



Bristol Street Improvement Project
Civic Center Drive to Washington Avenue
(Phase 3A)

Final Relocation Plan

Prepared for:
City of Santa Ana
Public Works Agency
20 Civic Center Plaza, M-36
Santa Ana, CA 92702

By:

Overland, Pacific & Cutler, Inc.
1 Jenner, Suite 200
Irvine, California 92618
(949) 951-5263

May 2, 2016

Contents

Introduction	1
I. Project Area Description.....	2
A. Project Site Location	2
B. Project Description	2
C. General Demographic and Housing Characteristics	4
II. Assessment of Relocation Needs.....	5
A. Survey Methods	5
B. Field Survey Data – Residential.....	5
1. Housing Mix	6
2. Occupancy Standards	6
3. Income.....	7
4. Ethnicity/Language	7
5. Households with Seniors.....	7
6. Households with Disabilities	7
7. Preferred Relocation Areas	8
C. Field Survey Data – Non-Residential.....	8
III. Relocation Resources	10
A. Methodology	10
B. Replacement Housing/Commercial Site Availability.....	10
1. Residential For-Sale Rental Housing	10
2. Commercial Space Availability	11
3. Loss of Goodwill.....	12
4. Summary	13
C. Related Issues.....	13
1. Concurrent Residential Displacement	13
2. Temporary Relocation	13
IV. The Relocation Program	14
A. Program Assurances, Standards and Objectives	14
B. Relocation Advisory Assistance.....	15
C. Relocation Benefits – Residential.....	16
1. Residential Moving Expense Payments.....	16
2. Rental Assistance to Tenants/Owner-Occupants Who Choose to Rent	17
3. Down payment Assistance to Tenants/90 Day Owner-Occupants Who Choose to Purchase	18
4. Payments to 90 Day Residential Owner-Occupants	18
5. Payments to Non-tenured Residential Tenants	20
D. Determinations of Comparable Housing	20
E. Relocation Benefits – Commercial Tenants and Non-profit Organizations	20
1. Payment for Actual Reasonable and Necessary Moving and Related Expenses	20
2. Self-Moves.....	22
3. A Fixed Payment in Lieu of a Payment for Actual Reasonable Moving and Related Expenses	22
F. General Information Regarding the Payment of Relocation Benefits	23
G. Last Resort Housing	24

H.	Immigration Status.....	25
I.	Relocation Tax Consequences.....	25
V.	Administrative Provisions	26
A.	Holdover Tenancies.....	26
B.	Notices	26
C.	Privacy of Records.....	27
D.	Grievance Procedures	27
E.	Eviction Policy.....	28
F.	Citizen Participation	28
G.	Projected Dates of Displacement.....	28
H.	Estimated Relocation Costs	28

List of Tables

Table 1:	2010 US Census Population – City of Santa Ana and Impacted Tract (752.02).....	4
Table 2:	2010 US Census Housing Units – City of Santa Ana and Impacted Tract (752.02).....	4
Table 3:	Affected Residential Dwellings.....	5
Table 4:	Affected Non-Residential Uses.....	9
Table 5:	Availability and Cost of Replacement Rental Housing (Conventional).....	11
Table 6:	Availability and Cost of Single-Family Residences for Sale.....	11
Table 7:	Summary of Available Commercial Space for Lease.....	12
Table 8:	Summary of Available Commercial Space for Sale.....	12
Table 9:	Schedule of Fixed Moving Payments.....	17
Table 10:	Computation of Rental Assistance Payments.....	18

List of Figures

Figure 1:	Project Site Location.....	3
-----------	----------------------------	---

List of Exhibits

- Exhibit A: Business Interview Form
- Exhibit B: Residential Interview Form
- Exhibit C: HUD Income Limits – Orange County
- Exhibit D: Homes for Sale and Rent Listings
- Exhibit E: Commercial For Sale and Rent Listings
- Exhibit F: Business Informational Brochure
- Exhibit G: Residential Informational Brochure
- Exhibit H: Public Comments and Response

Introduction

The City of Santa Ana (City) has authorized the preparation of a Relocation Plan in connection with the commencement of right of way acquisition activities for the Bristol Street Improvement Project (Phase III A), a street improvement project from Civic Center Drive to Washington Avenue, in the City of Santa Ana, in Orange County, California.

The Project will require the acquisition of twenty-nine (29) properties resulting in the permanent displacement of twenty-one (21) residential households and fifteen (15) business occupants.

The Project is funded with Orange County Transportation Authority (OCTA) gasoline tax, the OCTA Measure M2 funds, and a Federal Fund, and meets program funding requirements. This Relocation Plan conforms to the requirements of the California Relocation Assistance Law, *California Government Code* §7260, et seq.; the Relocation Assistance and Real Property Acquisition Guidelines; *California Code of Regulations*, Title 25, Division 1, Chapter 6 (Guidelines); the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA); the implementing federal relocation and acquisition guidelines found at 49 CFR Part 24; and the City's adopted right-of-way policies and procedures.

Overland, Pacific & Cutler, Inc. (OPC), an experienced acquisition and relocation firm, has been selected to prepare this Relocation Plan, and will provide all subsequently required relocation assistance in association with any permanently displaced households or non-residential occupants. In compliance with statutory requirements, the Relocation Plan has been prepared to evaluate the present circumstances and replacement housing requirements of Project tenants.

The Plan is organized in five sections:

1. The regional and specific location of the Project (**SECTION I**);
2. An assessment of the relocation needs of those persons subject to displacement as a result of the Project (**SECTION II**);
3. An assessment of available residential and commercial replacement sites within the Santa Ana and surrounding areas (**SECTION III**);
4. A review of the relocation assistance program to be offered to the displaced residential and business occupants (**SECTION IV**); and
5. Necessary administrative provisions (**SECTION V**).

I. Project Area Description

A. Project Site Location

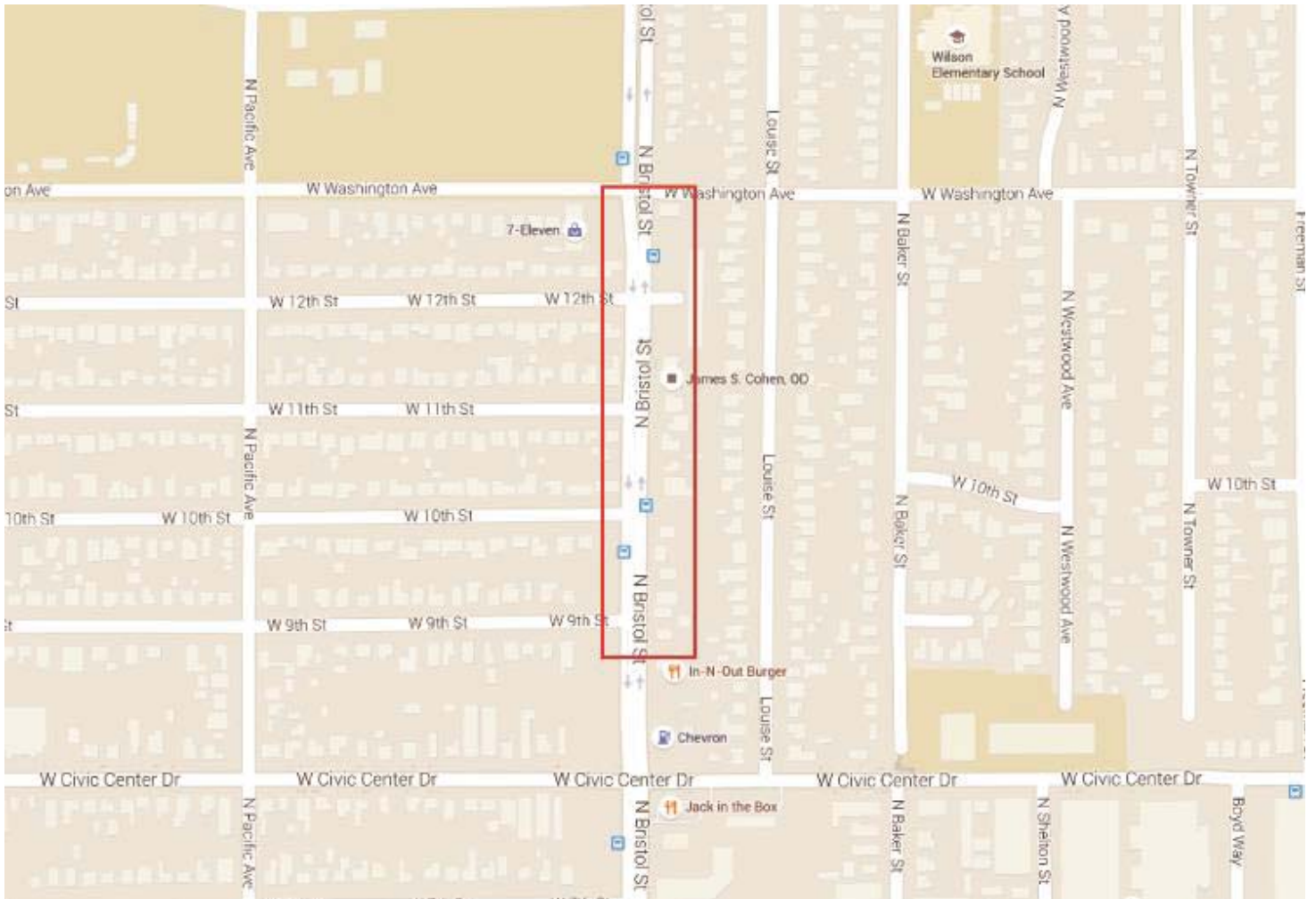
The Project is located approximately 1.3 miles south of State Route 22 (SR-22), 1.6 miles west of Interstate 5 (I-5), 0.9 mile east of the Santa Ana River, and 4.5 miles north of Interstate 405 (I-405). Adjacent communities include Orange, Anaheim, Tustin, and Costa Mesa. The City is home to points of interest including, but not limited to, the Discovery Center, the Bowers Museum, the Santa Ana Zoo, the Old Orange County Courthouse, and the Santa Ana Regional Transportation Center. Santa Ana is the County Seat and is the second largest city in Orange County.¹ Refer to Figure 1: Project Site Location, on the next page, for a project site map.

B. Project Description

The Bristol Street Improvement Project was planned and designed to incorporate complete street concepts with storm drain quality features. The improvements include widening of the street from four lanes to six lanes, with bus turnouts, raised median and sound walls. In addition the overhead utility lines will go underground.

¹ City of Santa Ana website: <http://www.ci.santa-ana.ca.us/facts/>, accessed January 7, 2016.

Figure 1: Project Site Location



C. General Demographic and Housing Characteristics

According to the 2010 U.S. Census, the population of the City of Santa Ana was 354,528, and the population of the impacted Census Tract is 5,753 (see **Table 1** below). Corresponding Census data concerning the housing mix is shown in **Table 2**, below.

Table 1: 2010 US Census Population – City of Santa Ana and Impacted Tract (752.02)

Population	Number of Persons	Percentage	City	Percentage
Total population	5,753	100.0%	354,258	100.0%
White	2,633	45.8%	148,838	45.9%
Black or African American	70	1.2%	4,856	1.5%
American Indian or Alaskan Native	59	1.0%	3,260	1.0%
Asian	175	3.0%	34,138	10.5%
Native Hawaiian and Other Pacific Islander	7	0.1%	976	0.3%
Some other Race	2,619	45.5%	120,789	37.2%
Two or More Races	190	3.3%	11,671	3.6%
Hispanic or Latino (of Any Race)	5,286	91.9%	253,928	78.2%

U.S. Census Bureau provides additional descriptive population data where persons are identified as either “Hispanic or Latino (of any race)” or “Not Hispanic or Latino.” The sum of these two categories will equal the total population of a data set.

Table 2: 2010 US Census Housing Units – City of Santa Ana and Impacted Tract (752.02)

Type	Number of Units	Percentage	City	Percentage
Total occupied units	1,097	96.2%	73,174	95.2%
Owner-occupied	636	58.0%	34,756	47.5%
Renter-occupied	461	42.0%	38,418	52.5%
Vacant Housing Units	43	3.8%	3,722	4.8%
Available for Sale Only (of Total Vacant Units)	10	23.3%	693	18.6%
Available for Rent – Full Time Occupancy (of Total Vacant Units)	19	44.2%	1,983	53.3%
Sold or Rented (Not Occupied)	0	0.0%	183	4.9%
Otherwise Not Available (e.g., seasonal, recreational, migratory, occasional use)	3	7.0%	132	3.5%
Other Vacant	11	25.6%	731	19.6%

Source: U.S. Census Bureau, accessed January 2016.

II. Assessment of Relocation Needs

A. Survey Methods

To obtain necessary information for the preparation of this Plan, field research of potentially affected residents and business operators was conducted. The research included in-person interviews and field analyses of affected residential and commercial parcels to identify displaced occupants and gather preliminary information for relocation planning.

Detailed in-person interviews were conducted with affected residential occupants to gather necessary information, including information such as household size and composition, income, monthly rent obligation, length and type of occupancy, language, disabilities/health problems, and replacement housing preferences. Survey questions of business owners concerned the nature of the business, leasehold circumstances, annual revenues, description and size of current operations, special facility requirements, relocation concerns and area preferences with respect to possible replacement locations.

In-person interviews are an important factor in the planning and relocation of displacees. In the early planning process, careful attention is paid to the physical needs of individuals with disabilities, and elderly displacees to make sure that these individuals receive appropriate care and housing.

The interviews were conducted on-site in homes and places of business in English, Spanish, or other necessary languages, as appropriate. Follow-up contacts were made with occupants to gather more information and/or to provide information or notices that would be or were made through personal visits and by telephone.

The descriptive data in this Plan concerning residents and businesses are based on in-person interviews and field observations. Samples of the residential and business interview forms used in the interview process are attached as **Exhibits A** and **B** of this report.

B. Field Survey Data – Residential

The Project will impact 17 single-family residential (SFR) dwellings with 21 residential households. Survey information was obtained from 17 of the 21 occupied residential households (80.9%). The City has adopted and would adhere to its local housing occupancy standards to make sure housing is of the appropriate size in relocating the affected occupants.

Table 3 below shows current housing in the Project area including bedroom size.

Table 3: Affected Residential Dwellings

No.	Address	Property Type	Use	Number of Bedrooms	Number of Occupants	Occupancy Type	City
1	907 N. Bristol	Residential	SFR	3	5	Owner	Santa Ana
2	1005 N. Bristol	Residential	SFR	2	4	Owner	Santa Ana
3	1009 N. Bristol	Residential	SFR	3	2	Owner	Santa Ana
4	1015 N. Bristol	Residential	SFR	4	Unknown*	Owner	Santa Ana

No.	Address	Property Type	Use	Number of Bedrooms	Number of Occupants	Occupancy Type	City
5	1301 W. 12 th St.	Residential	SFR	3	7	Owner	Santa Ana
6	1305 W. 12 th St.	Residential	SFR	2	6	Owner	Santa Ana
7	1302 W. 11 th St.	Residential	SFR	3	9	Owner	Santa Ana
8	1307 W. 10 th St.	Residential	SFR	3	6	Owner	Santa Ana
9	827 N. Bristol	Residential	SFR	2	Unknown*	Tenant	Santa Ana
10	829 N. Bristol	Residential	SFR	3	10	Tenant	Santa Ana
11	911 N. Bristol	Residential	SFR	3	5	Tenant	Santa Ana
12	917 N. Bristol	Residential	SFR	3	5	Tenant	Santa Ana
13	1003 N. Bristol	Residential	SFR	2	5	Tenant	Santa Ana
14	1003 N. Bristol ²	Residential	SFR	2	4	Tenant	Santa Ana
15	1003 N. Bristol ³	Residential	SFR	1	1	Tenant	Santa Ana
16	1005 N. Bristol	Residential	SFR	0**	2	Tenant	Santa Ana
17	1019 N. Bristol	Residential	SFR	3	9	Tenant	Santa Ana
18	1302 W. 12 th St.	Residential	SFR	2	2	Tenant	Santa Ana
19	1301 W. 11 th St.	Residential	SFR	3	12	Tenant	Santa Ana
20	1301 W. 10 th St.	Residential	SFR	3	7	Tenant	Santa Ana
21	1307 W. 10 th St.	Residential	SFR	0**	1	Tenant	Santa Ana

*Unable to interview occupants

**Room renters

1. Housing Mix

As shown in **Table 3** above, the Project area includes 21 households occupying 17 single family residences, some with multiple households in one dwelling and or converted into multiple units. 13 of the affected households are tenant-occupied and 8 are owner-occupied. Occupancy information will assist in determining the relocation needs and scope of assistance provided. No mobile homes will be affected by the Project.

2. Occupancy Standards

The standard for housing density adopted by the City allows two persons per bedroom and one person in a common living area. The City adheres to the state building code occupancy standard based on the square footage of dwellings for households larger than eight members. Referrals to replacement housing provided to occupants may reflect the need for larger accommodations to comply with the state and City of Santa Ana code requirements.

Generally, these standards allow for up to three persons to occupy a one-bedroom unit, five persons in a two-bedroom unit, and seven persons in a three-bedroom unit. Any households with more than eight members would require a four-bedroom replacement unit based on the respective size of that unit, per the state building code.

² The main house was converted from a three-bedroom, one bathroom dwelling, into a two-bedroom, one bathroom unit; a one-bedroom and one bathroom unit, and; a three-bedroom, one bathroom unit.

³ The main house was converted from a three-bedroom, one bathroom dwelling, into a two-bedroom, one bathroom unit; a one-bedroom and one bathroom unit, and; a three-bedroom, one bathroom unit.

3. Income

Information as to the household's income is gathered from residential interviews to determine individual relocation needs and the scope of financial relocation assistance that may be provided. Low-income households may experience challenges qualifying for the purchase or rent of replacement housing. Advance replacement housing payments may be needed to assist displacees in qualifying for loans or leases. Low-income households that choose to rent may be eligible for additional assistance.

Based on information obtained from the residential interviews, at least six households may be identified as low-income households. According to the low-income standards for the Housing Authority of the County of Orange (**Exhibit C**), adjusted for family size as published by the State of California, Department of Housing and Community Development (HCD), the 2015 low income limits are defined as follows:

Family Size	1	2	3	4	5	6	7	8
Low Income Limits 2015	\$53,950	\$61,650	\$69,350	\$77,050	\$83,250	\$89,400	\$95,550	\$101,750

Source: Department of Housing and Community Development (HCD) website, accessed March 13, 2016.

4. Ethnicity/Language

Per the 2000-2014 U.S. Census American Community Survey Five-Year Estimate, 82.8%⁴ of the population in the City of Santa Ana speaks a language besides English at home. Based on information obtained from the residential interviews of the 21 displaced households, Spanish is the primary language spoken at home. Language services are available to assist the requirements of all affected occupants.

5. Households with Seniors

Per the 2000-2014 U.S. Census 5-Year Housing Unit Estimate, 5.1% of the total households consist of occupants 65 years of age or over. Specific care is taken to identify and address the needs of senior occupants who may require special accommodations. Based on information obtained from residential interviews, no occupants over the age of 65 would be affected.

6. Households with Disabilities

Per the 2000-2014 U.S. Census 5-Year Housing Unit Estimates, 8.7%⁵ of the civilian non-institutionalized population consist of persons with a disability. Disabilities may include a variety of physical mobility impairments, including psychological and other physical health issues. Care is taken to meet the special needs of each household, particularly as these needs involve physical access to accommodations. Early identification of individual health issues would enable relocation staff to more effectively manage the relocation process. In all cases involving physical or mental impairments, additional services will be provided to ensure close individual case

⁴ United States Census Bureau web site, accessed March 13, 2016, <http://factfinder.census.gov/>.

⁵ United States Census Bureau web site, accessed March 13, 2016, <http://factfinder.census.gov/>.

monitoring. Based on information obtained from the residential interviews, at least one household has occupants that have disabilities.

7. Preferred Relocation Areas

The residential interviews identify specific replacement site needs and preferences, and assist in planning replacement housing accordingly. In residential interviews, many residents tend to express a preference to remain in the community in order to maintain current school enrollment, access to employment, medical facilities, recreational resources, and public transportation. Based on information obtained from the residential interviews, the affected households have indicated a preference to remain in the local Santa Ana and Garden Grove areas.

C. Field Survey Data – Non-Residential

The Project has identified potentially 15 non-residential occupants that would be displaced. Survey information was obtained from 12 of the 15 business owners.

The majority of the businesses impacted by the Project would be considered small businesses. The majority of affected businesses would require cost-effective small replacement sites, with proximity to existing customer bases. Detailed interviews with business owners are instrumental in identifying suitable replacement sites.

Interviews with the business tenants are crucial in addressing various complex relocation issues early in the process, including issues such as identification of trade fixtures and equipment, tenant improvements, personal property/real property issues, and the relocation requirements of various businesses that may become long lead items, such as obtaining special permits or zoning requirements. Such items should be carefully reviewed and planned in coordination with project time frames.

Several non-residential displacements may be identified as potential candidates for extensive advisory services and relocation assistance. Of particular concern are medical facilities and the fast food establishment.

- **Medical** – Medical facilities are historically difficult to relocate, due to the nature of the services provided, the need to provide consistent services without interruption, and expensive diagnostic equipment that would require relocation. For example, there are two dental offices, a chiropractor’s office and an eye care facility on the Project.
- **Restaurant** – As with larger chain restaurants, smaller fast food establishments such as Taqueria de Anda usually require busy intersections, pedestrian traffic, visibility, access, and parking. Fast food outlets have very specific market areas in which they must stay to avoid franchise or non-competitive agreements with outlets of the same brand.

Moving smaller businesses can have a more detrimental effect than moving larger businesses, presumably with larger capital reserves. For this reason, it would be essential to provide timely, viable referrals to replacement sites, with assistance in relocation planning, while simultaneously executing the move carefully and efficiently. Information obtained during the

relocation interview process will assist in determining the financial capacity of a business to accomplish a move, and if an advance relocation assistance payment is necessary.

Even if a business is relocated as planned, its employees may still encounter challenges with commuting or transportation to the replacement location. Some employees rely on public transportation to commute to and from work and may need to adjust their personal schedules and routines depending upon bus routes and/or schedules to reach the new location. Upon implementation of the Relocation Assistance Program, relocation timing issues and replacement site concerns will be discussed and addressed, as appropriate. The list of affected businesses provided in **Table 4** below reflects data gathered from field observations and business interviews.

Table 4: Affected Non-Residential Uses

No.	Address	Property Type	Use	Business Name
1	1023 N. Bristol	Commercial	Medical Office	Santa Ana Eye Care Optometry
2	1027 N. Bristol	Commercial	Medical Office	Dr. Euler R. Ferrer, Inc.
3	1111 N. Bristol, Unit A	Commercial	Service/Retail	N/A
4	1111 N. Bristol, Unit B	Commercial	Service/Retail	La Modele
5	1111 N. Bristol, Unit C	Commercial	Service/Retail	Nails Pro
6	1111 N. Bristol, Unit D	Commercial	Service/Retail	Advantage Insurance
7	1111 N. Bristol, Unit E	Commercial	Service/Retail	Queen's Beauty Salon
8	1111 N. Bristol, Unit F	Commercial	Service/Retail	Leon's Foto y Bridal
9	1111 N. Bristol, Unit G	Commercial	Service/Retail	Total Nutrition
10	1111 N. Bristol, Unit H	Commercial	Service/Retail	Hugo's Computer
11	1111 N. Bristol, Unit I & J	Commercial	Medical Office	Chiropractic
12	1111 N. Bristol, Unit K	Commercial	Medical Office	Denista
13	1111 N. Bristol, Unit L	Commercial	Service/Retail	Rey Income Tax
14	1111 N. Bristol, Unit M	Commercial	Service/Retail	Blooming Flowers
15	1221 N. Bristol	Commercial	Service/Retail	Taqueria De Anda

III. Relocation Resources

The Uniform Relocation Act provides that no eligible residential persons shall be required to move from their dwelling unless comparable replacement dwellings are available to such persons. The purpose of this section is to identify whether sufficient comparable replacement housing resources exist for all potential residential displacees. Additionally, while available replacement locations are not required for non-residential occupants to move, a survey of available replacement commercial sites have been searched to determine what sites may be available to the non-residential occupants and to determine what impacts, if any, may occur due to a lack of available replacement sites. The City is committed to making every effort to satisfactorily relocate all displaced occupants.

A. Methodology

To determine the availability of residential and commercial sites prior to the displacement of occupants from the Project area, resources were researched through the following sources:

- Internet sources (MLS listings, LoopNet);
- Canvassing the Project area for properties available for lease and or for sale;
- Telephone and field contact with commercial brokerages serving the area;
- Classified rental listings from local publications, and;
- Contacts with real estate/property management companies serving the community.

B. Replacement Housing/Commercial Site Availability

1. Residential For-Sale and Rental Housing

A housing resource survey was conducted to determine the availability of replacement housing within the City's replacement area, identified as the City of Santa Ana, and the neighboring cities of Tustin, Costa Mesa, Fountain Valley, Garden Grove, Orange, and Anaheim sufficient to meet the needs of displaced rental tenants and homeowners.

The replacement housing survey considered available two-, three-, and four-bedroom conventional housing for rent and for sale. This data is summarized in **Tables 5** and **6**, below. The conventional housing survey, **Table 5**, identified 24 currently available, two-, three-, four-, and five-bedroom conventional housing units for rent. The survey of available single-family residences for sale, **Table 6**, identified 25 currently available two-, three-, and four-bedroom housing units for sale. The individual figures for number of units found by bedroom size are presented in the tables, as well as location and price range.

Table 5: Availability and Cost of Replacement Rental Housing (Conventional)

Number of Bedrooms	Property Type	Number Available	City	Price Range Lease
Two	SFR	4	Anaheim, Orange	\$1,800 - \$2,800
Three	SFR	10	Santa Ana, Garden Grove, Fountain Valley, Orange, Tustin	\$2,499 - \$3,800
Four	SFR	6	Santa Ana, Fountain Valley, Tustin	\$2,550 - \$3,975
Five	SFR	4	Santa Ana, Orange, Tustin	\$2,750 - \$5,500

Source: Multiple Listing Service and Zillow, accessed March 2016.

The rent ranges identified in the table above are among the figures used to make benefit and budget projections for this Plan. The variances in the rent range are a result of age, condition, size, and locational factors. Rates are subject to change according to the market rates prevailing at the time of displacement. **Exhibit D** provides a detailed list of available housing for rent and for sale.

Table 6: Availability and Cost of Single-Family Residences for Sale

# Bedrooms	Property Type	Total Available	City	Price Range (in 000's)
Two	SFR	5	Santa Ana	\$350 - \$550
Three	SFR	14	Santa Ana	\$375 - \$725
Four	SFR	6	Santa Ana	\$417 - \$599

Source: Multiple Listing Service, accessed March 2016.

2. Commercial Space Availability

The availability of retail space in the City of Santa Ana and the surrounding communities was researched through commercial real estate listing resources. **Tables 7** and **8** below summarize the availability of various types of commercial properties for lease and sale in the City of Santa Ana and the surrounding areas. **Exhibit E** provides a detailed list of available commercial space.

Table 7: Summary of Available Commercial Space for Lease

Property Use/Type	Total Available	City	Price Range lease
Office	367	Santa Ana, Anaheim, Costa Mesa, Fountain Valley, Garden Grove, Irvine, Orange, Tustin, Westminster	\$0.09 - \$4.58 SF/Mo
Retail	195	Santa Ana, Anaheim, Costa Mesa, Fountain Valley, Garden Grove, Irvine, Orange, Tustin, Westminster	\$0.10 - \$4.58 SF/Mo
Industrial/Warehouse	72	Santa Ana, Anaheim, Costa Mesa, Garden Grove, Irvine, Orange, Tustin	\$0.34 - \$1.50 SF/Mo
Industrial/Flex Space	49	Santa Ana, Anaheim, Costa Mesa, Fountain Valley, Irvine, Orange, Tustin	\$0.20 - \$1.65 SF/Mo
Land	8	Santa Ana, Anaheim, Tustin	\$0.20 - \$2.50 SF/Mo

Source: LoopNet, accessed January 2016

Table 8: Summary of Available Commercial Space for Sale

Property Use/Type	Total Available	City	Price Range Purchase
Office	68	Santa Ana, Costa Mesa, Fountain Valley, Garden Grove, Irvine, Orange, Tustin	\$130,000 - \$17,685,000
Retail	49	Santa Ana, Anaheim, Fountain Valley, Garden Grove, Orange, Santa Ana, Tustin, Westminster	\$139,900 - \$17,685,000
Industrial/Warehouse	13	Santa Ana, Garden Grove, Irvine, Orange	\$599,000 - \$35,000,000
Industrial/Flex Space	7	Santa Ana, Anaheim, Costa Mesa, Irvine	\$520,000 - \$6,250,000
Land	10	Santa Ana, Anaheim, Garden Grove, Tustin	\$11,995 - \$3,500,000

Source: Multiple Listing Services, accessed January 2016; LoopNet, accessed January 2016

3. Loss of Goodwill

Goodwill consists of the benefits that accrue to a business as a result of its location; reputation for dependability, skill, or quality; and any other circumstances resulting in probable retention of old, or acquisition of new, patronage. Claims for loss of goodwill are not compensable under the statutory provisions related to relocation assistance.

Where claims are anticipated, state law (*California Code of Civil Procedure* §1263.510) requires business owners to prove all of the following: 1) The loss is caused by the acquisition of the property; 2) The loss cannot reasonably be prevented by relocation of the business, or by taking steps and adopting procedures that a reasonably prudent person would take to preserve the goodwill; and, 3) The compensation for the loss has not been included as a relocation payment, or duplicated in compensation otherwise awarded to the owner.

4. Summary

Considering the availability of replacement housing, adequate replacement resources exist in the Project area for affected residential tenants and owner-occupants.

Although adequate replacement resources exist, based on surveyed results of rental and purchase opportunities, and anticipated values of existing dwellings, occupants are anticipated to have increases in monthly rents and/or higher purchase costs. These possible increases, if any, would be met through the City's Relocation Assistance Program.

The data for non-residential resources indicates adequate business sites that are currently available for sale and lease to commercial occupants. While there are adequate replacement sites for non-residential occupants, some business uses may require conformance with local conditional use permits and/or zoning requirements.

C. Related Issues

1. Concurrent Residential Displacement

The Project would not compete with or adversely affect the availability of comparable replacement resources. There are no other known current public projects under way in the City of Santa Ana or adjacent communities that currently would compete with the Project for housing resources. The City intends to monitor the activity of local agencies. No residential displacee would be required to move without adequate notice and access to available, affordable, decent, safe, and sanitary housing.

2. Temporary Relocation

The Project is not anticipated to cause temporary displacements. Affected occupants will be permanently displaced.

IV. The Relocation Program

The City of Santa Ana's (City) Relocation Program is designed to minimize hardship, be responsive to unique project circumstances, maintain personal contact with all affected individuals, consistently applying all regulatory criteria to formulate eligibility and benefit determinations, and conform to all applicable requirements.

The City has retained Overland, Pacific & Cutler, Inc. (OPC) to administer the Relocation Program. OPC has worked on more than 2,500 public agency acquisition and relocation projects over the past 30 years. Additionally, OPC has an extensive resume of public works projects undertaken in other Orange County communities. Experienced City staff would monitor the performance of OPC and be responsible to approve or disapprove OPC's recommendations concerning eligibility and benefit determinations and interpretations of the City's policy.

The Relocation Program consists of two principal constituents: Advisory Assistance and Financial Assistance.

A. Program Assurances, Standards and Objectives

The City would provide the displaced residential and business occupants with the assistance, rights, and benefits required under federal and/or state relocation law and the City's policies and procedures. The relocation program would provide advisory and financial assistance. Every effort would be made to facilitate relocation arrangements and minimize hardship for displacees.

The program objectives would be as follows:

1. To fully inform eligible Project displacees of the nature of, and procedures for, obtaining relocation assistance and benefits;
2. To determine the needs of each displacee eligible for assistance;
3. To provide continuously updated referrals to potential replacement sites within a reasonable time prior to displacement and assure that no occupant is required to move without a minimum of 90 days written notice to vacate;
4. To provide assistance that does not result in different or separate treatment due to race, color, religion, national origin, sex, marital status or other arbitrary circumstances;
5. To supply information concerning federal programs and other governmental programs providing assistance to displaced persons;
6. To assist each eligible occupant to complete applications for benefits;
7. To make relocation benefit payments in accordance with the appropriate guidelines;
8. To inform all persons subject to displacement of City policies with regard to eviction and property management; and
9. To establish and maintain a formal grievance procedure for use by displaced persons seeking administrative review of City decisions with respect to relocation assistance.

B. Relocation Advisory Assistance

OPC staff is available to assist the permanently displaced households and businesses with questions or concerns about relocation and/or assistance in relocating. Relocation staff is located at 1 Jenner, Suite 200, Irvine, CA 92618, with office hours from 8:00 a.m. to 5:00 p.m., and can be contacted at (949)951-5263. A comprehensive relocation program, with technical and advisory assistance, would be provided to assist all persons being displaced as a consequence of the Project. Personal contact would be maintained with all individuals until the relocation process has been completed.

As discussed previously, OPC has been retained by the City to assist in the administration of its relocation program. OPC will work closely with City staff. City staff would provide final approvals, or otherwise, of all OPC recommendations. Every reasonable effort would be made to ensure that the relocation of residents and businesses occurs with a minimum of delay and hardship.

The following services will be provided:

1. The remaining interviews with residents and businesses located in the Project area will be completed to gather information appropriate to the determination of needs and preferences regarding replacement of existing facilities;
2. A printed Informational Brochure (**Exhibits F and G**) will be provided in English or the displacee's language if subsequently be deemed necessary. Signed acknowledgements will be obtained to verify receipt of this material;
3. A database will be maintained of available residential units for sale and commercial space and distribute replacement site referrals for the duration of the Project;
4. Assistance will be offered to displacees in connection with arrangements for the purchase of real property, if applicable, obtaining required business permits or licenses, the filing of claim forms to request relocation benefits from the City and to obtain services from other public agencies;
5. Special assistance in the form of referrals to governmental and non-governmental agencies will be made, if requested;
6. Eligible displacees will be assisted with the preparation and submission of relocation assistance claims;
7. Benefit determinations and payments will be made in accordance with applicable law and City policy;
8. Assure that displacees are not required to move without a minimum of 90 days written notice to vacate;
9. All persons subject to displacement will be informed of City policies with regard to eviction and property management;

10. A formal grievance procedure will be established and maintained for use by displaced persons seeking administrative review of City decisions with respect to relocation assistance; and
11. Assistance will be provided that does not result in different or separate treatment due to race, color, religion, national origin, sex, marital status or other arbitrary circumstances.

C. Relocation Benefits – Residential

Specific eligibility requirements and benefit plans would be detailed on an individual basis with displacees. In the course of personal interviews and follow-up visits, households would be counseled as to available options with respect to financial assistance.

Relocation benefits will be provided in accordance with the provisions of the federal and state relocation law and regulations. Benefits would be paid to eligible displaced persons upon submission of required claim forms and documentation in accordance with the City’s normal administrative procedures.

1. Residential Moving Expense Payments

All residential occupants that would be relocated would be eligible to receive a payment for moving expenses. Moving expense payments would be made based on the actual cost of a professional move or a fixed payment based on a room-count schedule.

a. Actual Cost (Professional Move)

The displacee may elect to retain the services of a licensed professional mover, in which case the City would pay for the actual cost of the moving services based on the lower of at least two acceptable bids (the City may, at its discretion, solicit competitive bids to determine the lowest reasonable move cost). After the move is complete, the displacee may pay the mover directly and seek reimbursement from the City, or request a direct payment from the City to the mover.

In addition to the cost of the actual move, one-time expenses associated with utility reconnections (e.g., gas, water, electricity, telephone, cable) would be eligible for reimbursement. Transportation costs would be limited to a distance of 50 miles, unless otherwise authorized by the City.

b. Fixed Payment (based on Room Count Schedule)

An occupant may elect to receive a fixed payment for moving expenses that is based on the number of rooms occupied in the displacement dwelling. In this case, the person to be relocated takes full responsibility for the move. The fixed payment includes all utility connections as described in Section 1.a above.

At a minimum, the fixed schedule payment for single occupancy efficiency units, furnished with the tenant’s own personal property, is \$450, which includes all utility connections at the replacement location. The current schedule for fixed moving payments is provided below in **Table 9**.

Table 9: Schedule of Fixed Moving Payments

Furnished Dwelling									
Room Count	1	2	3	4	5	6	7	8	Each Additional
Amount	\$725	\$930	\$1,165	\$1,375	\$1,665	\$1,925	\$2,215	\$2,505	\$265
Unfurnished Dwelling									
Room Count	1								Each Additional
Amount	\$475								\$90

Source: Federal Highway Administration (effective August 24, 2015).

2. Rental Assistance to Tenants/Owner-Occupants Who Choose to Rent

A tenant or an owner-occupant displaced from a dwelling may be entitled to a RHP in the form of rental or down payment assistance not to exceed \$7,200. The MAP-21 amended RHPs for displaced tenants to \$7,200. A payment in excess of \$7,200 would be made under the provisions of the Last Resort Housing Program (LRH), which is discussed in Section IV.G., Last Resort Housing. A displacee may be entitled to a RHP in the form of rental or down payment assistance if the displacee:

1. Has actually and lawfully occupied the displacement dwelling for at least 90 days immediately prior to the ION; and
2. Has rented, or purchased, and occupied a decent, safe, and sanitary replacement dwelling within one year (unless the City extends this period for good cause) after:
 - a. For a tenant, the date he or she moves from the displacement dwelling; or
 - i. For an owner-occupant, the later of:
 1. The date final payment is received for the displacement dwelling, or in the case of condemnation, the date the full amount of estimated just compensation is deposited with the court; or
 2. The date the owner-occupant moves from the displacement dwelling.

Rental/down payment assistance payment amounts are equal to 42 times the difference between the base monthly rent and the lesser of:

1. The monthly rent and estimated average monthly cost of utilities for a comparable replacement dwelling; or
2. The monthly rent and estimated average monthly cost of utilities for the decent, safe, and sanitary replacement dwelling actually occupied by the displaced person.

The base monthly rent for the displacement dwelling is the lesser of:

1. The average monthly cost for rent and utilities at the displacement dwelling for a reasonable period prior to displacement, as determined by the City. For owner-occupants or households that paid little or no rent, fair market rent would be used as a substitute for actual rent; or

2. Thirty percent (30%) of the displaced person’s average monthly gross household income if the amount is classified as “low income” by HUD’s Annual Survey of Income Limits for the Public Housing and Section 8 Programs. HUD’s Survey is shown as **Exhibit C**. If a displacee refuses to provide appropriate evidence of income or is a dependent, the base monthly rent shall be determined to be the average monthly cost for rent and utilities at the displacement dwelling; or
3. The total of the amount designated for shelter and utilities if receiving a welfare assistance payment from a program that designated the amounts for shelter and utilities.

Table 10 below illustrates the computation of a rental/down payment assistance payment amount.

Table 10: Computation of Rental Assistance Payments

1. Old Rent	\$1,000	Old Rent, plus Utility Allowance
Or		
2. Ability to Pay	\$950	30% of the Gross Household Income
3. Lesser of Lines 1 or 2	\$950	Base Monthly Rental
Subtracted From:		
4. Actual New Rent	\$1,050	Actual New Rent including Utility Allowance
Or		
5. Comparable Rent	\$1,050	Determined by the City; includes Utility Allowance
6. Lesser of Lines 4 or 5	\$1,050	
7. Yields Monthly Need:	\$100	Subtract Line 3 from Line 6
Rental Assistance	\$4,200	Multiply Line 7 by 42 Months

3. Down payment Assistance to Tenants/90 Day Owner-Occupants Who Choose to Purchase

Displacees otherwise eligible to receive a Rental Assistance Payment (RAP) as previously described may choose to utilize the full amount of their rental assistance eligibility to purchase a home. Such payments would be deposited directly to an escrow account with provisions that allow the City to recover its funds if the escrow is cancelled or does not proceed in a timely manner. Down payment assistance provided to a displaced owner-occupant cannot exceed the amount the owner would have received had the owner met the 90-day occupancy requirement.

4. Payments to 90 Day Residential Owner-Occupants

Residential owner-occupants who have established residency for at least 90 days prior to the City’s offer to purchase may be eligible for up to \$31,000 in replacement housing assistance, prior to consideration of eligibility for LRH assistance (see Last Resort Housing, Section IV.G). MAP-21 amended the maximum statutory benefit for RHPs for displaced homeowners to \$31,000. The length of occupancy requirement for homeowners was reduced from 180 days to 90 days in occupancy before the ION. The amount of the RHP would be determined based on three separate elements: 1) purchase price differential; 2) mortgage interest differential; and, 3) incidental expenses.

a. Price Difference Differential

The Purchase Price Differential is based on three factors:

Acquisition Price: The price paid by the City of Santa Ana for the Project dwelling;

Actual Purchase Price: The actual price paid for a replacement dwelling, and;

Comparable Replacement Cost: The cost of a decent, safe, and sanitary dwelling comparable to the dwelling acquired by the City of Santa Ana.

The purchase price differential amount is determined by comparing the price of the acquired dwelling (including any proceeds obtained through condemnation) to the lesser of the actual cost paid for a replacement home versus the price of the comparable dwelling used to compute eligibility in the Notice of Eligibility (NOE) issued to the displaced owner.

In today's real estate market, many agencies have encountered owner-occupants with negative equity, where the fair market value is less than the outstanding debt. The City will follow the Programmatic Waiver of the Code of Federal Regulations methodology for calculating RHPs. This waiver allows computing a RHP based upon the initial written offer of just compensation rather than the administrative settlement amount. The qualifying conditions for use of the Programmatic Waiver are:

- Applies only to those in a negative equity situation
- Applies only to owner-occupied homes
- Applies only to single-family homes
- Applies only to mortgages that are current

b. Mortgage Interest Differential

The purpose of the Mortgage Interest Differential Payment is to compensate homeowners for increased costs between the acquired dwelling and the replacement dwelling. The payment for increased mortgage interest cost shall be the amount that would reduce the mortgage balance on a new mortgage to an amount that could be amortized with the same monthly payment for principal and interest as that for the mortgage(s) on the displacement dwelling. In addition, payments shall include other debt service costs, if not paid as part of incidental costs. To be eligible for this payment, the mortgage on the dwelling being acquired must have been in place, as a valid lien, for at least 90 days prior to the City's initial written offer to purchase.

c. Incidental Expenses – Closing Costs

One-time, non-recurring closing costs associated with the purchase of a comparable, replacement dwelling are compensable. Examples of such compensable expenses include costs for: a property survey; preparation of a legal description and deed; recording fees; title insurance; revenue stamps and transfer taxes; loan application fees; loan origination fees; appraisal fees; a credit report; certification for structural soundness; and, termite inspection, when required. Prepaid recurring expenses for mortgage interest, property taxes and insurance are not compensable.

The total RHP is the sum of the Purchase Price Differential, Mortgage Interest Differential, and compensable Incidental Expenses.

5. *Payments to Non-tenured Residential Tenants*

A residential tenant who has actually and lawfully occupied the displacement dwelling for fewer than 90 days immediately prior to the ION is entitled to receive a moving expense payment. Additionally, non-tenured residential tenants may qualify for a RAP under the provisions of the LRH program (see Last Resort Housing, Section IV.G). Such assistance is authorized when the person's monthly rent and estimated average monthly utility costs for the replacement dwelling exceed the person's base monthly rental for the displacement dwelling.

D. *Determinations of Comparable Housing*

Relocation staff would evaluate the cost of comparable replacement housing in the preparation of each individual NOE issued to residential displacees. For residential tenants and owner-occupants, the cost of comparable replacement housing would be determined primarily on a comparative basis of three, if possible, presently available, comparable dwellings. A Replacement Housing Valuation (RHV) Form would be prepared and placed in the file of each affected household.

E. *Relocation Benefits – Commercial Tenants, and Non-profit Organizations*

Eligible businesses would have two options with respect to claims for relocation assistance benefits:

1. Compensation for actual reasonable and necessary moving and related expenses, or
2. A fixed payment not to exceed \$40,000

1. *Payment for Actual Reasonable and Necessary Moving and Related Expenses*

Any lawful business that qualifies as a displaced person is entitled to payment for such actual moving expenses, as the City determines to be reasonable and necessary, including expenses for:

1. Transportation of persons and property from the present location to the replacement location (transportation costs for a distance beyond 50 miles are not eligible unless the City determines that relocation beyond 50 miles is justified);
2. Packing, crating, uncrating, and unpacking personal property;
3. Disconnecting, dismantling, removing, reassembling, and installing relocated and substitute machinery, equipment and other personal property. This will include 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;
4. Storage of personal property for a period not to exceed 12 months, unless the City determines that a longer period is necessary;

5. Insurance of personal property while in storage or transit and the replacement value of property lost, stolen, or damaged (not through the fault or negligence of the displaced person) in the process of moving, where insurance is not readily available.
6. Any license, permit, or certification required by the displaced business, to the extent that the cost is necessary for reestablishment at the replacement location. (These costs may be pro-rated based on the remaining useful life of any existing license, permit, or certification);
7. Reasonable and pre-authorized professional services, including architects', attorneys', engineers' fees, and consultants' charges, necessary for: 1) planning the move of personal property; 2) moving the personal property; or, 3) installing the relocated personal property at the replacement location;
8. Professional services performed prior to the purchase or lease of a replacement site to determine its suitability for the business operation including, but not limited to, soil testing, feasibility and marketing surveys;
9. The purchase and installation of substitute personal property limited to the lesser of: 1) an amount equal to the reasonable expenses that would have been required to relocate the property, as determined by the City, subject to certain limitations, or, 2) the replacement cost, less any proceeds from its sale or trade in;
10. Connection to available nearby utilities from the right-of-way to improvements at the replacement site;
11. The modification of machinery, equipment, or other personal property necessary to adapt these to the replacement location or to utilities available at the replacement location;
12. Re-lettering signs and replacing stationary on hand at the time of displacement that are made obsolete as a result of the move;
13. Actual direct losses of tangible personal property resulting from moving or discontinuing a business or non-profit organization, not-to-exceed the lesser of: 1) the fair market value of the property for continued use at its location prior to displacement less any proceeds from the sale of the property; or, 2) an amount equal to the reasonable expenses that would have been required to relocate the property, as determined by the City, subject to certain limitations;
14. Actual and reasonable expenses incurred in searching for a replacement business or non-profit organization location, not to exceed \$2,500, and including compensation for transportation expenses; time spent searching for a reasonable location, meals, and lodging; real estate broker or agent fees; time spent in obtaining permits and attending zoning hearings; and time spent negotiating the purchase of a replacement site;
15. Impact fees or one-time assessments for anticipated heavy utility usage;
16. Low Value/High Bulk: when the personal property to be moved is of low value and high bulk, and the cost of moving the property would be disproportionate to its value in the

judgment of the City, the allowable moving cost payment shall not exceed the lesser of: 1) the amount which would be received if the property were sold at the site or 2) the replacement cost of a comparable quantity delivered to the new business location. Examples of personal property covered by this provision include, but are not limited to, stockpiled sand, gravel, minerals, metals and other similar items of personal property as determined by the City;

17. A Reestablishment allowance of up to \$25,000, available to farms, non-profit organizations, and small businesses with no more than 500 employees. MAP-21 amended the maximum statutory benefit for business reestablishment to \$40,000. Reestablishment allowance payments are made in addition to compensation provided for actual, reasonable, and necessary moving expenses. Reestablishment allowance expense categories include but are not limited to:
 - a. Repairs or improvements to the replacement property as required by federal, state or local law, code, or ordinance;
 - b. Modifications to the replacement property to accommodate the business operation or make replacement structures suitable for conducting business;
 - c. Construction and installation costs for exterior signing to advertise the business;
 - d. Redecoration or replacement of soiled or worn surfaces at the replacement site, such as paint paneling or carpeting;
 - e. Advertisement of replacement location;
 - f. Estimated increased costs of operation during the first two years at the replacement site for such items as:
 - i. Lease or rental charges
 - ii. Personal or real property taxes
 - iii. Insurance premiums, and
 - iv. Utility charges, excluding impact fees
 - g. Other items essential to the reestablishment of the business.

2. Self-Moves

If the displaced business elects to take full responsibility for the move of the business, the City would make a payment for the business's moving expenses in an amount not to exceed the lower of the two acceptable bids or estimates submitted to the City. At the City's discretion, a payment for a low cost or uncomplicated move may be based on a single bid or estimate.

3. A Fixed Payment in Lieu of a Payment for Actual Reasonable Moving and Related Expenses

The option to claim a fixed payment enables for-profit and non-profit businesses to receive relocation assistance compensation without providing documentation of bids and actual expenses. The payment amount available to any individual business is based on an average of

annual net earnings over a two-year period. For businesses that have not been in operation for two years, income figures can be annualized. The method for establishing income is through tax returns and/or certified financial statements. The payment to an eligible business may not be less than \$1,000, or more than \$40,000. The MAP-21 amended the maximum statutory fixed payment for non-residential moves to \$40,000.

To qualify for this payment, it must be determined that, a displaced business:

- Owns or rents personal property, which must be moved in connection with such displacement and for which an expense would be incurred in such move;
- Is not operated at the displacement site solely for the purpose of renting the dwelling or the site to others;
- Cannot be a part of a commercial enterprise having at least three other establishments which are not being acquired by the City, and which is under the same ownership and engaged in the same or similar business activities;
- Must not be able to relocate without substantial loss of patronage; and
- Contributed materially, as defined by the City, to the income of the displaced person during the two taxable years prior to the displacement.

When a fixed payment would precede settlement of a claim for compensation for loss of goodwill under the Eminent Domain Law, the City, before tendering payment, shall state in writing what portion of the payment, if any, is considered to be compensation for loss of goodwill and shall explain in writing that any payment made pursuant to *Code of Civil Procedure*, §1263.510 et seq. (the Eminent Domain Law, Chapter 9, Article 6 – “Compensation for Loss of Goodwill”) would be reduced in the same amount. The portion considered to be compensation for loss of goodwill shall not exceed the difference between the fixed payment made and an amount which reasonably approximates the payments for which the displaced person otherwise would be eligible to receive as outlined in Section IV.E.1, above.

F. General Information Regarding the Payment of Relocation Benefits

Claims and supporting documentation for relocation benefits must be filed with the City no later than 18 months after:

- For tenants, the date of displacement; or
- For owners, the date of displacement or the date on which final payment for the acquisition of real property is made, whichever is later.

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

1. Claimant(s) would provide all necessary documentation to substantiate eligibility for assistance;
2. Relocation staff would review all necessary documentation including, but not limited to, scopes-of-services, contractor bids, invoices, lease documents and escrow material before reaching a determination as to which expenses are eligible for compensation;

3. Required claim forms would be prepared by relocation staff and presented to the claimant for review. Signed claims and supporting documentation would be returned to relocation staff and submitted to the City;
4. The City would review and approve claims for payment, or request additional information;
5. The City would issue benefit checks to claimants in the most secure, expeditious manner possible;
6. Final payments to residential displacees would be issued after confirmation that the Project premises have been completely vacated, and actual residency at the replacement unit is verified;
7. Receipts of payment and all claim material would be maintained in the relocation case file.

G. Last Resort Housing

Based on information obtained from the residential surveys and the cost of replacement housing, it is anticipated that comparable housing would not be available to the displaced persons without providing additional assistance under the provisions of the Last Resort Housing Program (LRH).

Per federal regulations, when a program or a project cannot proceed on a timely basis due to the unavailability of comparable replacement dwellings within the monetary limits for owners or tenants, additional or alternative assistance may be provided under the provisions of the LRH program. Any decision to provide LRH must be adequately justified either:

1. On a case-by-case basis, for good cause, which means that appropriate consideration has been given to:
 - a. The availability of comparable replacement housing in the program or project area;
 - b. The resources available to provide comparable replacement housing; and
 - c. The individual circumstances of the displaced person, or
2. By a determination that:
 - a. There is little, if any, comparable replacement housing available to displaced persons within an entire program or project area; and, therefore, LRH is necessary for the area as a whole;
 - b. A program or project cannot be advanced to completion in a timely manner without LRH; and
 - c. The method selected for providing LRH is cost effective, considering all elements, which contribute to total program or project costs.

For renters, a payment under the provisions of the LRH program is considered when there is a determination, based on a RHP, that a replacement housing need or price differential exceeds the statutory limit of \$7,200. For homeowners, a payment under the provisions of the LRH program is considered when a RHP exceeds the statutory limit of \$31,000. By providing

additional assistance under the provisions of the LRH program, comparable replacement housing would be provided that is within the monetary limits of the displaced persons.

H. Immigration Status

Federal legislation (PL105-117) prohibits the payment of relocation assistance benefits under the Uniform Act to any alien not lawfully present in the United States 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 a significant and demonstrable adverse impact on the health or safety, continued existence of the family unit, and any other impact determined by the City to negatively affect the alien's spouse, parent, or child. The City may elect to authorize the payment of relocation assistance benefits to any otherwise eligible residential or commercial displacee from non-federally authorized reimbursable funds.

To track and account for relocation assistance and benefit payments, OPC's relocation staff would be required to seek immigration status information from each displacee 18 years and older and non-residential occupants by having them self-certify as to their legal status.

I. Relocation Tax Consequences

California Government Code §7269 indicates that no relocation payment received shall be considered as income for the purposes of the Personal Income Tax Law, Part 10 (commencing with §170 01) of Division 2 of the *Revenue and Taxation Code*, or the Bank and Corporation Tax law, Part 11 (commencing with §23001) of Division 2 of the *Revenue and Taxation Code*. Furthermore, federal regulations (49 CFR Part 24, §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)

V. Administrative Provisions

A. Holdover Tenancies

The City's acquisition schedule may allow some business and residential tenants to remain in occupancy of the City's acquired properties for periods as long as six months prior to displacement. It is anticipated that by adding time to the relocation process, businesses would have greater opportunities to successfully reestablish operations at a new location. Residential tenants would benefit by having greater flexibility to plan a move around school schedules, as an example, or other personal considerations.

Holdover tenants would be required to enter into a Rental Agreement with the City and make monthly payments. The City would assume responsibility for all property management functions. Holdover tenants would be required to conform to state and local law and the requirements of the City's Rental Agreement, or face eviction in conformance with the City's eviction policy as set forth in Section V.E.

B. Notices

Each notice that the City is required to provide to a property owner or occupant shall be personally delivered or sent via certified or registered first-class mail, return receipt requested and documented in each case file. Each notice would be written in plain, understandable language. Persons who are unable to read and understand any notice would be provided with appropriate translation and counseling. Each notice would indicate the name and telephone number of a person who may be contacted for answers to questions or other help.

There are three principal notices:

1. General Information Notice (GIN),
2. NOE, and
3. 90-Day Informational or 90-Day Notice

The GIN is intended to provide potential displacees with a general written description of the City's relocation program and basic information concerning benefits, conditions of eligibility, noticing requirements and appeal rights. The GIN would be issued at the time the properties are being appraised.

NOEs would be distributed to each commercial and residential displacee, including off-site owners of rental properties. The NOE that would be issued to business operators acknowledges the recipient's eligibility for assistance and right to make claims for relocation assistance benefits.

The NOE to residential displacees, both tenants and owner-occupants, contains a determination of eligibility for relocation assistance and a computation of maximum entitlement based on information provided by the affected household and the analyses of comparable replacement properties undertaken by relocation staff. NOEs would be issued promptly following the ION with property owners.

No lawful occupant would be required to move without having received at least 90 days' advance written notice of the earliest date by which the move would be necessary. The 90-day notice would either state a specific date as the earliest date by which the occupant may be required to move, or state that the occupant would receive a further notice indicating, at least 60 days in advance for residential tenants and 30 days in advance for owner-occupants and non-residential occupants, the specific date of the required move. The 90-day notice would not be issued to any residential displacees before a comparable replacement dwelling has been made available.

In addition to the three principal relocation notices previously identified, relocation staff would issue timely written notification in the form of a Reminder Notice, which discusses the possible loss of rights and sets the expiration date for the loss of benefits to those persons who:

1. Are eligible for monetary benefits,
2. Have moved from the acquired property, and
3. Have not filed a claim for benefits.

Reminder Notices would be issued periodically throughout the qualification period. An attempt shall be made to make written contact with all non-responsive displacees no later than within the last six months prior to the expiration date to file a claim for benefits.

C. Privacy of Records

All information obtained from displacees is considered confidential and would not be shared without the consent of the displacee or the City or as a requirement of a specific Public Records Request in accordance with state law. Relocation staff would comply with federal regulations concerning the safeguarding of relocation files and their contents.

D. Grievance Procedures

A person who is dissatisfied with a determination as to eligibility for benefits, a payment amount, the failure to provide comparable replacement housing referrals, or the City's property management practices must file an appeal form or any other written form of appeal with the City's Right-of-Way Project Manager or his/her designee (Hearing Officer).

The Hearing Officer shall set a hearing date of no later than 30 days from receipt of the appeal. The person making the appeal shall have:

1. The right to present oral and/or written evidence in support of the appeal,
2. The right to seek legal counsel (hired at the appellant's sole expense), and
3. The right to seek judicial review once having exhausted all administrative appeal remedies.

The Hearing Officer shall render a decision, in writing, within 30 days following the last day of the hearing. A copy of the decision would be mailed, via certified or registered mail, to the appellant and his/her authorized representative and copies would be filed in the relocation case file. The decision of the Hearing Officer shall be final, and the appellant shall be advised of the right to seek judicial review of the Hearing Officer's decision.

E. Eviction Policy

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

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

F. Citizen Participation

The City conducted several public hearings for the Project on the following dates: June 10, 2013; June 25, 2013; June 26, 2013; July 14, 2014; October 17, 2014; October 28, 2014; November 12, 2014; November 18, 2014; August 21, 2015, and; September 3, 2015. As the process for implementing the Project advances, the City will observe the following protocol:

1. Provide affected tenants with full and timely access to documents relevant to the relocation program;
2. Encourage meaningful participation in reviewing the relocation plan and monitoring the relocation assistance program; including the occupants in the Project area, neighborhood groups and community organizations forming a relocation committee;
3. Provide technical assistance necessary to interpret elements of this Plan and other pertinent materials;
4. Issue a general notice concerning the availability of the Plan for public review, as required, 30 days prior to its proposed adoption;

G. Projected Dates of Displacement

The City has approved acquisition and relocation activities, which began in September 2015 and would be completed no later than the summer of 2017, with construction scheduled to begin in August 2017, and the Project is anticipated to be completed by August 2018.

H. Estimated Relocation Costs

The total budget estimated for relocation-related payments for this Project, including a 10% contingency, is as follows:

Relocation:	\$ 2,831,336 (escalated)
Contingency at 10%:	\$ 283,134
Total:	\$ 3,114,470

The estimated relocation budget does not include any payments related to property acquisition, improvements pertaining to realty, or loss of business goodwill. In addition, the budget does

not consider the cost of any services necessary to implement the Plan and complete the relocation element of the Project.

If the Project is to be implemented, and circumstances arise that change the number of residential and business occupants or the nature of their activity, the City would authorize any additional, compensable funds that may need to be appropriated. The City pledges to appropriate, on a timely basis, the funds necessary to ensure the successful completion of the Project, including funds necessary for LRH as indicated in Section IV.G, of this Plan to meet its obligation under the relocation regulations.

Exhibit A:
Business Interview Form



Business Relocation Interview

Client/Project: City of Santa Ana - Bristol St. Project Phase IIIA	Case ID:	
Site Address:	Interview Date:	<input type="checkbox"/> Unoccupied
City, St, ZIP: Santa Ana, CA	Interviewer:	<input type="checkbox"/> No Contact

Business Claimant Information		
Legal business name (from tax return):	Person interviewed (name/title):	
Name under which claimant conducts operations (dba):	Ownership type: <input type="checkbox"/> Sole Proprietor <input type="checkbox"/> Partnership <input type="checkbox"/> Corporation <input type="checkbox"/> Non-profit	Business type: URA type (list 1): OPC type (list 2):
Mailing address (if different):		Goods, products or services provided:
Date business established:	This site move-in:	

Business Contacts Information			
	Contact 1 (PRIMARY)	Contact 2	Contact 3
Name:			
Title/position:			
Business phone:			
Cell phone:			
Fax #:			
Email:			
Authority (Y/N):			

Can the person(s) with authority to sign claims and agreements read/understand English? If not, language:

Business Professionals Involved (Attorney, Accountant, Broker, Move Planner, Contractor)			
	Professional 1	Professional 2	Professional 3
Name:			
Title/position:			
Specialty (list 3):			
Company:			
Address:			
Business phone:			
Cell phone:			
Fax #:			
Email:			
CC address (Y/N):			

Business Description and Features	
Business hours and days of operation:	
Customer trade area:	
Is this a franchise business?	If yes, is copy of franchise agreement available?
Describe any other businesses on site:	
List any sub-leases:	
List the same or similar operations owned elsewhere:	
List residents living on the property:	
Intend to relocate this business (Y/N):	If yes, plans for new market, product or service?:
Describe best time to move:	
Months of year with least inventory:	With most inventory:
Estimated time it would take to move business:	
Describe business conducted on the Internet:	
Describe types of advertising used:	
List printed materials to become obsolete:	
Annual gross income:	Full-time employees:
Annual net income:	Part-time employees:

Property Site Features				
Site layout available (provide):	Zoning designation:	Occupancy status		
Total building sq.ft.:	Parking spaces:	<input type="checkbox"/> Month-to-month rental		
Total land sq.ft.:	Loading spaces:	<input type="checkbox"/> Lease: expires: options:		
Area Breakdown	Dock spaces:	<input type="checkbox"/> Mortgage: balance:		
Office/retail sq.ft.:	Clearance/height:	<input type="checkbox"/> Own clear		
Warehouse/shop sq.ft.:	Railroad access:	Monthly payment:		
Yard sq.ft.:		Lease copy available?:		
Business Equipment/Improvements				
Inventory list available?:	Phone system	Computer system		
Electrical (Amps):	Type/brand:	Number of PCs:		
3 phases (Y/N):		Server room (# of racks, A/C, power, etc.):		
Describe plumbing:	Age:	Other equipment (printers, security, WAP, registers, inventory control, etc):		
	Voice lines:			
Other special utility:	Fax lines:	Internet service/provider (list 4):		
	Other lines:			
Indicate quantity of each type of equipment on site:				
Bridge crane: <input type="text"/>	Freezer: <input type="text"/>	Sinks: <input type="text"/>	Dry-cleaning plant: <input type="text"/>	Air lines: <input type="text"/>
Jib crane: <input type="text"/>	Walk-in cooler: <input type="text"/>	Clarifier: <input type="text"/>	UST: <input type="text"/>	Water lines: <input type="text"/>
Hood: <input type="text"/>	Walk-in freezer: <input type="text"/>	Boiler: <input type="text"/>	Racking/shelving: <input type="text"/>	Hoist: <input type="text"/>
Refrigerator: <input type="text"/>	Spray booth: <input type="text"/>	Compressor: <input type="text"/>	System furniture: <input type="text"/>	
Other significant improvements/machinery/equipment:				
Leased equipment onsite:				
Obsolete equipment or equipment that cannot be moved:				
Permits / Required Specialists				
List required special permits and licenses with number (provide copy):				
Operate under Conditional Use Permit? (provide copy)				
Will CUP be required at a new location?:				
Assistance required in obtaining any permits/licenses?:				
Describe any wastewater/air/stack discharge/emissions:				
List hazardous materials used or stored (including handling and disposal):				
Needs for outside specialists for a move:				

Preferred replacement site attributes						
Relocation area:	Property access (RR, dual):					
Zoning/type of use:	Truck access:					
Lease / purchase:	Freeways/arterials proximity:					
Building size/layout:	Public transport access:					
Single/multistory building:	Pedestrian access:					
Clearance/height:	Parking spaces:					
Lot/yard size:	Shipping/receiving type:					
Special utility needs:	Demographic needs:					
Internet service needs:	Traffic count needs:					
Franchise/ordinance restrictions:	Visibility needs:					
Specific concerns and anticipated move challenges						
<hr/> <hr/> <hr/>						
List of any identified replacement sites						
	Address	Bldg size	Lot size	Lease amount	Status	Broker info
1						
2						
3						
ADDITIONAL INTERVIEW NOTES (explain all special circumstances, including those noted above)						
<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>						
1. URA business type: Business, Farm, Non-Profit 2. OPC business type: Agricultural, Industrial, Office, Retail Sales, Retail Service, Special Purpose (detail online) 3. Professional Specialty: Attorney, Accountant, Broker, Move Planner, Contractor 4. Internet service: DSL, cable, T1, fiber, satellite, other						
<i>I certify that all information in this survey is true and complete to the best of my knowledge. The information contained herein shall be treated confidential to the extent permitted by law.</i>						
Claimant Name:		Date:		Signature:		

Exhibit B:
Residential Interview Form



Residential Relocation Interview

Client/Project: City of Santa Ana - Bristol St. Project Phase IIIA		Case ID:		
Site Address:		Total occupants:	Interview Date:	<input type="checkbox"/> Unoccupied
City, St, ZIP: Santa Ana, CA			Interviewer:	<input type="checkbox"/> No Contact

INDIVIDUAL OCCUPANTS (use additional pages as needed)

1. Name:		Gender: F M	Employer/School:		
Relationship (list 1): HEAD OF HOUSEHOLD	<input type="checkbox"/> ID verified	Income srce (list 2):	Income/empl. description:	Hire/start date:	Mo Income:
Lawful presence (list 3):	Date of birth:				
Phone/fax/email:	Move-in date:				

Notes/special needs:

2. Name:		Gender: F M	Employer/School:		
Relationship (list 1):	<input type="checkbox"/> ID verified	Income srce (list 2):	Income/empl. description:	Hire/start date:	Mo Income:
Lawful presence (list 3):	Date of birth:				
Phone/fax/email:	Move-in date:				

Notes/special needs:

3. Name:		Gender: F M	Employer/School:		
Relationship (list 1):	<input type="checkbox"/> ID verified	Income srce (list 2):	Income/empl. description:	Hire/start date:	Mo Income:
Lawful presence (list 3):	Date of birth:				
Phone/fax/email:	Move-in date:				

Notes/special needs:

4. Name:		Gender: F M	Employer/School:		
Relationship (list 1):	<input type="checkbox"/> ID verified	Income srce (list 2):	Income/empl. description:	Hire/start date:	Mo Income:
Lawful presence (list 3):	Date of birth:				
Phone/fax/email:	Move-in date:				

Notes/special needs:

5. Name:		Gender: F M	Employer/School:		
Relationship (list 1):	<input type="checkbox"/> ID verified	Income srce (list 2):	Income/empl. description:	Hire/start date:	Mo Income:
Lawful presence (list 3):	Date of birth:				
Phone/fax/email:	Move-in date:				

Notes/special needs:

6. Name:		Gender: F M	Employer/School:		
Relationship (list 1):	<input type="checkbox"/> ID verified	Income srce (list 2):	Income/empl. description:	Hire/start date:	Mo Income:
Lawful presence (list 3):	Date of birth:				
Phone/fax/email:	Move-in date:				

Notes/special needs:

DWELLING			HOUSEHOLD		
Mailing Address:			<input type="checkbox"/> Primary residence of all occupants? (If not, explain in notes)		
City, St, ZIP:			<input type="checkbox"/> Can someone read/understand English? If not, language:		
Carbon Copy Address:			Race/Ethnicity: <input type="checkbox"/> American Indian/Alaskan <input type="checkbox"/> Asian		
City, St, ZIP:			<input type="checkbox"/> Black/African-American <input type="checkbox"/> Hawaiian/Pacific Islander		
Dwelling Type (list 4):			<input type="checkbox"/> Hispanic/Latino <input type="checkbox"/> White <input type="checkbox"/> Other <input type="checkbox"/> Mixed		
Bedrooms:	Attic/Utility/Storage:	Approx Sq Ft:	Subscribe to: <input type="checkbox"/> Land phone <input type="checkbox"/> TV service <input type="checkbox"/> Internet		
Kitchen:	Basement:	Bathrooms:	<input type="checkbox"/> Home-based business? (describe in notes)		
Living/family rooms:	Garage:	Garage Spaces:	<input type="checkbox"/> Rent rooms in dwelling? (describe in notes)		
Dining room:	Other/Extra:	Carport Spaces:	<input type="checkbox"/> On fixed income or public assistance? (describe in Occupants)		
Den/Office:	Total physical and content rooms to move:	Parking Spaces:	<input type="checkbox"/> Disabled occupants? (describe modifications/needs in Occupants)		
Total Rooms:		Number of cars:	Replacement site special needs (mark and describe in Notes)		
Air Cond: <input type="checkbox"/> Central <input type="checkbox"/> Wall/Window <input type="checkbox"/> Heat Pump <input type="checkbox"/> Evap./Swamp <input type="checkbox"/> None			<input type="checkbox"/> Employment access <input type="checkbox"/> Shopping		
Heating: <input type="checkbox"/> FAU <input type="checkbox"/> Radiant <input type="checkbox"/> Hot Water <input type="checkbox"/> Space Htr <input type="checkbox"/> Solar <input type="checkbox"/> Heat Pump			<input type="checkbox"/> Public transport <input type="checkbox"/> Religious		
Dwelling Condition: <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor			<input type="checkbox"/> Medical facilities/services <input type="checkbox"/> Social/Public services		
Neighborhood Condition: <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor			<input type="checkbox"/> School needs <input type="checkbox"/> Relatives/Ethnic		
Amenities:			<input type="checkbox"/> Childcare <input type="checkbox"/> Other special needs		
			<input type="checkbox"/> All occupants to move to the same dwelling? (if not, explain in notes)		
TENANT			Replacement dwelling preference: <input type="checkbox"/> Rent <input type="checkbox"/> Buy		
Rent terms: <input type="checkbox"/> Month-Month <input type="checkbox"/> Lease, months left:			Can relocate from: <input type="checkbox"/> Neighborhood <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> State		
<input type="checkbox"/> Rent reduced in exchange for service		<input type="checkbox"/> Unit furnished by tenant	Preferred relocation areas:		
Monthly contract rent: \$		Security deposit: \$	HOMEOWNER		
Landlord/manager name/ph:			Lot size (sq ft):	Date purchased:	Age (yrs):
<input type="checkbox"/> Written rental agreement available?		<input type="checkbox"/> Rent receipts available?	<input type="checkbox"/> Own clear, no mortg/loans	<input type="checkbox"/> Negative equity	# of stories:
<input type="checkbox"/> Receiving Section 8 or other housing assistance?			1st Loan Information		2nd Loan Information
Caseworker name/ph:			Lender:		Lender:
Monthly tenant portion of rent: \$			Loan Type (list 5):		Loan Type (list 5):
Annual family/child care expenses to allow work: \$			Current % Rate:		Current % Rate:
Annual non-reimbursed medical expenses: \$			Principal Balance: \$		Principal Balance: \$
Annual non-reimb. handicapped assistance expenses: \$			Original Date:		Original Date:
Utilities paid by tenant:		Pets:	Remaining months:		Remaining months:
<input type="checkbox"/> Gas: \$			Monthly P&I payment:		Monthly P&I payment:
<input type="checkbox"/> Electric: \$		Energy source: Gas Electr Oil Other	MOBILE HOME		
<input type="checkbox"/> Water: \$		Cooking Stove: <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____	Pad space: <input type="checkbox"/> Rent <input type="checkbox"/> Own		Coach: <input type="checkbox"/> Rent <input type="checkbox"/> Own
<input type="checkbox"/> Sewer: \$		Water Heater: <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____	Pad rent: \$		Make/Model:
<input type="checkbox"/> Trash: \$		Space Heat: <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____	Coach length (ft):		Year:
<input type="checkbox"/> NONE		Air Conditioning: <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> _____	Coach width (ft):		Decal #:

Exhibit C:
HCD Income Limits – Orange County

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
Division of Housing Policy Development2020 W El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov**MEMORANDUM**

DATE: April 15, 2015

TO: Interested Parties

FROM: *Lisa Bates*
Lisa Bates, Deputy Director
Division of Housing Policy Development

SUBJECT: State Income Limits for 2015

Attached are briefing materials and State Income Limits for 2015 reflecting median income and household income levels for extremely low-, very low-, low-, and moderate-income households for California's 58 counties. Updated 2015 income Limits are now in effect and replace last year's limits. 2015 income limits can be downloaded on the Department of Housing and Community Development's (Department) website
<<http://www.hcd.ca.gov/hpd/hrc/rep/state/incNote.html>>.

State Income Limits apply to designated programs and are to be used to determine applicant eligibility (based on level of household income) and to calculate affordable housing cost for applicable housing assistance programs. Note that use of State Income Limits is subject to a particular program's definition of income, family, family size, effective dates, and other factors. Also, definitions applicable to income categories, criteria, and geographic areas sometimes differ depending on funding source and program resulting in some programs using other income limits.

California's 2015 income limits were updated based on: (1) federal income limit changes the U.S. Department of Housing and Urban Development (HUD) released on March 6, 2015 and revised on March 10, 2015 for its Section 8 Housing Choice Voucher Program income limits and (2) adjustments the Department made based on particular State statutory provisions and the Department's 2013 Hold Harmless (HH) Policy.

Since 2013, the Department's HH policy has held State Income Limits harmless from any decreases in household income category and median income levels that HUD, since 2010, began applying to its Section 8 Income Limits after eliminating its longstanding Hold Harmless Policy. HUD determined its HH Policy was no longer necessary due to federal law changes in 2008 (Public Law 110-98) prohibiting any rent decreases in federal or private activity bond funded projects.

Please contact Department staff at (916) 263-2911 to answer questions concerning State Income Limits.

Attachments: 2015 State Income Limits and Briefing Materials

**2015 State Income Limits Briefing Materials
California Code of Regulations, Title 25, § 6932**

Overview

Pursuant to Health & Safety Code (H&SC) Section 50093(c), California Department of Housing and Community Development (HCD) filed 2015 State Income Limits with the Office of Administrative Law. HCD updated its income limits based on Department of Housing and Urban Development (HUD) updates to its Section 8 Housing Choice Voucher Program that HUD released on March 6, 2015 and revised on March 10, 2015.

HUD annually updates Section 8 income limits to reflect changes in household income category levels and median income levels applicable to extremely-low, very-low, and low-income households. California law specifies that its State Income Limits must be updated based on HUD updates to its Section 8 income limit levels. The Department also revises its State Income Limit levels to reflect: (1) adjustments, per State law, to some HUD county median income figures, and (2) adjustments to some household income category and area median income levels to reflect HCD's February 2013 Hold Harmless (HH) Policy. This policy was implemented to replace HUD's HH Policy, discontinued in 2009, in maintaining income category and area median income levels at their highest achieved levels and (3) calculation of California's moderate-income household levels based on changes to county area median income levels.

Following are brief summaries of different methodologies used by HUD and HCD in updating income limits for different household income categories.

HUD Methodology

HUD uses 40th percentile rents in 50th percentile fair market rent (FMR) areas, to calculate high housing cost areas. The purpose is to prevent fluctuations in "Low-Income Housing Tax Credit Difficult Development Area" determinations that result solely from high housing cost income limit fluctuations as areas go in and out of the 50th percentile FMR program.

Extremely Low-Income

This income category comprises households with a maximum income of 30 percent (30%) of HUD's median family income (MFI). HUD calculates extremely-low income limits based on very-low income limits. Extremely low-income limits reflect 60 percent of very-low income limits. However, HUD sets a floor based on minimum Supplemental Security Income (SSI).

Very Low-Income

The maximum very-low income limit typically reflects 50 percent (50%) of MFI. HUD's MFI figure generally equals two times HUD's 4-person very low-income limit, except when HUD applies adjustments. HUD may adjust income limits for an area or county to account for conditions that warrant special considerations, referred to as exceptions. HUD may

2015 State Income Limits Briefing Materials
California Code of Regulations, Title 25, § 6932

apply exceptions to areas with unusually high or low family income, uneven housing-cost-to-income relationships or historical exceptions. The following reflect HUD's explanations of adjustment increases and decreases contained in HUD's FY 2015 Income Limits Briefing Material:

Adjustment Increases:

HUD applies an increase, if the four-person very low-income limit would otherwise be less than the amount at which 35 percent (35%) of it equals 85 percent (85%) of the annualized two-bedroom Section 8 FMR (or 40th percentile rent in 50th percentile FMR areas). The purpose is to increase the income limit for areas where rental housing costs are unusually high in relation to the median income.

HUD applies an increase to the four person income limit if it is less than the State non-metropolitan median family income level. In addition, the four-person income limit is also increased, if it is less than 95 percent of last year's very low income limit. HUD restricts adjustments so income limits do not vary more than five percent (5%) of the previous year's very low-income figure. Very low-income limits are used as the base to calculate extremely-low and low-income limits.

Adjustment Decreases:

HUD applies a decrease to the greater of 80 percent of the U.S. median family level (MFI), or the amount at which 30 percent of a four-person family's income equals 100 percent of the two-bedroom FMR (or 40th percentile rent in 50th percentile FMR areas). The purpose is to decrease the income limit for areas of high median family income. The four-person income limit is reduced to the greater of 105 percent of last year's limit or twice the change in the national MFI estimate if that amount would be larger than five percent (5%).

HUD restricts adjustment increases and decreases to not vary more than five percent (5%) of the previous year's very low-income figure. Adjusted very low-income limits are used as the base to calculate extremely-low and low-income limits.

Low-Income

In general, maximum income for low-income households reflects 80 percent (80%) of the MFI level. Most low-income limits represent the higher level of: (1) 80 percent of MFI or (2) 80 percent of State non-metropolitan median family income. However, due to adjustments that HUD sometimes makes, strictly calculating low-income limits as 80 percent of MFI could produce unintended anomalies inconsistent with statutory intent. HUD's briefing materials specify that, with some exceptions, the low-income limit reflects 160 percent of the very low-income limit. HUD may apply exceptions to areas with unusually high or low housing-costs-to-income relationships. An example of the result from HUD applying an exception to an area could be an increase to the low-income limit without an increase to the very low-income limit. In sum, an "80%" limit cannot be assumed to equal 80 percent of the AMI or 4-person median income limit nor 160 percent of the very low-income limit due to adjustments HUD may make.

**2015 State Income Limits Briefing Materials
California Code of Regulations, Title 25, § 6932**

Median Family Income/Area Median Income

HUD estimates and references Median Family Income (MFI) in calculating its income limits. California law and income limits reference Area Median Income (AMI) that, pursuant to H&SC 50093(c), means the median family income of a geographic area estimated by HUD for its Section 8 Program.

HUD's calculations of Section 8 Income Limits begin with the production of MFI estimates. FY 2015 MFI estimates use 5-year survey data (American Community Survey (ACS) 2008-2012 and Puerto Rico Community Survey (PRCS) 2007-2011) augmented by 2012, 1-year ACS and PRCS data. HUD then adjusts the survey data to account for anticipated income growth by applying the Consumer Price Index (CPI) inflation forecast (through the mid-point of 2015) that the Congressional Budget Office published in August 2014. HUD's determination of MFI is used to calculate very low-income limits that are then used as the basis to calculate income limits for other income categories.

Income Limit Calculations for Household Sizes Other Than 4-Persons

Income limits for all income categories are adjusted for household size so that larger households have higher income limits than smaller households. For all income categories, income limits for household sizes other than 4-persons are calculated using the 4-person income limit as the base. HUD's adjustments use the following percentages, with results rounded to the nearest \$50 increment:

Number of persons in Household: 1 2 3 4 5 6 7 8

Adjustments: 70% 80% 90% Base 108% 116% 124% 132%

Income Limit Calculations for Household Sizes Greater Than 8-Persons

For households of more than eight persons, refer to the formula at the end of the table for 2015 Income Limits. Due to the adjustments HUD can make to income limits in a given county, table data should be the only method used to determine program eligibility. Arithmetic calculations are applicable only when a household has more than eight members.

Reference: FY 2015 HUD Income Limits Transmittal Notice PDR-2015-02 issued March 6, 2015 and HUD Income Limits Briefing Material dated March 10, 2015
<http://www.huduser.org/portal/datasets/il/il15/index.html>
http://www.huduser.org/portal/datasets/il/il15/HUD_sec8_15.pdf

HCD Methodology

State law (Health & Safety Code Section 50093, et. seq.) prescribes the methodology the Department uses to update its Official State Income Limits. The Department utilizes HUD's Section 8 Housing Choice Voucher Program Income Limits. HCD's methodology involves: (1) increasing some counties' median income levels established by HUD, (2) increasing some 4-person very-low income limits established by HUD, (3) applying its Hold Harmless (HH) Policy, in effect since 2013, to not allow decreases in area median income levels and household income category levels, and (4) determining income limit levels applicable to California's moderate-income households defined by State law as household income not exceeding 120 percent of county AMI.

2015 State Income Limits Briefing Materials California Code of Regulations, Title 25, § 6932

Area Median Income and Income Category Levels

HCD, pursuant to federal and state law and its Hold Harmless (HH) Policy, adjusts median income levels determined by HUD for a metropolitan county (county included in a metropolitan statistical area) and for a non-metropolitan county (county not included in a metropolitan statistical area). For non-metropolitan counties, federal law (Section 567 of the 1987 Housing and Community Development Act) requires adjusting median income to the higher of the (1) median income for the county or (2) the current statewide non-metropolitan median income (\$56,900 for 2015) determined by HUD. Next, HCD, for both metropolitan and non-metropolitan counties, applies its HH policy to ensure area median income for all counties and income limits for all income categories do not fall below any level achieved in the prior year.

4-person Median Income Calculation

HUD's 4-person median income figure usually reflects the county's AMI figure. HUD sometimes makes adjustments to decrease the 4-person very-low income limit when median family income is unusually high. The Department makes adjustments so its calculation of the 4-person very-low income limit for each county is not less than HUD's median family income figure and, pursuant to HCD's HH Policy, not less than the prior year's higher level.

Moderate-Income Levels

The Department is responsible for establishing California moderate-income limit levels. After calculating the 4-person area median income (AMI) level as previously described, the Department sets the maximum moderate income limit to equal 120 percent of the county's AMI.

Applicability of California's Official State Income Limits

Applicability of these State Income Limits is subject to particular programs as program definitions of such factors as income, family, and household size, etc., vary. Some programs, such as Multifamily Tax Subsidy Projects (MTSPs), use different income limits.

For MTSPs, separate income limits apply per provisions of the Housing and Economic Recovery Act (HERA) of 2008 (Public Law 110-289). Income limits for MTSPs are used to determine qualification levels as well as set maximum rental rates for projects funded with tax credits authorized under Section 42 of the Internal Revenue Code (Code). Also, MTSP income limits apply to projects financed with tax exempt housing bonds issued to provide qualified residential rental development under Section 142 of the Code. These income limits are available at this web link <http://www.huduser.org/datasets/mtsp.html>.

County	Income Category	Number of Persons in Household							
		1	2	3	4	5	6	7	8
Alameda County 4-Person Area Median Income: \$93,500	Extremely Low	19650	22450	25250	28050	30300	32570	36730	40890
	Very Low Income	32750	37400	42100	46750	50500	54250	58000	61750
	Low Income	50150	57300	64450	71600	77350	83100	88800	94550
	Median Income	65450	74800	84150	93500	101000	108450	115950	123400
	Moderate Income	78550	89750	101000	112200	121200	130150	139150	148100
Alpine County 4-Person Area Median Income: \$94,900	Extremely Low	18150	20750	23350	25900	28410	32570	36730	40890
	Very Low Income	30250	34600	38900	43200	46700	50150	53600	57050
	Low Income	46100	52650	59250	65800	71100	76350	81600	86900
	Median Income	66450	75900	85400	94900	102500	110100	117700	125250
	Moderate Income	79750	91100	102500	113900	123000	132100	141250	150350
Amador County 4-Person Area Median Income: \$72,300	Extremely Low	15200	17400	20090	24250	28410	32570	36730	40890
	Very Low Income	25350	28950	32550	36150	39050	41950	44850	47750
	Low Income	40500	46300	52100	57850	62500	67150	71750	76400
	Median Income	50600	57850	65050	72300	78100	83850	89650	95450
	Moderate Income	60700	69400	78100	86750	93700	100650	107550	114500
Butte County 4-Person Area Median Income: \$58,700	Extremely Low	12350	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20550	23500	26450	29350	31700	34050	36400	38750
	Low Income	32900	37600	42300	46950	50750	54500	58250	62000
	Median Income	41100	46950	52850	58700	63400	68100	72800	77500
	Moderate Income	49300	56350	63400	70450	76100	81700	87350	93000
Calaveras County 4-Person Area Median Income: \$70,200	Extremely Low	14750	16850	20090	24250	28410	32570	36730	40890
	Very Low Income	24600	28100	31600	35100	37950	40750	43550	46350
	Low Income	39350	44950	50550	56150	60650	65150	69650	74150
	Median Income	49150	56150	63200	70200	75800	81450	87050	92650
	Moderate Income	58950	67400	75850	84250	91000	97750	104450	111200
Colusa County 4-Person Area Median Income: \$58,700	Extremely Low	12350	15930	20090	24250	28410	32570	36400	38750
	Very Low Income	20550	23500	26450	29350	31700	34050	36400	38750
	Low Income	32900	37600	42300	46950	50750	54500	58250	62000
	Median Income	41100	46950	52850	58700	63400	68100	72800	77500
	Moderate Income	49300	56350	63400	70450	76100	81700	87350	93000
Contra Costa County 4-Person Area Median Income: \$93,500	Extremely Low	19650	22450	25250	28050	30300	32570	36730	40890
	Very Low Income	32750	37400	42100	46750	50500	54250	58000	61750
	Low Income	50150	57300	64450	71600	77350	83100	88800	94550
	Median Income	65450	74800	84150	93500	101000	108450	115950	123400
	Moderate Income	78550	89750	101000	112200	121200	130150	139150	148100
Del Norte County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
El Dorado County 4-Person Area Median Income: \$76,100	Extremely Low	16000	18300	20600	24250	28410	32570	36730	40890
	Very Low Income	26650	30450	34250	38050	41100	44150	47200	50250
	Low Income	42650	48750	54850	60900	65800	70650	75550	80400
	Median Income	53250	60900	68500	76100	82200	88300	94350	100450
	Moderate Income	63900	73050	82150	91300	98600	105900	113200	120500

County	Income Category	Number of Persons in Household							
		1	2	3	4	5	6	7	8
Fresno County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
Glenn County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
Humboldt County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
Imperial County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
Inyo County 4-Person Area Median Income: \$71,500	Extremely Low	15050	17200	20090	24250	28410	32570	36730	40890
	Very Low Income	25050	28600	32200	35750	38650	41500	44350	47200
	Low Income	40050	45800	51500	57200	61800	66400	70950	75550
	Median Income	50050	57200	64350	71500	77200	82950	88650	94400
	Moderate Income	60050	68650	77200	85800	92650	99550	106400	113250
Kern County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
Kings County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
Lake County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
Lassen County 4-Person Area Median Income: \$69,400	Extremely Low	14600	16650	20090	24250	28410	32570	36730	40890
	Very Low Income	24300	27800	31250	34700	37500	40300	43050	45850
	Low Income	38850	44400	49950	55500	59950	64400	68850	73300
	Median Income	48600	55500	62450	69400	74950	80500	86050	91600
	Moderate Income	58300	66650	74950	83300	89950	96650	103300	109950

County	Income Category	Number of Persons in Household							
		1	2	3	4	5	6	7	8
Los Angeles County 4-Person Area Median Income: \$64,800	Extremely Low	17950	20500	23050	25600	28410	32570	36730	40890
	Very Low Income	29900	34200	38450	42700	46150	49550	52950	56400
	Low Income *	47850	54650	61500	68300	73800	79250	84700	90200
	Median Income	45350	51850	58300	64800	70000	75150	80350	85550
	Moderate Income	54450	62200	70000	77750	83950	90200	96400	102650
<i>* Low income exceeding median income is an anomaly for this county due to HUD historical adjustments to median income. Household lower income figures are derived from very-low income figures that are not adjusted by HUD for exceptions.</i>									
Madera County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
Marin County 4-Person Area Median Income: \$103,000	Extremely Low	24650	28150	31650	35150	38000	40800	43600	46400
	Very Low Income	41050	46900	52750	58600	63300	68000	72700	77400
	Low Income	65700	75100	84500	93850	101400	108900	116400	123900
	Median Income	72100	82400	92700	103000	111250	119500	127700	135950
	Moderate Income	86500	98900	111250	123600	133500	143400	153250	163150
Mariposa County 4-Person Area Median Income: \$61,900	Extremely Low	13000	15930	20090	24250	28410	32570	36730	40890
	Very Low Income	21700	24800	27900	30950	33450	35950	38400	40900
	Low Income	34650	39600	44550	49500	53500	57450	61400	65350
	Median Income	43350	49500	55700	61900	66850	71800	76750	81700
	Moderate Income	52000	59450	66850	74300	80250	86200	92150	98100
Mendocino County 4-Person Area Median Income: \$58,900	Extremely Low	12200	15930	20090	24250	28410	32570	36000	38300
	Very Low Income	20300	23200	26100	29000	31350	33650	36000	38300
	Low Income	32500	37150	41800	46400	50150	53850	57550	61250
	Median Income	41250	47100	53000	58900	63600	68300	73050	77750
	Moderate Income	49500	56550	63650	70700	76350	82000	87650	93300
Merced County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
Modoc County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
Mono County 4-Person Area Median Income: \$81,200	Extremely Low	17050	19500	21950	24350	28410	32570	36730	40890
	Very Low Income	28450	32500	36550	40600	43850	47100	50350	53600
	Low Income	44750	51150	57550	63900	69050	74150	79250	84350
	Median Income	56850	64950	73100	81200	87700	94200	100700	107200
	Moderate Income	68200	77950	87700	97450	105250	113050	120850	128650
Monterey County 4-Person Area Median Income: \$68,700	Extremely Low	15250	17400	20090	24250	28410	32570	36730	40890
	Very Low Income	25400	29000	32650	36250	39150	42050	44950	47850
	Low Income	40600	46400	52200	58000	62650	67300	71950	76600
	Median Income	48100	54950	61850	68700	74200	79700	85200	90700
	Moderate Income	57700	65950	74200	82450	89050	95650	102250	108850

County	Income Category	Number of Persons in Household							
		1	2	3	4	5	6	7	8
Napa County 4-Person Area Median Income: \$86,100	Extremely Low	18350	21000	23600	26200	28410	32570	36730	40890
	Very Low Income	30600	34950	39300	43650	47150	50650	54150	57650
	Low Income	48900	55850	62850	69800	75400	81000	86600	92150
	Median Income	60250	68900	77500	86100	93000	99900	106750	113650
	Moderate Income	72300	82650	92950	103300	111550	119850	128100	136350
Nevada County 4-Person Area Median Income: \$73,500	Extremely Low	16100	18400	20700	24250	28410	32570	36730	40890
	Very Low Income	26850	30700	34550	38350	41450	44500	47600	50650
	Low Income	42950	49050	55200	61300	66250	71150	76050	80950
	Median Income	51450	58800	66150	73500	79400	85250	91150	97000
	Moderate Income	61750	70550	79400	88200	95250	102300	109350	116400
Orange County 4-Person Area Median Income: \$87,200	Extremely Low	20250	23150	26050	28900	31250	33550	36730	40890
	Very Low Income	33750	38550	43350	48150	52050	55900	59750	63600
	Low Income	53950	61650	69350	77050	83250	89400	95550	101750
	Median Income	61050	69750	78500	87200	94200	101150	108150	115100
	Moderate Income	73250	83700	94200	104650	113000	121400	129750	138150
Placer County 4-Person Area Median Income: \$76,100	Extremely Low	16000	18300	20600	24250	28410	32570	36730	40890
	Very Low Income	26650	30450	34250	38050	41100	44150	47200	50250
	Low Income	42650	48750	54850	60900	65800	70650	75550	80400
	Median Income	53250	60900	68500	76100	82200	88300	94350	100450
	Moderate Income	63900	73050	82150	91300	98600	105900	113200	120500
Plumas County 4-Person Area Median Income: \$62,000	Extremely Low	13050	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	21700	24800	27900	31000	33500	36000	38450	40950
	Low Income	34750	39700	44650	49600	53600	57550	61550	65500
	Median Income	43400	49600	55800	62000	66950	71900	76900	81850
	Moderate Income	52100	59500	66950	74400	80350	86300	92250	98200
Riverside County 4-Person Area Median Income: \$65,000	Extremely Low	14100	16100	20090	24250	28410	32570	36730	40890
	Very Low Income	23450	26800	30150	33500	36200	38900	41550	44250
	Low Income	37550	42900	48250	53600	57900	62200	66500	70800
	Median Income	45500	52000	58500	65000	70200	75400	80600	85800
	Moderate Income	54600	62400	70200	78000	84250	90500	96700	102950
Sacramento County 4-Person Area Median Income: \$76,100	Extremely Low	16000	18300	20600	24250	28410	32570	36730	40890
	Very Low Income	26650	30450	34250	38050	41100	44150	47200	50250
	Low Income	42650	48750	54850	60900	65800	70650	75550	80400
	Median Income	53250	60900	68500	76100	82200	88300	94350	100450
	Moderate Income	63900	73050	82150	91300	98600	105900	113200	120500
San Benito County 4-Person Area Median Income: \$81,100	Extremely Low	17050	19500	21950	24350	28410	32570	36730	40890
	Very Low Income	28400	32450	36500	40550	43800	47050	50300	53550
	Low Income	45100	51550	58000	64400	69600	74750	79900	85050
	Median Income	56750	64900	73000	81100	87600	94100	100550	107050
	Moderate Income	68100	77850	87550	97300	105100	112850	120650	128450
San Bernardino County 4-Person Area Median Income: \$65,000	Extremely Low	14100	16100	20090	24250	28410	32570	36730	40890
	Very Low Income	23450	26800	30150	33500	36200	38900	41550	44250
	Low Income	37550	42900	48250	53600	57900	62200	66500	70800
	Median Income	45500	52000	58500	65000	70200	75400	80600	85800
	Moderate Income	54600	62400	70200	78000	84250	90500	96700	102950

County	Income Category	Number of Persons in Household							
		1	2	3	4	5	6	7	8
San Diego County 4-Person Area Median Income: \$75,900	Extremely Low	17350	19850	22300	24800	28410	32570	36730	40890
	Very Low Income	28900	33050	37150	41300	44600	47900	51200	54500
	Low Income	46250	52900	59500	66100	71400	76700	81950	87250
	Median Income	53150	60700	68300	75900	81950	88050	94100	100200
	Moderate Income	63750	72900	82000	91100	98400	105700	112950	120250
San Francisco County 4-Person Area Median Income: \$103,000	Extremely Low	24650	28150	31650	35150	38000	40800	43600	46400
	Very Low Income	41050	46900	52750	58600	63300	68000	72700	77400
	Low Income	65700	75100	84500	93850	101400	108900	116400	123900
	Median Income	72100	82400	92700	103000	111250	119500	127700	135950
	Moderate Income	86500	98900	111250	123600	133500	143400	153250	163150
San Joaquin County 4-Person Area Median Income: \$66,300	Extremely Low	13950	15950	20090	24250	28410	32570	36730	39350
	Very Low Income	23250	26550	29850	33150	35850	38500	41150	43800
	Low Income	37150	42450	47750	53050	57300	61550	65800	70050
	Median Income	46400	53050	59650	66300	71600	76900	82200	87500
	Moderate Income	55700	63650	71600	79550	85900	92300	98650	105000
San Luis Obispo County 4-Person Area Median Income: \$77,100	Extremely Low	16250	18550	20850	24250	28410	32570	36730	40890
	Very Low Income	27000	30850	34700	38550	41650	44750	47850	50900
	Low Income	43200	49400	55550	61700	66650	71600	76550	81450
	Median Income	53950	61700	69400	77100	83250	89450	95600	101750
	Moderate Income	64750	74000	83250	92500	99900	107300	114700	122100
San Mateo County 4-Person Area Median Income: \$103,000	Extremely Low	24650	28150	31650	35150	38000	40800	43600	46400
	Very Low Income	41050	46900	52750	58600	63300	68000	72700	77400
	Low Income	65700	75100	84500	93850	101400	108900	116400	123900
	Median Income	72100	82400	92700	103000	111250	119500	127700	135950
	Moderate Income	86500	98900	111250	123600	133500	143400	153250	163150
Santa Barbara County 4-Person Area Median Income: \$75,400	Extremely Low	16850	19250	21650	24250	28410	32570	36730	40890
	Very Low Income	28100	32100	36100	40100	43350	46550	49750	52950
	Low Income	44950	51350	57750	64150	69300	74450	79550	84700
	Median Income	52800	60300	67850	75400	81450	87450	93500	99550
	Moderate Income	63350	72400	81450	90500	97750	105000	112200	119450
Santa Clara County 4-Person Area Median Income: \$106,300	Extremely Low	22350	25550	28750	31900	34500	37050	39600	42150
	Very Low Income	37250	42550	47850	53150	57450	61700	65950	70200
	Low Income	59400	67900	76400	84900	91650	98450	105250	112050
	Median Income	74400	85050	95650	106300	114800	123300	131800	140300
	Moderate Income	89300	102050	114800	127550	137750	147950	158150	168350
Santa Cruz County 4-Person Area Median Income: \$87,000	Extremely Low	21200	24200	27250	30250	32700	35100	37550	40890
	Very Low Income	35300	40350	45400	50400	54450	58500	62500	66550
	Low Income	56500	64550	72600	80650	87150	93600	100050	106500
	Median Income	60900	69600	78300	87000	93950	100900	107900	114850
	Moderate Income	73100	83500	93950	104400	112750	121100	129450	137800
Shasta County 4-Person Area Median Income: \$59,000	Extremely Low	12400	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20650	23600	26550	29500	31900	34250	36600	38950
	Low Income	33050	37800	42500	47200	51000	54800	58550	62350
	Median Income	41300	47200	53100	59000	63700	68450	73150	77900
	Moderate Income	49550	56650	63700	70800	76450	82150	87800	93450

County	Income Category	Number of Persons in Household							
		1	2	3	4	5	6	7	8
Sierra County 4-Person Area Median Income: \$71,800	Extremely Low	14800	16900	20090	24250	28410	32570	36730	40890
	Very Low Income	24650	28150	31650	35150	38000	40800	43600	46400
	Low Income	39400	45000	50650	56250	60750	65250	69750	74250
	Median Income	50250	57450	64600	71800	77550	83300	89050	94800
	Moderate Income	60300	68900	77550	86150	93050	99950	106850	113700
Siskiyou County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
Solano County 4-Person Area Median Income: \$82,600	Extremely Low	17400	19850	22350	24800	28410	32570	36730	40890
	Very Low Income	28950	33050	37200	41300	44650	47950	51250	54550
	Low Income	45500	52000	58500	65000	70200	75400	80600	85800
	Median Income	57800	66100	74350	82600	89200	95800	102400	109050
	Moderate Income	69350	79300	89200	99100	107050	114950	122900	130800
Sonoma County 4-Person Area Median Income: \$82,600	Extremely Low	17400	19850	22350	24800	28410	32570	36730	40890
	Very Low Income	28950	33050	37200	41300	44650	47950	51250	54550
	Low Income	45500	52000	58500	65000	70200	75400	80600	85800
	Median Income	57800	66100	74350	82600	89200	95800	102400	109050
	Moderate Income	69350	79300	89200	99100	107050	114950	122900	130800
Stanislaus County 4-Person Area Median Income: \$62,000	Extremely Low	13050	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	21700	24800	27900	31000	33500	36000	38450	40950
	Low Income	34750	39700	44650	49600	53600	57550	61550	65500
	Median Income	43400	49600	55800	62000	66950	71900	76900	81850
	Moderate Income	52100	59500	66950	74400	80350	86300	92250	98200
Sutter County 4-Person Area Median Income: \$59,400	Extremely Low	12500	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20800	23800	26750	29700	32100	34500	36850	39250
	Low Income	33250	38000	42750	47500	51300	55100	58900	62700
	Median Income	41600	47500	53450	59400	64150	68900	73650	78400
	Moderate Income	49900	57050	64150	71300	77000	82700	88400	94100
Tehama County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
Trinity County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750
Tulare County 4-Person Area Median Income: \$57,900	Extremely Low	12150	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20300	23200	26100	28950	31300	33600	35900	38250
	Low Income	32450	37050	41700	46300	50050	53750	57450	61150
	Median Income	40550	46300	52100	57900	62550	67150	71800	76450
	Moderate Income	48650	55600	62550	69500	75050	80600	86200	91750

County	Income Category	Number of Persons in Household							
		1	2	3	4	5	6	7	8
Tuolumne County 4-Person Area Median Income: \$66,700	Extremely Low	13950	15950	20090	24250	28410	32570	36730	40890
	Very Low Income	23250	26600	29900	33200	35900	38550	41200	43850
	Low Income	37200	42500	47800	53100	57350	61600	65850	70100
	Median Income	46700	53350	60050	66700	72050	77350	82700	88050
	Moderate Income	56050	64050	72050	80050	86450	92850	99250	105650
Ventura County 4-Person Area Median Income: \$89,300	Extremely Low	19050	21800	24500	27200	29400	32570	36730	40890
	Very Low Income	31750	36250	40800	45300	48950	52550	56200	59800
	Low Income	50750	58000	65250	72500	78300	84100	89900	95700
	Median Income	62500	71450	80350	89300	96450	103600	110750	117900
	Moderate Income	75000	85700	96450	107150	115700	124300	132850	141450
Yolo County 4-Person Area Median Income: \$76,900	Extremely Low	16150	18450	20750	24250	28410	32570	36730	40890
	Very Low Income	26950	30800	34650	38450	41550	44650	47700	50800
	Low Income	43050	49200	55350	61500	66450	71350	76300	81200
	Median Income	53850	61500	69200	76900	83050	89200	95350	101500
	Moderate Income	64600	73850	83050	92300	99700	107050	114450	121850
Yuba County 4-Person Area Median Income: \$59,400	Extremely Low	12500	15930	20090	24250	28410	32570	35300	37600
	Very Low Income	20800	23800	26750	29700	32100	34500	36850	39250
	Low Income	33250	38000	42750	47500	51300	55100	58900	62700
	Median Income	41600	47500	53450	59400	64150	68900	73650	78400
	Moderate Income	49900	57050	64150	71300	77000	82700	88400	94100

Instructions:

Eligibility Determination:

Use household size income category figures in this chart. Determine eligibility based on actual number of persons in household and total of gross income for all persons.

Determination of Income Limit for Households Larger than Eight Persons:

Per person (PP) adjustment above 8: (1) multiply the 4-person income limit by eight percent (8%), (2) multiply result by number of persons in excess of eight, (3) add the amount to the 8-person income limit, and (4) round to the nearest \$50.

E X A M P L E	Yuba County				8 person+	8% Adj x2=	10 persons
	Income Category	4 persons	8% PP Adj	+8 persons =9 persons			
	Extremely Low	24,250	1940	32,000	32,000	3880	35,900
	Very Low Income	29,700	2376	39,200	39,200	4752	43,950
	Lower Income	47,500	3800	62,700	62,700	7600	70,300
	Moderate Income	71,300	5704	94,100	94,100	11408	105,500

Calculation of Housing Cost and Rent:

Refer to Health & Safety Code Sections 50052.5 and 50053. Use benchmark household size and multiply against applicable percentages defined in H&SC using Area Median Income identified in this chart.

Determination of Household Size:

For projects with no federal assistance, household size is set at number of bedrooms in unit plus one.

For projects with federal assistance, household size may be set by multiplying 1.5 against the number of bedrooms in unit.

HUD release: 3/6/2015

Authority cited: Health and Safety Code (H&SC) Section 50093.

Reference: H&SC Sections 50079.5, 50093, 50105, and 50106.

Exhibit D:
Homes for Sale and Rent Listings

SFRs for Sale in Santa Ana			
Address	Bedrooms	Purchase Price	Median Price
804 W. McFadden	2	\$350,000	\$409,900
2082 S. Standard	2	\$379,900	
1144 W. Cubbon	2	\$409,900	
1135 Cabrillo Park	2	\$459,900	
325 W. 18th St	2	\$550,000	
1001 Elaine Drive	3	\$465,000	\$527,000
1110 S. Huron	3	\$439,900	
1908 S. Standard	3	\$439,900	
2537 W. Camden	3	\$468,000	
623 S. Cooper St	3	\$525,000	
3709 S. Van Ness	3	\$552,500	
218 N. Susan	3	\$375,000	
1809 Merriday Lane	3	\$479,999	
1015 Cherry Street	3	\$529,000	
2105 N. Spruce St	3	\$530,000	
914 E. West St	3	\$535,000	
3106 Mary	3	\$550,000	
710 W. Jonquil	3	\$572,000	
2707 Olive Lane	3	\$725,000	
209 N. Cooper	4	\$599,000	\$499,450
911 S. Figueroa	4	\$417,000	
1901 S. Fairview	4	\$465,000	
1809 Halladay	4	\$499,000	
2057 S. Broadway	4	\$499,900	
1506 E. Avalon	4	\$589,000	

SFRs for Rent in Santa Ana and surrounding areas				
Address	City	Bedrooms	Rent	Median Price
1437 E. Century Drive	Orange	2	\$2,800	\$2,400
221 W. Sparkleberry	Orange	2	\$2,600	
931 N. Ventura St	Anaheim	2	\$1,800	
1067 S. Sundance	Anaheim	2	\$2,200	
12752 Malena Drive	Santa Ana	3	\$2,499	\$2,975
2329 N. Lyon Street	Santa Ana	3	\$2,600	
402 W. Harvey	Santa Ana	3	\$3,000	
14392 Morning Glory	Tustin	3	\$2,950	
10236 Ferrey Drive	Tustin	3	\$3,100	
10008 Albee Ave	Tustin	3	\$3,200	
15209 Washington	Tustin	3	\$3,800	
9581 Royal Palm Blvd.	Garden Grove	3	\$2,700	
142 N. Grant Place	Orange	3	\$2,750	
18903 Mount Walton	Fountain Valley	3	\$3,650	
2518 N. Greenbrier	Santa Ana	4	\$3,975	\$3,448
10531 Ridgeway Drive	Santa Ana	4	\$3,695	
2225 N. Hesperian Street	Santa Ana	4	\$3,150	
1309 Marcella Lane	Santa Ana	4	\$3,750	
2162 Sweetbriar	Tustin	4	\$2,550	
8844 La Zana	Fountain Valley	4	\$3,200	
1909 W. Blackhawk Drive	Santa Ana	5	\$4,600	\$4,000
1320 Sun Dial Drive	Tustin	5	\$5,500	
2402 N. Cameo St	Orange	5	\$2,750	
1760 N. Maplewood	Orange	5	\$3,400	

Exhibit E:
Commercial For Sale and Rent Listings

Commercial Properties for Sale	
City	Price
Tustin	\$139,900
Garden Grove	\$299,999
Orange	\$449,000
Santa Ana	\$699,000
Santa Ana	\$699,000
Santa Ana	\$850,000
Orange	\$875,000
Santa Ana	\$900,000
Santa Ana	\$900,000
Santa Ana	\$929,000
Santa Ana	\$975,000
Santa Ana	\$1,100,000
Garden Grove	\$1,200,000
Orange	\$1,280,000
Santa Ana	\$1,375,000
Santa Ana	\$1,400,000
Garden Grove	\$1,499,900
Santa Ana	\$1,500,000
Santa Ana	\$1,550,000
Santa Ana	\$1,620,000
Garden Grove	\$1,670,000
Garden Grove	\$1,700,000
Anaheim	\$1,920,000
Santa Ana	\$2,050,000
Orange	\$2,400,000
Santa Ana	\$2,495,000
Fountain Valley	\$2,498,000
Westminster	\$2,590,000
Anaheim	\$2,880,000
Westminster	\$2,900,000
Garden Grove	\$3,010,000
Santa Ana	\$3,495,000
Tustin	\$3,500,000
Tustin	\$3,500,000
Santa Ana	\$4,000,000
Santa Ana	\$4,320,000
Tustin	\$4,875,000
Orange	\$5,200,000
Tustin	\$6,000,000
Santa Ana	\$7,000,000
Anaheim	\$7,200,000
Orange	\$11,855,000
Santa Ana	\$17,685,000

Fountain Valley	Not disclosed
Garden Grove	Not disclosed
Garden Grove	Not disclosed
Santa Ana	Not disclosed
Tustin	Not disclosed
Tustin	Not disclosed

**Properties for Sale:
Land Only**

City	Price
Santa Ana	\$11,995
Santa Ana	\$250,000
Santa Ana	\$290,000
Santa Ana	\$689,000
Garden Grove	\$750,000
Tustin	\$1,500,000
Santa Ana	\$2,380,000
Anaheim	\$3,500,000
Santa Ana	Not disclosed
Santa Ana	Not disclosed

**Properties for Sale:
Office Use**

City	Price
Tustin	\$130,000
Tustin	\$137,000
Santa Ana	\$149,999
Santa Ana	\$155,000
Santa Ana	\$159,200
Santa Ana	\$168,000
Santa Ana	\$190,000
Orange	\$220,000
Santa Ana	\$268,650
Santa Ana	\$290,250
Santa Ana	\$315,000
Tustin	\$333,000
Santa Ana	\$418,500
Tustin	\$440,000
Santa Ana	\$454,300
Santa Ana	\$485,000
Santa Ana	\$735,000
Santa Ana	\$775,000
Santa Ana	\$795,000
Santa Ana	\$899,000
Santa Ana	\$900,000
Orange	\$1,050,000
Costa Mesa	\$1,050,950
Costa Mesa	\$1,056,000
Costa Mesa	\$1,100,000
Santa Ana	\$1,100,000
Santa Ana	\$1,150,000
Santa Ana	\$1,250,000
Santa Ana	\$1,280,000
Orange	\$1,300,000
Fountain Valley	\$1,450,000
Irvine	\$1,597,950
Tustin	\$1,698,928
Santa Ana	\$1,699,000
Orange	\$1,795,000
Costa Mesa	\$1,920,000
Santa Ana	\$1,936,000
Tustin	\$1,950,000
Tustin	\$2,495,000
Santa Ana	\$2,511,630
Costa Mesa	\$2,560,000
Irvine	\$2,589,580

Orange	\$3,000,000
Orange	\$3,000,000
Costa Mesa	\$3,275,000
Orange	\$3,500,000
Santa Ana	\$3,500,000
Santa Ana	\$3,500,000
Tustin	\$3,895,000
Tustin	\$3,970,727
Irvine	\$3,995,000
Orange	\$4,200,000
Orange	\$4,399,000
Santa Ana	\$4,500,000
Santa Ana	\$4,600,000
Santa Ana	\$4,680,000
Irvine	\$4,735,000
Santa Ana	\$6,200,000
Irvine	\$7,234,235
Santa Ana	\$7,650,000
Garden Grove	\$8,250,000
Santa Ana	\$10,828,800
Santa Ana	\$15,500,000
Santa Ana	\$17,685,000
Costa Mesa	Not disclosed
Irvine	Not disclosed
Santa Ana	Not disclosed
Santa Ana	Not disclosed

Retail Properties for Sale	
City	Price
Tustin	\$139,900
Garden Grove	\$299,999
Orange	\$449,000
Santa Ana	\$699,000
Santa Ana	\$699,000
Santa Ana	\$850,000
Orange	\$875,000
Santa Ana	\$900,000
Santa Ana	\$900,000
Santa Ana	\$929,000
Santa Ana	\$975,000
Santa Ana	\$1,100,000
Garden Grove	\$1,200,000
Orange	\$1,280,000
Santa Ana	\$1,375,000
Santa Ana	\$1,400,000
Garden Grove	\$1,499,900
Santa Ana	\$1,500,000
Santa Ana	\$1,550,000
Santa Ana	\$1,620,000
Garden Grove	\$1,670,000
Garden Grove	\$1,700,000
Anaheim	\$1,920,000
Santa Ana	\$2,050,000
Orange	\$2,400,000
Santa Ana	\$2,495,000
Fountain Valley	\$2,498,000
Westminster	\$2,590,000
Anaheim	\$2,880,000
Westminster	\$2,900,000
Garden Grove	\$3,010,000
Santa Ana	\$3,495,000
Tustin	\$3,500,000
Tustin	\$3,500,000
Santa Ana	\$4,000,000
Santa Ana	\$4,320,000
Tustin	\$4,875,000
Orange	\$5,200,000
Tustin	\$6,000,000
Santa Ana	\$7,000,000
Anaheim	\$7,200,000
Orange	\$11,855,000
Santa Ana	\$17,685,000

**Retail Properties
for Sale**

City	Price
Fountain Valley	Not disclosed
Garden Grove	Not disclosed
Garden Grove	Not disclosed
Santa Ana	Not disclosed
Tustin	Not disclosed
Tustin	Not disclosed

Warehouse Properties for Sale	
City	Price
Garden Grove	\$599,000
Garden Grove	\$1,111,725
Garden Grove	\$1,437,735
Santa Ana	\$1,461,020
Garden Grove	\$2,576,000
Orange	\$4,885,000
Irvine	\$5,132,640
Santa Ana	\$35,000,000
Santa Ana	Not disclosed
Santa Ana	Not disclosed
Orange	Not disclosed
Irvine	Not disclosed
Irvine	Not disclosed

Commercial Properties for Lease: Warehouse Lease	
City	Price
Santa Ana	\$0.34
Garden Grove	\$0.49
Santa Ana	\$0.50
Anaheim	\$0.59
Santa Ana	\$0.65
Santa Ana	\$0.65
Santa Ana	\$0.65
Santa Ana	\$0.67
Anaheim	\$0.69
Costa Mesa	\$0.72
Irvine	\$0.72
Santa Ana	\$0.72
Santa Ana	\$0.74
Anaheim	\$0.75
Irvine	\$0.75
Santa Ana	\$0.75
Orange	\$0.78
Santa Ana	\$0.79
Orange	\$0.80
Santa Ana	\$0.80
Santa Ana	\$0.80
Santa Ana	\$0.83
Irvine	\$0.85
Orange	\$0.85
Santa Ana	\$0.85
Orange	\$0.88
Irvine	\$0.89
Santa Ana	\$0.89
Santa Ana	\$0.89
Santa Ana	\$0.89
Garden Grove	\$0.90
Irvine	\$0.90
Orange	\$0.90
Orange	\$0.90
Santa Ana	\$0.90
Santa Ana	\$0.90
Santa Ana	\$0.90
Santa Ana	\$0.92
Santa Ana	\$0.95
Santa Ana	\$0.95
Tustin	\$0.95
Santa Ana	\$0.98
Tustin	\$0.98

Commercial Properties for Lease: Warehouse Lease	
City	Price
Tustin	\$0.98
Santa Ana	\$0.99
Anaheim	\$1.00
Irvine	\$1.00
Santa Ana	\$1.00
Santa Ana	\$1.00
Santa Ana	\$1.00
Orange	\$1.05
Santa Ana	\$1.05
Santa Ana	\$1.10
Orange	\$1.11
Orange	\$1.11
Anaheim	\$1.18
Anaheim	\$1.18
Tustin	\$1.20
Santa Ana	\$1.21
Irvine	\$1.25
Irvine	\$1.25
Irvine	\$1.25
Orange	\$1.25
Santa Ana	\$1.25
Santa Ana	\$1.25
Irvine	\$1.30
Garden Grove	\$1.35
Anaheim	\$1.40
Tustin	\$1.50
Orange	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable

Commercial Properties for Lease: Warehouse Lease	
City	Price
Santa Ana	\$0.10
Irvine	\$0.77
Anaheim	\$0.79
Santa Ana	\$0.80
Santa Ana	\$0.80
Anaheim	\$0.82
Orange	\$0.85
Orange	\$0.85
Santa Ana	\$0.89
Orange	\$0.90
Santa Ana	\$0.90
Orange	\$0.93
Orange	\$0.95
Santa Ana	\$0.95
Tustin	\$0.95
Santa Ana	\$0.97
Santa Ana	\$0.98
Irvine	\$1.00
Orange	\$1.00
Santa Ana	\$1.05
Tustin	\$1.05
Santa Ana	\$1.10
Tustin	\$1.10
Santa Ana	\$1.13
Santa Ana	\$1.15
Irvine	\$1.20
Irvine	\$1.20
Irvine	\$1.20
Irvine	\$1.20
Santa Ana	\$1.20
Irvine	\$1.25
Irvine	\$1.25
Irvine	\$1.25
Santa Ana	\$1.25
Irvine	\$1.30
Tustin	\$1.30
Costa Mesa	\$1.35
Fountain Valley	\$1.35
Tustin	\$1.40
Tustin	\$1.40
Tustin	\$1.40
Tustin	\$1.40
Tustin	\$1.40

Commercial Properties for Lease: Warehouse Lease	
City	Price
Irvine	\$1.50
Orange	\$1.50
Irvine	\$1.65
Orange	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable

Commercial Properties for Lease: Flex Sale	
City	Price
Santa Ana	\$520,000
Santa Ana	\$540,000
Anaheim	\$1,492,155
Costa Mesa	\$2,200,000
Anaheim	\$6,250,000
Irvine	Not disclosed
Santa Ana	Not disclosed

Commercial Properties for Lease: Land Lease	
City	Price
Tustin	\$0.20
Santa Ana	\$0.25
Santa Ana	\$0.27
Santa Ana	\$0.30
Santa Ana	\$0.34
Anaheim	\$0.74
Santa Ana	\$2.50
Santa Ana	Negotiable

Commercial Properties for Lease: Office Lease	
City	Price
Costa Mesa	\$0.09
Tustin	\$0.10
Santa Ana	\$0.12
Santa Ana	\$0.13
Irvine	\$0.15
Tustin	\$0.18
Santa Ana	\$0.65
Santa Ana	\$0.68
Orange	\$0.79
Santa Ana	\$0.79
Costa Mesa	\$0.80
Irvine	\$0.89
Santa Ana	\$0.89
Garden Grove	\$0.90
Orange	\$0.95
Santa Ana	\$0.95
Santa Ana	\$0.95
Santa Ana	\$0.99
Orange	\$1.00
Orange	\$1.00
Orange	\$1.00
Santa Ana	\$1.00
Santa Ana	\$1.00
Santa Ana	\$1.00
Santa Ana	\$1.00
Santa Ana	\$1.00
Santa Ana	\$1.05
Tustin	\$1.05
Fountain Valley	\$1.10
Fountain Valley	\$1.13
Santa Ana	\$1.15
Santa Ana	\$1.15
Santa Ana	\$1.15
Santa Ana	\$1.15
Santa Ana	\$1.15
Santa Ana	\$1.15
Santa Ana	\$1.15
Irvine	\$1.20
Santa Ana	\$1.20
Santa Ana	\$1.20
Santa Ana	\$1.20
Tustin	\$1.20
Santa Ana	\$1.21
Santa Ana	\$1.22

Commercial Properties for Lease: Office Lease	
City	Price
Santa Ana	\$1.24
Anaheim	\$1.25
Anaheim	\$1.25
Garden Grove	\$1.25
Garden Grove	\$1.25
Irvine	\$1.25
Irvine	\$1.25
Santa Ana	\$1.25
Santa Ana	\$1.25
Santa Ana	\$1.25
Santa Ana	\$1.25
Tustin	\$1.25
Tustin	\$1.25
Tustin	\$1.25
Tustin	\$1.25
Santa Ana	\$1.29
Garden Grove	\$1.30
Santa Ana	\$1.30
Santa Ana	\$1.30
Santa Ana	\$1.30
Anaheim	\$1.35
Costa Mesa	\$1.35
Garden Grove	\$1.35
Garden Grove	\$1.35
Irvine	\$1.35
Orange	\$1.35
Orange	\$1.35
Orange	\$1.35
Orange	\$1.35
Orange	\$1.35
Santa Ana	\$1.35
Santa Ana	\$1.35
Santa Ana	\$1.35
Santa Ana	\$1.35
Santa Ana	\$1.35
Orange	\$1.36
Santa Ana	\$1.39
Santa Ana	\$1.39
Irvine	\$1.40
Irvine	\$1.40
Santa Ana	\$1.40
Santa Ana	\$1.40
Santa Ana	\$1.42

Commercial Properties for Lease: Office Lease	
City	Price
Santa Ana	\$1.55
Santa Ana	\$1.55
Anaheim	\$1.58
Garden Grove	\$1.60
Irvine	\$1.60
Orange	\$1.60
Orange	\$1.60
Tustin	\$1.60
Westminster	\$1.60
Fountain Valley	\$1.65
Garden Grove	\$1.65
Irvine	\$1.65
Irvine	\$1.65
Irvine	\$1.65
Orange	\$1.65
Santa Ana	\$1.65
Santa Ana	\$1.65
Santa Ana	\$1.65
Santa Ana	\$1.65
Santa Ana	\$1.70
Tustin	\$1.71
Santa Ana	\$1.74
Costa Mesa	\$1.75
Costa Mesa	\$1.75
Orange	\$1.75
Orange	\$1.75
Santa Ana	\$1.75
Santa Ana	\$1.75
Santa Ana	\$1.75
Santa Ana	\$1.75
Santa Ana	\$1.75
Santa Ana	\$1.75
Santa Ana	\$1.75
Santa Ana	\$1.75
Santa Ana	\$1.75
Santa Ana	\$1.75
Santa Ana	\$1.75
Santa Ana	\$1.75
Santa Ana	\$1.75
Santa Ana	\$1.75
Tustin	\$1.75
Tustin	\$1.75
Tustin	\$1.75
Tustin	\$1.75
Tustin	\$1.76
Santa Ana	\$1.77

Commercial Properties for Lease: Office Lease	
City	Price
Anaheim	\$1.78
Costa Mesa	\$1.80
Orange	\$1.80
Santa Ana	\$1.80
Costa Mesa	\$1.85
Costa Mesa	\$1.85
Costa Mesa	\$1.85
Fountain Valley	\$1.85
Fountain Valley	\$1.85
Garden Grove	\$1.85
Irvine	\$1.85
Irvine	\$1.85
Orange	\$1.85
Santa Ana	\$1.85
Santa Ana	\$1.85
Tustin	\$1.85
Tustin	\$1.85
Tustin	\$1.85
Orange	\$1.89
Anaheim	\$1.90
Anaheim	\$1.90
Irvine	\$1.90
Santa Ana	\$1.90
Santa Ana	\$1.90
Tustin	\$1.91
Fountain Valley	\$1.93
Costa Mesa	\$1.95
Costa Mesa	\$1.95
Costa Mesa	\$1.95
Irvine	\$1.95
Irvine	\$1.95
Irvine	\$1.95
Irvine	\$1.95
Orange	\$1.95
Santa Ana	\$1.95
Tustin	\$1.95
Tustin	\$1.95
Costa Mesa	\$2.00
Costa Mesa	\$2.00
Garden Grove	\$2.00
Santa Ana	\$2.00
Santa Ana	\$2.00
Santa Ana	\$2.00

Commercial Properties for Lease: Office Lease	
City	Price
Tustin	\$2.00
Tustin	\$2.00
Tustin	\$2.00
Orange	\$2.05
Santa Ana	\$2.05
Santa Ana	\$2.05
Santa Ana	\$2.05
Santa Ana	\$2.05
Santa Ana	\$2.05
Santa Ana	\$2.05
Santa Ana	\$2.06
Orange	\$2.10
Tustin	\$2.10
Tustin	\$2.10
Irvine	\$2.15
Santa Ana	\$2.15
Tustin	\$2.15
Costa Mesa	\$2.20
Tustin	\$2.20
Tustin	\$2.20
Westminster	\$2.20
Anaheim	\$2.25
Costa Mesa	\$2.25
Irvine	\$2.25
Santa Ana	\$2.25
Tustin	\$2.25
Orange	\$2.30
Anaheim	\$2.35
Garden Grove	\$2.35
Irvine	\$2.35
Irvine	\$2.35
Irvine	\$2.35
Irvine	\$2.35
Irvine	\$2.35
Irvine	\$2.35
Irvine	\$2.35
Irvine	\$2.35
Orange	\$2.35
Santa Ana	\$2.35
Santa Ana	\$2.35
Orange	\$2.40
Santa Ana	\$2.40
Orange	\$2.43
Irvine	\$2.45

Commercial Properties for Lease: Office Lease	
City	Price
Irvine	\$2.45
Irvine	\$2.45
Irvine	\$2.45
Irvine	\$2.45
Irvine	\$2.45
Irvine	\$2.45
Tustin	\$2.45
Irvine	\$2.50
Orange	\$2.50
Santa Ana	\$2.65
Tustin	\$2.65
Costa Mesa	\$2.75
Orange	\$2.75
Orange	\$2.75
Orange	\$2.93
Orange	\$2.93
Costa Mesa	\$2.95
Orange	\$2.95
Tustin	\$2.95
Orange	\$3.00
Westminster	\$3.00
Costa Mesa	\$3.10
Orange	\$3.10
Orange	\$3.10
Orange	\$3.10
Orange	\$3.10
Garden Grove	\$3.15
Costa Mesa	\$3.20
Costa Mesa	\$3.20
Santa Ana	\$3.25
Santa Ana	\$3.33
Orange	\$3.62
Irvine	\$4.58
Anaheim	Negotiable
Anaheim	Negotiable
Anaheim	Negotiable
Anaheim	Negotiable
Costa Mesa	Negotiable
Costa Mesa	Negotiable
Costa Mesa	Negotiable
Costa Mesa	Negotiable
Costa Mesa	Negotiable
Costa Mesa	Negotiable

Commercial Properties for Lease: Office Lease	
City	Price
Orange	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Santa Ana	Negotiable
Tustin	Negotiable
Tustin	Negotiable
Tustin	Negotiable
Tustin	Negotiable
Tustin	Negotiable

Commercial Properties for Lease: Retail Lease	
City	Price
Santa Ana	\$0.10
Orange	\$0.12
Santa Ana	\$0.23
Orange	\$0.28
Santa Ana	\$0.50
Santa Ana	\$0.80
Garden Grove	\$1.00
Orange	\$1.00
Santa Ana	\$1.00
Garden Grove	\$1.10
Fountain Valley	\$1.13
Santa Ana	\$1.20
Santa Ana	\$1.20
Santa Ana	\$1.20
Santa Ana	\$1.22
Anaheim	\$1.25
Garden Grove	\$1.25
Garden Grove	\$1.25
Santa Ana	\$1.25
Santa Ana	\$1.25
Santa Ana	\$1.25
Tustin	\$1.25
Fountain Valley	\$1.35
Fountain Valley	\$1.35
Garden Grove	\$1.35
Garden Grove	\$1.35
Garden Grove	\$1.35
Orange	\$1.35
Orange	\$1.35
Fountain Valley	\$1.39
Garden Grove	\$1.40
Garden Grove	\$1.40
Santa Ana	\$1.45
Garden Grove	\$1.47
Anaheim	\$1.50
Anaheim	\$1.50
Fountain Valley	\$1.50
Garden Grove	\$1.50
Garden Grove	\$1.50
Orange	\$1.50
Orange	\$1.50
Orange	\$1.50
Orange	\$1.50

Commercial Properties for Lease: Retail Lease	
City	Price
Orange	\$1.50
Orange	\$1.50
Orange	\$1.50
Santa Ana	\$1.50
Santa Ana	\$1.50
Santa Ana	\$1.50
Tustin	\$1.50
Tustin	\$1.50
Orange	\$1.55
Santa Ana	\$1.55
Santa Ana	\$1.55
Garden Grove	\$1.60
Santa Ana	\$1.60
Santa Ana	\$1.64
Orange	\$1.65
Tustin	\$1.65
Tustin	\$1.67
Tustin	\$1.67
Garden Grove	\$1.70
Garden Grove	\$1.75
Garden Grove	\$1.75
Garden Grove	\$1.75
Anaheim	\$1.80
Garden Grove	\$1.80
Orange	\$1.80
Orange	\$1.82
Fountain Valley	\$1.85
Orange	\$1.85
Orange	\$1.86
Santa Ana	\$1.87
Orange	\$1.90
Garden Grove	\$1.95
Santa Ana	\$1.95
Santa Ana	\$1.95
Santa Ana	\$1.95
Garden Grove	\$2.00
Garden Grove	\$2.00
Garden Grove	\$2.00
Orange	\$2.00
Orange	\$2.00
Santa Ana	\$2.00
Santa Ana	\$2.00
Santa Ana	\$2.00

Commercial Properties for Lease: Retail Lease	
City	Price
Tustin	\$2.00
Tustin	\$2.00
Orange	\$2.10
Garden Grove	\$2.13
Orange	\$2.14
Tustin	\$2.15
Westminster	\$2.20
Orange	\$2.21
Garden Grove	\$2.25
Orange	\$2.25
Orange	\$2.25
Orange	\$2.25
Santa Ana	\$2.25
Santa Ana	\$2.25
Santa Ana	\$2.25
Santa Ana	\$2.25
Santa Ana	\$2.25
Santa Ana	\$2.25
Tustin	\$2.25
Tustin	\$2.25
Westminster	\$2.25
Garden Grove	\$2.35
Santa Ana	\$2.35
Santa Ana	\$2.40
Garden Grove	\$2.50
Orange	\$2.50
Santa Ana	\$2.50
Santa Ana	\$2.50
Tustin	\$2.50
Tustin	\$2.50
Tustin	\$2.75
Santa Ana	\$2.85
Tustin	\$2.95
Tustin	\$2.95
Tustin	\$2.95
Fountain Valley	\$3.00
Garden Grove	\$3.00
Santa Ana	\$3.00
Santa Ana	\$3.00
Santa Ana	\$3.00
Tustin	\$3.00
Westminster	\$3.00
Westminster	\$3.00

City	Price
Santa Ana	\$520,000
Santa Ana	\$540,000
Anaheim	\$1,492,155
Costa Mesa	\$2,200,000
Anaheim	\$6,250,000
Irvine	Not disclosed
Santa Ana	Not disclosed

Exhibit F:
Business Informational Brochure

**Relocation Assistance
Informational Statement
For Business, Farm & Nonprofit**

(Federal)

Displacing Agency:

City of Santa Ana

Project Name:

**Bristol Street Improvement Project Phase III A
between Civic Center Dr. and Washington Ave.**

Displacing Agency Representative:



**Overland, Pacific & Cutler, Inc.
1 Jenner, Suite 200
Irvine, CA 92618
Phone: 949.951.5263**

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



Introduction

The property on which you now conduct your business is in an 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 your business, 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 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 THE PROPERTY.

However, if you desire to move sooner than required, you must contact your relocation agent at 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.

Summary of Available Relocation Assistance:

- A.** Advisory assistance to explain the relocation process, the related eligibility requirements, the procedures for obtaining reimbursement for moving expenses and referrals to suitable replacement locations
- B.** Payment for your moving expenses. You may receive one of the following options:
 - Option 1: A Payment for Actual Reasonable Moving and Related Expenses;** or
 - Option 2: A Fixed Payment In Lieu of a Payment for Actual Moving and Related Expenses**
- C.** Other help to reestablish your business and minimize the impact of the move including help in preparing claim forms to request relocation payments.

If you disagree with the Displacing Agency's decision as to your right to a relocation payment, or the amount of the payment, you may appeal that decision.

GENERAL RELOCATION QUESTIONS

1. How Will I Know I Am Eligible for Relocation Assistance?

Ordinarily, eligibility begins on the date the owner of the property receives the Displacing Agency's initial written offer to purchase the property. Therefore, you should not move before that date or receiving a notice of eligibility. If you do, you may not be eligible for relocation assistance.

2. How Will the Displacing Agency Know How Much Help I Need?

You will be contacted at an early date and personally interviewed by an agent of the Displacing Agency. The interviewer will want to get information about your current operation, as well as identify movable personal property and non-movable improvements, determine your needs and preferences for a replacement location, estimate the time required to vacate the premises and your need for advance payments. During the interview, you may want to discuss other issues relative to your move. It is to your advantage to provide as much information as possible so that the Displacing Agency, through its relocation agent, can assist you in moving with a minimum of hardship. The information you give will be kept in confidence.

3. How Soon Will I Have to Move?

Every reasonable effort will be made to provide you with sufficient time to find a suitable replacement location and reestablish your business. If possible, a mutually agreeable date for the move will be worked out. Unless there is an urgent need for the property (e.g., your occupancy would present a health or safety emergency), you will not be required to move without at least 90 days advance written notice. It is important, however, that you keep in close contact with the Displacing Agency so that you are aware of the time schedule for carrying out the project and the approximate date by which you will have to move.

4. I Own the Property. Will I Be Paid for It Before I Have to Move?

If you reach a voluntary agreement to sell your property to the Displacing Agency, you will not be required to move before you receive the agreed purchase price. If the property is acquired through an eminent domain proceeding, you cannot be required to move before the estimated fair market value of the property has been deposited with the court. (You should be able to withdraw this amount immediately, less any amounts necessary to pay off any mortgage or other liens on the property and to resolve any special ownership problems. Withdrawal of your share of the money will not affect your right to seek additional compensation for your property).

5. Will I Have to Pay Rent to the Displacing Agency Before I Move?

You may be required to pay a fair rent to the Displacing Agency for the period between the acquisition of your property and the date that you move. Your rent and the terms of your tenancy will be generally the same as in the prior arrangement.

6. How Will I Find a Replacement Location?

Your relocation agent will provide you with current and continuing information on available replacement locations that meet your needs. You will also be provided with the names of local real estate agents and brokers who can assist you in finding the type of replacement location you require. However, you are urged to take an active role in identifying, and relocating to, a location of your choice. No one knows your needs better than you do. You will want a facility that provides sufficient space for your planned activities. You will also want to ensure that there are no zoning or other requirements which will unduly restrict your planned operations. Your relocation agent will explain which kind of moving costs are eligible for reimbursement and which are not eligible. That will enable you to carry out your move in the most advantageous manner.

7. What Other Assistance Will Be Available to Help Me?

In addition to help in finding a suitable replacement location, your relocation agent will help you secure the services of outside specialists, as necessary, to plan the move, as well as provide assistance during the actual move and in the reinstallation of machinery and/or other personal property. The range of services depends on the needs of the business being displaced. You should ask the Displacing Agency's relocation agent to tell you about the specific services that will be available to you.

8. I Have a Replacement Location and Want to Move. What Should I Do?

Before you make any arrangements to move, notify the Displacing Agency's relocation agent, in writing, of your intention to move. This should be done at least 30 days before the date you begin your move. The Displacing Agency will discuss the move with you and advise you of the relocation payment(s) for which you may be eligible, the requirements to be met, and how to obtain a payment.

9. I Plan to Discontinue My Business Rather than Move. What Should I Do?

If you have decided to discontinue your business rather than reestablish it, you may still be eligible to receive a payment. Contact the Displacing Agency's relocation agent and discuss your decision to discontinue your business. You will be informed of the payment, if any, for which you may be eligible, the requirements to be met, and how to obtain your payment.

10. What Kinds of Payments for Moving Expenses Will I Receive?

Every business is eligible for a relocation payment to cover the reasonable cost of moving. Assuming you meet certain eligibility criteria, you may choose one of the following options:

Option 1: A Payment for Actual Reasonable Moving and Related Expenses; or

Option 2: A Fixed Payment In Lieu of Moving and Related Expenses

These payment options are described below:

Option 1: Payment for Actual Reasonable Moving and Related Expenses

If you choose a Payment for Actual Reasonable Moving and Related Expenses, you may claim the cost of:

1. Transportation of personal property. Transportation costs for a distance beyond 50 miles are not eligible, unless the Displacing Agency determines that relocation beyond 50 miles is justified.
2. Packing, crating, unpacking, and uncrating of the personal property.
3. Disconnecting, dismantling, removing, reassembling, and reinstalling relocated machinery, equipment, and other personal property, and certain substitute personal property. This includes connection to utilities available within the building. It also includes modifications to the personal property, including those mandated by Federal, State or local law, code or ordinance, necessary to adapt it to the replacement structure, the replacement site, or the utilities at the replacement site, and modifications necessary to adapt the utilities at the replacement site to the personal property.
4. Storage of the personal property determined to be necessary by the Displacing Agency, not to exceed 12 months, unless the Displacing Agency determines that a longer period is warranted.
5. Insurance for the replacement value of the personal property in connection with the move and necessary storage.
6. The replacement value of property lost, stolen or damaged in the process of moving (not through fault or negligence of the displaced person, his or her agent or employee), where insurance covering such loss, theft or damage is not reasonably available.
7. Any license, permit, fees or certification required of your business at the replacement location. However, the payment may be based on the remaining useful life of the existing license, permit, fees or certification.
8. Reasonable and preauthorized professional services, the Displacing Agency determines to be necessary for (i) planning the move of the personal property, (ii) moving the personal property, and (iii) installing the relocated personal property at the replacement location.
9. Re-lettering signs and replacing stationary on hand at the time of displacement that is made obsolete as a result of the move.
10. Actual direct loss of tangible personal property incurred as a result of moving or discontinuing your business. The payment will consist of the lesser of:
 - (i) The fair market value in place of the item, as is for continued use at the displacement site, less the proceeds from its sale. (To be eligible for payment, you must make a good faith effort to sell the personal property, unless the Displacing Agency determines that such effort is not necessary. When payment for property loss is claimed for goods held for sale, the fair market value will be based on the cost of the goods to the business, not the potential selling price.); or
 - (ii) The estimated cost of moving the item as is, but with no allowance for storage; or for reconnecting a piece of equipment if the equipment is in storage or not being used at the acquired site. (If you elect to discontinue your business, the estimated cost will be based on a moving distance of 50 miles.)

11. Purchase of substitute personal property. If an item of personal property which is used as part of your business is not moved but is promptly replaced with a substitute item that performs a comparable function at the replacement site, you will be entitled to payment for the lesser of:
 - (i) The cost of the substitute item, including installation costs at the replacement site, minus any proceeds from the sale or trade-in of the replaced item; or
 - (ii) The estimated cost of moving and reinstalling the replaced item but with no allowance for storage. At the Displacing Agency's discretion, the estimated cost for a low cost or uncomplicated move may be based on a single bid or estimate.
12. The reasonable cost incurred in attempting to sell an item that is not to be relocated.
13. Searching for a replacement location. Your business is entitled to reimbursement for actual expenses, not to exceed \$2,500 as the Displacing Agency determines to be reasonable, which are incurred in searching for a replacement location including:
 - i) Transportation
 - ii) Meals and lodging away from home.
 - iii) Time spent searching, based on reasonable salary or earnings.
 - iv) Fees paid to a real estate agent or broker to locate a replacement site, exclusive of any fees or commissions related to the purchase of such site.
 - v) Time spent in obtaining permits and attending zoning hearings; and
 - vi) Time spent negotiating the purchase of a replacement site based on a reasonable salary or earnings.
14. When the personal property to be moved is of low value and high bulk, and the cost of moving the property would be disproportionate to its value in the judgment of the Displacing Agency, the allowable moving cost payment shall not exceed the lesser of: the amount which would be received if the property were sold at the site or the replacement cost of a comparable quantity delivered to the new business location.
15. Other related moving expenses as the Displacing Agency determines to be reasonable and necessary, including:
 - i) Connection to available nearby utilities from the right-of-way to improvements at the replacement site;
 - ii) Professional services performed prior to the purchase or lease of a replacement site to determine its suitability for your business operation, including but not limited to soil testing, feasibility and marketing studies (excluding any fees or commissions directly related to the purchase or lease of such site). At the Displacing Agency's discretion, a reasonable pre-approved hourly rate may be established
 - iii) Impact fees or one-time assessments for anticipated heavy utility usage, as determined by the Displacing Agency.

The Displacing Agency's relocation agent will explain all eligible moving costs, as well as, those which are not eligible. You must be able to account for all costs that you incur, so keep all your receipts. The Displacing Agency will inform you of the documentation needed to support your claim.

You may minimize the amount of documentation needed to support your claim, if you elect to "self-move" your property. Payment for a self-move is based on the amount of an acceptable low bid or estimate obtained by the

Displacing Agency. If you self-move, you may move your personal property using your own employees and equipment or a commercial mover. If you and the Displacing Agency cannot agree on an acceptable amount to cover the cost of the self-move, you will have to submit full documentation in support of your claim.

You may elect to pay your moving costs yourself and be reimbursed by the Displacing Agency or, if you prefer, you may have the Displacing Agency pay the mover directly. In either case, let the Displacing Agency's relocation agent know before you move. The Displacing Agency agent can help you select a reliable and reputable mover.

When a payment for "actual direct loss of personal property" or "substitute personal property" is made for an item, the estimated cost of moving the item may be based on the lowest acceptable bid or estimate obtained by the Displacing Agency. If not sold or traded-in, the item must remain at the old location and ownership of the item must be transferred to the Displacing Agency before you may receive the payment.

In addition to the reimbursable expenses described above, a small business, farm or non-profit organization may be eligible to receive a payment of up to \$25,000 for expenses actually incurred in relocating and reestablishing its operation at a replacement site. Eligible expenses must be reasonable and necessary, as determined by the Displacing Agency. They may include but are not limited to the following:

1. Repairs or improvements to the replacement real property as required by federal, state or local law, code or ordinance.
2. Modifications to the replacement property to accommodate the business operation or make replacement structures suitable for conducting the business.
3. Construction and Installation costs for exterior signage to advertise the business.
4. Redecoration or replacement of soiled or worn surfaces at the replacement site, such as paint, paneling or carpeting.
5. Advertising of replacement location.
6. Estimated increased costs of operation during the first 2 years at the replacement site, for such items as:
 - a. Lease or rental charges
 - b. Personal or real property taxes
 - c. Insurance premiums, and
 - d. Utility charges (excluding Impact fees)
7. Other items that the Displacing Agency considers essential to the reestablishment of the business.

The following is a non-exclusive listing of reestablishment expenditures not considered to be reasonable, necessary or otherwise eligible:

- Purchase of capital assets, such as, office furniture, filing cabinets, and machinery or trade fixtures.
- Purchase of manufacturing materials, production supplies, product inventory, or other items used in the normal course of the business operation.
- Interest costs associated with any relocation expense or the purchase of replacement property.
- Payment to a part-time business in the home which does not contribute materially to the household income.

Option 2: Fixed Payment In Lieu of a Payment for Actual Reasonable Moving and Related Expenses

A displaced business, non-profit organization or farm may be eligible to choose a fixed payment in lieu of the payments for actual moving and related expenses and actual reasonable reestablishment expenses. The payment may not be less than \$1,000.00 or more than \$40,000.00. For a business or farm, the payment is based on the average annual net earnings before Federal, State and local income taxes during the 2 taxable years immediately prior to the taxable year in which it was displaced. For a non-profit organization, the payment is based on the average of 2 years annual gross revenues less administrative expenses.

In order to qualify for this payment, the Displacing Agency must determine that:

1. The business owns or rents personal property which must be moved in connection with the displacement and for which an expense would be incurred in such move, and the business vacates or relocates from its displacement site.
2. The business cannot be relocated without a substantial loss of existing patronage (clientele or net earnings).
3. The business is not a part of a commercial enterprise having more than three other entities which are not being acquired by the Displacing Agency, and which are engaged in the same or similar business activities.
4. The business is not operated at the displacement dwelling/site solely for the purpose of renting such dwelling/site to others.
5. The business contributed materially to the income of the displaced person during the two (2) taxable years prior to displacement.

If the business or farm was not in operation for the full two years prior to displacement, the net earnings are based on the actual period of operation at the acquired site projected to an annual rate. Average net earnings may be based on a different period of time when the Displacing Agency determines it to be more equitable. Net earnings include any compensation paid to the owners of the business, a spouse or dependents. Proof of net earnings must be furnished to the Displacing Agency through income tax returns, certified financial statements, or other reasonable evidence which the Displacing Agency determines is satisfactory.

For a qualified non-profit organization, gross earnings may include membership fees, class fees, cash donations, tithes and receipts from sales or other forms of fund collection that enables the non-profit organization to operate. Administrative expenses are those for administrative support such as rent, utilities, salaries, advertising and other like items as well as fund raising expenses. Operating expenses for carrying out the purposes of the non-profit organization are not included in administrative expenses. The monetary receipts and expense amounts may be verified with certified financial statements or financial documents required by public agencies.

The Displacing Agency will inform you as to your eligibility for this payment option and the documentation you must submit to support your claim. Remember, when you elect to take this payment option you are not entitled to reimbursement for any other moving expenses, i.e. **Option A** described above.

11. I Own an Outdoor Advertising Display. What Relocation Payment Will I Receive?

As the owner of an outdoor advertising display, you are eligible for a Relocation Payment For Actual Reasonable Moving and Related Expenses. You are not eligible to receive a Payment In Lieu of a Payment For Actual Reasonable Moving and Related Expenses.

If you choose not to relocate or replace the sign, the payment for "direct loss of personal property" would be the lesser of: (1) the depreciated reproduction cost of the sign, as estimated by the Displacing Agency, less the proceeds from its sale, or (2) the estimated cost of moving the sign without temporary storage. The Displacing Agency will inform you as to the exact costs that may be reimbursed.

12. How do I Receive a Relocation Payment?

You must file a claim for a relocation payment. The Displacing Agency's relocation agent will provide you with the required claim forms, assist you in completing them, and explain the type of documentation that you must submit in order to receive your relocation payments. If you must pay any relocation expenses before you move (e.g., because you must provide a security deposit if you lease your new location), discuss your financial needs with the Displacing Agency. You may be able to obtain an advance payment. An advance payment may be placed in "escrow" to ensure that the move will be completed on a timely basis.

If you are a tenant, you must file your claim within 18 months after the date you move. If you own the property, you must file within 18 months after the date you move, or the date you receive the final acquisition payment, whichever is later. However, it is to your advantage to file as soon as possible after you move. The sooner you submit your claim, the sooner it can be processed and paid. If you are unable to file your claim within 18 months, the Displacing Agency may extend this period.

You will be paid promptly after you file an acceptable claim. If there is any question regarding your right to a relocation payment or the amount of the payment, you will be notified, in writing, of the problem and the action you may take to resolve the matter.

13. Non-Discrimination

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 laws. You may file a complaint if you believe you have been subjected to discrimination. For details contact the Displacing Agency.

14. Appeals

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.

15. 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)

16. Lawful Presence Requirement

Pursuant to the Public Law 105-117, in order to be eligible to receive non-residential relocation benefits in federally-funded projects, in the case of an unincorporated business, each owner must be either a citizen or national of the United States, or an alien who is lawfully present in the United States. The owner of a sole proprietorship and all owners of a partnership must provide information regarding their lawful presence in the United States, and a for-profit or a non-profit corporation must certify that it is authorized to conduct business within the United States. Owners of sole proprietorships or partnerships, who are not lawfully present in the United States, or who decline to provide this information, are not eligible for relocation assistance, 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 owners with certified lawful presence in the United States.

17. Additional Information

If you have further questions after reading this brochure, please contact the Displacing Agency's relocation agent at **Overland, Pacific & Cutler, Inc.**

Exhibit G:
Residential Informational Brochure

Relocation Assistance Informational Statement for Families and Individuals

(Federal)

Displacing Agency:
City of Santa Ana

Project Name:
**Bristol Street Improvement Project Phase III A
between Civic Center Dr. and Washington Ave.**

Displacing Agency Representative:



Overland, Pacific & Cutler, Inc.
1 Jenner, Suite 200
Irvine, CA 92618
Phone: 949.951.5263

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. Section 8 Tenants
6. Replacement Housing Payment – Homeowners
7. Qualification For And Filing Of Relocation Claims
8. Last Resort Housing Assistance
9. Rental Agreement
10. Evictions
11. Appeal Procedures – Grievance
12. Tax Status of Relocation Benefits
13. Legal Presence Requirement
14. Non-Discrimination and Fair Housing
15. Additional Information And Assistance Available

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.

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 \$725.00 for one furnished room to \$2,505.00 for eight rooms. (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.

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.

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
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

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. SECTION 8 TENANTS

When you do move, you may be eligible to 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.

6. REPLACEMENT HOUSING PAYMENT - HOMEOWNERS

- A. If you own and occupy a dwelling to be purchased by the Displacing Agency for **at least 90 days** prior to the initiation of negotiation, you may be eligible to receive a payment of up to \$31,000.00 to assist you in purchasing a comparable replacement unit. This payment is intended to cover the following items:
1. **Purchase Price Differential** - An amount which, when added to the amount for which the Displacing Agency purchased your property, equals the lesser of the actual cost of your replacement dwelling; **or** the amount determined by the Displacing Agency as necessary to purchase a comparable replacement dwelling. Your relocation agent will explain both methods to you.
 2. **Mortgage Interest Differential** - The amount which covers the increased interest costs, if any, required to finance a replacement dwelling. Your relocation agent will explain limiting conditions.
 3. **Incidental Expenses** - Those one time incidental costs related to purchasing a replacement unit, such as escrow fees, recording fees, and credit report fees. Recurring expenses such as prepaid taxes and insurance premiums are not compensable.
- B. **Rental Assistance Option** - If you are an owner-occupant and choose to rent rather than purchase a replacement dwelling, you may be eligible for a rental assistance payment of up to the amount that you could have received under the Purchase Price Differential, explained above. The payment will be based on the difference between the fair market rent of the dwelling you occupy and the rent you must pay for a comparable replacement dwelling.

If you receive a rental assistance payment, as described above, and later decide to purchase a replacement dwelling, you may apply for a payment equal to the amount you would have received if you had initially purchased a comparable replacement dwelling, less the amount you have already received as a rental assistance payment.

7. 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 17001) 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.

Exhibit H:
Public Comments and Response

Public Comments and Responses

No Comments were received from the public during the 30 day public review and comment period between March 31, 2016 to April 30, 2016