displaced person(s).

30-Day Notice This is a notice that may be given to a person who shall be required to move a residence, business or personal property as a result of the agency's project. It informs the person that he or she must move the residence, business or personal property thirty (30) calendar days from the date of the notice. This notice can only be given after a 90-Day Notice is given to the displaced person(s).

Comparable Replacement Dwelling The term *comparable replacement dwelling* means a dwelling which is:

(i) Decent, safe and sanitary; (ii) Functionally equivalent to the displacement dwelling. The term *functionally equivalent* means that it performs the same function, and provides the same utility. While a comparable replacement dwelling need not possess every feature of the displacement dwelling, the principal features must be present. Generally, functional equivalency is an objective standard, reflecting the range of purposes for which the various physical features of a dwelling may be used. However, in determining whether a replacement dwelling is functionally equivalent to the displacement dwelling, the Agency may consider reasonable trade-offs for specific features when the replacement unit is equal to or better than the displacement dwelling; (iii) Adequate in size to accommodate the occupants; (iv) In an area not subject to unreasonable adverse environmental conditions; (v) In a location generally not less desirable than the location of the displaced person's dwelling with respect to public utilities and commercial and public facilities, and reasonably accessible to the person's place of employment; (vi) On a site that is typical in size for residential development with normal site improvements, including customary landscaping. The site need not include special improvements such as outbuildings; (vii) Currently available to the displaced person on the private market; and (viii) Within the financial means of the displaced person: A replacement dwelling rented by an eligible displaced person is considered to be within

his or her financial means if, after receiving rental assistance under this part, the person's monthly rent and estimated average monthly utility costs for the replacement dwelling do not exceed the person's base monthly rental for the displacement dwelling; For a displaced person who is not eligible to receive a replacement housing payment because of the person's failure to meet length-of occupancy of occupancy requirements, comparable replacement rental housing is considered to be within the person's financial means if an Agency pays that portion of the monthly housing costs of a replacement dwelling which exceeds the person's base monthly rent for the displacement dwelling. Such rental assistance must be paid under Replacement housing of last resort. (ix) For a person receiving government housing assistance before displacement, a dwelling that may reflect similar government housing assistance. In such cases any requirements of the government housing assistance program relating to the size of the replacement dwelling shall apply.

Decent, Safe, and Sanitary Dwelling The term *decent, safe, and sanitary dwelling* means a dwelling which meets local housing and occupancy codes. However, any of the following standards which are not met by the local code shall apply unless waived for good cause by the Federal Agency funding the project. The dwelling shall: (i) Be structurally sound, weather tight, and in good repair; (ii) Contain a safe electrical wiring system adequate for lighting and other devices; (iii) Contain a heating system capable of sustaining a healthful temperature (of approximately 70 degrees) for a displaced person, except in those areas where local climatic conditions do not require such a system; (iv) Be adequate in size with respect to the number of rooms and area of living space needed to accommodate the displaced person. The number of persons occupying each habitable room used for sleeping purposes shall not exceed that permitted by local housing codes or, in the absence of local codes, the policies of the displacing Agency. In addition, the displacing Agency shall follow the requirements for separate bedrooms for children of the opposite gender included in local housing codes or in the absence of local codes, the policies of such Agencies; (v) There shall be a separate, well lighted and ventilated bathroom that provides privacy to the user and contains a sink, bathtub or shower stall, and a toilet, all in good working order and properly connected to appropriate sources of water and to a sewage drainage system. In the case of a housekeeping dwelling, there shall be a kitchen area that contains a fully usable sink, properly connected to potable hot and cold water and to a sewage drainage system, and adequate space and utility service connections for a stove and refrigerator; (vi) Contains unobstructed egress to safe, open space at ground level; and

(vii) For a displaced person with a disability, be free of any barriers which would preclude reasonable ingress, egress, or use of the dwelling by such displaced person.

Displacement The act of requiring a displaced person to move permanently from the dwelling in which they occupy for a federally or State funded or sponsored project.

Displacement Dwelling The term displacement dwelling means the dwelling unit on the real property that the displaced person moves from or moves his or her personal property from the real property.

Displacing Agency The term displacing Agency means any Federal Agency carrying out a program or project, and any State, State Agency, or person carrying out a program or project with federal financial assistance, which causes a person to be a displaced person.

Displaced Person (i) *General* the term *displaced person* means any person who moves from the real property or moves his or her personal property from the real property. This includes a person who occupies the real property prior to its acquisition, but who does not meet the length of occupancy requirements. (A) As a direct result of a written notice of intent to acquire, the initiation of negotiations for, or the acquisition of, such real property in whole or in part for a project; (B) As a direct result of rehabilitation or demolition for a project. (ii) *Persons not displaced*. The following is a nonexclusive listing of persons who do not qualify as displaced persons under this part: (A) A person who moves before the initiation of negotiations, unless the Agency determines that the person was displaced as a direct result of the program or project; (B) A person who initially enters into occupancy of the property after the date of its acquisition for the project; (C) A person who has occupied the property for the purpose of obtaining assistance under the Uniform Act; (D) A person who is not required to relocate permanently as a direct result of a project. Such determination shall be made by the Agency in accordance with any guidelines established by the Federal Agency funding the project, or as a result of the rehabilitation or demolition of the real property. (However, the displacement of a tenant as a direct result of any acquisition, rehabilitation or demolition for a federal or federally assisted project is subject to this part.); (E) A person who, after receiving a notice of relocation eligibility, is notified in writing that he or she shall not be displaced for a project. Such written notification shall not be issued unless the person has not moved and the Agency agrees to reimburse

the person for any expenses incurred to satisfy any binding contractual relocation obligations entered into after the effective date of the notice of relocation eligibility.

Eligible Household/Resident A Household eligible for relocation assistance in accordance with the Uniform Relocation Act and/or the California Relocation Assistance Guidelines/Law.

Fixed Residential Moving Cost Schedule A schedule is used to calculate the amount of reimbursement that displaced persons may be eligible to receive if they decide to move their own personal property. The Federal Highways Administration periodically updates and distributes this schedule. A copy can be found on our web site at: <http://www.fhwa.dot.gov/realestate/index.htm> in the section *Relocation Assistance*. Payment per this schedule is also known as a fixed move payment.

General Information Notice (GIN) A required notice under the Uniform Relocation Act (URA) that provides the household of their general relocation rights and advises them not to move or vacate from their unit until they receive a notification of their relocation eligibility.

Household means one or more persons occupying an existing housing unit at Twin Rivers.

In-Eligible Household/Resident Household not eligible for relocation assistance in accordance with the Uniform Relocation Act and/or the California Relocation Assistance Guidelines/Law.

Low-income Families means families whose annual incomes do not exceed 80 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 80 percent of the median for the area on the basis of HUD findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Notice of Eligibility (NOE) The term Notice of Eligibility, also referred to as an NOE, is the written description of the type of permanent relocation benefits and the monetary amount(s) of those benefits a displaced person is eligible to receive under the

appropriate relocation statutes or laws (for example the URA.) This notice can be given prior to the approval of the relocation plan as deemed appropriate by the displacing agency.

Relocation The act of moving permanently or temporarily from a dwelling unit as a result of a federally or State funded or sponsored project where the URA or other relocation statutes or laws are triggered.

Rent Differential Payment Amount of assistance paid to a displaced person, who is a renter, to compensate for the difference between the monthly rent and utility payment that they shall pay at the replacement dwelling unit and what was paid for rent and utilities at the displacement dwelling. This difference is calculated over a forty-two (42) month period. If Tenant-based Rental Assistance such as Section 8 Housing Choice Voucher is available to the displaced person, that amount of assistance shall offset a portion of the difference and any un-met portion of the difference is eligible to be paid a rent differential payment. The payment must be claimed within eighteen (18) months after the displaced person moves from the displacement dwelling. Also referred to as a Rental Assistance Payment (RAP) or Replacement Housing Payment (RHP).

Replacement Dwelling A replacement dwelling is the unit the displaced person elects to move to from the displacement dwelling. A displaced person must locate and move into a replacement dwelling within twelve (12) months of the date they vacate the displacement dwelling to claim a RAP.

Right to Return The right to return to Twin Rivers upon completion of a new unit long as the Household meets all eligibility requirements.

Tenant-based Rental Assistance is a form of rental assistance in which the assisted tenant may move from a dwelling unit with a right to continued assistance. Tenant-based rental assistance under this part also includes security deposits for rental of dwelling units. A common form of Tenant Based Rental Assistance is a Section 8 Housing Choice Voucher and Tenant Protection Vouchers.

Uniform Act Relocation (URA) The term *Uniform Act* means the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Pub. L. 91-646, 84 Stat. 1894; 42 U.S.C. 4601 *et seq.*), and amendments thereto. Also known as the URA.

B. APPLICABLE RELOCATION REGULATIONS

Permanent Relocation Assistance for Displaced Public Housing Tenants: Federal and State of California Relocation Requirements²

	URA	Section 18	California Law
<p>Relocation Plan</p>	<p>Must plan for relocation which may include conducting a survey of needs including:</p> <ul style="list-style-type: none"> • Estimate of the number of households to be displaced including information such as owner/tenant status, estimated value and rental rates of properties to be acquired, family characteristics, and special consideration of the impacts on minorities, the elderly, large families, and persons with disabilities when applicable • Estimate of comparable replacement housing available (including price ranges and rental rates). • Consideration of any special relocation advisory services that may be necessary from the housing authority and other cooperating agencies. <p>No formal plan documents are required, and no approval process is required.</p>	<p>Relocation Plan must include:</p> <ul style="list-style-type: none"> • The number of individual residents to be displaced; • The type of counseling and advisory services the PHA plans to provide; • What housing resources are expected to be available to provide housing for displaced residents; and • An estimate of the costs for counseling and advisory services and resident moving expenses, and the expected source for payment of these costs. <p>Relocation must be executed on a nondiscriminatory basis</p> <p>PHA must provide in disposition application the following information:</p> <ul style="list-style-type: none"> • The number of occupied units; • A schedule for relocation on a month-to-month basis; 	<p>As soon as possible following initiation of negotiation PHA must prepare relocation plan and submit for approval of PHA board of Head of PHA. Plan must be available for public comment and review at least 30 days prior to approval. Plan must contain -</p> <ul style="list-style-type: none"> • Analysis of relocation needs • Projected dates of displacement • Analysis of comparable housing resources • Description of relocation advisory services • Description of relocation payments • Cost of carrying out relocation plan • Last resort housing plan if necessary • Temporary relocation plan if applicable • Plans for citizens participation • Comments from relocation committee if applicable.

² California Relocation Law (California Government Code Section 7260 et seq. (the CRAL²), and the California Relocation Assistance and real Property Acquisition Guidelines, Title 15, CCR, Section 6000 et seq. (the "Guidelines") (collectively, the "California Relocation Law"); Section 18 of the U.S. Housing Act of 1937, and implementation regulations at 24 CFR Part 970) (collectively, "Section 18"); the Uniform Relocation Act (46 U.S.C. §4600 et seq.), and its implementation regulations (49 CFR Part 24)(collectively, "URA"); RAD is subject to the URA.

TWIN RIVERS - MASTER RELOCATION PLAN

	URA	Section 18	California Law
Moving & Related Expenses (PHA unit move to a PHA unit)	<p>PHA choice!</p> <ul style="list-style-type: none"> PHA move resident with force account staff or contractor (\$100 allowance to resident), or allow resident to choose: <ul style="list-style-type: none"> Payment for actual costs of a self-move, or Payment for self-move at DOT schedule amount Or <ul style="list-style-type: none"> A combination of both <p>Resident's choice!</p> <ul style="list-style-type: none"> Payment for actual costs of a Self-move, or Payment for self-move at DOT schedule amount, or A combination of both. <p>(Optional) PHA may offer to move resident with force account staff or contractor (\$100 allowance to resident)</p>	<ul style="list-style-type: none"> Actual and reasonable relocation expenses 	
Moving & Related Expenses (PHA unit move to non-public housing—with or without Voucher assistance)	<ul style="list-style-type: none"> Offer comparable replacement dwelling which may be: <ul style="list-style-type: none"> Tenant based assistance (voucher) Project-based assistance Public housing unit Computed on 42-month period Amount needed to reduce new rent/utility costs to the lower of old rent/utility costs or (for low income persons only, 30% of gross monthly income) "Gap" payments may be necessary 	<ul style="list-style-type: none"> Actual and reasonable relocation expenses 	<p>Actual and reasonable moving costs including costs for</p> <ul style="list-style-type: none"> Transportation not to exceed a distance of 50 miles except where justified Packing and unpacking Storage of personal property if necessary Replacement value of property lost, stolen or damaged
Replacement Housing	<ul style="list-style-type: none"> Offer comparable replacement dwelling which may be: <ul style="list-style-type: none"> Tenant based assistance (voucher) Project-based assistance Public housing unit Computed on 42-month period Amount needed to reduce new rent/utility costs to the lower of old rent/utility costs or (for low income persons only, 30% of gross monthly income) "Gap" payments may be necessary 	<ul style="list-style-type: none"> Provide comparable housing which may be: <ul style="list-style-type: none"> Tenant based assistance (voucher) Project-based assistance Public housing unit No Replacement Housing Payment No provisions for "gap" payments 	<ul style="list-style-type: none"> Provide at least three offers of comparable replacement housing – no specific provisions regarding the use of subsidized housing as an offer of comparability. Computed on 42-month period Amount needed to reduce new rent/utility costs to the lower of old rent/utility costs or 30% of gross monthly income
Replacement Housing Payment (RAP)	<ul style="list-style-type: none"> Offer comparable replacement dwelling which may be: <ul style="list-style-type: none"> Tenant based assistance (voucher) Project-based assistance Public housing unit Computed on 42-month period Amount needed to reduce new rent/utility costs to the lower of old rent/utility costs or (for low income persons only, 30% of gross monthly income) "Gap" payments may be necessary 	<ul style="list-style-type: none"> Provide comparable housing which may be: <ul style="list-style-type: none"> Tenant based assistance (voucher) Project-based assistance Public housing unit No Replacement Housing Payment No provisions for "gap" payments 	<ul style="list-style-type: none"> Provide at least three offers of comparable replacement housing – no specific provisions regarding the use of subsidized housing as an offer of comparability. Computed on 42-month period Amount needed to reduce new rent/utility costs to the lower of old rent/utility costs or 30% of gross monthly income

	URA	Section 18	California Law
	<p>even between old PHA rent/utilities and new subsidized rent/utilities</p>		<ul style="list-style-type: none"> • "Gap" payments may be necessary even between old PHA rent/utilities and new subsidized rent/utilities
Notices	<ul style="list-style-type: none"> • General Information Notice (GIN) • Notice of Eligibility or Non-displacement at ION • 90 day notice to vacate 	<ul style="list-style-type: none"> • 90 day notice to move 	<ul style="list-style-type: none"> • General Information Notice (GIN) within sixty days of Initiation of Negotiations • Notice of Eligibility • 90 day notice to vacate
Services	<ul style="list-style-type: none"> • Advisory services <ul style="list-style-type: none"> ○ Determine resident needs and preferences ○ Explain payments and assistance ○ Current and continuing information on comparable housing ○ Inspection of replacement housing ○ Assistance filling out claim forms ○ Mobility counseling ○ Transportation to inspect replacement housing ○ Advice on other assistance sources ○ Information on federal and state housing programs 	<ul style="list-style-type: none"> • Necessary counseling • Mobility counseling 	<ul style="list-style-type: none"> • Advisory services <ul style="list-style-type: none"> ○ Determine resident needs and preferences ○ Explain payments and assistance ○ Current and continuing information on comparable housing ○ Inspection of replacement housing ○ Assistance filling out claim forms and applications ○ Mobility counseling ○ Transportation to inspect replacement housing ○ Advice on other assistance sources • Information on federal and state housing programs • Inform all persons about eviction policies
Aliens not lawfully present in country	<ul style="list-style-type: none"> • Aliens not lawfully in the country are not eligible for relocation benefits 	<ul style="list-style-type: none"> • No prohibition on benefits for illegal aliens 	<ul style="list-style-type: none"> • No prohibition on benefits for illegal aliens

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<p>Impact of eviction on eligibility</p>	<p>URA</p> <ul style="list-style-type: none"> Persons who are evicted before or after initiation of negotiation are ineligible for benefits 	<p>Section 18</p> <ul style="list-style-type: none"> No provisions 	<p>California Law</p> <ul style="list-style-type: none"> Eviction does not impact eligibility for benefits. Displaced persons do not include unlawful occupants (those persons evicted by court order or who vacated after receipt of a termination notice) unless persons was occupant of permanently affordable housing.
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The following documents applicable to tenant relocation will be available for review at the Relocation Office

- Uniform Relocation Act, its implementing regulations (49 Code of Federal Regulations, Part 24).
- HUD Handbook 1378, Tenant Assistance, Relocation and Real Property Acquisition Act of 1970.
- California Relocation Assistance and Real Property Acquisition Guidelines, Title 25, California Code of Regulations, Chapter 6, Section 6000 et. seq. (the Guidelines)
- California Relocation Assistance Law, California Government Code Section 7260, et. seq (the CRAL)
- Other funding program related relocation guidelines and regulations as necessary.
- Uniform Federal Accessibility Standards (UFAS)
- Government Code Section 12955.3 (Definition of disability)
- Admissions and Continued Occupancy Policy of the Authority (ACOP)
- Current proposed Architectural drawings
- Current proposed Project schedule
- Copies of all financing commitments obtained to date as received
- Phasing Plan

C. RESIDENT MEETING MATERIALS



STAY CONNECTED

Choice Neighborhoods Initiative (CNI)



FAMILY
SUPPORT

Twin Rivers Community Meeting

June 8, 2017

5:30 PM to 7:00 PM

❖ **General Information Notice (G.I.N)**

By Chad Wakefield, OPC

❖ **Community Suggestions**

DINNER WILL BE SERVED

Community Room
321 Eliza Street
Sacramento, CA 95811

URBAN
STRATEGIES



Twin Rivers Relocation Information Sessions

By Chad Wakefield, Overland Pacific & Cutler (OPC)

Information sessions will be held to discuss benefit highlights from the Draft Relocation Plan which can be viewed at www.shra.org. Relocation Specialist will be available to answer questions regarding upcoming one-on-one interviews with residents, provide general information on proposed benefits, and Notice of Eligibility.

Monday, July 10th

⬇️ **Session 1- 11:00AM**

⬇️ **Session 3- 3:00PM**

⬇️ **Session 2- 1:00PM**

⬇️ **Session 4- 6:00PM**

Sign up in the office at Twin Rivers, 321 Eliza Street.



Choice Neighborhoods Initiative (CNI)



Twin Rivers Community Meeting

Monthly meeting to discuss Community and Redevelopment updates from various partners.

Thursday, July 13th

6:00 PM to 7:00 PM

REFRESHMENTS WILL BE PROVIDED BY SHRA

**URBAN
STRATEGIES**



D. RESIDENT MEETING DOCUMENTATION

Relocation Information Sessions:

July 10, 2017

On July 10, 2017 four information sessions were held at 11 am, 1 pm, 3 pm, and 6 pm in the Twin Rivers Community Room. A total of 68 household representatives signed up for the sessions in advance; 62 attended the four sessions.

In these sessions the relocation program including notifications, assistance locating and moving to replacement housing, and OPC's approach to the outreach, engagement and execution process of the relocation program with the residents was discussed. Residents asked many great questions including the following, which have been paraphrased:

1. Will OPC assist me locate new housing? Yes. OPC will conduct housing searches, reach out directly to landlords, property management companies, and property owners to obtain information and present this information to the residents. OPC will review the information with the residents, solicit their feedback, and assist them with the leasing process when they locate a unit that meets their needs.
2. Will OPC assist me with locating an accessible unit? Yes. OPC will conduct specific searches for accessible units where a resident requires such a unit. In cases where a unit may not have the features necessary to meet their needs, OPC will negotiate with landlord to have features installed.
3. Is there a limit to the amount of deposit I will be assisted with? Yes. Under state law, a landlord may only charge twice the monthly rent as a security deposit. The deposit amount must be based on the contract rent and be within the payment standard of the Section 8 program.
4. Does the Section 8 Voucher expire? The voucher is good for a period of 90-days after it is issued. In cases where a reasonable extension is needed to ensure the household can relocate within the time required, such an extension will be considered and granted on a case-by-case basis.
5. Can I use my voucher to leave the county or even the state? Yes. Section 8 Housing Choice Vouchers can be transferred or ported to other jurisdictions that have Section 8 programs.

6. Will advanced funds be available for moving costs? Yes. On a case by case basis, OPC will request advanced payments.

E. SAMPLE RELOCATION FORMS

General Information Notice

Residential Occupant

<<DATE>>

<<HEAD-OF-HOUSEHOLD>> and All Other Occupants

<<MAILING ADDRESS>>

<<CITY, STATE ZIP>>

Dear <<Head of Household> and all Other Occupants:

The Housing Authority of the County of Sacramento ("HACOS") is moving forward with the planning of the redevelopment of the Twin Rivers Public Housing Community (Potential Project). HACOS and its development partner are planning for a substantial transformation of the property to modernize the housing and infrastructure at the site. The Potential Project has received federal assistance through the US Department of Housing and Urban Development (HUD) Choice Neighborhood Initiative (CNI) program.

This notice is to inform households of their rights under Federal and or State relocation law if the Potential Project moves forward as a fully approved project. Households are defined as families or individuals who have been approved by HACOS to reside in their current unit. If those households are required to relocate permanently or temporarily, they will be eligible for relocation assistance under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended and California Relocation Assistance Law (Sec 7260 et. seq. of the CA Government Code).

However, you do not have to move now.

This is not a notice to vacate the premises or a notice of relocation eligibility.

Should the Potential Project move forward, households will be required to move from their current unit. The Potential Project may take multiple years to complete. In accordance with the URA, this would be considered a permanent displacement. However, HACOS wants to make every opportunity available for residents to return to the site once a unit becomes available. All households in good standing pursuant to the

terms of their lease agreements will have a Right-to-Return to a new unit at Twin Rivers should a unit be available that meets the household's needs within the occupancy standard.

Households in good standing will be eligible to receive the following assistance:

- Relocation advisory services including written explanation of the relocation assistance program and in person meetings with a relocation specialist as needed to assist households with the relocation process.
- A Memorandum of Agreement (MOA) that explains the household's right to return to a new unit at Twin Rivers including the provisions under which they will be assisted with their return move.
- A written Notice of Eligibility (NOE) for the relocation assistance households are eligible to receive. Households that voluntarily transfer to other housing prior to receiving an NOE will have the assistance they will receive documented in an MOA.
- Choice of housing options as provided below:
 - Temporary transfer to another comparable HACOS unit. Upon availability of a new comparable unit at Twin Rivers, the household would be transferred to that unit.
 - Temporary relocation to other housing utilizing a Housing Choice Voucher or Tenant Protection Voucher. Upon availability of a new unit that accommodates the household's needs at Twin Rivers, the household would be transferred to that unit.
 - Direct permanent transfer to another comparable HACOS unit. This would be a one-time transfer. The Right-to-Return will not be retained.
 - Permanent relocation to a comparable non-HACOS unit. This would be a one-time relocation. The Right-to-Return will not be retained.
- Assistance with packing and moving household goods and other personal property to the temporary and/or permanent housing unit.
- A minimum of 90-days Written Notice and referral to at least one comparable housing unit including but not limited another HACOS unit.

Pursuant to Public Law 105-117, aliens not lawfully present in the United States are not eligible for relocation assistance, unless such ineligibility would result in exceptional hardship to a qualifying spouse, parent, or child. All persons seeking relocation

assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

Please note that households should continue to pay their monthly rent to their landlord because failure to pay rent and meet their obligations as a tenant under the terms of their lease may be cause for eviction and loss of relocation assistance. Households are urged not to move or sign any agreement to purchase or lease a unit before receiving formal notice of eligibility for relocation assistance. ***If households move or are evicted before receiving such notice, they will not be eligible to receive relocation assistance. Please contact us before making any moving plans.***

HACOS will make all efforts to resolve any issues that may arise to avoid the need for a formal appeal and resolve grievances. However, any person aggrieved by a determination as to eligibility for, or the amount of, a payment authorized by the Relocation Assistance Program may have the appeal application reviewed by HACOS in accordance with its appeals procedure. Complete details on appeal procedures will be available upon request from HACOS should the project move forward. Households will be provided with all necessary appeals forms for their use. Any party requiring a reasonable accommodation should contact Marisela Fuller, Site Manager of the Twin Rivers Community.

Again, this is not a notice to vacate and does not establish eligibility for relocation payments or other relocation assistance.

Sincerely,

La Shelle Dozier
Executive Director

_____ Delivered on/by: _____ / _____
Received by

X _____ Posted on/by: _____ / _____
Recipient's Signature

_____ Mailed/receipt received on: _____ / _____
Date

**Relocation Assistance
Informational Statement
for Families and Individuals**

(Federal)

Displacing Agency:

Housing Authority of the County of Sacramento (HACOS)

Project Name:

Twin Rivers Relocation Project

Displacing Agency Representative:



**Overland, Pacific & Cutler, Inc.
7901 Oakport St, Unit 4800
Oakland, CA 94621
Phone: 800-400-5673**

Informational Statement Content:

1. General Information
2. Assistance In Locating A Replacement Dwelling
3. Moving Benefits
4. Replacement Housing Payment - Tenants And Certain Others
5. Public Housing and Section 8 Tenants
6. Qualification For And Filing Of Relocation Claims
7. Last Resort Housing Assistance
8. Rental Agreement
9. Evictions

10. Appeal Procedures – Grievance
11. Tax Status of Relocation Benefits
12. Legal Presence Requirement
13. Non-Discrimination and Fair Housing
14. Additional Information And Assistance Available

Spanish speaking agents are available. Si necesita esta información en español, por favor llame a su agente.

Informational Statement for Families and Individuals

(Federal)

1. GENERAL INFORMATION

The dwelling in which you now live is in a project area to be improved by, or financed through, the Displacing Agency using federal funds. If and when the project proceeds, and it is necessary for you to move from your dwelling, you may be eligible for certain benefits. You will be notified in a timely manner as to the date by which you must move. Please read this information, as it will be helpful to you in determining your eligibility and the amount of the relocation benefits you may receive under the federal law. You will need to provide adequate and timely information to determine your relocation benefits. The information is voluntary, but if you don't provide it, you may not receive the benefits or it may take longer to pay you. We suggest you save this informational statement for reference.

The Displacing Agency has retained the professional firm of **Overland, Pacific & Cutler, Inc. (OPC)** to provide relocation assistance to you. The firm is available to explain the program and benefits. Their address and telephone number is listed on the cover.

PLEASE DO NOT MOVE PREMATURELY. THIS IS NOT A NOTICE TO VACATE YOUR DWELLING. However, if you desire to move sooner than required, you must contact your representative with Overland, Pacific & Cutler, Inc., so you will not jeopardize any benefits. This is a general informational brochure only, and is not intended to give a detailed description of either the law or regulations pertaining to the Displacing Agency's relocation assistance program.

Please continue to pay your rent to your current landlord, otherwise you may be evicted and jeopardize the relocation benefits to which you may be entitled to receive. Once the Displacing Agency acquires the property, you will also be required to pay rent to the Displacing Agency.

2. ASSISTANCE IN LOCATING A REPLACEMENT DWELLING

The Displacing Agency, through its representatives, will assist you in locating a comparable replacement dwelling by providing referrals to appropriate and available housing units. You are encouraged to actively seek such housing yourself. When a suitable replacement dwelling unit has been found, your relocation agent will carry out an inspection and advise you as to whether the dwelling unit meets decent, safe and sanitary housing requirements. A decent, safe and sanitary housing unit provides adequate space for its occupants, proper weatherproofing and sound heating, electrical and plumbing systems. Your new dwelling must pass inspection before relocation assistance payments can be authorized.

3. MOVING BENEFITS

If you must move as a result of displacement by the Displacing Agency, you will receive a payment to assist in moving your personal property. The actual, reasonable and necessary expenses for moving your household belongings may be determined based on the following methods:

- A Fixed Moving Payment based on the number of rooms you occupy (see below); **or**
- A payment for your Actual Reasonable Moving and Related Expenses based on at least two written estimates and receipted bills; **or**
- A combination of both (in some cases).

For example, you may choose a Self-Move, receiving a payment based on the Fixed Residential Moving Cost Schedule shown below, plus contract with a professional mover to transport your grand piano and /or other items that require special handling. In this case, there may be an adjustment in the number of rooms which qualify under the Fixed Residential Moving Cost Schedule.

Fixed Moving Schedule CALIFORNIA (Effective 2015)	
Occupant Owns Furniture:	
1 room	\$725
2 rooms	\$930
3 rooms	\$1,165
4 rooms	\$1,375
5 rooms	\$1,665

A. Fixed Moving Payment (Self-Move)

A Fixed Moving Payment is based upon the number of rooms you occupy and whether or not you own your own furniture. The payment is based upon a schedule approved by the Displacing Agency, and ranges, for example, from \$475.00 for one furnished room to \$2,505.00 for eight rooms in an unfurnished dwelling. (For details see the table). Your relocation agent will inform you of the amount you are eligible to receive, if you choose this type of payment.

6 rooms	\$1,925
7 rooms	\$2,215
8 rooms	\$2,505
Each additional room	\$265
Occupant does NOT Own Furniture:	
1 room	\$475
Each additional room	\$90

If you select a fixed payment, you will be responsible for arranging for your own move, and the Displacing Agency will assume no liability for any loss or damage of your personal property. A fixed payment also includes utility hook-ups and other related moving fees.

B. Actual Moving Expense (Commercial Move)

If you wish to engage the services of a licensed commercial mover and have the Displacing Agency pay the bill, you may claim the ACTUAL cost of moving your personal property up to 50 miles. Your relocation agent will inform you of the number of competitive moving bids (if any) which may be required, and assist you in developing a "mover" scope of services for Displacing Agency approval.

4. REPLACEMENT HOUSING PAYMENT – TENANTS AND CERTAIN OTHERS

You may be eligible for a payment up to \$7,200.00 to assist in renting or purchasing a comparable replacement dwelling. In order to qualify, you must either be a tenant or owner who has occupied the present dwelling for at least 90 days immediately prior to the initiation of negotiations.

A. Rental Assistance. If you **wish to rent** your replacement dwelling, your maximum rental assistance benefits will be based upon the difference over a forty-two (42) month period between the rent you must pay for a comparable replacement dwelling and the lesser of your current rent or thirty percent (30%) of your monthly household income if your total gross income is classified as "low income" by the U. S. Department of Housing and Urban Development's (HUD) Annual Survey of Income Limits for Public Housing and Section 8 Programs. You will be required to provide your relocation agent with monthly rent and household income verification prior to the determination of your eligibility for this payment.

- OR -

- B. **Down-payment Assistance.** If you qualify, and **wish to purchase** a home as a replacement dwelling, you can apply up to the total amount of your rental assistance payment towards the down-payment and non-recurring incidental expenses. Your relocation agent will clarify procedures necessary to apply for this payment.

5. PUBLIC HOUSING AND SECTION 8 TENANTS

When you do move, you may be eligible to transfer to another public housing unit or transfer your Section 8 eligibility to a replacement site. In such cases, a comparable replacement dwelling will be determined based on your family composition at the time of displacement and the current housing program criteria. This may not be the size of the unit you currently occupy. Your relocation agent will provide counseling and other advisory services along with moving benefits. In most cases your Total Tenant Payment would continue to be 30% of your household's income.

6. QUALIFICATION FOR, AND FILING OF, RELOCATION CLAIMS

To qualify for a Replacement Housing Payment, you must rent or purchase and occupy a comparable replacement unit **within one year from the following:**

- For a tenant, the date you move from the displacement dwelling.
- For an owner-occupant, the latter of:
 - a. The date you receive final payment for the displacement dwelling, or, in the case of condemnation, the date the full amount of estimated just compensation is deposited in court; **or**
 - b. The date the Displacing Agency fulfills its obligation to make available comparable replacement dwellings.

All claims for relocation benefits must be filed with the Displacing Agency **within eighteen (18) months** from the date on which you receive final payment for your property, or the date, on which you move, whichever is later.

8. LAST RESORT HOUSING ASSISTANCE

If comparable replacement dwellings are not available when you are required to move, or if replacement housing is not available within the monetary limits described above, the Displacing Agency will provide Last Resort Housing assistance to enable you to rent or purchase a

replacement dwelling on a timely basis. Last Resort Housing assistance is based on the individual circumstances of the displaced person. Your relocation agent will explain the process for determining whether or not you qualify for Last Resort assistance.

If you are a tenant, and you choose to purchase rather than rent a comparable replacement dwelling, the entire amount of your rental assistance and Last Resort eligibility must be applied toward the down-payment and eligible incidental expenses of the home you intend to purchase.

9. RENTAL AGREEMENT

As a result of the Displacing Agency's action to purchase the property where you live, you may become a tenant of the Displacing Agency. If this occurs, you will be asked to sign a rental agreement which will specify the monthly rent to be paid, when rent payments are due, where they are to be paid and other pertinent information.

10. EVICTIONS

Eviction for cause must conform to applicable State and local law. Any person who occupies the real property and is not in unlawful occupancy on the date of initiation of negotiations is presumed to be entitled to relocation benefits, unless the Displacing Agency determines that:

- The person received an eviction notice prior to the initiation of negotiations and, as a result, was later evicted; or
- The person is evicted after the initiation of negotiations for serious or repeated violation of material terms of the lease; and
- The eviction was not undertaken for the purpose of evading relocation assistance regulations.

Except for the causes of eviction set forth above, no person lawfully occupying property to be purchased by the Displacing Agency will be required to move without having been provided with at least 90 days written notice from the Displacing Agency.

11. APPEAL PROCEDURES - GRIEVANCE

Any person aggrieved by a determination as to eligibility for, or the amount of, a payment authorized by the Displacing Agency's Relocation Assistance Program may have the appeal application reviewed by the Displacing Agency in accordance with its appeals procedure. Complete details on appeal procedures are available upon request from the Displacing Agency.

12. TAX STATUS OF RELOCATION BENEFITS

California Government Code Section 7269 indicates no relocation payment received shall be considered as income for the purposes of the Personal Income Tax Law, Part 10 (commencing with Section 170 01) of Division 2 of the Revenue and Taxation Code, or the Bank and Corporation Tax law, Part 11 (commencing with Section 23001) of Division 2 of the Revenue and Taxation Code. Furthermore, federal regulations (49 CFR Part 24, Section 24.209) also indicate that no payment received under this part (Part 24) shall be considered as income for the purpose of the Internal Revenue Code of 1954, which has been redesignated as the Internal Revenue Code of 1986. The preceding statement is not tendered as legal advice in regard to tax consequences, and displacees should consult with their own tax advisor or legal counsel to determine the current status of such payments.

(IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any tax advice contained in this communication (including any attachments) was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding tax-related penalties under the Internal Revenue Code or (ii) promoting marketing or recommending to another party any matters addressed herein)

13. LAWFUL PRESENCE REQUIREMENT

In order to be eligible to receive relocation benefits in federally-funded relocation projects, all members of the household to be displaced must provide information regarding their lawful presence in the United States. Any member of the household who is not lawfully present in the United States or declines to provide this information may be denied relocation benefits, unless such ineligibility would result in an exceptional and extremely unusual hardship to the alien's spouse, parent, or child, any of whom is a citizen or an alien admitted for permanent residence. Exceptional and extremely unusual hardship is defined as significant and demonstrable adverse impact on the health or safety, continued existence of the family unit, and any other impact determined by the Displacing Agency to negatively affect the alien's spouse, parent or child. Relocation benefits will be prorated to reflect the number of household members with certified lawful presence in the US.

14. NON-DISCRIMINATION AND FAIR HOUSING

No person shall on the grounds of race, color, national origin or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under the Displacing Agency's relocation assistance program pursuant to Title VI of the Civil Rights Act of

1964, Title VIII of the Civil Rights Act of 1968, and other applicable state and federal anti-discrimination and fair housing laws. You may file a complaint if you believe you have been subjected to discrimination. For details contact the Displacing Agency.

15. ADDITIONAL INFORMATION AND ASSISTANCE AVAILABLE

Those responsible for providing you with relocation assistance hope to assist you in every way possible to minimize the hardships involved in relocating to a new home. Your cooperation will be helpful and greatly appreciated. If you have any questions at any time during the process, please do not hesitate to contact your relocation agent at Overland, Pacific & Cutler.



**Receipt of Informational Statement
And Explanation of Residential Benefits**

Claimant:		Agency:	
Site Address:		Project:	
OPC case ID:		OPC Agent:	

By signing below, I acknowledge the following:

A. I have received an informational statement to explain relocation assistance benefits.

B. The following relocation issues have been explained to me: ✓

- Need to provide adequate and timely information to determine benefits
- Documents required to verify occupancy, rent, and income
- Actual benefits depend on cost of replacement and comparable dwelling
- 90-day occupancy requirements
- Move distance eligibility limitations (50 miles)
- 90-Day notice will be given before requiring to move
- Referrals will be provided but may move to any qualified dwelling
- Replacement dwelling must be inspected before buying/renting
- "Decent, Safe & Sanitary" inspection no substitute for professional inspection
- 12-month time requirement to move into "Decent, Safe & Sanitary" housing
- 18-month time requirement to file relocation claims
- Fixed versus Actual (estimates and receipts required) moving expenses options
- Rental versus Downpayment Assistance options
- Replacement Housing Payment (homeowners only)
- Rent must be paid and Interim Rental Agreements may be required
- Agency may withhold unpaid rent from relocation benefits
- Legal presence requirement (federal projects)
- The right to appeal the eligibility and amount of benefits
- Non-discrimination and fair housing protection (Title VI)
- Must inform your relocation agent of any plans to move
- How to contact the relocation agent

Claimant(s) Name

Agent's Name

X _____
Claimant(s) Signature

X _____
Agent's Signature

Date

Date

 **Final 90-Day Notice to Vacate**

<<DATE>>

Your OPC Relocation Agent	
Name:	<<AGENT NAME>>
Phone:	<<OFFICE PHONE>>
Case ID:	<<CASE ID>>

<<HEAD-OF-HOUSEHOLD>> and All Other Occupants
<<MAILING ADDRESS>>
<<CITY, STATE ZIP>>

Dear Occupants:

On <<APPROVAL DATE>> the **Housing Authority of the County of Sacramento** (called here the "Displacing Agency") received all approvals to move forward with the Redevelopment of the Twin Rivers Public Housing property (Project). The property which you occupy at <<SITE ADDRESS>> (called here the "Premises") will be affected by this Project. The Displacing Agency has now determined that it will be necessary for you to vacate the Premises.

Notice is hereby given that the Displacing Agency elects to terminate your tenancy in ninety (90) days beginning <<90DAY START>> and ending <<90DAY END>> and you are hereby to quit and deliver up possession of the property you occupy on or before <<90DAY END>>. If you do not vacate the Premises by that date, the Displacing Agency will initiate legal proceedings to recover possession of the Premises, along with any rents and damages.

During this period, **Overland, Pacific & Cutler, Inc.** will be available to provide assistance with referrals to replacement sites, coordination with movers and other vendors, the processing of relocation benefit claim forms, and other tasks to help facilitate your relocation. Please contact your relocation agent listed below if you have any questions regarding this notice or the relocation process. Upon vacating your unit,

you are responsible for removing all of your personal property, delivering the Premises in satisfactory condition and turning in the keys to your relocation agent.

Sincerely,

<<AGENT NAME>>

<<AGENT TITLE>>

Overland, Pacific & Cutler, Inc.

<<OFFICE ADDRESS>>

Phone <<OFFICE PHONE>>

Received by

Delivered on/by: _____ / _____

X _____
Recipient's Signature

Posted on/by: _____ / _____

Date

Mailed/receipt received on: _____ / _____



Notice of Eligibility and Conditional Entitlement

Tenant-Occupant (Federal)

<<DATE>>

<<ALL ELIGIBLE OCCUPANTS>>

<<MAILING ADDRESS>>

<<CITY, STATE ZIP>>

Your OPC Relocation Agent	
Name:	<<AGENT NAME>>
Phone:	<<OFFICE PHONE>>
Your Case ID:	<<CASE ID>>

Dear Occupants:

The **Housing Authority of the County of Sacramento** (called here the "Displacing Agency") is proceeding with the project known as **Twin Rivers Redevelopment Project**. To carry out this project, it will be necessary for you to relocate from your dwelling at **321 Eliza St., Sacramento, CA**.

You will not be required to move without at least 90 days advance written notice of the day by which you must vacate. However, you can contact us at any time for assistance with your move and to receive the benefits for which you are eligible.

This is a notice of eligibility for relocation assistance. The effective date of your eligibility, known as the "initiation of negotiations", is **<<INIT OF NEGOTIATIONS DATE>>**. You are eligible for relocation assistance and benefits under the Displacing Agency's Relocation Assistance Program.

Additional information about your benefits was previously provided to you in the Informational Statement. You are eligible to receive the following benefits:

1. **RELOCATION ADVISORY ASSISTANCE:** provided by **Overland, Pacific & Cutler, Inc. (OPC)**, a professional firm hired by the Displacing Agency to provide relocation assistance to you, such as referrals to replacement housing and help with filing for benefits.

2. **MOVING EXPENSES:** You will receive a payment to assist in moving your personal property. You may select one of the following payments:
- A. A Fixed Moving Payment based on the number of rooms you occupy (from Informational Statement). Your entitlement under this option for <<ROOM COUNT>> rooms is \$<<FIXED MOVING AMOUNT>>; **or**
 - B. A payment for your Actual Reasonable Moving and Related Expenses based on at least two written estimates and receipted bills; **or**
 - C. A combination of both (in some cases).
3. **REPLACEMENT HOUSING ASSISTANCE:** You may receive the following financial assistance to purchase or to rent replacement housing:
- A. If you **RENT** replacement housing, you may file a claim for a **RENTAL ASSISTANCE** payment, equal to the difference between the monthly rent and utilities necessary to rent a comparable replacement dwelling (as determined by the Displacing Agency) and the base monthly rent, multiplied by 42 months (see table below).

A study was completed to determine the cost of a comparable replacement dwelling most nearly representative of your current dwelling. The study indicated that the dwelling located at <<COMP ADDRESS>>, with a monthly rent and estimated utilities of \$<<COMP AMT>> (rent of \$<<COMP RENT AMT>> and utilities of \$<<COMP UTIL AMT>>) was the most representative of your current dwelling.

Base monthly rent is defined as the lesser of:

- (1) \$<<DISPL AMT>>, which represents the average monthly rent (\$<<DISPL RENT AMT>>) and average monthly utilities (\$<<DISPL UTIL AMT>>) at your displacement dwelling (if you are paying little or no rent, the amount is based on the economic rental value of your dwelling); **or**
- (2) \$<<INCOME30 AMT>>, which represents thirty (30) percent of your gross monthly household income if your household income is classified as "low income" by the U. S. Department of Housing and Urban Development's Annual Survey of Income Limits for the Public Housing and Section 8 Programs. (If "N/A", income was not used in the calculation because you have been determined to not be "low income" and/or are a dependent, or the income information provided was insufficient evidence of income.)

Based on the above, your base monthly rent amount is \$<<BASE RENT AMT>>, and your maximum rental assistance payment is calculated as follows:

Maximum Rental Assistance Payment Calculation		
1	Comparable Dwelling Cost	\$0.00
2	Base Monthly Rent	\$0.00
3	Monthly Difference (Line 1 minus Line 2)	\$0.00
4	Maximum payment (difference times 42 months)	\$0.00

Your actual payment depends on the cost of the replacement dwelling you decide to rent. If you rent and occupy a replacement dwelling that rents for **less** than the comparable dwelling, your rental assistance payment will be based on the actual cost of your replacement dwelling. If you rent and occupy a replacement dwelling that rents for **more** than the comparable dwelling, your rental assistance payment will be limited by the cost of the comparable dwelling.

Please find attached a listing of other available comparable replacement dwellings that you may want to consider renting. If you need any assistance or transportation to inspect these referrals, please contact the relocation agent identified below.

- B.** If you **BUY** replacement housing, you may file a claim for **DOWNPAYMENT ASSISTANCE** payment. You may then use the full amount of your rental assistance payment, as calculated above (**\$<<MAX RENTAL AMT>>**), for a down payment and incidental expenses (typically known as "closing costs") associated with the purchase of a replacement dwelling. All amounts used as a down-payment and incidental expenses must be applied to the purchase of the replacement dwelling. Any payments you may have received as rental assistance will be deducted from your down payment assistance. Let us know if you prefer to buy a replacement home, and we will help you find such housing.

To be eligible for a replacement housing payment described above, you must rent or purchase and occupy a decent, safe and sanitary replacement dwelling **within 12 months**, as well as file claims for replacement housing or moving payments **within 18 months** from the date you move from your displacement dwelling. **Failure to occupy the replacement dwelling or to submit claims within the above time limits could result in loss of moving and/or replacement housing benefits.**

You do not have to accept any dwelling referred to you by the Displacing Agency. You may choose your own replacement, but to qualify for relocation assistance payments it must first be inspected to assure that it meets the "decent, safe and sanitary" standards. For this reason, **DO NOT MOVE from your home and DO NOT CONTRACT to rent or purchase a replacement dwelling without first contacting your relocation agent.** The "decent, safe and sanitary" inspection is **not** a substitute for a professional housing inspection.

If you remain in occupancy of your present dwelling after the Displacing Agency has completed the purchase, you must continue to pay your rent to the Displacing Agency for the period of your tenancy, as well as meet all other conditions stated in your lease or rental agreement.

The Relocation Assistance Program is very complex. It is important that you carefully read and understand the matters explained in this notice and in the Informational Statement which was provided to you. Any person aggrieved by a determination as to eligibility for, or the amount of, a payment authorized by the Displacing Agency's Relocation Assistance Program may have the appeal application reviewed by the Displacing Agency in accordance with its appeals procedure. Complete details on appeal procedures are available upon request from the Displacing Agency.

If at any time you have questions or need assistance, please contact your OPC relocation agent:

<<AGENT NAME>>

<<AGENT TITLE>>

Overland, Pacific & Cutler, Inc.

<<OFFICE ADDRESS>>

Phone <<OFFICE PHONE>>

Sincerely,

<<MANAGER NAME>>

<<MANAGER TITLE>>

Overland, Pacific & Cutler, Inc.

Attachment (referrals)

ACKNOWLEDGMENT BY OCCUPANTS

I was personally contacted by the Relocation Agent for the Displacing Agency. I have been given a copy of this notice and I have had the available services and entitlements explained to me. I have been advised that the Relocation Agent will be available to assist me if any questions arise or assistance is needed.

Name:

Signature:

Date:



Notice of Eligibility and Conditional Entitlement

Section 8 Tenant-Occupant

<<DATE>>

<<ALL ELIGIBLE ADULTS>>

<<MAILING ADDRESS>>

<<CITY, STATE ZIP>>

Your OPC Relocation Agent	
Name:	<<AGENT NAME>>
Phone:	<<OFFICE PHONE>>
Your Case ID:	<<CASE ID>>

Dear Occupants:

The **Housing Authority of the County of Sacramento** (called here the "Displacing Agency") is proceeding with the project known as **Twin Rivers Redevelopment Project**. To carry out this project, it will be necessary for you to relocate from your dwelling at **321 Eliza St., Sacramento, CA**.

You will not be required to move without at least 90 days advance written notice of the day by which you must vacate. However, you can contact us at any time for assistance with your move and to receive the benefits for which you are eligible.

This is a notice of eligibility for relocation assistance. The effective date of your eligibility, known as the "initiation of negotiations", is <<INIT OF NEGOTIATIONS DATE>>. You are eligible for relocation assistance and benefits under the Displacing Agency's Relocation Assistance Program.

Additional information about your benefits was previously provided to you in the Informational Statement. You are eligible to receive the following benefits:

- 1. RELOCATION ADVISORY ASSISTANCE:** provided by **Overland, Pacific & Cutler, Inc. (OPC)**, a professional firm hired by the Displacing Agency to provide relocation assistance to you, such as referrals to replacement housing and help with filing for benefits.

2. **MOVING EXPENSES:** You will receive a payment to assist in moving your personal property. You may select one of the following payments:
 - A. A Fixed Moving Payment based on the number of rooms you occupy (from Informational Statement). Your entitlement under this option for <<ROOM COUNT>> rooms is \$<<FIXED MOVING AMOUNT>>; **or**
 - B. A payment for your Actual Reasonable Moving and Related Expenses based on at least two written estimates and receipted bills; **or**
 - C. A combination of both (in some cases).
3. **SECURITY DEPOSIT AND CREDIT CHECKS:** The Displacing Agency may pay the cost of any security deposit required to rent a Section 8 approved replacement dwelling unit, and the Displacing Agency may also cover any required credit checks fees.
4. **REPLACEMENT HOUSING ASSISTANCE:** Based on information you have provided us, you have been receiving rental assistance through the <<HOUSING AUTHORITY NAME>> Housing Authority's Section 8 Housing Assistance Payments program. You may continue using your Section 8 Voucher to apply as a tenant for other comparable replacement dwellings.

If comparable rentals are not available within the Housing Authority's payment standard for your replacement housing needs, and there is a difference between your current rent and your new rent at a replacement dwelling, you will be eligible to receive a gap differential paid to you over a 42 month period.

To be eligible for a replacement housing payment described above, you must rent or purchase and occupy a decent, safe and sanitary replacement dwelling **within 12 months**, as well as file claims for replacement housing or moving payments **within 18 months** from the date you move from your displacement dwelling. **Failure to occupy the replacement dwelling or to submit claims within the above time limits could result in loss of moving and/or replacement housing benefits.**

As part of our advisory services, we have also enclosed referrals to available replacement units on the market in your area, which accept Section 8 tenants. Please notify us, if you identify a unit that you would be interested in securing as a replacement dwelling.

You do not have to accept any dwelling referred to you by the Displacing Agency. You may choose your own replacement, but to qualify for relocation assistance payments it must first be inspected to assure that it meets the "decent, safe and sanitary" standards. For this reason, **DO NOT MOVE from your home and DO NOT CONTRACT to rent or purchase a replacement dwelling without first contacting your relocation agent and the**

Housing Authority. The "decent, safe and sanitary" inspection is **not** a substitute for a professional housing inspection.

If you remain in occupancy of your present dwelling after the Displacing Agency has completed the purchase, you must continue to pay your rent to the Displacing Agency for the period of your tenancy, as well as meet all other conditions stated in your lease or rental agreement.

The Relocation Assistance Program is very complex. It is important that you carefully read and understand the matters explained in this notice and in the Informational Statement which was provided to you. Any person aggrieved by a determination as to eligibility for, or the amount of, a payment authorized by the Displacing Agency's Relocation Assistance Program may have the appeal application reviewed by the Displacing Agency in accordance with its appeals procedure. Complete details on appeal procedures are available upon request from the Displacing Agency.

If at any time you have questions or need assistance, please contact your OPC relocation agent:

<<AGENT NAME>>
<<AGENT TITLE>>
Overland, Pacific & Cutler, Inc.
<<OFFICE ADDRESS>>
Phone <<OFFICE PHONE>>

Sincerely,

<<MANAGER NAME>>
<<MANAGER TITLE>>
Overland, Pacific & Cutler, Inc.

Attachment (referrals)

ACKNOWLEDGMENT BY OCCUPANTS

I was personally contacted by the Relocation Agent for the Displacing Agency. I have been given a copy of this notice and I have had the available services and entitlements explained to me. I have been advised that the Relocation Agent will be available to assist me if any questions arise or assistance is needed.

Name:	Signature:	Date:
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F. RELOCATION RESOURCES

NOTE: The following information is forthcoming and will be added to the plan once available:

- List of Open Waitlist Properties
- List of "Coming Soon Properties"
- List of Housing Search Resources
- List of Social Service Providers

G. RELOCATION APPEAL / GRIEVANCE PROCEDURES

Purpose

The purpose of this procedure is to set forth the guidelines of the Sacramento Housing Authority ("Authority") for processing appeals to determinations as to relocation eligibility, the amount of a relocation payment, or the failure to provide comparable replacement housing referrals.

Right of Review

(a) Any appellant, that is any person who believes him/herself aggrieved by a determination by the Authority as to eligibility, the amount of a relocation payment or failure to provide comparable replacement housing referrals, may, at his or her election, have his/her claim reviewed and reconsidered by the Authority in accordance with the procedures set forth herein, as supplemented by the procedures the Authority may establish for the conduct of hearings.

(b) A person or organization directly affected by the relocation project may petition the California Department of Housing and Community Development ("HCD") to review the Authority's final relocation plan to determine if the plan is in compliance with state laws and guidelines, or to review the implementation of the relocation plan to determine if the Authority is acting in compliance with its relocation plan.

Notification to Appellant

If the Authority denies or refuses to consider a claim, the Authority's notification to the appellant of its determination shall inform the appellant of its reasons, and the applicable procedures for obtaining review of the decision. If necessary, such notification shall be printed in a language other than English.

Stages of Review by the Authority

(a) **Request for Further Written Information.** An appellant may request the Authority to provide him or her with a full written explanation of its determination and the basis therefore, if he/she feels that the explanation of the Authority's determination accompanying the payment of the claim or notice was incorrect or

inadequate. The Authority shall provide such an explanation to the appellant within three (3) weeks of its receipt of his or her request.

(b) **Informal Oral Presentation.** An appellant may request an informal oral presentation before seeking formal review and reconsideration. A request for an informal oral presentation shall be filed with the Authority within the period described in subsection (d) of this section. The Authority shall afford the appellant the opportunity to make such presentation before a management-level Housing Authority staff person designated by the Executive Director and who has not previously participated in the relocation decision. The appellant may be represented by an attorney or other person of his/her choosing at his/her expense.

This oral presentation shall enable the appellant to discuss the claim with the designated Housing Authority staff person. The designated Housing Authority staff person shall make a summary of the matters discussed in the oral presentation to be included as part of the Authority's file on the appellants relocation. The right to formal review and reconsideration shall not be conditioned upon requesting an oral presentation.

(c) **Written Request for Review and Reconsideration.** At any time within the period described in subsection (d) below, an appellant may file a written request with the Authority for formal review and reconsideration. The appellant may include in the request for review any statement of fact within the appellant's knowledge or belief or other material that may have a bearing on the appeal. If the appellant requests more time to gather and prepare additional material for consideration or review and demonstrates a reasonable basis therefore, the Authority may grant the appellants request by granting the appellant a definite period of time to gather and prepare materials.

(d) **Time Limit for Requesting Review.** An appellant desiring either an informal oral presentation or seeking formal review and reconsideration, shall make a request to the Authority within eighteen (18) months following the date he/she moves from the property.

Formal Review and Reconsideration by SFHA

(a) **General.** The Authority shall consider the request for formal review and shall decide whether a modification of its initial determination is necessary. This formal review shall be conducted by an independent arbitrator (the "Arbitrator"). The Arbitrator shall consider the appeal regardless of form, and the Authority staff shall, if necessary, provide assistance to the claimant in preparing the written claim. When a claimant seeks review, Authority staff shall inform him/her that he/she has the right to be represented by an attorney at the claimant's expense, to present his/her case by oral or documentary evidence, to submit rebuttal evidence, to conduct such cross-examination as may be required for a full and true disclosure of facts, and to seek judicial review once he/she has exhausted the administrative appeal.

(b) **Scope of Review.** The Arbitrator shall review and reconsider the initial determination of the claimant's case in light of: (1) all material upon which the Authority based its original determination, including all applicable rules and regulations, except that no evidence shall be relied upon where a claimant has been improperly denied an opportunity to controvert the evidence or cross-examine the witness(es); (2) the reasons given by the claimant for requesting review and reconsideration of the claim; (3) any additional written or relevant documentary material submitted by the claimant; (4) any further information which the Arbitrator, in its discretion, obtains by request, investigation, or research, to ensure fair and full review of the claim.

(c) **Determination on Review.** The determination on review by the Arbitrator shall include, but is not limited to: (1) the Arbitrator's decision on reconsideration of the claim; (2) the factual and legal basis upon which the decision rests, including any pertinent explanation or rationale; and (3) a statement to the claimant that administrative remedies have been exhausted and judicial review may be sought. The determination shall be in writing with a copy provided to the claimant. The Arbitrator's decision shall be binding on the Authority.

(d) **Time Limits.** The Authority shall issue its determination on review as soon as possible but no later than six weeks from the date of the hearing. In the case

of appeals dismissed for un-timeliness or for any other reason not based on the merits of the claim, the Authority shall furnish a written statement to the claimant stating the reason for the dismissal of the claim as soon as possible but not later than two weeks from receipt of the last material submitted by the claimant, or the date of the hearing, whichever is later.

Refusals to Waive Time Limitation

Whenever the Authority rejects a request by a claimant for a waiver of the time limits, the claimant may file a written request for reconsideration of this decision, except that such written request for reconsideration shall be filed within ninety (90) calendar days of the claimant's receipt of the Authority's determination.

Extension of Time Limits

The time limits specified may be extended for good cause by the Authority.

Recommendations by Third Party

Upon agreement between the claimant and the Authority, a mutually acceptable third party or parties may review the claim and make advisory recommendations thereon to the Authority for its final determination. In reviewing the claim and making recommendations to the Authority, the third party or parties shall be guided by the provisions of this Appeals/Grievance Procedure.

Review of Files by Claimant

Except to the extent the confidentiality of material is protected by law or its disclosure is prohibited by law, the Authority shall permit the claimant to inspect all files and records bearing upon his or her claim or the prosecution of the appellant's grievance.

If an appellant is improperly denied access to any relevant material bearing on his or her claim, such material may not be relied upon in reviewing the initial determination.

Effect of Determination on Other Persons

The principles established in all determinations by the Authority shall be considered as precedent for all eligible persons in similar situations regardless of whether or not a person has filed a written request for review. All written determinations shall be kept on file and available for public review.

Right to Counsel

Any aggrieved party has a right to representation by legal or other counsel at his or her expense at any and all stages of the proceedings set forth in this procedure.

Stay of Displacement Pending Review

If an appellant seeks to prevent displacement, the Authority shall not require the appellant to move until at least twenty (20) calendar days after the Authority has made a determination and the appellant has had an opportunity to seek judicial review. In all cases the Authority shall notify the appellant in writing, twenty (20) calendar days prior to the proposed new date of displacement.

Joint Appellants

Where more than one person believes themselves aggrieved by the failure of the Authority to refer them to comparable permanent replacement housing, the appellants may join in filing a single written request for review. A determination shall be made by the Authority for each of the appellants.

Judicial Review

Nothing in this Appeals/Grievance Procedure shall in any way preclude, or limit a claimant or the Authority from seeking judicial review of a claim upon exhaustion of such administrative remedies as are available herein.

RELOCATION ASSISTANCE APPEAL FORM

INSTRUCTIONS: This is an appeal of a determination made by the Displacing Agency under the California Relocation Assistance Law (Government Code, Section 7260 et seq.) or Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 USC §§4601 et. seq.). Complete this document, explaining the nature of your complaint and reasons for this appeal below. Attach extra pages if needed. You will be notified of the date when your complaint will be considered.

Claimant:		Agency:	
Site Address:		Project:	
Mailing Address:		Consultant:	
Phone number:		Case ID:	

Claimant Type: Residential Tenant	This appeal is based on: <input type="checkbox"/> Eligibility only <input type="checkbox"/> Amount of Payment only <input type="checkbox"/> Eligibility amount
Appeal Type: <input type="checkbox"/> Request for Further Written Information <input type="checkbox"/> Informal Oral Presentation <input type="checkbox"/> Formal Review and reconsideration	
Will you be present at the hearing?: <input type="checkbox"/> Yes <input type="checkbox"/> No	Will you be represented by counsel?: <input type="checkbox"/> Yes <input type="checkbox"/> No

.... continued next page.

Claimant's Statement:

[Empty box for Claimant's Statement]

I certify that the information provided on this form is accurate and complete.

Claimant Signature

Date

H. COMMENTS & RESPONSES TO PLAN & COMMENT PERIOD DOCUMENTS

RESPONSES TO COMMENTS RECEIVED DURING COMMENT PERIOD

Below is a summary of the comments received as shown at the end of these responses.

Comments Received From: Sarah Ropelato, Legal Services of Northern California dated June 13, 2017.

Comment 1A: Commenter raises concerns regarding the standards and practices of securing and maintaining information by Urban Strategies for case management services. States requirements that must be followed under various sections of CFR 24. Entire comment included on subsequent pages.

Response to Comment: Noted. Urban Strategies has received comment and will comply with all applicable State and Federal Law. Urban Strategies and all others working to assist the residents, including the Relocation Team, will utilize and comply with the guidance found in Section 504 of the Rehabilitation Act. The Relocation Team will specifically follow the guidance found in HUD Hand Box 1378 at Exhibit 3-1 in Chapter 3. Where necessary Urban Strategies will develop appropriate informational materials.

Changes to Plan Found at: Page 8 at last paragraph on page.

Comment 1 B: Commenter expresses that discussions of comparable and last resort housing is needed in the plan.

Response to Comment: Thank you for the comment. NOTE: Section B includes discussion regarding comparable housing referrals, Section F provides for a re-housing plan including referrals to replacement housing, Appendix A contains a definition of Comparable Housing and Decent Safe and Sanitary Housing. The Informational Statement that will be provided to the residents includes discussion regarding Comparable and Last Resort Housing; this form can be found in Appendix E. Language pertaining to comparable and last resort housing in various sections of the plan including B and F and in Appendix A. Section G has also been enhanced as requested in the comment.

Changes to Plan Found at: Through the sections of plan indicated above.

Comment 1 C: Commenter states that 1) an expanded discussion of Section 104 (d) applicability be included including the alternative payment amount is needed; 2) Under California Relocation Guidelines [CCR 6058] evictions do not impact eligibility for relocation assistance; and 3) \$250 for application fees is an in-sufficient amount.

Response to Comments: In regards to 1) CDBG has been removed from the list of possible sources. HOME funds are only being considered at this time and no commitment for HOME has been made. Should HOME or CDBG be utilized in the Project, all households will be assessed for their eligibility under Section 104(d). In accordance with 24 CFR 42.350(e) (1) (b) the offer of voucher assistance shall satisfy requirements under 104(d) and in accordance with Appendix A of the URA offer of a public housing unit or a voucher shall satisfy the offer of a comparable unit; the requirement to offer comparable replacement housing shall be made through offers of other public housing and vouchers. In accordance with Chapter 7, Paragraph 7-8 items E) 1) b) of HUD Handbook 1378 should a household be found eligible under 104(d) they will be offered a Housing Choice Voucher or a Comparable Replacement Public Housing Unit to assist them relocate to an affordable unit. Should the household reject a Housing Choice Voucher or the Public Housing Unit they may be eligible to receive assistance at the levels described under the URA, however, the comparable housing unit utilized in calculating and 104(d) assistance will also be applicable to that calculated under the URA, which may create no monthly differential payment. No additional discussion will be added to the Relocation Plan at this time. Refusal of such offer of a Housing Choice Voucher or a Public Housing would not be the basis to change the comparable unit for the purposes of calculating a replacement housing unit based on a market rate rental unit. OPC, who shall implement the Relocation Plan, has staff knowledgeable and experienced providing assistance under 104(d) including advising residents of the benefits of both programs, advising of the challenges associated with rejecting a voucher as they apply to individual cases, and calculating benefits. In regard to 2) Evictions will be a last resort used to cure repeated and substantive violations of the lease including non-payment of rent. Evictions do not impact eligibility; however, a lawful eviction may absolve HACOS from obligations to pay relocation assistance. In accordance with the definition of a Displaced Person in the California Relocation Assistance Law (7260 c) (1) (a) (ii) and (c) (2) (a), a person not in lawful occupancy of the displacement unit is not considered a displaced person and not eligible for assistance – an eviction may be grounds to consider the person to be no longer be in lawful occupancy of the unit and cause a relocation payment not to be made to them;

And in regards to. Note enhanced language has been added to Section J of the Plan. In regard to 3) No increase to the security deposit will be considered in all cases. Additional security deposit assistance may be considered on a case by case basis; however, language has been added to the plan to indicate that additional funds will be considered on a case by case basis.

Changes to Plan Found at: Footnote on Page 6 pertaining to use of HOME funds. No additional plans will be proposed to the document pertaining to Section 104(d). In regards to evictions, additional language has been added to the paragraph concluding at the top of page 33. Page 23 regarding security deposits.

Comment 1 D: Commenter requests additional language regarding right to return in the plan. Commenter further requests opportunity to review Memorandum of Agreement (MOA) that pertains to the resident's right to return.

Response to Comment: Plan has been revised to include additional details regarding the right to return. HACOS will consider whether they require an outside review of the MOA. Feedback on potential language in the MOA is appreciated and deemed useful.

Changes to Plan Found at: Item 8 on page 10 and second bullet point on page 58.

Comment 1 E: Commenter states that the Relocation Team's responsibilities should include inspecting replacement housing.

Response to Comment: Agreed. Plan has been enhanced to include inspections of replacement housing.

Changes to Plan Found at: Item 5 on page 10, item 4 and 7 on page 23.

Comment 2: Commenter requests that is specified that the 218 replacement housing units at Twin Rivers are public housing units and that public housing protections will remain in place.

Response to Comment: The replacement units will be Project Based Section 8.

Changes to Plan Found at: Page 20 under Replacement Housing Needs.

Comment 3: Commenter requests that all languages spoken at Twin Rivers are identified in the Relocation Plan.

Response to Comment: All known languages have been accounted for. Plan has been updated to state that should additional languages be discovered, services will be provided in those languages.

Changes to Plan Found at: Top of Page 14, last sentence before next paragraph.

Comment 4: No comment requiring response. HACOS and the Relocation Team appreciate the substantive comments for consideration. Commenter may contact HACOS with additional questions and concerns throughout the relocation process as they deem necessary.

LEGAL SERVICES

OF NORTHERN CALIFORNIA

July 13, 2017

Sacramento Housing and Redevelopment Commission
801 12th Street, 5th Floor
Sacramento, CA. 95814

Submitted via e-mail to vsmith@shra.org

Re: Public Comments on Twin Rivers Redevelopment, Draft Master Relocation Plan.

Dear Honorable Members in Session:

Legal Services of Northern California respectfully submits the following comments regarding the Twin Rivers Redevelopment Draft Master Relocation Plan ("Plan"). Legal Services of Northern California is a legal-aid organization that advocates for low-income tenants in Sacramento and throughout northern California. We look forward to working with Overland Pacific and Cutler; McCormack, Baron, and Salazar; the Housing Authority of the County of Sacramento; and Urban Strategies to ensure the adoption of a clear and effective Plan that provides the correct guidance and information to current residents at Twin Rivers and stakeholders in the Sacramento community. We offer the following comments on the Plan.

1. Relocation Assistance Program

a. Individual Case Management through Urban Strategies

On Page 7, the Plan states that individual case management is provided through Urban Strategies. The Project must ensure that it does not discriminate in providing individual case management. Section 504 of the Rehabilitation Act, as implemented by 49 CFR part 24 and HUD's regulations at 24 CFR part 8 requires the Displacing Agency to take steps to ensure that no displaced person with disabilities is excluded from participating in, denied the benefits of, or subjected to discrimination in the provision of relocation assistance because of the person's disability.

Urban Strategies requires that "each individual must meet certain responsibilities in order to be involved in the case management program." Urban Strategies, "Residents' Rights and Responsibilities," attached as Exhibit A. These requirements force residents "[t]o provide . . . accurate and complete information about . . . current problems, past illnesses and treatment, and other matters relating to one's health" and "[t]o sign a Release of Information authorizing the case management staff to obtain information . . . including past medical records" to access the case

Legal Services of Northern California
515 12th Street
Sacramento, CA 95814
P: 916.551.2150
F: 916.551.2190
www.lsncl.net

Attn: Services Administration Division 

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July 13, 2017
Page 3

possible; (2) to find at least one comparable unit; and (3) to provide last resort housing.

- Under Section "G. Relocation Assistance Program," clarify and reaffirm that no person shall be required to move from a displacement dwelling unless comparable replacement housing is available to such person. 49 C.F.R. § 24.404.
- Under Section "G. Relocation Assistance Program," the Plan should discuss last-resort housing under both Federal and State law and discuss the Plan's processes in providing last-resort housing should the Relocation Team fail to find comparable units.

c. Replacement Housing Assistance Payment

On Page 21, the Plan states that any household or non-residential occupant that has been evicted for cause shall not be eligible to receive relocation assistance. Under 25 C.C.R. Section 6058, however, "[e]viction is permissible only as a last resort. It in no way affects the eligibility of evicted displaced persons for relocation payments. Relocation records must be documented to reflect the specific circumstances surrounding the eviction." We request that the Plan clarify that households would not qualify for assistance under the URA, but may still qualify under California Relocation Assistance Law Act per state regulations.

On Page 26-28, the Plan provides a formula and an example of rent differential payment. It also states on page 28 that "Should 104(d) be triggered, this period shall be required to cover sixty (60) months versus 42." If both the URA and Section 104(d) apply, a resident has a choice between the relocation programs. The calculations for the rent differential payments are different, and case managers must know these differences to properly advise and assist residents. We request that the Plan clarify when Section 104(d) would be applicable and provide an example computation under Section 104(d). It should also provide a section explaining the protections given by Section 104(d).

On Page 28, application fee assistance is capped at \$250 per household. With a 2% vacancy rate in Sacramento, low-income tenants from Twin Rivers will likely need to apply to multiple complexes. A \$250 cap on application fees presents a potential barrier to finding relocation housing. Increasing the cap on application fee assistance would help facilitate a family's relocation to another property by removing a monetary barrier.

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d. Right of Return

The right of return is a Choice Neighborhoods program requirement. FY2014-2014 Choice Neighborhoods Implementation Grant Agreement, p. 11. A returning tenant must be provided a preference of occupancy of on-site or off-site replacement units before such units are available to any other eligible households. *Id.* HACOS must ensure that residents are well informed about this important right during the relocation period. To that end, HACOS “must plan for and provide current public and assisted housing residents, relocated public and assisted housing residents, and returning and new public and assisted housing residents with supportive services for the term of the Grant Agreement.” FY2014-2014 Choice Neighborhoods Implementation Grant Agreement, p. 10. HACOS also states that “all remedies will be used to minimize displacement and ensure Households in good standing return to the Site if they choose to do so.” Plan at 6. It is important for HACOS to remove as many barriers to return as possible.

Although there are brief mentions of the right of return on pages 6, 21, and 28, the Plan should clarify that residents have a right of return to Twin Rivers once the development is complete and who would have a priority or preference to return. HACOS should also include provisions that it will pay directly for all reasonable out-of-pocket expenses incurred in connection with the return relocation. Without assistance on the backend, many families may face insurmountable difficulties in returning to Twin Rivers.

Further, on Page 55, the Appendix provides a copy of the General Information Notice (“GIN”). The GIN states that households will receive a Memorandum of Agreement (“Memorandum”) that explains the household’s rights to return to a new unit at Twin Rivers. The Memorandum is not a part of the Plan. We urge HACOS to include the Memorandum as part of the Plan and request the ability to review the Memorandum regarding residents’ right to return. We recommend that HACOS provide—at a minimum—the following information in the Memorandum of Agreement:

1. The address of the resident’s assigned unit in the redeveloped Twin Rivers Project and, if different from the resident’s original unit, information regarding the size and amenities of the unit;
2. The expected date of the resident’s return to the Twin Rivers Project;
3. That the PHA or Project Owner will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with the return relocation; and
4. The resident’s options and the implications of those options if the resident determines that he or she does not want to return to the Covered Project and wants to decline the right of return.

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e. Other Responsibilities.

Page 24 lists the Relocation Team's responsibilities. It does not list required responsibilities, such as inspections. Inspection of each replacement dwelling is required under 49 C.F.R. 24.403(b). Before making a replacement housing payment, the Displacing Agency or its designated representative shall make a thorough internal and external inspection of the replacement dwelling to determine whether it is decent, safe and sanitary (as defined at 49 CFR 24.2(a)(8)). A copy of the inspection report should be included with the pertinent claim form in the Displacing Agency's files. We recommend that the Plan clarify that these duties are the responsibilities of the Relocation Team. While inspections are discussed sparingly in the Appendix, a discussion in the Plan itself is needed.

2. Replacement Housing Needs and Resources

On Page 21, the Plan discusses the replacement housing needs and right-to-return. It states that all 218 existing Twin Rivers housing units shall be replaced one-for-one by the Project, that the units shall be constructed on the current location of the Project, and that all households in good standing will be offered the right to return to Twin Rivers upon completion. We request that the Project clarify that residents will be returning to Public Housing upon completion of the new Twin Rivers project and that their current Public Housing protections remain upon their return.

3. Needs Assessment

On Page 18, the Need Assessment states that there are five languages other than English spoken at Twin Rivers. Table 6 lists English, Spanish, Vietnamese, ASL, and Other Languages. We ask that the Plan clarify and provide information on all languages spoken at Twin Rivers and ensure each family receives proper translation services when needed.

4. Conclusion

We appreciate the opportunity to engage in the proposed Draft Master Relocation Plan, as well as the opportunity for public input throughout this process. Should you have any questions about these comments, please contact Sarah Ropelato at (sropelato@lsnc.net). We look forward to working with you to ensure that Twin River residents are fully informed of their rights and that no resident is denied access to vital relocation benefits.

Comments to Draft Master Relocation Plan
July 13, 2017
Page 6

Respectfully Submitted,



Sarah Ropelato
LEGAL SERVICES OF NORTHERN
CALIFORNIA

Exhibit A



Twin Rivers Choice Neighborhood Implementation

Residents' Rights and Responsibilities

As participants in the Twin Rivers Case Management, each individual has basic rights concerning how staff treats him/her. In addition, each individual must meet certain responsibilities in order to be involved in the case management program.

Residents' Rights

Every eligible resident of Twin Rivers is entitled to the following rights and privileges without limitation:

1. To have case management polices explained orally and in writing;
2. To be treated with respect and dignity as a human being;
3. To have records kept confidential;
4. To have the same legal rights and responsibilities as any other citizen, unless otherwise stated by law;
5. To not be denied services because of race, age, creed; disability, marital status or national origin;
6. To be free from verbal, sexual or physical abuse;
7. To have their records and documents explained to them.

Residents' Responsibilities

Every resident of Twin Rivers has the following responsibilities so that we can help you to the best of our abilities:

1. To provide, to the best of one's knowledge, accurate and complete information about employment, current problems, past illnesses and treatment, and other matters relating to one's health
 2. To sign a Release of Information authorizing the case management staff to obtain information from other agencies or institutions if and as needed, including past medical records
 3. Attend appointments scheduled with one's case manager
 4. To report unexpected changes in one's circumstances to the case manager
 5. To participate in developing a Family Development Plan and/or Individual Development Plan(s), and follow through on agreements outlined in these
 6. To report whether one clearly understands a recommended course of action and what is expected
 7. To keep all appointments and, when unable to do so for any reason, to notify the appropriate person(s)
 8. To be considerate of the rights of other residents and of staff
 9. To be respectful of the property of case management staff
-
-

[END OF DOCUMENT]
SPACE AVAILABLE FOR USER REMARKS

LEGAL SERVICES
of
NORTHERN CALIFORNIA

July 28, 2017

Sacramento Housing and Redevelopment Commission
801 12th Street, 5th Floor
Sacramento, CA 95814
Sent via email to vsmith@shra.org

Re: Twin Rivers Redevelopment, Draft Master Relocation Plan.

Dear Honorable Members of the Commission:

Thank you for your careful consideration of our comments and concerns regarding the draft Relocation Plan submitted July 13, 2017. Following the public hearing, Sacramento Housing and Redevelopment Agency ("SHRA") and Overland, Pacific & Cutler ("OPC") contacted our office to discuss our comments. We appreciate the approach SHRA and OPC took to resolve these matters. We also appreciate the revisions that were made in response to our written comments and understand additional revisions were made in response to our phone call. Further, we understand and appreciate that SHRA will be working with Urban Strategies to revise the form attached to our comment letter.

At this time, most of our office's major concerns have been resolved. However, SHRA and OPC informed us that tenant protections at the new Twin Rivers Project have not yet been fully formulated. In previous documents including e.g. the Transformation Plan and prior versions of the Relocation Plan, the replacement units were described as "public housing" units. SHRA has now clarified that the replacement units will *not* be public housing units as such which inherently come with significant tenant protections. Rather, the replacement units will be Project Based Section 8 units. SHRA and OPC stated that the tenant protections of returning and future tenants will be addressed at a later time and that the protections will likely be memorialized through regulatory agreements and other deed restrictions. Our concerns over what the nature and strength of these future protections will be and how they will actually be realized remain, but we look forward to the opportunity to collaborate on these tenant protections at a future date to ensure the adoption of clear guidance and strong tenant protections as the Project evolves.

Sincerely,

Sarah R. Ropelato
Managing Attorney

Sacramento Office:
515 12th Street
Sacramento, CA 95814
P: 916.551.2150
F: 916.551.2196
www.lanc.net

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