HOUSING AUTHORITIES
CITY OF EUREKA & COUNTY OF HUMBOLDT

735 WEST EVERDING STREET, EUREKA CA 95503
PHONE: (707) 443-4583 FAX: (707) 443-4762 TTY: (800) 651-5111

CITY OF EUREKA HOUSING AUTHORITY
REGULAR COMMISSION MEETING
AGENDA

Tuesday – January 18, 2022
7:30pm

Participate Via Zoom Meeting
Join Zoom meeting at https://us02web.zoom.us/join or call (669) 900-6833
Meeting ID: 870 1254 8835 Passcode: 695956

(a) Roll Call
Kali Serotta, Chairperson
Kay Escarda, Vice Chairperson
Renee Byers, Commissioner
Mark Konkler, Commissioner
Kristen Raymond, Commissioner

(b) Public Comment: This time is reserved for members of the public to address the Committee relative to matters of the Housing Authority of the County of Humboldt not on the agenda. No action may be taken on non-agenda items unless authorized by law. Comments will be limited to five minutes per person and twenty minutes in total.

Page(s)

3 - 5 (c) Minutes from the Regular Session of November 15, 2021
Recommendation: Staff recommends the Commissioners approve minutes.

(d) Bills and Communication:
6 - 10 (d1) Q4 2021 Tenant Newletter

(e) Report of the Secretary: The report of the Secretary is intended to brief the Commission on items, issues, key dates, etc., that do not require specific action, and are not separate items on the Board of Commissioners Agenda
(e1) Covid-19 Updates
11 (e2) Occupancy and Leasing Report
10 - 15 (e3) HCV Utilization Reports

(f) Reports of the Commissioners: This time is reserved for Commissioners to share any relevant news or Housing related endeavors undertaken by Commissioners.

(g) Unfinished Business: This time is reserved for any business that has been carried over from previous meetings/discussions.

(h) New Business:

16 - 81 (h1) Repositioning Draft Plan Update

(i) Closing Comments: Any other business to properly come before the Commission

(j) Executive Session (if necessary)

Adjournment

The Commissioners of the City of Eureka Housing Authority met in a Regular Session on Monday, November 15, 2021, at 7:30p.m via Zoom.

Chairperson Serotta declared a quorum present and called the meeting to order at 7:30 p.m.

(a) Roll Call - Upon roll call those present and absent were:

Commissioners present: Chairperson Serotta, Vice Chairperson Escarda, Commissioner Byers, Commissioner Konkler, Commissioner Raymond
Commissioners absent: None
Staff present: Churchill, Briggs, Wiesner
Public present: None

(b) Public Comment - Chairperson Serotta opens for Public comment. No comments are heard.

(c) Minutes of the Regular Session of October 18, 2021:

Motion to approve the minutes of the meeting of October 18, 2021 made by Commissioner Byers.

Second – Commissioner Konkler

Roll call:
Ayes: Serotta, Escarda, Byers, Konkler, Raymond
Nays: None
Abstain: None

Chairperson Serotta declared the motion carried to approve the minutes of October 18, 2021.

(d) Bills and Communications:

(d1) HUD PHA Plan Approval – letter dated November 05, 2021: Secretary Churchill informs the Commissioners that HUD has approved the City of Eureka Housing Authority's most recent PHA Plan submission.

(d2) Tenant Newsletter Q3 2021: Secretary Churchill goes over the newsletter and briefly points out key points and information on the tenant newsletter.

(d3) Landlord Newsletter Q4 2021: Secretary Churchill goes over the newsletter and briefly points out key points and information on the landlord newsletter.

(e) Report of the Secretary:

(e1) Covid-19 Update: Secretary Churchill briefs the Commissioners that currently we are keeping the lobby open Tuesday, Wednesday, and Thursday from 10:00am – 3:00pm. Anyone who enters the lobby is required to wear a mask.

(e2) Occupancy and Leasing Report: Secretary Churchill briefs the Commissioners on this report. Secretary Churchill notes that we are working towards improving turn times of vacant units and in turn, leasing up units which will improve our numbers.

(e3) HCV Utilization Reports: Secretary Churchill updates the Commissioners on the report, noting that we added the Mainstream Vouchers to the report and now have 18 Mainstream Vouchers leased up with more vouchers going out. Secretary Churchill notes in October we issued the first five EHV vouchers. For the HCV summary, our numbers are slightly lower than where we want to see them, however we will continue to work to get those numbers up.

(f) Reports of Commissioners – Commissioner Konkler comments that he participated in the Repositioning Community Input Session on November 4, 2021.

(g) Unfinished Business – None.

(h) New Business:
(h1) Resolution 1958
Proposed Utility Allowance Study Schedule for 2022
Recommended Board Action: Accept and Adopt for Approval

<u>RESOLUTION 1958</u>
Adopt Updated Utility Schedule
Public Housing – City of Eureka

WHEREAS, The U.S. Department of Housing and Urban Development requires a survey of utility usage and fees be done to ascertain a schedule of Public Housing allowances for resident furnished utilities; and

WHEREAS, The Housing Authorities have contracted with The Nelrod Company to complete a Resident Life Utility Allowance Survey and Study for Public Housing; and

WHEREAS, The Survey demonstrates a need to adjust the present utility allowances to bring them in line with actual usage figures;

NOW, THEREFORE, BE IT RESOLVED, that the Commissioners of the City of Eureka Housing Authority approve and adopt the September 2021 updated schedule for Public Housing Utility Allowances for Resident Furnished Utilities and Other Services, effective January 1, 2022.

Motion to approve Resolution 1958 made by Vice Chairperson Escarda

Second – Commissioner Raymond

Roll call: Ayes: Serotta, Escarda, Byers, Konkler, Raymond
Nays: None
Abstain: None

Chairperson Serotta declared the motion carried to approve Resolution 1958.

(h2) HTVN Training Demo with Dustin Wiesner (informational): Dustin Wiesner provides the Board members a visual overview and walk through of training offered by HTVN online portal. Dustin demonstrates how to log in to the portal, find training and complete the trainings.

(h3) Repositioning Community Input Session – Nov. 4th 2021, 6:00-7:30pm Community feedback information: Secretary Churchill briefs the Board on the input session noting that there were approximately 17 public in attendance along with other service providers, the City of Eureka Mayor and the City of Eureka Housing Authority Board Chairperson. The meeting was held via zoom and had break out rooms for public input sessions.

(i) Closing Comments: Any Other Business to Properly Come Before the Commission. None heard.

There being no further business to come before the Commissioners, the regular session adjourned at 8:25p.m.

____________________________ ____________________________

Secretary Chairperson

Housing Insider

Issue 2021.4 *"Communication leads to community."*

Emergency Rental Assistance Program

As our country's economy struggles to recover from the effects of a now almost two-year pandemic in the U.S., we are doing what we can locally to ensure housing stability. Due to job losses, increased expenses, and other pandemic issues, numerous households have struggled to keep up on rents. In order to help clear rental debts, the City of Eureka Housing Authority has submitted applications to California's COVID-19 Rent Relief Program (ERAP) on behalf of our tenants.

However, in order for ERAP to complete a payment request, the tenant is responsible for completing their portion of documentation. You will need to provide: current income verification documents; proof of identity (birth certificate or current license/ID); a copy of your lease; and a list of unpaid rent charges (for which you are requesting payment).

If you have applied to ERAP independently (not initiated through the link provided by the Housing Authority), provide your case number to Stephanie (707.443.4583 x221) so she can prepare the information that ERAP requires from landlords. Be sure to check your spam and junk email folders as well as the Rent Relief app at least twice a week. The application may be cancelled if information is not received timely. If you have not received any messages or status updates after 21 days, call the hotline at 1.833.430.2122. Additionally, local community resource centers are available to help complete applications by appointment. Call 2-1-1 for help.

General Information

Lobby and Dumpster Hours: Open Tuesday, Wednesday, and Thursday, 10 am – 3 pm at 735 West Everding Street, Eureka, CA 95503.

Business hours are Monday-Thursday, 8:00-5:30; Fridays alternating weeks with closed days and business hours until 4:30. Please call our main line during business hours at (707) 443-4583 if you need assistance.

We have a payment drop box by our front door for easy submission of any amounts payable.

Reminder About Bins for Garbage and Recycling

We appreciate how our tenants have been using the blue bins for recyclables and grey trash cans to dispose of rubbish and keep units and properties clean and tidy. However, just as important as putting your bins out is bringing them back in once they have been emptied. If left in the street, they block tenant and visitor parking spaces. Additionally, if left on the sidewalk, they present a barrier for people trying to pass. This is especially cumbersome for anyone in a wheelchair or with mobility issues. Please be kind to others and bring your bins in when empty. Thank you!

EHA Mission Statement: *The mission of the Housing Authority of the City of Eureka is to assist low-income families with safe, decent, and affordable housing opportunities as they strive to achieve self-sufficiency and improve the quality of their lives. The Housing Authority is committed to operating in an efficient, ethical, and professional manner, and treating all clients with dignity and respect. The Housing Authority will create and maintain partnerships with its clients and appropriate community agencies in order to accomplish this mission.*

Incident Reporting – When, How, Who?

The City of Eureka Housing Authority (CEHA) works closely with the Eureka Police Department (EPD) to ensure our neighborhoods are receiving adequate services and the protection our communities need. Recently, we discussed the question of when tenants should be calling the Housing Authority regarding neighborhood complaints and when it would be more appropriate to call EPD. Please review the following guidelines to help your household know who to contact when, and how to make that contact.

Report to EPD
EPD's Community Concern Reporting Form should be used to document and report known or suspected criminal activity, such as drug related criminal activity or theft, to the Police. Completed forms can be emailed to bpowell@ci.eureka.ca.gov, or dropped off or mailed to: Eureka Police Department, Attn: POP, 604 C Street, Eureka, CA 95501.

Report to CEHA
Whenever you notice something that would fall under a lease infraction, such as something that disturbs the peaceful enjoyment of your home, you can report that to the Housing Authority. Examples of this might be when a neighbor smokes at their unit or regularly has a dog off-leash and is not cleaning up pet waste. Though these aren't criminal activities, they do go against your lease, and if they present a pattern of noncompliance, may be cause for eviction. Complaints should be made by completing the Tenant Complaint/Concern Form and returning it to the CEHA office. You may also email Tykeshia Leschke, Community Liaison, at tykeshial@eurekahumboldtha.org or call 707.443.4583 x211 with any concerns.

Q&A

Q – Is the eviction moratorium over?
A – Yes, the CDC Eviction Moratorium, which prevented eviction for nonpayment of rent, ended September 30, 2021. However, you cannot be evicted if you've paid at least 25% of the rent you owe for the past year. Additionally, the Housing Authority has been working diligently to submit applications for Emergency Rental Assistance for any household with overdue rents. Please contact Stephanie with any questions about balances due.

Q – Are late fees still being charged?
A – The last month late fees were charged was March 2020. Due to the COVID-19 pandemic, all late fees have been waived from April 2020 through December 2021. However, beginning January 2022, we will restart charging late fees, as stipulated in your lease. As a reminder, rents are due by the 5th of each month, or the next business day thereafter if the 5th falls on a weekend or holiday. Late fees will be charged thereafter if your rent has not been received as expected, and a notice of late fee will be sent to your mailing address. Sign up for the tenant portal at **https://portal.eurekahumboldtha.org**.

Volunteer opportunity: Are you a Public Housing tenant who is interested in serving on our Board of Commissioners? Please contact Heather at heatherh@eurekahumboldtha.org or 443.4583 x219 with any questions and to obtain an application for tenant commissioner.

Who to Contact

Call our main line at (707) 443-4583, then:

Natalie for work orders..............................x218

Neil for paperwork, certification, rent /income calculation questions...............................x214

Stephanie for charges, account balance questions, and payments.........................x221

Ty for questions, complaints, or concerns about the neighborhood........................x211

Front desk for all other questions regarding Housing Authority services....................x210

Emergency Maintenance phone........444-1424

In an emergency, please call 911 or the Eureka Police Department at (707) 441-4060

EUREKA POLICE DEPARTMENT

Problem Oriented Policing (POP)

COMMUNITY CONCERN REPORTING FORM

Use to report drug dealers, drug houses, drug related crimes, or other problems within your neighborhood.

PROBLEM ADDRESS:
(Description of building or location if address is unknown)

____

____

____

Office use only
POP Case # ____________________
Officer Assigned________________

CHECK ONE OR MORE OF THE BELOW BOXES:

- ☐ Suspected Drug House
- ☐ Wanted Person
- ☐ Dealing in Stolen Property
- ☐ Transients ___ Trespasser ___ Prowler ___
- ☐ Trash/Garbage/Weeds
- ☐ Other (Specify)__________________________

PERSONS INVOLVED:

Name of suspect(s)(if known): ______________________________

Description: Gender ____ Race ____ Est. Age________

Height _____ Weight ____ Hair ____ Eyes ____ Facial Hair____

Other description or frequently worn clothing: _______________

____

Weapon carried by suspect? Yes __ No __ Type: ____________

Additional Persons involved: Yes __ No __ Name: ___________

Please provide the following information if known:

Property Owner's Name: ____ Phone: ______________________

Landlord or Property Manager's Name: ____ Phone: ______________________

DEFINE PROBLEM: (Use additional sheets of paper if necessary)

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PROBLEM VEHICLES:

CHECK ONE OR MORE OF THE BOXES

- ☐ Involved in suspected drug activity
- ☐ Abandoned Vehicles
- ☐ People living in vehicle/trailer
- ☐ Loud vehicles/vehicles being worked on
- ☐ Other (describe above)

Vehicles Involved	Make	Model	Color(s)	Year	License	State
Vehicle #1						
Vehicle #2						

Date form completed ___/___/_____ My information is: Personal Knowledge ☐ From Another Person ☐

Reporting Party Name: _________________________________ Address: ____

Phone: ___________________________ Email Address: ____

EPD #139 5/2016

CEHA TENANT COMPLAINT/CONCERN FORM

Date: ______________________________

Complaint/Concern Made By:
Name: _____________________________ Phone: _________________________
Address: ____

Complaint/Concern Against:
Name: ____
Address: ____

Note any other parties involved:
Name: ____
Address: ____

Date of incident: ______________________Time: _____________________AM/PM
Location of incident: ____

Explanation of Complaint/Concern:

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I certify the foregoing statement is accurate and true to the best of my knowledge. If the City of Eureka Housing Authority institutes legal proceedings against the tenant about whom I am complaining, I understand that I may be called as a witness at such proceedings.

____ ________________
Signature Date

Occupancy and Leasing Report
Month: November 2021

City of Eureka Housing Authority
County of Humboldt Housing Authority

Program	Total Units Available		Vacant Units 1st of Month		# Units Leased 1st of Month	Move-outs During Month	Move-ins During Month	Wait List End of Month	
Eureka									
Public Housing	196	*	18	*	178	3	2	390	
Eureka Family Housing	51		3		48	0	0	436	
Eureka Senior Housing	22		2		20	0	0	151	
	269				**246**				
Humboldt									
Housing Choice Vouchers	1217		N/A		818	6	1	1123	
VASH Vouchers	73		N/A		23	0	0	N/A	
Mainstream vouchers	75	***	N/A		18	0	5	N/A	
Project Based Vouchers									
PBV-VASH - Bayview Heights (Eureka)	22	**	N/A		21	0	0	N/A	
PBV-HCV - Bayview Heights (Eureka)	3	**							
PBV-HCV - Sorrell Place (Arcata)	5	**	N/A		N/A	N/A	N/A	N/A	
Emergency Housing Vouchers (EHV)	182	‡	N/A		N/A	N/A	N/A	N/A	‡
	1577				**880**				

Vouchers issued but not under contract, end of month (aka "Searching")	21

*Total PH units is 198; 2 units are exempted for EPD use and Boys & Girls Club and are unavailable for tenant rental

**25 Project Based VASH Vouchers at Bayview Heights Veteran's housing at 4th & C Street, Eureka; contract signed 6/30/2020.
Modified in 2021 to meet project requirements; 22 VASH PBVs and 3 non-VASH for veterans who don't meet HUD-VASH requirements.
5 Project Based HCV vouchers set-aside for Sorrell Place extremely low income units at 7th & I Street, Arcata; December 2021

*** Mainstream vouchers were awarded December 2020. Funding began April 2021; initial referrals from CoC partners began April 2021.

‡ No PHA waitlist for EHVs; all are issued based on referral from HHHC. Referrals began 9/2021.

HOUSING AUTHORITY - COUNTY OF HUMBOLDT
For the month of November 2021

HAP (per VMS):	January	February	March	April	May	June	July	August	September	October	November	Total
HUD Budget Authority Income (HAP)	479,338.00	479,338.00	487,982.00	498,296.00	498,296.00	511,513.25	511,513.25	511,513.25	511,513.25	498,812.00	498,815.00	5,486,930.00
HUD Additional VO Funding	2,311.00	2,311.00	1,502.00									6,124.00
Less: HUD Recapture				(8,812.00)	(35,512.00)	(23,454.25)	(26,086.25)	(26,086.25)	(26,215.25)	(13,514.00)	(72,271.00)	(231,951.00)
Draw from HUD-held reserves												-
Other HAP income	724.50	492.00	473.00	568.53	977.83	504.00	736.50	1,259.00	410.00	1,636.50	201.50	7,983.36
HAP expenses	(478,489.00)	(477,686.00)	(475,909.00)	(476,341.00)	(475,782.00)	(475,507.00)	(479,368.00)	(477,214.00)	(477,686.00)	(480,688.00)	(483,032.00)	(5,257,702.00)
Surplus (Deficit)	3,884.50	4,455.00	14,048.00	13,711.53	(12,020.17)	13,056.00	6,795.50	9,472.00	8,022.00	6,246.50	(56,286.50)	11,384.36
% Total income utiliized	99.19%	99.08%	97.13%	97.20%	102.59%	97.33%	98.60%	98.05%	98.35%	96.05%	96.80%	99.78%
% Budget Authority utilized	99.82%	99.66%	97.53%	95.59%	95.48%	92.96%	93.72%	93.29%	93.39%	96.37%	96.84%	95.82%
# of Households Assisted	883	876	875	874	872	868	866	865	865	863	866	9,573
Average HAP Payment	541.89	545.30	543.90	545.01	545.62	547.82	553.54	551.69	552.24	557.00	557.77	549.22
ADMIN & OPERATIONS (per G/L):												
Administrative Fee income (HUD)	59,042.00	59,042.00	88,927.00	71,351.00	60,767.00	61,187.00	61,187.00	61,187.00	65,105.00	61,187.00	50,283.00	699,265.00
HUD Additional AF Funding												
Other Admin income	1,258.96	2,360.92	2,118.13	3,405.65	3,522.28	1,907.80	4,817.93	2,742.83	1,950.36	3,233.39	1,803.11	29,121.36
Port-in HAP income	5,586.00	5,622.00	5,607.00	5,607.00	5,475.00	5,559.00	5,567.00	6,291.00	7,122.00	7,879.00	7,688.00	68,003.00
Port-in HAP expense	(5,586.00)	(5,622.00)	(5,607.00)	(5,607.00)	(5,447.00)	(5,559.00)	(5,567.00)	(6,291.00)	(7,122.00)	(7,879.00)	(7,688.00)	(67,975.00)
Operating expenses	(53,313.64)	(55,747.98)	(63,285.28)	(55,715.64)	(79,701.64)	(55,260.44)	(93,736.87)	(60,467.23)	(59,046.63)	(70,543.29)	(62,650.16)	(709,468.80)
Surplus (Deficit)	6,987.32	5,654.94	27,759.85	19,041.01	(15,384.36)	7,834.36	(27,731.94)	3,462.60	8,008.73	(6,122.90)	(10,564.05)	18,945.56
Remaining HAP Cash	12,452.15	15,867.15	25,068.15	52,595.67	38,133.50	43,639.50	51,082.35	61,129.00	72,303.00	72,853.50	15,677.00	
Remaining Non-HAP Cash	403,339.44	407,808.52	429,909.14	435,987.25	411,761.59	423,386.58	434,278.58	434,152.44	429,234.35	421,847.01	407,229.22	
Total HCV Cash	415,791.59	423,675.67	454,977.29	488,582.92	449,895.09	467,026.08	485,360.93	495,281.44	501,537.35	494,700.51	422,906.22	
Cash Increase/(Decrease)	(2,196.03)	7,884.08	31,301.62	33,605.63	(38,687.83)	17,130.99	18,334.85	9,920.51	6,255.91	(6,836.84)	(71,794.29)	
			A	B	C						D	

A Higher than expected Admin Fee. May be recaptured in the future.
B Additional AF Income due to 2020 HUD reconciliation.
C Decrease due to HAP recapture and annual Yardi license expense.
D Decrease due to HAP recapture.

HOUSING AUTHORITY - COUNTY OF HUMBOLDT
Mainstream Vouchers Only
For the month of November 2021

HAP:	April	May	June	July	August	September	October	November	Total
HUD Budget Authority Income (HAP)	44,260.00	44,261.00	44,261.00						132,782.00
HUD Additional VO Funding									-
Less: HUD Recapture									-
Draw from HUD-held reserves									-
Other HAP income									-
HAP expenses						7,679.00	12,043.00	15,166.00	34,888.00
Surplus (Deficit)	44,260.00	44,261.00	44,261.00	-	-	7,679.00	12,043.00	15,166.00	167,670.00
% Total income utiliized	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	26.27%
% Budget Authority utilized	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	26.27%
# of Households Assisted						15	18	24	57
Average HAP Payment						511.93	669.06	631.92	612.07
ADMIN & OPERATIONS (per G/L):									
Administrative Fee income (HUD)									-
HUD Additional AF Funding									-
Other Admin income									-
Port-in HAP income									-
Port-in HAP expense									-
Operating expenses				38.30		3,500.00	5,457.56	2,459.07	11,454.93
Surplus (Deficit)	-	-	-	38.30	-	3,500.00	5,457.56	2,459.07	11,454.93
Remaining HAP Cash	44,260.00	88,521.00	132,782.00	132,782.00	132,782.00	127,368.00	113,372.00	97,966.00	
Remaining Non-HAP Cash				(38.30)	(38.30)	(38.30)	(472.32)	(1,308.77)	
Total Mainstream Voucher Cash	44,260.00	88,521.00	132,782.00	132,743.70	132,743.70	127,329.70	112,899.68	96,657.23	
Cash Increase/(Decrease)	44,260.00	44,261.00	44,261.00	(38.30)	-	(5,414.00)	(14,430.02)	(16,242.45)	
				A	B	C	C	C	

A Negative cash due to timing difference of program start and receiving administrative funds based on lease-ups.

B No change in cash from prior month due to timing of lease-ups. MSV lease-ups expected to start 09/2021.

C Cash decrease due to timing of HUD stopping MSV payments. Expecting cash to increase when payments continue in 2022.

HOUSING AUTHORITY - COUNTY OF HUMBOLDT
Emergency Housing Vouchers Only
For the month of November 2021

HAP:	July	August	September	October	November	Total
HUD Budget Authority Income (HAP)	104,554.00	104,554.00	104,554.00	104,554.00	104,554.00	522,770.00
HUD Additional VO Funding						
Less: HUD Recapture						
Draw from HUD-held reserves						
Other HAP income						
HAP expenses	-	-	-	-	-	-
Surplus (Deficit)	104,554.00	104,554.00	104,554.00	104,554.00	104,554.00	522,770.00
% Total income utiliized	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
% Budget Authority utilized	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
# of Households Assisted						
Average HAP Payment						
ADMIN & OPERATIONS (per G/L):						
Administrative Fee income (HUD)	16,431.00	16,431.00	16,431.00	16,431.00		65,724.00
HUD Additional AF Funding						
Other Admin income	83.98	316.18	6,301.10	6,300.25	6,139.74	19,141.25
Port-in HAP income						
Port-in HAP expense						
Operating expenses	83.98		6,301.10	6,300.25	6,179.84	18,865.17
Surplus (Deficit)	16,598.96	16,747.18	29,033.20	29,031.50	12,319.58	103,730.42
Remaining HAP Cash	104,554.00	209,108.00	313,662.00	418,216.00	522,770.00	
Remaining Non-HAP Cash	407,647.02	423,761.84	434,037.55	444,325.95	437,882.75	
Total Emergency Housing Voucher Cash	512,201.02	632,869.84	747,699.55	862,541.95	960,652.75	
Cash Increase/(Decrease)	512,201.02 A	120,668.82 B	114,829.71 B	114,842.40 B	98,110.80 B	

A Initial funding to start program

B Increase due to timing of receiving funding before initial lease-ups.

HOUSING AUTHORITY - COUNTY OF HUMBOLDT
For the month of November 2021

Section 8 Program
County of Humboldt

Housing Assistance Payments

Month	Income	Expense**	% Expended
January	$ 480,062.50	$ (478,489.00)	99.67%
February	482,141.00	(477,686.00)	99.08%
March	489,957.00	(475,909.00)	97.13%
April	490,052.53	(476,341.00)	97.20%
May	463,761.83	(475,782.00)	102.59%
June	488,563.00	(475,507.00)	97.33%
July	486,163.50	(479,368.00)	98.60%
August	486,686.00	(477,214.00)	98.05%
September	485,708.00	(477,686.00)	98.35%
October	486,934.50	(480,688.00)	98.72%
November	426,745.50	(483,032.00)	113.19%
Year to Date Total	**$ 5,266,775.36**	**$ (5,257,702.00)**	**99.83%**

Administrative and Operating Expenses

Month	Income	Expense	% Expended
January	$ 60,300.96	$ (53,313.64)	88.41%
February	61,402.92	(55,747.98)	90.79%
March	91,045.13	(63,285.28)	69.51%
April	74,756.65	(55,715.64)	74.53%
May	64,289.28	(79,701.64)	123.97%
June	63,094.80	(55,260.44)	87.58%
July	66,004.93	(93,736.87)	142.01%
August	63,929.83	(60,467.23)	94.58%
September	67,055.36	(59,046.63)	88.06%
October	64,420.39	(70,543.29)	109.50%
November	52,086.11	(62,650.16)	120.28%
Year to Date Total	**$ 728,386.36**	**$ (709,468.80)**	**97.40%**

Households Served

Month	Number of Households Leased		Average Housing Assistance Payment
January	883		$ 541.89
February	876		545.30
March	875		543.90
April	874		545.01
May	872		545.62
June	868		547.82
July	866		553.54
August	865		551.69
September	865		552.24
October	863		557.00
November	866		557.77

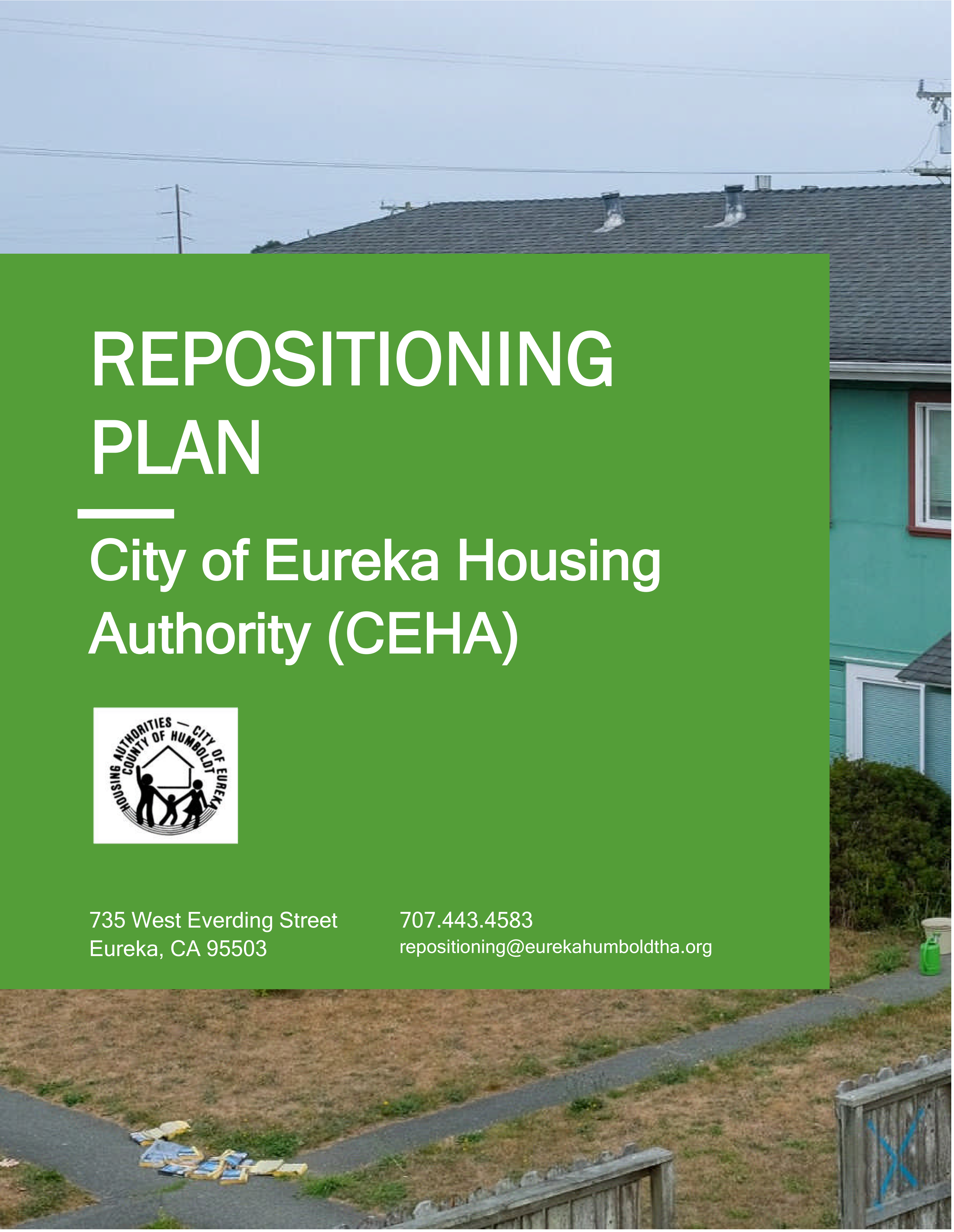
** Note that prior month HAP expenses/counts are subject to revision based on periodic retroactive adjustments.

Housing Choice Vouchers	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
January	945	966	939	918	888	931	985	913	889	917	918	903	882	866	883
February	935	960	936	911	884	933	983	906	901	921	919	898	894	867	876
March	921	953	940	910	881	944	977	899	908	923	918	896	897	861	875
April	927	953	935	909	883	945	979	896	920	928	919	908	895	859	874
May	929	930	932	903	907	949	977	890	920	927	917	905	895	850	872
June	929	911	935	895	892	944	976	890	922	930	914	898	892	853	868
July	937	922	936	885	900	940	969	891	929	924	919	895	882	873	866
August	969	923	931	880	902	938	962	891	929	923	917	888	879	872	865
September	967	924	926	884	903	944	956	896	931	927	913	888	872	883	865
October	971	937	923	880	898	953	946	897	918	934	906	888	866	888	863
November	979	934	917	879	912	968	939	900	913	928	903	887	881	890	866
December	995	940	919	885	922	973	927	890	910	925	902	882	877	887	
Average	**950**	**938**	**931**	**895**	**898**	**947**	**965**	**897**	**916**	**926**	**914**	**895**	**884**	**871**	**870**
UML's	11,404	11,253	11,169	10,739	10,772	11,362	11,576	10,759	10,990	11,107	10,965	10,736	10,612	10,449	9,573

Mainstream Vouchers															2021
January															
February															
March															
April															
May															
June															
July															
August															
September															15
October															18
November															24
December															
Average															**19**
UML's															57

Emergency Housing Vouchers															2021
January															
February															
March															
April															
May															
June															
July															
August															
September															
October															
November															
December															
Average															
UML's															

Total All Voucher Programs	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
January	945	966	939	918	888	931	985	913	889	917	918	903	882	866	883
February	935	960	936	911	884	933	983	906	901	921	919	898	894	867	876
March	921	953	940	910	881	944	977	899	908	923	918	896	897	861	875
April	927	953	935	909	883	945	979	896	920	928	919	908	895	859	874
May	929	930	932	903	907	949	977	890	920	927	917	905	895	850	872
June	929	911	935	895	892	944	976	890	922	930	914	898	892	853	868
July	937	922	936	885	900	940	969	891	929	924	919	895	882	873	866
August	969	923	931	880	902	938	962	891	929	923	917	888	879	872	865
September	967	924	926	884	903	944	956	896	931	927	913	888	872	883	880
October	971	937	923	880	898	953	946	897	918	934	906	888	866	888	881
November	979	934	917	879	912	968	939	900	913	928	903	887	881	890	890
December	995	940	919	885	922	973	927	890	910	925	902	882	877	887	
Average	**950**	**938**	**931**	**895**	**898**	**947**	**965**	**897**	**916**	**926**	**914**	**895**	**884**	**871**	**889**
UML's	11,404	11,253	11,169	10,739	10,772	11,362	11,576	10,759	10,990	11,107	10,965	10,736	10,612	10,449	9,630



REPOSITIONING PLAN

City of Eureka Housing Authority (CEHA)

735 West Everding Street
Eureka, CA 95503

707.443.4583
repositioning@eurekahumboldtha.org

Executive Summary

Public housing authorities nationally have been working to repositioning their traditional public housing units. This effort is motivated by several factors:

1) Backlog of capital needs have outpaced the ability of public housing funding to keep pace;
2) Operating revenue form public housing is uncertain year over year, and in many instances, less than other available options;
3) Repositioning public housing can reduce or eliminate administrative requirements and generally ease burdens of operations; and
4) Unmet need for affordable housing can be addressed by redeveloping and leveraging public housing assets to provide more housing.

Repositioning means to convert properties owned and operated by public housing authorities to a Section 8 platform. This change can bring more stable and increased revenue to properties. In addition to changing the subsidy type from public housing to Section 8, repositioning can also mean recapitalizing existing properties to address physical needs, or redeveloping sites to create a net increase in units. The outcome of repositioning can include the public housing authorities maintaining ownership and control of original properties.

The City of Eureka Housing Authority (CEHA) has set out to reposition its traditional public housing. This report provides a detailed analysis of CEHA's existing condition and offers a repositioning recommendation that results in more households served and improves the physical and financial soundness of the portfolio.

CEHA is organized as a corporate and public body as defined by California law, to develop, own, and operate affordable housing. CEHA is governed by a volunteer Board of Commissioners. Relevant to CEHA's repositioning plan is the close operational arrangement with the County of Humboldt Housing Authority (CHHA) which administers a Housing Choice Voucher (Section 8) program. CEHA will work closely with CHHA through the implementation of this repositioning plan.

CEHA owns and operates 196 traditional public housing units across 12 separate properties. Among the households served, there are approximately 500 total residents. Median income of households is $17,604. Over half of the households served have incomes less than 30% of the area median income. CEHA provides a critical housing resource in the City of Eureka.

Buildings in the CEHA portfolio were constructed between 1964 and 1983. Given the age of these buildings, expected capital needs and general maintenance needs exists. Additionally, due to changes in the zoning code, there are properties with capacity for more units on the same sites. This presents an opportunity to leverage CEHA's land resources for additional units.

An evaluation of physical, financial, and social information related to the CEHA portfolio was completed to understand existing conditions and opportunities available. Details are provided in the body and attachment to this report. This quantitative analysis was used as a basis for recommendations. Additionally, CEHA sought input from community stakeholders with insight and direct experience with affordable housing in the City of Eureka.

Using information gained from analysis and community input, recommendations were developed based on the following 5 policy guidelines:

1) Continue to serve very low-income populations in these communities.
2) Increase the supply of affordable housing.
3) Maintain ownership or control of the properties.
4) Improve the physical and financial condition of the properties.
5) Partner to optimize public and private resources on behalf of the properties and our residents.

The guidelines provided priority and a basis for repositioning recommendations.

Based on this analysis, the recommendation is for CEHA to reposition the entire public housing portfolio. Implementation of this strategy would rely on a series of applications to the U.S. Department of Housing and Urban Development (HUD), seeking incremental approval for the desired project plan. The table below outlines the recommendations.

Project Order	Name	Application Type	Strategy	Application No.	Project Type	Units Existing	Units Additional	Units Future
1	1645 C Street	Section 18	Scattered Site	1	Preservation	3	0	3
2	25-1	Section 18	Obsolescence	2	Redevelop Site	96	78	174
3	Prospect Avenue	Section 18	Obsolescence	3	Redevelop Site	10	6	16
4	C & Clark	Section 18	Obsolescence	4	Redevelop Site	16	42	58
5	Buhne/Union/Summer	Section 18	Obsolescence	5	Preservation & Rehab	13	0	13
6	Spring & Garland	Section 18	Obsolescence	6	Redevelop Site	12	6	18
7	1335 B	Section 18	Very Small	7	Preservation & Rehab	5	9	14
8	2523 Albee	Section 18	Very Small	7	Preservation & Rehab	4	0	4
9	510 W. Harris	Section 18	Very Small	7	Preservation & Rehab	5	0	5
10	330 Grant Street	Section 18	Very Small	7	Preservation & Rehab	5	0	5
11	Albee & Del Norte	Section 18	Very Small	7	Preservation & Rehab	8	0	8
12	131 West Del Norte	Section 18	Very Small	7	Preservation & Rehab	19	14	33
Total						196	154	350

Using HUD's Section 18 Disposition program over a series of seven applications, CEHA will be able to maximize the revenue available to the portfolio by converting to new Section 8 vouchers for each unit and carrying out the desired physical redevelopment plan. Some of the properties don't need significant rehabilitation and/or don't offer an opportunity to increase units. These factors were used to determine which properties are best suited for Preservation or Redevelopment. Here, Preservation means to keep the existing building, convert the subsidy to Section 8, and complete a needed or desired rehabilitation. Redevelop means to relocate the existing residents, raze the buildings, and develop a new property with more units than previously on the site.

Two fundamental measurable outcomes from this recommendation are: 1) number of housing units owned and controlled by CEHA will increase from 196 units to 350 units, and 2) the weighted average rent received per unit will increase from approximately $850 per month to $1,225 per month.

A strategic goal for this repositioning plan was to find a path that would allow CEHA to fully reposition using the Section 18 repositioning tool as opposed to other available tools. Section 18 is the only tool that provides a net new Section 8 voucher for each unit repositioned. Other tools available provide an alternative subsidy, but the value is less. Achieving the new weighted average rent of $1,225 is only achievable with the Section 18 application type.

Process for implementation will be detailed in this plan. Generally, the HUD process will begin with compiling the information needed to submit application for HUD. The different Strategy types listed above come with their own application requirements. Sequence of the applications is important to the plan. Using the Strategy called Very Small requires CEHA have 50 or fewer units remaining in its traditional public housing inventory at the time of these applications. Therefore, the prior projects must be completed in order to submit these applications.

In addition to the HUD process, CEHA will implement a real estate strategy for each property. Properties involving preservation provide an opportunity for CEHA to complete the tasks needed and increase capacity. For properties involving redevelopment it is recommended CEHA seek a development partner.

CEHA is positioned to make changes to its public housing portfolio that will significantly increase the number of households served and improve the physical and financial position of the portfolio.

Section I: Introduction

Enterprise is being tasked by HUD to develop an asset repositioning strategy that fully analyzes real estate assets inclusive of a market analysis, financial resources, resident needs, organizational structure, legal implications, capacity, potential partners, etc.

Technical Assistance will be delivered remotely and on-site (as appropriate and in consideration of local COVID-19 precautions) in coordination with Housing Authority Staff, HUD Field Office Staff and other technical assistance providers/consultants.

The City of Eureka Housing Authority (CEHA) is a small PHA located in Humboldt County in Northern California. The agency is comprised of two housing authorities: The City of Eureka Housing Authority (CEHA) and the County of Humboldt Housing Authority (CHHA). CEHA owns and operates several public housing properties in the City of Eureka and the County of Humboldt Housing Authority administers assistance through the Section 8, Housing Choice Voucher (HCV) program.

Enterprise will work with the CEHA in a multi-year engagement to develop and implement a repositioning strategy that will ultimately lead to improving current properties and encourage the development of more affordable housing in the area.

The first element of the engagement included a portfolio analysis, a site visit, goal and vision setting, and a community input meeting. Based on these initial efforts, Enterprise, in partnership with CEHA and Structure Development Advisors, has developed a repositioning plan.

Section II: Overview of the City of Eureka Housing Authority (CEHA)

HISTORY

The federal Public Housing program began as a part of the United States Housing Act of 1937 (the "Act"), specifically as a mechanism for incentivizing workers for public works projects and clearing slums. It wasn't until the Housing Act of 1949 that Public Housing was expanded widespread across the country into the housing stock that we see today.

CEHA incorporated on August 6, 1946, a few years before the massive expansion in Public Housing under the Housing Act of 1949. CEHA is an independent agency, with operations separate from those of the City of Eureka. CEHA operated exclusively traditional Public Housing until the development of its first Low-Income Housing Tax Credit Project (LIHTC) in 2004. Currently the Housing Authority owns and operates several housing projects throughout the City of Eureka, including Eureka Family Housing, Eureka Senior Housing, and Public Housing Projects.

GOVERNANCE

CEHA and CHHA operate together as the Housing Authority of the City of Eureka and County of Humboldt, with two separate boards and one staff. The Board for the County Housing Authority is appointed by the Humboldt County Board of Supervisors. The Board for the City Housing Authority is appointed by the mayor of the City of Eureka and confirmed by the City Council. There are currently five (5) Commissioners for the City Housing Authority and five (5) Commissioners for the County Housing Authority.

The Eureka Housing Development Corporation (EHDC) also exists within the CEHA governing structure as a separate legal entity. EHDC remains a component of the CEHA. EHDC has provided development support primarily to CEHA and collaborated with procured developers to do rehabilitation of affordable housing properties. CEHA envisions EHDC to be CEHA's representative on all development transactions, including repositioning.

AGENCY PROFILE

CEHA currently operates with a budget of $3,528,177 and 23 full time employees (FTEs). This budget and staff lend itself to the administration of 270 units owned and operated by the housing authority through a combination of public housing developments and tax-credit properties assisted with project-based vouchers. 198 of the units are traditional public housing units, with an additional 72 LIHTC units.

CEHA Resident Demographics

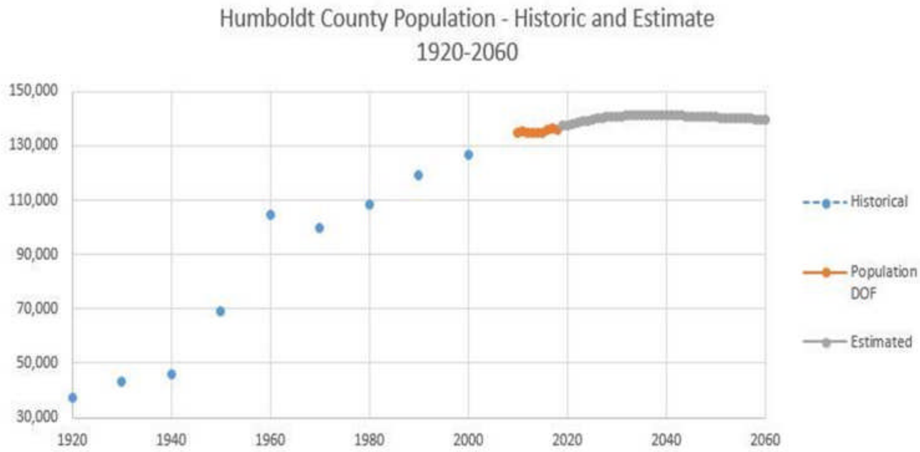
- *Residents 65 or older:* 72
- *Households with income of 30% AMI or lower:* 101
- *Households with income of 50% AMI:* 43
- *Households with income of 80% AMI:* 25
- *Over-income households:* 12
- *Disabled residents:* 140
- *Racial Demographics:*
  - *White:* 51.7%
  - *Black:* 8.4%
  - *Hispanic: 12.6%*
  - *American Indian Alaskan Native:* 12.1%
  - *Asian: 13%*
  - *Native Hawaiian/Pacific Islander: 2.2%*

Section III: Community Overview

For many years, Congress has failed to fully fund federal housing programs, including the Public Housing Capital Fund and Public Housing Operating Fund. Currently, public housing agencies (PHAs) are only receiving about 70 percent of the amount HUD has determined they need to responsibly administer the Public Housing program. This chronic underfunding has resulted in 250,000 public housing units being lost from the program, and more are disappearing each year.

Many years of insufficient program funding has created a backlog of public housing capital repair needs nationally estimated at $70 billion. Yet public housing remains a critical source of affordable, stable housing for more than 1.8 million U.S. residents — especially women, people of color and people with disabilities. Currently, a worker making the local minimum wage can afford a one-bedroom apartment at fair market rent in just 5% of U.S. counties.

Since the creation of the Housing Authorities in 1946 (CEHA) and 1970 (CHHA), the demographics, population size, economy, and social fabric of the area has changed dramatically. However, the housing stock has not been changed or revitalized since the construction of CEHA's newest property in the 1980s.



Source: https://humboldtgov.org/2448/2019-

HOUSING MARKET CONDITIONS

As the funding for public housing has stagnated, housing prices and demand in the state of California have only increased, becoming inaccessible for the nearly 6 million renter households in the state. Currently, the Fair Market Rent (FMR) for a two-bedroom apartment in California is $2,030 and in order to afford this level of rent and utilities without paying more than 30% of income on housing, a household must earn $81,191, which would equate to an hourly wage of $39.03 an hour, assuming a 40-hour work week for 52 weeks of the year.[1]

Looking at these numbers in Humboldt County specifically we see that the Fair Market Rent (FMR) for a two-bedroom apartment is a little bit lower than the statewide estimate, at $1,113. In order to afford this level of rent and utilities within the 30% of income threshold, a household must earn $44,520 a year which equates to $21.40 an hour, assuming a 40-hour work week for 52 weeks of the year. According to the U.S. Census bureau, the average yearly income in Humboldt County is $25,114.

This leaves 6,154 low-income renter households in Humboldt County without access to an affordable home and 81% of extremely low-income households paying more than half of their income on housing costs, compared to just 5% of moderate-income households.

In addition to households experiencing extreme cost-burden, Humboldt County and the City of Eureka have a higher-than-average rate of homelessness relative to other regions of the State. Specifically, in December of 2019, the County counted 1,473 homeless people, over two and a half times the state average of 410 per 100,000 people, according to the U.S. Department of Housing and Urban Development.

[1] National Low-Income Housing Coalition 2021 Out of Reach Report: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/viewer.html?pdfurl=https%3A%2F%2Fnlihc.org%2Fsites%2Fdefault%2Ffiles%2Foor%2F2021%2FOut-of-Reach_2021.pdf&clen=11916493&chunk=true

HOUSING ELEMENT

California State law requires cities and counties to have housing elements as part of their general plans. The housing element identifies existing and projected housing needs and establishes goals, policies, standards and implementation measures for the preservation, improvement, and development of housing in the unincorporated areas of the county. Both Humboldt County and the City of Eureka's Housing Elements were last updated in 2019. The planning horizon for this Element extends to 2027.

The Housing Element is designed to achieve the following objectives set forth in State law:

1. Identify adequate sites for a range of housing opportunities;
2. Assist in the development of adequate and affordable housing;
3. Address constraints to meeting the City's housing needs;
4. Conserve and improve the condition of housing; and
5. Promote housing opportunities for all persons.

In the City of Eureka, specifically, since annexation of new developable lands is not possible, and because the city is largely built-out with few undeveloped sites remaining inside the city limits, Eureka needs a new set of realistic strategies designed to overcome these challenges and to stimulate the creation of new housing units across the economic and social spectrum of the city.

This Housing Element opens a new chapter for Eureka. Through considerable analysis and community engagement, the City has developed six specific strategies to stimulate the creation of housing. These strategies are unique in that they are explicitly based on the City's existing context and designed specifically to stimulate new housing in Eureka. The six strategies are:

1. Maximize Development Potential of the Few Remaining Vacant and Underutilized Sites;
2. Accessory Dwelling Units (ADUs);
3. Internal Conversions;
4. Small-lot Subdivisions and Conservation Subdivisions;
5. Geographically Dispersed Affordable Housing Through Affordable-by-design Incentives; and
6. Local Density Bonuses.

State housing element law requires the County and other jurisdictions to meet their shares of the state prescribed regional housing need. The County does this by maintaining a residential land inventory sufficient to meet the assessed number of units (known as RHNA). The final housing allotments for Humboldt County are outlined in the chart below:

Jurisdiction	Very Low-Income Allocation	Low-Income Allocation	Moderate Income Allocation	Above Moderate-Income Allocation	Proposed Total RHNA Allocation
Arcata	142	95	111	262	610
Blue Lake	7	4	5	7	23
Eureka	231	147	172	402	952
Ferndale	9	5	6	13	33
Fortuna	73	46	51	120	290
Rio Dell	12	8	9	22	51
Trinidad	4	4	3	7	18
Unincorporated Area	351	223	256	583	1413
RHNA Targets	829	532	613	1416	3390

State housing element law requires the County and other jurisdictions to meet the state prescribed regional housing need. The County does this by maintaining a residential land inventory sufficient to meet the assessed number of units (known as RHNA). CEHA and CHHA work closely with the City and County governments and seek to develop a repositioning plan in order to contribute to the Housing Element implementation and stimulate new and improved housing in Eureka.

Section IV: Community Involvement

COMMUNITY INVOLVEMENT PLAN

(Needs input)

COMMUNITY INPUT MEETING SUMMARY

On November 11th, 2021, CEHA held its first Virtual Community Input Meeting to better understand what the community values and prioritizes as it relates to housing in Eureka and how CEHA can play a role in addressing the lack of affordable housing in the City of Eureka and Humboldt County through repositioning. The meeting was advertised to residents, advocates, City and County officials, developers, and other stakeholders through both an email listserv and direct flyer distribution to residents.

The content of the meeting covered background of the Housing Authority, current state of the Housing Authority, an overview of Repositioning, and 3 breakout rooms designed to facilitate discussion on the following topics:

- General thoughts about affordable housing in Eureka
- Concerns about affordable housing in Eureka
- Likes or dislikes about affordable housing in Eureka
- Future vision for affordable housing in Eureka
- Other suggestions

Poll questions were also dispersed throughout the meeting to identify more specific targets for housing in Eureka.

There were 27 unique attendees of the meeting, 2 of which were identified as residents. The overall sentiment amongst attendees was that although there is much to be done in terms of improving housing conditions and providing additional units for residents, people are hopeful and encouraged by the efforts of the City and County governments as well as the Housing Authorities.

To view a recording of the meeting, download a copy of the presentation, or look at the notes from the breakout discussion, follow this link: https://eurekahumboldtha.org/repositioning/.

Section V: CEHA Principles and Policy Guidelines for Repositioning

CEHA provides opportunities to people in our community who need safe, decent, and affordable housing. For over 70 years, providing housing has been a foundation for our work. Today, we have about 270 units of housing throughout the City of Eureka that provide a reliably affordable home for families, seniors, and people with disabilities.

Nearly 200 of these homes operate as Public Housing in over 12 communities throughout the city. The buildings and the affordability they offer are important resources for the people we serve. Given waning federal support, mounting capital needs, and growing demand for affordable housing, the Public Housing program itself now obstructs our ability to provide affordable housing opportunities efficiently and effectively in our community.

Given these circumstances, it is in the best interest of the residents, the properties and CEHA to pursue a repositioning strategy to convert all our public housing to Section 8 project based rental assistance. Section 8 provides more stable and higher operating funding and allows CEHA to use a conventional real estate model to operate and enhance the portfolio of housing.

The process to repositioning public housing has evolved over years. Increased need for affordable housing and the prospect of increased financial viability have made this an imperative for CEHA.

CEHA Vision Statement

Support the lives of those facing housing challenges.

Enhance the City of Eureka by advocating and acting to promote quality affordable housing.

POLICY GUIDELINES FOR REPOSITIONING

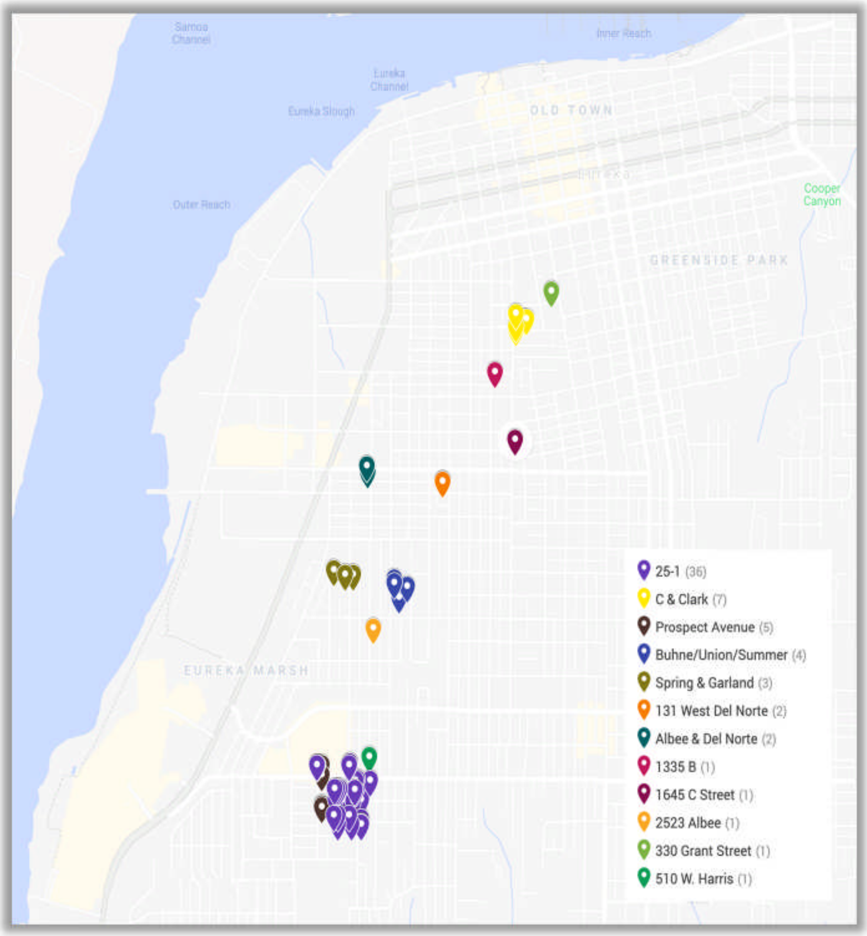
1) Continue to serve very low-income populations in these communities.
2) Increase the supply of affordable housing.
3) Maintain ownership or control of the properties.
4) Improve the physical and financial condition of the properties.
5) Partner to optimize public and private resources on behalf of the properties and our residents.

DIVERSITY, EQUITY, AND INCLUSION

CEHA believes that equity is critical to providing access to affordable housing for residents in Eureka. Valuing diversity, equity and inclusion needs to live in our approach to creating and offering housing. CEHA recognizes the historical patterns that can create injustice and inequity in housing. Addressing these systematic social and economic patterns requires a broader and deeper organizational commitment.

CEHA is committed to understanding and addressing the patterns of inequity and injustice in our community. We have begun to create an organizational approach to diversity, equity, and inclusion. As our public housing repositioning is implemented, like other efforts, it will reflect our commitment to equity values.

Section VI: Portfolio Analysis



PORTFOLIO OVERVIEW

CEHA public housing portfolio is a reflection of two distinct periods of federal public housing development. The first occurred in the late 1940s to early 1960s and reflects the period of post-World War II era housing spurred by the Housing Act of 1949. The second occurred in the 1970s and 1980s and is reflective of smaller scale, scattered site projects.

Today, CEHA's portfolio includes 196 traditional public housing units in twelve properties. All units are in a single AMP (CA025000001). Nearly half of CEHA's apartments are within a single development constructed in the early 1950s. The other half were developed over the next three decades.

DOFA Year	Units
1952	96
1964	60
1982	21
1983	19

The properties are generally aligned along the western edge of Eureka's residential districts in land zoned R2 and R3. Buildings are either one or two stories with a wood frame structure. Construction type, site development and building condition reflect their age.

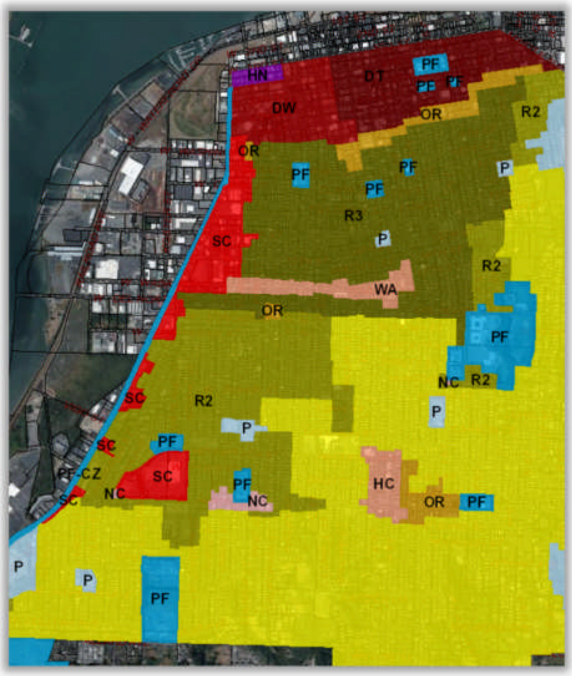
The portfolio consists of 1-, 2-,3-, and 4-bedroom units. Units are both flats and townhouse style. Units exit directly outside.

Name	SRO	1BR	2BR	3BR	4BR	5BR	6BR	Total
25-1	0	24	42	22	8	0	0	96
Prospect Avenue	0	0	2	4	4	0	0	10
C & Clark	0	10	6	0	0	0	0	16
Buhne/Union/Summer	0	0	10	3	0	0	0	13
Spring & Garland	0	0	5	7	0	0	0	12
1335 B	0	0	3	2	0	0	0	5
2523 Albee	0	0	2	2	0	0	0	4
1645 C Street	0	0	2	1	0	0	0	3
510 W. Harris	0	0	4	1	0	0	0	5
330 Grant Street	0	0	4	1	0	0	0	5
Albee & Del Norte	0	0	4	4	0	0	0	8
131 West Del Norte	0	0	19	0	0	0	0	19
Total	0	34	103	47	12	0	0	196
Percent of Total	0%	17%	53%	24%	6%	0%	0%	100%

REGULATORY OVERVIEW OF PORTFOLIO

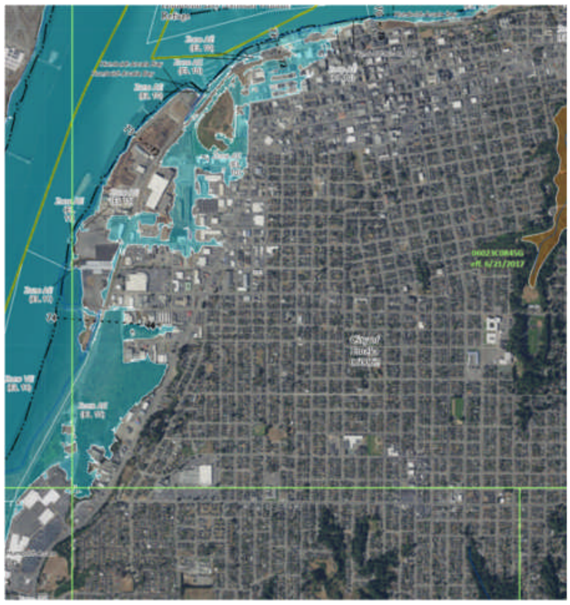
Zoning

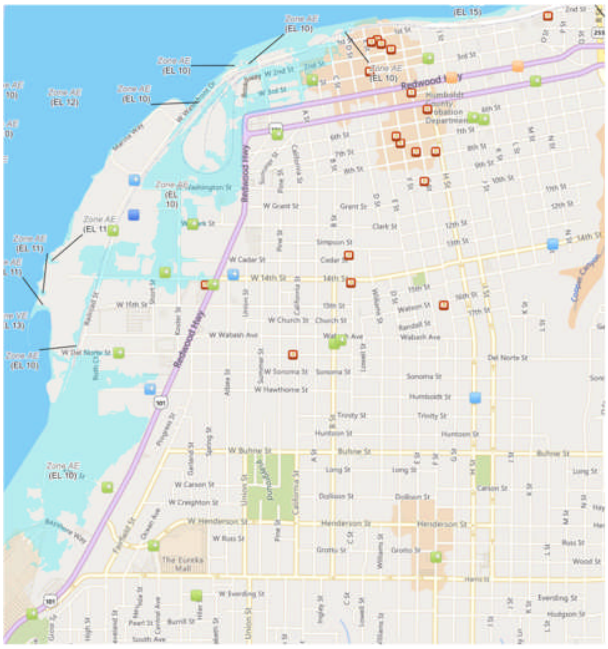
CEHA properties are located in either R2 or R3 zones. Additional information about development capacity is contained in the property level analysis.



Flood Plain

No properties are in flood hazard areas.



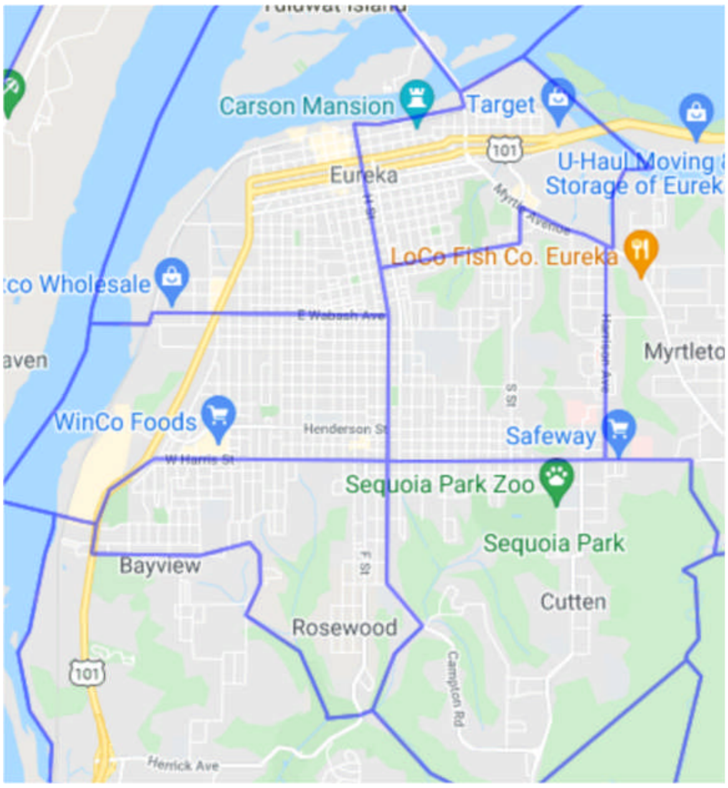


National Environmental Policy Act (NEPA), Part 58 Review

The Environmental Protection Agency (EPA) NEPAssist website did not reveal any hazardous elements likely to be discovered during a Part 58 Environmental Review.

Minority Concentration Census Tracts

There are no minority concentration census tracts in the City of Eureka.



PHA ANNUAL PLAN

CEHA's 5-Year and Annual Plan include an intent to explore repositioning and a desire to pursue RAD, Section 18 or Section 22 as methods for repositioning. The Annual Plan will need to be updated to include the specific repositioning tools intended for specific projects. Intended tools can be listed in the alterative to allow for flexibility should a desired change present after the plan approval.

PORTFOLIO-LEVEL ANALYSIS

1) 25-1

1) Aerial photo: *insert*
2) Street level photo: *insert*
3) Bedroom mix and rent table:

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	10	24	$71.92	$597	$790	$869	$948	$1,185
2BRD	63	42	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	25	22	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	4	8	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		96	$71.92	$848	$1,151	$1,266	$1,381	$1,726

4) Building & Site Information
   a. Address: 3107 Prospect Avenue
   b. City/state/zip: Eureka, CA 95501
   c. Census Tract: 6023000100
   d. Building age: 70 years
   e. QCT: Yes
   f. Opportunity Zone: Yes
   g. Minority Census Tract: No
   h. Lot size: 343,688 sf / 7.89 acres
   i. Zoning: R2
   j. District: 14
   k. APN: 009-074-001, 009-073-001, 009-075-001, 009-072-001

5) Physical description:
The building and property within 25-1 appear to be in satisfactory condition for their age, original construction type, and historical funding trends in public housing. 25-1 is largest of all CEHA properties, containing 39 residential buildings (two of which have non-residential uses), an administrative building and a maintenance building sited within five parcels on five separated city blocks.

Buildings are one- and two-story wood frame construction with gable roofs. Foundations are slab on grade. Water distribution and waste lines are contained within the poured slab foundation. Staff reports there is asbestos in the floor mastic and wall compound.

Due to the size of the development and site design, there is considerable landscaping and open space. Additionally, there is no intentional design to the system for trash disposal, which results in most tenants leaving their individual trash reception on the street week over week. Copious amount of fencing is used to define the edge or boundary of the site and create private or semi-private space within the site for residents. These design factors drive up landscape maintenance expense, contribute to nuisance activities within indefensible space, and result in negative public perception due to general appearance of the site.

The overall site is flat and lacks any natural features that would impact operations of development of site. Water and sanitary service are available to the site. Information about the capacity of the system for additional conveyance or service is not available.

In 2020, CEHA contracted with Bureau Veritas (fka EMG) to complete a Physical Needs Assessment. On site investigation occurred from January 14 to 17, 2020, and the final report is dated August 5, 2020. The report is comprehensive in its scope of review. As of the final report, Bureau concluded needs totaling $16,325,417 through 2024. These costs do not appear to include general conditions, Builder Profit, Architectural or PHA Administrative Costs. Assuming correct, these costs would be additive.

6) Total Development Cost / Housing Construction Cost analysis:
Several HUD Repositioning tools rely upon Total Development Cost (TDC) or Housing Construction Cost (HCC) to determine eligibility. The tables below illustrate the TDC and HCC amounts for 25-1. Because 25-1 includes multiple building types as defined by HUD, the per unit amounts shown are weighted averages based on the mix of units and building types. The 2021 TDC for 25-1 is $30,620,517. At 57.14%, the Obsolescence threshold amount is $17,496,558.

Section 18 Analysis

Size	Override Unit	Units	2020 Limits HCC	TDC		Unit Dist - Blend RAD	Section 18	Total
0BRD	0	0	$121,118	$211,956		0	0	0
1BRD	10	24	$154,899	$271,074	*WAVG Bldg Type*	19	5	24.1
2BRD	63	42	$175,838	$307,716	*WAVG Bldg Type*	34	8	42
3BRD	25	22	$201,666	$352,915	*WAVG Bldg Type*	18	4	22
4BRD	4	8	$244,753	$428,318	*WAVG Bldg Type*	6	2	8
5BRD	0	0	$287,862	$503,758		0	0	0
6BRD	0	0	$311,468	$545,070		0	0	0
Total		96	$17,497,432	$30,620,507		77	19	96.1
						80%	20%	100%

TDC / HCC Thresholds

Obsolescence		57.14%	of TDC	$17,496,558	or $182,256 / U	0%	100%
Const Blend	> 30%	30.00%	of HCC	$5,249,230	or $54,679 / U	80%	20%
Const Blend	> 60%	60.00%	of HCC	$10,498,459	or $109,359 / U	60%	40%
Const Blend	> 90%	90.00%	of HCC	$15,747,689	or $164,038 / U	40%	60%
Const Blend	> 90% high $	90.00%	of HCC	$15,747,689	or $164,038 / U	20%	80%

Using the Bureau Veritas capital needs value through 2024, and applying the allowable load factors for General Conditions (5%), Buildings Profit (10%), Architectural (7%), and PHA Administration (2%), the gross capital needs for 25-1 is projected to be $20,242,277 or 66.10% of the TDC.

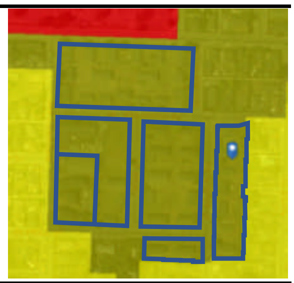
7) Development capacity analysis:
25-1 is entirely located in a Residential Medium (R2) Zone. R2 permits development density of 22 dwelling units per acre. Additional development standards including Floor Area Ratio (FAR), building height, and building setback further define the development capacity of a site.

For purpose of this repositioning plan, a development capacity analysis was completed to determine if the underlying zone would allow for more units than currently exist on the site. This capacity analysis mathematically test fit units based on development standards. Gross Square Footage (GSF) was determined using a bedroom mix, unit square footage, and a building efficiency factor. Detail supporting this analysis can be found in Appendix XX.

Since 25-1 and Prospect Avenue share a city block, this analysis combined these properties to consider future development capacity. In the aggregate, 25-1 and Prospect Avenue can yield approximately 83 additional housing units on the same land under a redevelopment scenario. Five of the six parcels possess demonstrably more unit capacity than exists. The smallest southerly lot, APN 009-076-001 could only yield one additional unit.

Total: 25-1 & Prospect Avenue

Size	%	#	NSF Target	Total NSF	GSF 0.75 Eff	# of Stories 3
0 BRD	0%	0	410 SF	SF	SF	
1 BRD	186%	80	600 SF	48,000 SF	64,000 SF	
2BRD	216%	93	860 SF	79,980 SF	106,640 SF	
3BRD	37%	16	1,145 SF	18,320 SF	24,427 SF	
4 BRD	0	0	SF	SF	SF	
TOTALS	440%	189	774 SF	146,300 SF	195,067 SF	65,022 SF



Information		
APN		
Zoning	R2	
District	14	
Acres	8.61	7.89
SF	375,052	343,688
Existing Units	106	

Standards		Calcs
Density	22 units/acre	189 units
FAR	1.00	375,052
Site Coverage	70%	262,536
Height	35 ft.	3 stories

Program			
0 BRD	0		
1 BRD	80		
2BRD	93		
3BRD	16		
4 BRD	0		
Total	189	Existing Units	106
		Net Change	83

8) Economic analysis:
A fundamental consideration for public housing repositioning is how to maximize property revenue post conversion. The two bases for consideration are RAD rents and Fair Market Rents (FMR). RAD rents are available through a RAD repositioning. FMR is the basis for determining property revenue when using Section 18 Disposition.

The table below reflects a comparison of 2022 RAD rents and 2022 FMRs available to CEHA. Both RAD rents and FMR figures reflect the net revenue to a project.
[need to settle on how much description of rent setting should be in this document. And how the implication of FMR rents to a redevelopment scenario work].

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	10	24	$71.92	$597	$790	$869	$948	$1,185
2BRD	63	42	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	25	22	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	4	8	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		96	$71.92	$848	$1,151	$1,266	$1,381	$1,726

FMR based rents for 25-1 are significantly higher than RAD rents. FMR weighted average rents for the property bedroom mix are 36% higher than RAD rents ($1,151 versus $848). This difference across the current 96 units for one-year totals $348,862.

9) Discussion of development opportunity:
25-1 is the older and largest property in CEHA's portfolio. Capital needs are conservatively projected to be over $28.0M within the next several years. This amount exceeds the Obsolescence threshold criteria for Section 18 Disposition.

The original site plan contributes to high costs. Landscape and grounds maintenance is high due to the amount of open space. The ratio of units to buildings (106 units in 25-1 and

Prospect within in 42 residential buildings) results in a high proportion of roof and exterior facades to maintain.

Current zoning allows for 22 units per acre. The current development is at 12 units per acre. An additional 83 units is achievable on this site.

Under a FMR based revenue scenario, the 106 residential units in 25-1 and Prospect Avenue would be approximately $404,203 higher per year than a RAD revenue scenario.

Buildings in 25-1 are greater than 50 years old. This will cause a Section 106 review under the National Historic Preservation Act by California Office of Historic Preservation. The buildings in 25-1 do not appear to have historic significance besides age.

10) Repositioning Tool Analysis:
HUD offers a variety of repositioning tools that convert traditional public housing to the Section 8 platform. These tools include RAD, RAD / Section 18 Blends, Section 18, and Section 22 Streamline Voluntary Conversion. Each tool has its own eligibility criteria and resulting rent structure post conversion to Section 8.

Identifying the optimal tool for CEHA begins with determining eligibility. The table below reflect eligibility by repositioning tool and option. Information in the 2020 physical needs assessment completed by Bureau Veritas is used to conclude conditional eligibility.

Public Housing Repositioning Tool: Option Eligibility

Type	Eligibility	Threshold	Note
RAD			
PBV	Yes	na	Available by right to PHA
PBRA	Yes	na	Available by right to PHA
PBRA Rent Boost	Yes	Located in OZ	Project is not in an Opportunity Zone
Streamline	No	50 units	Not less than 50 units
RAD / Section 18 Blends			
Const Blend > 30%	Conditional	$5,249,230	Project meets Threshold based on Bureau Vista report.
Const Blend > 60%	Conditional	$10,498,459	Project meets Threshold based on Bureau Vista report.
Const Blend > 90%	Conditional	$15,747,689	Project meets Threshold based on Bureau Vista report.
Const Blend > 90% High Cost	No		Project is not in a HUD deteremied "high cost" area.
Small PHA	Conditional	<= 250 units	PHA must have 250 or fewer units remaining in PIC at time of application.
Very Small PHA	No	<= 50 units	Project exceeds 50 units.
Section 18			
Obsolescence	Conditional	$17,496,558	Project meets Threshold based on Bureau Vista report.
Scattered Site	No	<= 4 units / lot	Project is not "scattered site."
Health & Safety	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Infeasible Opereations	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Section 22			
SVC	Yes	<=250 units	CEHA has less than 250 units in PIC.

2) Prospect Avenue

1) Aerial photo: *insert*
2) Street level photo: *insert*
3) Bedroom mix and rent table:

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2021	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$495	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$577	$790	$869	$948	$1,185
2BRD	103	2	$71.92	$744	$1,040	$1,144	$1,248	$1,560
3BRD	43	4	$71.92	$1,064	$1,508	$1,659	$1,810	$2,262
4BRD	8	4	$71.92	$1,270	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,270	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,270	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		10	$71.92	$1,083	$1,544	$1,266	$1,381	$1,726

4) Building & Site Information
   a. Address: 3229 Prospect Avenue
   b. City/state/zip: Eureka, CA 95501
   c. Census Tract: 6023000100
   d. Building age: 58 years
   e. QCT: Yes
   f. Opportunity Zone: Yes
   g. Minority Census Tract: No
   h. Lot size: 31,363 sf / 0.72 acres
   i. Zoning: R2
   j. District: 14
   k. APN: 009-083-001, 009-083-002, 009-083-003

5) Physical description:

The building and property within Prospect Avenue appear to be in satisfactory condition for their age, original construction type, and historical funding trends in public housing. Prospect Avenue was construction adjacent and to be a part of 25-1. By appearance and operation, they function as a single site.

Prospect Avenue contains 3 residential buildings totaling 10 units. They are sited on three separate parcels on a city block also containing units from 25-1, the CEHA administrative office and maintenance facility.

Buildings are two story wood frame construction with a gable roof. Foundations are slab on grade. The buildings were constructed in 1964, making them 58 years old. This site includes off-street parking and a drive aisle shared with CEHA's maintenance facility.

The overall site is flat and lacks any natural features that would impact operations of development of site. Water and sanitary service are available to the site. Information about the capacity of the system for additional conveyance or service is not available.

As with 25-1, but proportional to the size of this site, there is ample landscaping and open space. Unlike 25-1, the edge of Prospect Avenue includes a privacy fence. Backyards face the street and front doors are interior to the site off the central parking. This creates private space for residents, aids in management of the site, and lends to the site feeling disconnected from the neighborhood.

In 2020, CEHA contracted with Bureau Veritas (fka EMG) to complete a Physical Needs Assessment. On-site investigation occurred from January 14 to 17, 2020, and the final report is dated August 5, 2020. The report is comprehensive in its scope of review. As of the final report, Bureau concluded needs totaling $2,413,529 through 2024. These costs do not appear to include general conditions, Builder Profit, Architectural or PHA Administrative Costs. Assuming correct, these costs would be additive.

6) Total Development Cost / Housing Construction Cost analysis:
Several HUD Repositioning tools rely upon Total Development Cost (TDC) or Housing Construction Cost (HCC) to determine eligibility. The tables below illustrate the TDC and HCC amounts for Prospect Avenue. The 2021 TDC is $3,662,404. At 57.14%, the Obsolescence threshold amount is $2,092,698.

Section 18 Analysis

Size	Override Unit	Units	HCC	TDC	Unit Dist - Blend RAD	Unit Dist - Blend Section 18	Unit Dist - Blend Total
0BRD	0	0	$104,865	$183,514	0	0	0
1BRD	34	0	$136,735	$239,286	0	0	0
2BRD	103	2	$165,504	$289,632	2	0	2
3BRD	43	4	$201,666	$352,915	3	1	4
4BRD	8	4	$238,783	$417,870	3	1	4
5BRD	0	0	$262,812	$459,920	0	0	0
6BRD	0	0	$285,060	$498,856	0	0	0
Total		10	$2,092,802	$3,662,404	8	2	10
					80%	20%	100%

TDC / HCC Thresholds

Threshold		Percent	Basis	Amount	Per Unit	RAD	Section 18
Obsolescence		57.14%	of TDC	$2,092,698	or $209,270 / U	0%	100%
Const Blend	> 30%	30.00%	of HCC	$627,841	or $62,784 / U	80%	20%
Const Blend	> 60%	60.00%	of HCC	$1,255,681	or $125,568 / U	60%	40%
Const Blend	> 90%	90.00%	of HCC	$1,883,522	or $188,352 / U	40%	60%
Const Blend	> 90% high $	90.00%	of HCC	$1,883,522	or $188,352 / U	20%	80%

Using the Bureau Veritas capital needs value through 2024 and applying the allowable load factors for General Conditions (5%), Buildings Profit (10%), Architectural (7%), and PHA Administration (2%), the gross capital needs for Prospect Avenue is projected to be $2,992,776 or 81.72% of the TDC.

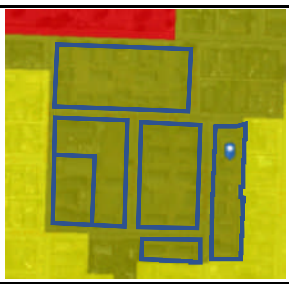
7) Development capacity analysis:
Prospect Avenue is entirely located in a Residential Medium (R2) Zone. R2 permits development density of 22 dwelling units per acre. Additional development standards including Floor Area Ratio (FAR), building height, and building setback further define the development capacity of a site.

For purpose of this repositioning plan, a development capacity analysis was completed to determine if the underlying zone would allow for more units than currently exist on the site. This capacity analysis mathematically test fit units based on development standards. Gross Square Footage (GSF) was determined using a bedroom mix, unit square footage, and a building efficiency factor. Detail supporting this analysis can be found in Appendix XX.

Since 25-1 and Prospect Avenue share a city block, this analysis combined these properties to consider future development capacity. In the aggregate, 25-1 and Prospect Avenue can yield approximately 83 additional housing units on the same land under a redevelopment scenario. Five of the six parcels possess demonstrably more unit capacity than exists. The smallest southerly lot, APN 009-076-001, could only yield one additional unit.

Total: 25-1 & Prospect Avenue

			NSF		GSF	# of Stories
Size	%	#	Target	Total NSF	0.75 Eff	3
0 BRD	0%	0	410 SF	SF	SF	
1 BRD	186%	80	600 SF	48,000 SF	64,000 SF	
2BRD	216%	93	860 SF	79,980 SF	106,640 SF	
3BRD	37%	16	1,145 SF	18,320 SF	24,427 SF	
4 BRD	0	0	SF	SF	SF	
TOTALS	440%	189	774 SF	146,300 SF	195,067 SF	65,022 SF



Information		
APN		
Zoning	R2	
District	14	
Acres	8.61	7.89
SF	375,052	343,688
Existing Units	106	

Standards		Calcs
Density	22 units/acre	189 units
FAR	1.00	375,052
Site Coverage	70%	262,536
Height	35 ft.	3 stories

Program			
0 BRD	0		
1 BRD	80		
2BRD	93		
3BRD	16		
4 BRD	0		
Total	189	Existing Units	106
		Net Change	83

8) Economic analysis:
A fundamental consideration for public housing repositioning is how to maximize property revenue post conversion. The two bases for consideration of RAD rents and Fair Market Rents (FMR). RAD rents are available through a RAD repositioning. FMR is the basis for determining property revenue when using Section 18 Disposition.

The table below reflects a comparison of 2022 RAD rents and 2022 FMR for available to CEHA. Both RAD rents and FMRs figures reflect the net revenue to a project.
[need to settle on how much description of rent setting should be in this document. And how the implication of FMR rents to a redevelopment scenario work].

Property Units & Rents

	Override	Existing		2020 RAD Rent	2022 FMR-UA			
Size	Unit	Units	Utility Allowance*	OCAF'd 2021	100%	110%	120%	150%
0BRD	0	0	$71.92	$495	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$577	$790	$869	$948	$1,185
2BRD	103	2	$71.92	$744	$1,040	$1,144	$1,248	$1,560
3BRD	43	4	$71.92	$1,064	$1,508	$1,659	$1,810	$2,262
4BRD	8	4	$71.92	$1,270	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,270	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,270	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		10	$71.92	$1,083	$1,544	$1,266	$1,381	$1,726

FMR based rents for Prospect Avenue are significantly higher than RAD rents. FMR weighted average rents for the property bedroom mix are 43% higher than RAD rents ($1,544 versus $1,083). This difference across 10 units for one-year totals $55,340.

9) Discussion of development opportunity:
Prospect Avenue was developed in the early 1960s and sits among the building and land part of 25-1. Capital needs are conservatively projected to be over $2.9MM within the next several years. This amount exceeds the Obsolescence threshold criteria for Section 18 Disposition.

The site's connection with the larger 25-1 suggests planning for the two properties occur in tandem. Additionally, the CEHA's continuity of operations relates to planning for the Prospect Avenue.

Current zoning allows for 22 units per acres. The current development is at 13 units per acres. There is an additional 5 units available on these three parcels, and when considered as part of a larger with 25-1, development options become greater.

Under a FMR based revenue scenario, the 106 residential units in 25-1 and Prospect Avenue would be approximately $404,203 higher per year than a RAD revenue scenario.

Buildings in Prospect Avenue are greater than 50 years old. This will cause a Section 106 review under the National Historic Preservation Act by California Office of Historic Preservation. The buildings in Prospect Avenue do not appear to have historic significance besides age.

10) Repositioning Tool Analysis:
HUD offers a variety of repositioning tools that convert traditional public housing to the Section 8 platform. These tools include RAD, RAD / Section 18 Blends, Section 18, and Section 22 Streamline Voluntary Conversion. Each tool has its own eligibility criteria and resulting rent structure post conversion to Section 8.

Identifying the optimal tool for CEHA begins with determining eligibility. The table below reflects eligibility by repositioning tool and option. Information in the 2020 physical needs assessment completed by Bureau Veritas is used to conclude conditional eligibility.

Public Housing Repositioning Tool: Option Eligibility

Type	Eligibility	Threshold	Note
RAD			
PBV	Yes	na	Available by right to PHA
PBRA	Yes	na	Available by right to PHA
PBRA Rent Boost	No	Located in OZ	Project is not in an Opportunity Zone
Streamline	No	50 units	Not less than 50 units
RAD / Section 18 Blends			
Const Blend > 30%	Conditional	$627,841	Project meets Threshold based on Bureau Vista report.
Const Blend > 60%	Conditional	$1,255,681	Project meets Threshold based on Bureau Vista report.
Const Blend > 90%	Conditional	$1,883,522	Project meets Threshold based on Bureau Vista report.
Const Blend > 90% High Cost	No		Project is not in a HUD deteremied "high cost" area.
Small PHA	Conditional	<= 250 units	PHA must have 250 or fewer units remaining in PIC at time of application.
Very Small PHA	Conditional	<= 50 units	PHA must have 50 or fewer units remaining in PIC at time of application.
Section 18			
Obsolescence	Conditional	$2,092,698	Project meets Threshold based on Bureau Vista report.
Scattered Site	No	<= 4 units / lot	Project is not "scattered site."
Health & Safety	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Infeasible Opereations	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Section 22			
SVC	Yes	<=250 units	CEHA has less than 250 units in PIC.

3) C & Clark

1) Aerial photo: *insert*
2) Street level photo: *insert*
3) Bedroom mix and rent table:

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	24	10	$71.92	$597	$790	$869	$948	$1,185
2BRD	99	6	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	47	0	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		16	$71.92	$662	$884	$1,266	$1,381	$1,726

4) Building & Site Information
   a. Address: 1115 C Street
   b. City/state/zip: Eureka, CA 95501
   c. Census Tract: 6023000100
   d. Building age: 58 years
   e. QCT: Yes
   f. Opportunity Zone: Yes
   g. Minority Census Tract: No
   h. Lot size: 43,996 sf / 1.01 acres
   i. Zoning: R2
   j. District: 14
   k. APN: 004-163-001, 004-163-019.

5) Physical description:

The building and property within C & Clark are located on C Street between Clark Street and Hillsdale Street. The buildings and land exist on two parcels bisected by a public right of way alley. The alley runs the length of the block from C Street to E Street. Head in parking exists for the project off the alley.

The overall site is flat and lacks any natural features that would impact operations of development of site. Water and sanitary service are available to the site. Information about the capacity of the system for additional conveyance or service is not available

There are seven buildings on the site containing 16 units. Buildings are generally oriented inward toward the centrally located parking and private outdoor space. Buildings appear to be in satisfactory condition for their age, original construction type, and historical funding trends in public housing.

Buildings are one- and two-story wood frame construction with a gable roof. Foundation are slab on grade. The buildings were constructed in 1964 making them 58 years old.
In 2020, CEHA contracted with Bureau Veritas (fka EMG) to complete a Physical Needs Assessment. On site investigation occurred from January 14 to 17, 2020, and the final report is dated August 5, 2020. The report is comprehensive in its scope of review. As of the final report, Bureau concluded needs totaling $2,126,273 through 2024. These costs do not appear to include general conditions, Builder Profit, Architectural or PHA Administrative Costs. Assuming correct, these costs would be additive.

6) Total Development Cost / Housing Construction Cost analysis:
Several HUD Repositioning tools rely upon Total Development Cost (TDC) or Housing Construction Cost (HCC) to determine eligibility. The tables below illustrate the TDC and HCC amounts for Prospect Avenue. The 2021 TDC is $4,477,427. At 57.14%, the Obsolescence threshold amount is $2,558,402.

Section 18 Analysis

Size	Override Unit	Units	HCC	TDC		Unit Dist - Blend RAD	Section 18	Total
0BRD	0	0	$121,118	$211,956		0	0	0
1BRD	24	10	$156,551	$273,964	*WAVG Bldg Type*	8	2	10
2BRD	99	6	$165,504	$289,632	*WAVG Bldg Type*	5	1	6
3BRD	47	0	$223,042	$390,324		0	0	0
4BRD	12	0	$262,665	$459,663		0	0	0
5BRD	0	0	$287,862	$503,758		0	0	0
6BRD	0	0	$311,468	$545,070		0	0	0
Total		16	$2,558,530	$4,477,427		13	3	16
						81%	19%	100%

TDC / HCC Thresholds

Obsolescence		57.14%	of TDC	$2,558,402	or $159,900 / U	0%	100%
Const Blend	> 30%	30.00%	of HCC	$767,559	or $47,972 / U	80%	20%
Const Blend	> 60%	60.00%	of HCC	$1,535,118	or $95,945 / U	60%	40%
Const Blend	> 90%	90.00%	of HCC	$2,302,677	or $143,917 / U	40%	60%
Const Blend	> 90% high $	90.00%	of HCC	$2,302,677	or $143,917 / U	20%	80%

Using the Bureau Veritas capital needs value through 2024 and applying the allowable load factors for General Conditions (5%), Buildings Profit (10%), Architectural (7%), and PHA

Administration (2%), the gross capital needs for Prospect Avenue is projected to be $2,636,579 or 58.89% of the TDC.

7) Development capacity analysis:
Prospect Avenue is entirely located in a Residential Medium (R2) Zone. R2 permits development density of 22 dwelling units per acre. Additional development standards including Floor Area Ratio (FAR), building height, and building setback further define the development capacity of a site.

For purpose of this repositioning plan, a development capacity analysis was completed to determine if the underlying zone would allow for more units than currently exist on the site. This capacity analysis mathematically tests fit units based on development standards. Gross Square Footage (GSF) was determined using a bedroom mix, unit square footage, and a building efficiency factor. Detail supporting this analysis can be found in Appendix XX.

Since the two parcels that make up C & Clark are separated by a public right of way, they will likely be treated distinctly for entitlements. Given the underlying zoning and existing development, both parcels are underdeveloped. APN 004-163-001 has capacity for 12 units more than the current development. APN 004-163-019 has capacity for 10 more units than are currently developed.

Total: C & Clark

			NSF		GSF	# of Stories
Size	%	#	Target	Total NSF	0.75 Eff	3
SRO	0%	0				
0 BRD	0%	0	410 SF	SF	SF	
1 BRD	214%	30	600 SF	18,000 SF	24,000 SF	
2BRD	107%	15	860 SF	12,900 SF	17,200 SF	
3BRD	0%	0	1,145 SF	SF	SF	
4 BRD	0	0	SF	SF	SF	
TOTALS	321%	45	687 SF	30,900 SF	41,200 SF	13,733 SF

Information	
APN	
Zoning	R2
District	14
Acres	1.01
SF	43,996
Existing Units	16

Standards		Calcs
Density	44 units/acre	44 units
FAR	1.00	43,996
Site Coverage	70%	30,797
Height	35 ft.	3 stories

Program			
0 BRD	0		
1 BRD	30		
2BRD	15		
3BRD	0		
4 BRD	0		
Total	45	Existing Units	16
		Net Change	29

8) Economic analysis:
A fundamental consideration for public housing repositioning is how to maximize property revenue post conversion. The two bases for consideration are RAD rents and Fair Market Rents (FMR). RAD rents are available through a RAD repositioning. FMR is the basis for determining property revenue when using Section 18 Disposition.

The table below reflects a comparison of 2022 RAD rents and 2022 FMR available to CEHA. Both RAD rents and FMR figures reflect the net revenue to a project.
[need to settle on how much description of rent setting should be in this document. And how the implication of FMR rents to a redevelopment scenario work].

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	24	10	$71.92	$597	$790	$869	$948	$1,185
2BRD	99	6	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	47	0	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		16	$71.92	$662	$884	$1,266	$1,381	$1,726

FMR based rents for Prospect Avenue are significantly higher than RAD rents. FMR weighted average rents for the property bedroom mix are 34% higher than RAD rents ($884 versus $662). This difference across 16 units for one-year totals $42,666.

9) Discussion of development opportunity:

C & Clark was developed in the early 1960s. The properties possess the wear and needs expected given the age of the buildings, construction type and use. Capital needs are conservatively projected to be over $2.6M within the next several years. This amount exceeds the Obsolescence threshold criteria for Section 18 Disposition.

The site encompasses an entire city block along C Street, approximately 315 ft curb to curb, bisected by a public alley asymmetrically on the block, creating two different frontage lengths.

Current zoning allows for 44 units per acre. The current development is at 16 units per acre. There is an additional 29units available on these two parcels.

10) Repositioning Tool Analysis:
HUD offers a variety of repositioning tools that convert traditional public housing to the Section 8 platform. These tools include RAD, RAD / Section 18 Blends, Section 18, and Section 22 Streamline Voluntary Conversion. Each tool has its own eligibility criteria and resulting rent structure post conversion to Section 8.

Identifying the optimal tool for CEHA begins with determining eligibility. The table below reflect eligibility by repositioning tool and option. Information in the 2020 physical needs assessment completed by Bureau Veritas is used to conclude conditional eligibility.

Public Housing Repositioning Tool: Option Eligibility

Type	Eligibility	Threshold	Note
RAD			
PBV	Yes	na	Available by right to PHA
PBRA	Yes	na	Available by right to PHA
PBRA Rent Boost	No	Located in OZ	Project is not in an Opportunity Zone
Streamline	No	50 units	Not less than 50 units
RAD / Section 18 Blends			
Const Blend > 30%	Conditional	$767,559	Project meets Threshold based on Bureau Vista report.
Const Blend > 60%	Conditional	$1,535,118	Project meets Threshold based on Bureau Vista report.
Const Blend > 90%	Conditional	$2,302,677	Project meets Threshold based on Bureau Vista report.
Const Blend > 90% High Cost	No		Project is not in a HUD deteremied "high cost" area.
Small PHA	Conditional	<= 250 units	PHA must have 250 or fewer units remaining in PIC at time of application.
Very Small PHA	Conditional	<= 50 units	PHA must have 50 or fewer units remaining in PIC at time of application.
Section 18			
Obsolescence	Conditional	$2,558,402	Project meets Threshold based on Bureau Vista report.
Scattered Site	No	<= 4 units / lot	Project is not "scattered site."
Health & Safety	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Infeasible Opereations	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Section 22			
SVC	Yes	<=250 units	CEHA has less than 250 units in PIC.

4) Buhne / Union / Summer

1) Aerial photo: *insert*
2) Street level photo: *insert*
3) Bedroom mix and rent table:

Property Units & Rents

	Override	Existing		2020 RAD Rent	2022 FMR-UA			
Size	Unit	Units	Utility Allowance*	OCAF'd 2022	100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	24	10	$71.92	$597	$790	$869	$948	$1,185
2BRD	102	3	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	47	0	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		13	$71.92	$637	$848	$1,266	$1,381	$1,726

4) Building & Site Information
   a. Address: 235 Union Street
   b. City/state/zip: Eureka, CA 95501
   c. Census Tract: 6023000100
   d. Building age: 58 years
   e. QCT: Yes
   f. Opportunity Zone: Yes
   g. Minority Census Tract: No
   h. Lot size: 33,541 sf / 0.77 acres
   i. Zoning: R2
   j. District: 14
   k. APN: 009-131-011, 009-131-009.

5) Physical description:
Two parcels make up this irregular shaped property between Union Street and Summer Street along W Buhne. The otherwise full block property is interrupted by a single-family home on the corner of W Buhne Street and Union Street.

The western edge of the site rises quickly for approximately 10 feet and then the site levels. Parking is located in the center of the property, accessed by a driveway off Buhne. Based on the Humboldt County maps, it appears the drive may be in public ownership or a right of way dedication. Water and sanitary service are available to the site. Information about the capacity of the system for additional conveyance or service is not available

There are four buildings on the site containing 13 units. Buildings are generally oriented inward toward the centrally located parking or set back from the street. Buildings appear to be in satisfactory condition for their age, original construction type, and historical funding trends in public housing.

Buildings are two story wood frame construction with a gable roof. Foundations are slab on grade. The buildings were constructed in 1964, making them 58 years old.
In 2020, CEHA contracted with Bureau Veritas (fka EMG) to complete a Physical Needs Assessment. On site investigation occurred from January 14 to 17, 2020, and the final report is dated August 5, 2020. The report is comprehensive in its scope of review. As of the final report, Bureau concluded needs totaling $3,195,600 through 2024. These costs do not appear to include general conditions, Builder Profit, Architectural or PHA Administrative Costs. Assuming correct, these costs would be additive.

6) Total Development Cost / Housing Construction Cost analysis:
Several HUD Repositioning tools rely upon Total Development Cost (TDC) or Housing Construction Cost (HCC) to determine eligibility. The tables below illustrate the TDC and HCC amounts for Prospect Avenue. The 2021 TDC is $3,261,751. At 57.14%, the Obsolescence threshold amount is $1,863,765.

Section 18 Analysis

	Override				Unit Dist - Blend		
Size	Unit	Units	HCC	TDC	RAD	Section 18	Total
0BRD	0	0	$104,865	$183,514	0	0	0
1BRD	24	10	$136,735	$239,286	8	2	10
2BRD	102	3	$165,504	$289,632	2	1	3
3BRD	47	0	$201,666	$352,915	0	0	0
4BRD	12	0	$238,783	$417,870	0	0	0
5BRD	0	0	$262,812	$459,920	0	0	0
6BRD	0	0	$285,060	$498,856	0	0	0
Total		13	$1,863,858	$3,261,751	10	3	13
					77%	23%	100%

TDC / HCC Thresholds

Obsolescence		57.14%	of TDC	$1,863,765	or $143,367 / U	0%	100%
Const Blend	> 30%	30.00%	of HCC	$559,157	or $43,012 / U	80%	20%
Const Blend	> 60%	60.00%	of HCC	$1,118,315	or $86,024 / U	60%	40%
Const Blend	> 90%	90.00%	of HCC	$1,677,472	or $129,036 / U	40%	60%
Const Blend	> 90% high $	90.00%	of HCC	$1,677,472	or $129,036 / U	20%	80%

Using the Bureau Veritas capital needs value through 2024 and applying the allowable load factors for General Conditions (5%), Buildings Profit (10%), Architectural (7%), and PHA

Administration (2%), the gross capital needs for Prospect Avenue is projected to be $3,962,544 or 121.49% of the TDC.

7) Development capacity analysis:
Buhne / Union / Summer is entirely located in a Residential Medium (R2) Zone. R2 permits development density of 22 dwelling units per acre. Additional development standards including Floor Area Ratio (FAR), building height, and building setback further define the development capacity of a site.

For purpose of this repositioning plan, a development capacity analysis was completed to determine if the underlying zone would allow for more units than currently exist on the site. This capacity analysis mathematically tests fit units based on development standards. Gross Square Footage (GSF) was determined using a bedroom mix, unit square footage, and a building efficiency factor. Detail supporting this analysis can be found in Appendix XX.

The two parcels that make up Buhne / Union / Summer are adjacent and appear to be adjoined by either a publicly owned right of way or a dedication. Given the underlying zoning and existing development, both parcels are underdeveloped. Together the two parcels have capacity for 4 units more than the current development.

Total: Buhne/Union/Summer

			NSF		GSF	# of Stories
Size	%	#	Target	Total NSF	0.75 Eff	3
SRO	0%	0				
0 BRD	0%	0	410 SF	SF	SF	
1 BRD	100%	9	600 SF	5,400 SF	7,200 SF	
2BRD	89%	8	860 SF	6,880 SF	9,173 SF	
3BRD	0%	0	1,145 SF	SF	SF	
4 BRD	0	0	SF	SF	SF	
TOTALS	189%	17	722 SF	12,280 SF	16,373 SF	5,458 SF

Information	
APN	
Zoning	R2
District	14
Acres	0.77
SF	33,541
Existing Units	13

Standards		Calcs
Density	22 units/acre	17 units
FAR	1.00	33,541
Site Coverage	70%	23,479
Height	35 ft.	3 stories

Program			
0 BRD	0		
1 BRD	9		
2BRD	8		
3BRD	0		
4 BRD	0		
Total	17	Existing Units	13
			4

8) Economic analysis:
A fundamental consideration for public housing repositioning is how to maximize property revenue post conversion. The two bases for consideration are RAD rents and Fair Market Rents (FMR). RAD rents are available through a RAD repositioning. FMR is the basis for determining property revenue when using Section 18 Disposition.

The table below reflects a comparison of 2022 RAD rents and 2022 FMR for available to CEHA. Both RAD rents and FMR figures reflect the net revenue to a project.
[need to settle on how much description of rent setting should be in this document. And how the implication of FMR rents to a redevelopment scenario work].

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	24	10	$71.92	$597	$790	$869	$948	$1,185
2BRD	99	6	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	47	0	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		16	$71.92	$662	$884	$1,266	$1,381	$1,726

FMR based rents for Buhne / Union / Summer are significantly higher than RAD rents. FMR weighted average rents for the property bedroom mix are 25% higher than RAD rents ($848 versus $637). This difference across 13 units for one-year totals $32,931.

9) Discussion of development opportunity:

Buhne / Union / Summer was developed in the early 1960s. The buildings possess the wear and needs expected given the buildings age, construction type and use. Capital needs are conservatively projected to be over $3.9M within the next several years. This amount exceeds the Obsolescence threshold criteria for Section 18 Disposition.

The site is an irregular shape, primarily due to the single-family home at the corner of Union Street and W Buhne Street.

Current zoning allows for 17 units per acre. The current development is at 13 units per acre. There is an additional capacity of 4 units available on the property.

Under a FMR based revenue scenario, the 13 residential units in Buhne / Union / Summer would be approximately $32,931 higher per year than a RAD revenue scenario.

Buildings in Buhne / Union / Summer are greater than 50 years old. This will cause a Section 106 review under the National Historic Preservation Act by California Office of Historic Preservation. The buildings in Buhne / Union / Summer do not appear to have historic significance besides age.

10) Repositioning Tool Analysis:
HUD offers a variety of repositioning tools that convert traditional public housing to the Section 8 platform. These tools include RAD, RAD / Section 18 Blends, Section 18, and Section 22 Streamline Voluntary Conversion. Each tool has its own eligibility criteria and resulting rent structure post conversion to Section 8.

Identifying the optimal tool for CEHA begins with determining eligibility. The table below reflects eligibility by repositioning tool and option. Information in the 2020 physical needs assessment completed by Bureau Veritas is used to conclude conditional eligibility.

Public Housing Repositioning Tool: Option Eligibility

Type	Eligibility	Threshold	Note
RAD			
PBV	Yes	na	Available by right to PHA
PBRA	Yes	na	Available by right to PHA
PBRA Rent Boost	No	Located in OZ	Project is not in an Opportunity Zone
Streamline	No	50 units	Not less than 50 units
RAD / Section 18 Blends			
Const Blend > 30%	Conditional	$559,157	Project meets Threshold based on Bureau Vista report.
Const Blend > 60%	Conditional	$1,118,315	Project meets Threshold based on Bureau Vista report.
Const Blend > 90%	Conditional	$1,677,472	Project meets Threshold based on Bureau Vista report.
Const Blend > 90% High Cost	No		Project is not in a HUD deteremied "high cost" area.
Small PHA	Conditional	<= 250 units	PHA must have 250 or fewer units remaining in PIC at time of application.
Very Small PHA	Conditional	<= 50 units	PHA must have 50 or fewer units remaining in PIC at time of application.
Section 18			
Obsolescence	Conditional	$1,863,765	Project meets Threshold based on Bureau Vista report.
Scattered Site	No	<= 4 units / lot	Project is not "scattered site."
Health & Safety	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Infeasible Opereations	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Section 22			
SVC	Yes	<=250 units	CEHA has less than 250 units in PIC.

5) Spring & Garland

1) Aerial photo: *insert*
2) Street level photo: *insert*
3) Bedroom mix and rent table:

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	100	5	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	40	7	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		12	$71.92	$963	$1,313	$1,266	$1,381	$1,726

4) Building & Site Information
   a. Address: 2230 Spring Street
   b. City/state/zip: Eureka, CA 95501
   c. Census Tract: 6023000100
   d. Building age: 58 years
   e. QCT: Yes
   f. Opportunity Zone: Yes
   g. Minority Census Tract: No
   h. Lot size: 36,155 sf / 0.83 acres
   i. Zoning: R2
   j. District: 14
   k. APN: 009-021-017,
      009-021-003
5) Physical description:
   The building and property within Spring & Garland appear to be in satisfactory condition for their age, original construction type, and historical funding trends in public housing. The

development exists on two parcels and fronts two parallel streets. The development has three distinct modules, two on Spring and one on Garland.

Buildings are two story wood frame construction with gable roofs. Foundations are slab on grade. The buildings function as two separate developments; the buildings on Spring and the buildings on Garland. Two on-site parking lots exist for all units. The site plan creates some space between the buildings that is functional and manageable, and other space interior for management and use by residents.

The overall site is flat and lacks any natural features that would impact operations of development of site. Water and sanitary service are available to the site. Information about the capacity of the system for additional conveyance or service is not available.

In 2020, CEHA contracted with Bureau Veritas (fka EMG) to complete a Physical Needs Assessment. On site investigation occurred from January 14 to 17, 2020, and the final report is dated August 5, 2020. The report is comprehensive in its scope of review. As of the final report, Bureau concluded needs totaling $3,004,071 through 2024. These costs do not appear to include general conditions, Builder Profit, Architectural or PHA Administrative Costs. Assuming correct, these costs would be additive.

6) Total Development Cost / Housing Construction Cost analysis:
Several HUD Repositioning tools rely upon Total Development Cost (TDC) or Housing Construction Cost (HCC) to determine eligibility. The tables below illustrate the TDC and HCC amounts for Spring and Garland. The 2021 TDC is $3,725,048. At 57.14%, the Obsolescence threshold amount is $2,239,067.

Section 18 Analysis

	Override				Unit Dist - Blend		
Size	Unit	Units	HCC	TDC	RAD	Section 18	Total
0BRD	0	0	$104,865	$183,514	0	0	0
1BRD	34	0	$136,735	$239,286	0	0	0
2BRD	100	5	$165,504	$289,632	4	1	5
3BRD	40	7	$201,666	$352,915	6	1	7
4BRD	12	0	$238,783	$417,870	0	0	0
5BRD	0	0	$262,812	$459,920	0	0	0
6BRD	0	0	$285,060	$498,856	0	0	0
Total		12	$2,239,179	$3,918,563	10	2	12
					83%	17%	100%

TDC / HCC Thresholds

Obsolescence		57.14%	of TDC	$2,239,067	or $186,589 / U	0%	100%
Const Blend	> 30%	30.00%	of HCC	$671,754	or $55,979 / U	80%	20%
Const Blend	> 60%	60.00%	of HCC	$1,343,507	or $111,959 / U	60%	40%
Const Blend	> 90%	90.00%	of HCC	$2,015,261	or $167,938 / U	40%	60%
Const Blend	> 90% high $	90.00%	of HCC	$2,015,261	or $167,938 / U	20%	80%

Using the Bureau Veritas capital needs value through 2024 and applying the allowable load factors for General Conditions (5%), Buildings Profit (10%), Architectural (7%), and PHA Administration (2%), the gross capital needs for Spring and Garland is projected to be $3,725,048 or 95.06% of the TDC.

7) Development capacity analysis:
Spring & Garland is entirely located in a Residential Medium (R3) Zone. R3 permits development density of 44 dwelling units per acre. Additional development standards including Floor Area Ratio (FAR), building height, and building setback further define the development capacity of a site.

For purposes of this repositioning plan, a development capacity analysis was completed to determine if the underlying zone would allow for more units than currently exist on the site. This capacity analysis mathematically tests fit units based on development standards. Gross Square Footage (GSF) was determined using a bedroom mix, unit square footage, and a building efficiency factor. Detail supporting this analysis can be found in Appendix XX.

Spring & Garland can yield approximately 6 additional housing units on the same land under a redevelopment scenario.

Total: Spring & Garland

			NSF		GSF	# of Stories
Size	%	#	Target	Total NSF	0.75 Eff	3
SRO	0%	0				
0 BRD	0%	0	410 SF	SF	SF	
1 BRD	58%	7	600 SF	4,200 SF	5,600 SF	
2BRD	67%	8	860 SF	6,880 SF	9,173 SF	
3BRD	25%	3	1,145 SF	3,435 SF	4,580 SF	
4 BRD	0	0	SF	SF	SF	
TOTALS	150%	18	806 SF	14,515 SF	19,353 SF	6,451 SF

Information	
APN	
Zoning	R2
District	14
Acres	0.83
SF	36,155
Existing Units	12

Standards		Calcs
Density	22 units/acre	18 units
FAR	1.00	36,155
Site Coverage	70%	25,308
Height	35 ft.	3 stories

Program			
0 BRD	0		
1 BRD	7		
2BRD	8		
3BRD	3		
4 BRD	0		
Total	18	Existing Units	12
			6

8) Economic analysis:
A fundamental consideration for public housing repositioning is how to maximize property revenue post conversion. The two bases for consideration of RAD rents and Fair Market Rents (FMR). RAD rents are available through a RAD repositioning. FMR is the basis for determining property revenue when using Section 18 Disposition.

The table below reflects a comparison of 2022 RAD rents and 2022 FMR available to CEHA. Both RAD rents and FMR figures reflect the net revenue to a project.
[need to settle on how much description of rent setting should be in this document. And how the implication of FMR rents to a redevelopment scenario work].

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	10	24	$71.92	$597	$790	$869	$948	$1,185
2BRD	63	42	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	25	22	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	4	8	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		96	$71.92	$848	$1,151	$1,266	$1,381	$1,726

FMR based rents for Spring & Garland are significantly higher than RAD rents. FMR weighted average rents for the property bedroom mix are 27% higher than RAD rents ($1,313 versus $963). This difference across 12 units for one-year totals $50,370.

9) Discussion of development opportunity:
Spring & Garland are among the larger properties in CEHA's portfolio. Capital needs are conservatively projected to be over $3.7MM within the next several years. This amount exceeds the Obsolescence threshold criteria for Section 18 Disposition.

The original site plan is challenging for operations and residents. Parking is disconnected from units. Open space is unintentional. The site operates as three adjoining small projects rather than a single development.

Current zoning allows for 4 units per acre. The current development is at 12 units per acre. An additional 6 units is achievable on this site.

Under a FMR based revenue scenario, the 12 residential units in Spring & Garland would earn approximately $50,370 more revenue per year than a RAD revenue scenario.

Buildings in Spring & Garland are greater than 50 years old. This will cause a Section 106 review under the National Historic Preservation Act by California Office of Historic Preservation. The buildings in Spring & Garland do not appear to have historic significance besides age.

10) Repositioning Tool Analysis:
HUD offers a variety of repositioning tools that convert traditional public housing to the Section 8 platform. These tools include RAD, RAD / Section 18 Blends, Section 18, and Section 22 Streamline Voluntary Conversion. Each tool has its own eligibility criteria and resulting rent structure post conversion to Section 8.

Identifying the optimal tool for CEHA begins with determining eligibility. The table below reflect eligibility by repositioning tool and option. Information in the 2020 physical needs assessment completed by Bureau Veritas is used to conclude conditional eligibility.

Public Housing Repositioning Tool: Option Eligibility

Type	Eligibility	Threshold	Note
RAD			
PBV	Yes	na	Available by right to PHA
PBRA	Yes	na	Available by right to PHA
PBRA Rent Boost	No	Located in OZ	Project is not in an Opportunity Zone
Streamline	No	50 units	Not less than 50 units
RAD / Section 18 Blends			
Const Blend > 30%	Conditional	$671,754	Project meets Threshold based on Bureau Vista report.
Const Blend > 60%	Conditional	$1,343,507	Project meets Threshold based on Bureau Vista report.
Const Blend > 90%	Conditional	$2,015,261	Project meets Threshold based on Bureau Vista report.
Const Blend > 90% High Cost	Yes		Project is not in a HUD deteremied "high cost" area.
Small PHA	Conditional	<= 250 units	PHA must have 250 or fewer units remaining in PIC at time of application.
Very Small PHA	Conditional	<= 50 units	PHA must have 50 or fewer units remaining in PIC at time of application.
Section 18			
Obsolescence	Conditional	$2,239,067	Project meets Threshold based on Bureau Vista report.
Scattered Site	No	<= 4 units / lot	Project is not "scattered site."
Health & Safety	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Infeasible Opereations	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Section 22			
SVC	Yes	<=250 units	CEHA has less than 250 units in PIC.

6) 1335 B

1) Aerial photo: *insert*
2) Street level photo: *insert*
3) Bedroom mix and rent table:

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	102	3	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	45	2	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		5	$71.92	$902	$1,227	$1,266	$1,381	$1,726

4) Building & Site Information
   a. Address: 1335 B Street
   b. City/state/zip: Eureka, CA 95501
   c. Census Tract: 6023000100
   d. Building age: 58 years
   e. QCT: Yes
   f. Opportunity Zone: No
   g. Minority Census Tract: No
   h. Lot size: 13,504 sf / 0.31 acres
   i. Zoning: R3
   j. District: 14
   k. APN: 004-114-007

5) Physical description:
The building and property at 1335 B appear to be in satisfactory condition for their age, original construction type, and historical funding trends in public housing. The development occupies a full quarter block between B Street and C Street, 14th Street and Cedar Street.

The rowhouse style buildings are two story wood frame construction with gable roofs. Foundations are slab on grade. Parking for the building is serviced from an alley.

The overall site is flat and lacks any natural features that would impact operations of development of site. Water and sanitary service are available to the site. Information about the capacity of the system for additional conveyance or service is not available.

In 2020, CEHA contracted with Bureau Veritas (fka EMG) to complete a Physical Needs Assessment. On site investigation occurred from January 14 to 17, 2020, and the final report is dated August 5, 2020. The report is comprehensive in its scope of review. As of the final report, Bureau concluded needs totaling $706,607 through 2024. These costs do not appear to include general conditions, Builder Profit, Architectural or PHA Administrative Costs. Assuming correct, these costs would be additive.

6) Total Development Cost / Housing Construction Cost analysis:
Several HUD Repositioning tools rely upon Total Development Cost (TDC) or Housing Construction Cost (HCC) to determine eligibility. The tables below illustrate the TDC and HCC amounts for Spring and Garland. The 2021 TDC is $1,574,725. At 57.14%, the Obsolescence threshold amount is $899,798.
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Section 18 Analysis

	Override				Unit Dist - Blend		
Size	Unit	Units	HCC	TDC	RAD	Section 18	Total
0BRD	0	0	$104,865	$183,514	0	0	0
1BRD	34	0	$136,735	$239,286	0	0	0
2BRD	102	3	$165,504	$289,632	2	1	3
3BRD	45	2	$201,666	$352,915	2	0	2
4BRD	12	0	$238,783	$417,870	0	0	0
5BRD	0	0	$262,812	$459,920	0	0	0
6BRD	0	0	$285,060	$498,856	0	0	0
Total		5	$899,843	$1,574,725	4	1	5
					80%	20%	100%

TDC / HCC Thresholds

Obsolescence		57.14%	of TDC	$899,798	or $179,960 / U	0%	100%
Const Blend	> 30%	30.00%	of HCC	$269,953	or $53,991 / U	80%	20%
Const Blend	> 60%	60.00%	of HCC	$539,906	or $107,981 / U	60%	40%
Const Blend	> 90%	90.00%	of HCC	$809,859	or $161,972 / U	40%	60%
Const Blend	> 90% high $	90.00%	of HCC	$809,859	or $161,972 / U	20%	80%

Using the Bureau Veritas capital needs value through 2024 and applying the allowable load factors for General Conditions (5%), Buildings Profit (10%), Architectural (7%), and PHA Administration (2%), the gross capital needs for Spring and Garland is projected to be $876,193 or 55.64% of the TDC. This projection is $23,605 short of meeting the obsolescence threshold criteria.

7) Development capacity analysis:
1335B is entirely located in a Residential Medium (R3) Zone. R3 permits development density of 44 dwelling units per acre. Additional development standards including Floor Area Ratio (FAR), building height, and building setback further define the development capacity of a site.

For purpose of this repositioning plan, a development capacity analysis was completed to determine if the underlying zone would allow for more units than currently exist on the site. This capacity analysis mathematically test fit units based on development standards. Gross Square Footage (GSF) was determined using a bedroom mix, unit square footage, and a building efficiency factor. Detail supporting this analysis can be found in Appendix XX.

1335B can yield approximately 9 additional housing units on the same land under a redevelopment scenario.

1335 B St.

			NSF		GSF	# of Stories
Size	%	#	Target	Total NSF	0.75 Eff	3
SRO	0%	0				
0 BRD	0%	0	410 SF	SF	SF	
1 BRD	43%	6	600 SF	3,600 SF	4,800 SF	
2BRD	57%	8	860 SF	6,880 SF	9,173 SF	
3BRD	0%	0	1,145 SF	SF	SF	
4 BRD	0		SF	SF	SF	
TOTALS	100%	14	749 SF	10,480 SF	13,973 SF	4,658 SF

Information	
APN	004-114-007
Zoning	R3
District	14
Acres	0.31
SF	13,504
Existing Units	5

Standards		Calcs
Density	44 units/acre	14 units
FAR	1.15	15,529
Site Coverage	80%	10,803
Height	35 ft.	3 stories

Program			
0 BRD	0	FAR	1.03
1 BRD	6	Stories	3
2BRD	8	Site Coverage	34%
3BRD	0		
4 BRD	0		
Total	14	Existing Units	5
		Net Change	9

8) Economic analysis:
A fundamental consideration for public housing repositioning is how to maximize property revenue post conversion. The two bases for consideration are RAD rents and Fair Market Rents (FMR). RAD rents are available through a RAD repositioning. FMR is the basis for determining property revenue when using Section 18 Disposition.

The table below reflects a comparison of 2022 RAD rents and 2022 FMR available to CEHA. Both RAD rents and FMR figures reflect the net revenue to a project.
[need to settle on how much description of rent setting should be in this document. And how the implication of FMR rents to a redevelopment scenario work].

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	102	3	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	45	2	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		5	$71.92	$902	$1,227	$1,266	$1,381	$1,726

FMR based rents for 1335 B are significantly higher than RAD rents. FMR weighted average rents for the property bedroom mix are 26% higher than RAD rents ($1,227 versus $902). This difference across 5 units for one-year totals $19,491.

9) Discussion of development opportunity:
1335 B is among the smaller properties in CEHA's portfolio by existing units and land size. Capital needs are conservatively projected to be at approximately $876K within the next several years. This amount is short of the Obsolescence threshold criteria for Section 18 Disposition by a manageable $23,605.

The site is square, served by an alley and on a corner. These dimensions, size, access and adjacencies are conducive to an efficient building design.

Current zoning allows for 44 units per acre. The current development is at 16 units per acre. An additional 9 units is achievable on this site.

Under a FMR based revenue scenario, the 5 residential units in 1335 B would earn approximately $19,491 more revenue per year than a RAD revenue scenario.

Buildings at 1335 B are greater than 50 years old. This will cause a Section 106 review under the National Historic Preservation Act by California Office of Historic Preservation. The buildings at 1335 B do not appear to have historic significance besides age.

10) Repositioning Tool Analysis:
HUD offers a variety of repositioning tools that convert traditional public housing to the Section 8 platform. These tools include RAD, RAD / Section 18 Blends, Section 18, and Section 22 Streamline Voluntary Conversion. Each tool has its own eligibility criteria and resulting rent structure post conversion to Section 8.

Identifying the optimal tool for CEHA begins with determining eligibility. The table below reflects eligibility by repositioning tool and option. Information in the 2020 physical needs assessment completed by Bureau Veritas is used to conclude conditional eligibility.

Public Housing Repositioning Tool: Option Eligibility

Type	Eligibility	Threshold	Note
RAD			
PBV	Yes	na	Available by right to PHA
PBRA	Yes	na	Available by right to PHA
PBRA Rent Boost	No	Located in OZ	Project is not in an Opportunity Zone
Streamline	No	50 units	Not less than 50 units
RAD / Section 18 Blends			
Const Blend > 30%	Conditional	$269,953	Project meets Threshold based on Bureau Vista report.
Const Blend > 60%	Conditional	$539,906	Project meets Threshold based on Bureau Vista report.
Const Blend > 90%	Conditional	$809,859	Project meets Threshold based on Bureau Vista report.
Const Blend > 90% High Cost	No		Project is not in a HUD deteremied "high cost" area.
Small PHA	Conditional	<= 250 units	PHA must have 250 or fewer units remaining in PIC at time of application.
Very Small PHA	Conditional	<= 50 units	PHA must have 50 or fewer units remaining in PIC at time of application.
Section 18			
Obsolescence	No	$899,798	Project does not meet Threshold based on Bureau Vista report.
Scattered Site	No	<= 4 units / lot	Project is not "scattered site."
Health & Safety	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Infeasible Opereations	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Section 22			
SVC	Yes	<=250 units	CEHA has less than 250 units in PIC.

7) 2523 Albee

a) Aerial photo: *insert*

b) Street level photo: *insert*

c) Bedroom mix and rent table:

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	103	2	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	45	2	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		4	$71.92	$936	$1,274	$1,266	$1,381	$1,726

d) Building & Site Information

a. Address: 2523 Albee Street
b. City/state/zip: Eureka, CA 95501
c. Census Tract: 6023000100
d. Building age: 58 years
e. QCT: Yes
f. Opportunity Zone: Yes
g. Minority Census Tract: No
h. Lot size: 11,761 sf / 0.27 acres
i. Zoning: R2
j. District: 14
k. APN: 009-033-012

e) Physical description:
The building and property at 2523 Albee Street appear to be in satisfactory condition for their age, original construction type, and historical funding trends in public housing. The property is located at the corner of Albee Street and W Carson Street.

The rowhouse style buildings are two story wood frame construction with gable roofs. Foundations are slab on grade. Parking for the building is serviced from an alley that bisects the block.

The site is square and level. The site lacks any natural features that would impact operations of development of site. Buildings are set back from the street frontage. A fence creates private space for residents and leaves a spacious area outside of the fence that is not clearly used by residents or intended for neighbors. Information about the capacity of the system for additional conveyance or service is not available.

In 2020, CEHA contracted with Bureau Veritas (fka EMG) to complete a Physical Needs Assessment. On site investigation occurred from January 14 to 17, 2020, and the final report is dated August 5, 2020. The report is comprehensive in its scope of review. As of the final report, Bureau concluded needs totaling $601,654 through 2024. These costs do not appear to include general conditions, Builder Profit, Architectural or PHA Administrative Costs. Assuming correct, these costs would be additive.

f) Total Development Cost / Housing Construction Cost analysis:
Several HUD Repositioning tools rely upon Total Development Cost (TDC) or Housing Construction Cost (HCC) to determine eligibility. The tables below illustrate the TDC and HCC amounts for Spring and Garland. The 2021 TDC is $1,285,093. At 57.14%, the Obsolescence threshold amount is $734,302.

Section 18 Analysis 16,246

Size	Override Unit	Units	HCC	TDC	Unit Dist - Blend RAD	Section 18	Total
0BRD	0	0	$104,865	$183,514	0	0	0
1BRD	34	0	$136,735	$239,286	0	0	0
2BRD	103	2	$165,504	$289,632	2	1	2
3BRD	45	2	$201,666	$352,915	2	1	2
4BRD	12	0	$238,783	$417,870	0	0	0
5BRD	0	0	$262,812	$459,920	0	0	0
6BRD	0	0	$285,060	$498,856	0	0	0
Total		4	$734,339	$1,285,093	3	1	4
					75%	25%	100%

TDC / HCC Thresholds

Obsolescence		57.14%	of TDC	$734,302	or $183,576 / U	0%	100%
Const Blend	> 30%	30.00%	of HCC	$220,302	or $55,075 / U	80%	20%
Const Blend	> 60%	60.00%	of HCC	$440,603	or $110,151 / U	60%	40%
Const Blend	> 90%	90.00%	of HCC	$660,905	or $165,226 / U	40%	60%
Const Blend	> 90% high $	90.00%	of HCC	$660,905	or $165,226 / U	20%	80%

Using the Bureau Veritas capital needs value through 2024 and applying the allowable load factors for General Conditions (5%), Buildings Profit (10%), Architectural (7%), and PHA Administration (2%), the gross capital needs for 2523 Albee Street is projected to be $748,051 or 58.05% of the TDC.

g) Development capacity analysis:
2523 Albee Street is entirely located in a Residential Medium (R2) Zone. R2 permits development density of 22 dwelling units per acre. Additional development standards including Floor Area Ratio (FAR), building height, and building setback further define the development capacity of a site.

For purpose of this repositioning plan, a development capacity analysis was completed to determine if the underlying zone would allow for more units than currently exist on the site. This capacity analysis mathematically test fit units based on development standards. Gross Square Footage (GSF) was determined using a bedroom mix, unit square footage, and a building efficiency factor. Detail supporting this analysis can be found in Appendix XX.

2523 Albee Street can yield approximately 2 additional housing units on the same land under a redevelopment scenario.

1645 C St

			NSF		GSF	# of Stories
Size	%	#	Target	Total NSF	0.75 Eff	3
SRO	0%	0				
0 BRD	0%	0	410 SF	SF	SF	
1 BRD	100%	5	600 SF	3,000 SF	4,000 SF	
2BRD	0%	0	860 SF	SF	SF	
3BRD	0%	0	1,145 SF	SF	SF	
4 BRD	0		SF	SF	SF	
TOTALS	100%	5	600 SF	3,000 SF	4,000 SF	1,333 SF

Information	
APN	004-199-012
Zoning	R3
District	14
Acres	0.12
SF	5,227
Existing Units	3

Standards		Calcs
Density	44 units/acre	5 units
FAR	1.15	6,011
Site Coverage	80%	4,182
Height	35 ft.	3 stories

Program			
0 BRD	0	FAR	0.77
1 BRD	5	Stories	3
2BRD	0	Site Coverage	26%
3BRD	0		
4 BRD	0		
Total	5	Existing Units	3
		Net Change	2

h) Economic analysis:
A fundamental consideration for public housing repositioning is how to maximize property revenue post conversion. The two bases for consideration are RAD rents and Fair Market Rents (FMR). RAD rents are available through a RAD repositioning. FMR is the basis for determining property revenue when using Section 18 Disposition.

The table below reflects a comparison of 2022 RAD rents and 2022 FMR available to CEHA. Both RAD rents and FMR figures reflect the net revenue to a project.
[need to settle on how much description of rent setting should be in this document. And how the implication of FMR rents to a redevelopment scenario work].

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	103	2	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	45	2	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		4	$71.92	$936	$1,274	$1,266	$1,381	$1,726

FMR based rents for 2523 Albee are significantly higher than RAD rents. FMR weighted average rents for the property bedroom mix are 27% higher than RAD rents ($1,274 versus $936). This difference across 5 units for one-year totals $16,246.

i) Discussion of development opportunity:
2523 Albee is among the smallest sites in CEHA portfolio. Based on the capital needs assessment, the property meets the threshold criteria for Obsolescence.

Existing setbacks, location and height of the perimeter fence, and placement of trees create a disconnect from the neighbors. The property feels physically and socially isolated from its neighborhood.

Current zoning allows for 22 units per acre. The current development is at 15 units per acre. Given the site size, only an additional 2 units are achievable on this site.

Under a FMR based revenue scenario, the 4 residential units in 2523 Albee would be approximately $16,246 more revenue per year than a RAD revenue scenario.

2523 Albee is greater than 50 years old. This will cause a Section 106 review under the National Historic Preservation Act by California Office of Historic Preservation. The buildings in Spring & Garland do not appear to have historic significance besides age.

j) Repositioning Tool Analysis:
HUD offers a variety of repositioning tools that convert traditional public housing to the Section 8 platform. These tools include RAD, RAD / Section 18 Blends, Section 18, and Section 22 Streamline Voluntary Conversion. Each tool has its own eligibility criteria and resulting rent structure post conversion to Section 8.

Identifying the optimal tool for CEHA begins with determining eligibility. The table below reflects eligibility by repositioning tool and option. Information in the 2020 physical needs assessment completed by Bureau Veritas is used to conclude conditional eligibility.

Public Housing Repositioning Tool: Option Eligibility

Type	Eligibility	Threshold	Note
RAD			
PBV	Yes	na	Available by right to PHA
PBRA	Yes	na	Available by right to PHA
PBRA Rent Boost	No	Located in OZ	Project is not in an Opportunity Zone
Streamline	No	50 units	Not less than 50 units
RAD / Section 18 Blends			
Const Blend > 30%	Conditional	$220,302	Project meets Threshold based on Bureau Vista report.
Const Blend > 60%	Conditional	$440,603	Project meets Threshold based on Bureau Vista report.
Const Blend > 90%	Conditional	$660,905	Project meets Threshold based on Bureau Vista report.
Const Blend > 90% High Cost	No		Project is not in a HUD deteremied "high cost" area.
Small PHA	Conditional	<= 250 units	PHA must have 250 or fewer units remaining in PIC at time of application.
Very Small PHA	Conditional	<= 50 units	PHA must have 50 or fewer units remaining in PIC at time of application.
Section 18			
Obsolescence	Conditional	$734,302	Project meets Threshold based on Bureau Vista report.
Scattered Site	No	<= 4 units / lot	Project is not "scattered site."
Health & Safety	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Infeasible Opereations	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Section 22			
SVC	Yes	<=250 units	CEHA has less than 250 units in PIC.

8) 1645 C Street

a) Aerial photo: *insert*

b) Street level photo: *insert*

c) Bedroom mix and rent table:

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	103	2	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	46	1	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		3	$71.92	$880	$1,196	$1,266	$1,381	$1,726

d) Building & Site Information

a. Address:	1645 C Street
b. City/state/zip:	Eureka, CA 95501
c. Census Tract:	6023000100
d. Building age:	58 years
e. QCT:	Yes
f. Opportunity Zone:	Yes
g. Minority Census Tract:	No
h. Lot size:	5,227 sf / 0.12 acres
i. Zoning:	R3
j. District:	14
k. APN:	004-199-012

e) Physical description:
The building and property at 1645 C Street appear to be in satisfactory condition for their age, original construction type, and historical funding trends in public housing. The lot is located mid-block and has frontage on both C Street and Lowell Street.

The rowhouse style buildings are two story wood frame construction with gable roofs. Foundations are slab on grade. Parking for the building is serviced from Lowell Street.

The site is 50 ft wide and 190 feet long. There is a slight rise off C Street and then the site flattens. The site lacks any natural features that would impact operations of development of site. Immediate adjacent uses are single family homes. Water and sanitary service are available to the site. Information about the capacity of the system for additional conveyance or service is not available.

In 2020, CEHA contracted with Bureau Veritas (fka EMG) to complete a Physical Needs Assessment. On site investigation occurred from January 14 to 17, 2020, and the final report is dated August 5, 2020. The report is comprehensive in its scope of review. As of the final report, Bureau concluded needs totaling $81,578 through 2024. These costs do not appear to include general conditions, Builder Profit, Architectural or PHA Administrative Costs. Assuming correct, these costs would be additive.

f) Total Development Cost / Housing Construction Cost analysis:
Several HUD Repositioning tools rely upon Total Development Cost (TDC) or Housing Construction Cost (HCC) to determine eligibility. The tables below illustrate the TDC and HCC amounts for Spring and Garland. The 2021 TDC is $945,535. At 57.14%, the Obsolescence threshold amount is $540,278.

Section 18 Analysis

	Override				Unit Dist - Blend		
Size	Unit	Units	HCC	TDC	RAD	Section 18	Total
0BRD	0	0	$94,256	$164,949	0	0	0
1BRD	34	0	$128,610	$225,068	0	0	0
2BRD	103	2	$162,852	$284,992	1	1	2
3BRD	46	1	$214,601	$375,551	1	0	1
4BRD	12	0	$265,874	$465,279	0	0	0
5BRD	0	0	$299,528	$524,173	0	0	0
6BRD	0	0	$332,759	$582,328	0	0	0
Total		3	$540,305	$945,535	2	1	3
					67%	33%	100%

TDC / HCC Thresholds

Obsolescence		57.14%	of TDC	$540,278	or $180,093 / U	0%	100%
Const Blend	> 30%	30.00%	of HCC	$162,092	or $54,031 / U	80%	20%
Const Blend	> 60%	60.00%	of HCC	$324,183	or $108,061 / U	60%	40%
Const Blend	> 90%	90.00%	of HCC	$486,275	or $162,092 / U	40%	60%
Const Blend	> 90% high $	90.00%	of HCC	$486,275	or $162,092 / U	20%	80%

Using the Bureau Veritas capital needs value through 2024 and applying the allowable load factors for General Conditions (5%), Buildings Profit (10%), Architectural (7%), and PHA Administration (2%), the gross capital needs for 1645 C Street is projected to be $101,157 or 10.70% of the TDC. An additional $439,122 in cost is needed to meet threshold.

g) Development capacity analysis:
1645 C Street is entirely located in a Residential Medium (R3) Zone. R3 permits development density of 44 dwelling units per acre. Additional development standards including Floor Area Ratio (FAR), building height, and building setback further define the development capacity of a site.

For purpose of this repositioning plan, a development capacity analysis was completed to determine if the underlying zone would allow for more units than currently exist on the site. This capacity analysis mathematically tests fit units based on development standards. Gross Square Footage (GSF) was determined using a bedroom mix, unit square footage, and a building efficiency factor. Detail supporting this analysis can be found in Appendix XX.

1645 C Street can yield approximately 2 additional housing units on the same land under a redevelopment scenario.

1645 C St

			NSF		GSF	# of Stories
Size	%	#	Target	Total NSF	0.75 Eff	3
SRO	0%	0				
0 BRD	0%	0	410 SF	SF	SF	
1 BRD	100%	5	600 SF	3,000 SF	4,000 SF	
2BRD	0%	0	860 SF	SF	SF	
3BRD	0%	0	1,145 SF	SF	SF	
4 BRD	0		SF	SF	SF	
TOTALS	100%	5	600 SF	3,000 SF	4,000 SF	1,333 SF

Information	
APN	004-199-012
Zoning	R3
District	14
Acres	0.12
SF	5,227
Existing Units	3

Standards		Calcs
Density	44 units/acre	5 units
FAR	1.15	6,011
Site Coverage	80%	4,182
Height	35 ft.	3 stories

Program			
0 BRD	0	FAR	0.77
1 BRD	5	Stories	3
2BRD	0	Site Coverage	26%
3BRD	0		
4 BRD	0		
Total	5	Existing Units	3
		Net Change	2

h) Economic analysis:
A fundamental consideration for public housing repositioning is how to maximize property revenue post conversion. The two bases for consideration are RAD rents and Fair Market Rents (FMR). RAD rents are available through a RAD repositioning. FMR is the basis for determining property revenue when using Section 18 Disposition.

The table below reflects a comparison of 2022 RAD rents and 2022 FMR available to CEHA. Both RAD rents and FMR figures reflect the net revenue to a project.
[need to settle on how much description of rent setting should be in this document. And how the implication of FMR rents to a redevelopment scenario work].

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	103	2	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	46	1	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		3	$71.92	$880	$1,196	$1,266	$1,381	$1,726

FMR based rents for 1645 C Street are significantly higher than RAD rents. FMR weighted average rents for the property bedroom mix are 26% higher than RAD rents ($1,196 versus $880). This difference across 5 units for one-year totals $11,368.

i) Discussion of development opportunity:
1645 C Street is the smallest of CEHA's properties. At 3 units, the property is considered a "Scattered Site" by HUD's Section 18 Disposition criteria.

Capital needs for 1645 C Street are far below the threshold criteria for Obsolescence.

Physical development capacity of the site is limited by its size, shape, adjacencies and for being located mid-block with relatively short street frontages.

Existing setbacks, location and height of the perimeter fence, and placement of trees create a disconnect from the neighbors. The property feels physically and socially isolated from its neighborhood.

Current zoning allows for 44 units per acre. The current development is at 3 units per acre. Only an additional 2 units are achievable on this site.

Under a FMR based revenue scenario, the 3 residential units in 1645 C Street would be approximately $11,368 more revenue per year than a RAD revenue scenario.

1645 C Street is greater than 50 years old. This will cause a Section 106 review under the National Historic Preservation Act by California Office of Historic Preservation. The buildings in 1645 C Street do not appear to have historic significance besides age.

j) Repositioning Tool Analysis:
HUD offers a variety of repositioning tools that convert traditional public housing to the Section 8 platform. These tools include RAD, RAD / Section 18 Blends, Section 18, and Section 22 Streamline Voluntary Conversion. Each tool has its own eligibility criteria and resulting rent structure post conversion to Section 8.

Identifying the optimal tool for CEHA begins with determining eligibility. The table below reflect eligibility by repositioning tool and option. Information in the 2020 physical needs assessment completed by Bureau Veritas is used to conclude conditional eligibility.

Public Housing Repositioning Tool: Option Eligibility

Type	Eligibility	Threshold	Note
RAD			
PBV	Yes	na	Available by right to PHA
PBRA	Yes	na	Available by right to PHA
PBRA Rent Boost	No	Located in OZ	Project is not in an Opportunity Zone
Streamline	No	50 units	Not less than 50 units
RAD / Section 18 Blends			
Const Blend > 30%	Conditional	$162,092	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 60%	Conditional	$324,183	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 90%	Conditional	$486,275	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 90% High Cost	No		Project is not in a HUD deteremied "high cost" area.
Small PHA	Conditional	<= 250 units	PHA must have 250 or fewer units remaining in PIC at time of application.
Very Small PHA	Conditional	<= 50 units	PHA must have 50 or fewer units remaining in PIC at time of application.
Section 18			
Obsolescence	Conditional	$540,278	Project does not meet Threshold based on Bureau Vista report.
Scattered Site	Yes	<= 4 units / lot	Project is a "scattered site."
Health & Safety	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Infeasible Opereations	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Section 22			
SVC	Yes	<=250 units	CEHA has less than 250 units in PIC.

9) 510 W. Harris

a) Aerial photo: *insert*

b) Street level photo: *insert*

c) Bedroom mix and rent table:

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	101	4	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	46	1	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		5	$71.92	$836	$1,134	$1,266	$1,381	$1,726

d) Building & Site Information

a. Address: 510 West Harris
b. City/state/zip: Eureka, CA 95501
c. Census Tract: 6023000100
d. Building age: 40 years
e. QCT: Yes
f. Opportunity Zone: No
g. Minority Census Tract: No
h. Lot size: 8,276 sf / 0.19 acres
i. Zoning: R2
j. District: 14
k. APN: 009-064-005

e) Physical description:

The building and property at 510 W Harris appear to be in satisfactory condition for their age, original construction type, and historical funding trends in public housing. The property is located at the corner of W Harris Street and Albee Street. 25-1 is located two blocks to the west on W Harris Street.

The rowhouse style buildings are two story wood frame construction with gable roofs. Foundations are slab on grade. Parking for the building is serviced from an alley that bisects the block.

The site is rectangular with good street frontage, access, and visibility. The site is flat and lacks any natural features that would impact operations of development of site. Immediate adjacent uses are single family homes. Water and sanitary service are available to the site. Information about the capacity of the system for additional conveyance or service is not available.

In 2020, CEHA contracted with Bureau Veritas (fka EMG) to complete a Physical Needs Assessment. On site investigation occurred from January 14 to 17, 2020, and the final report is dated August 5, 2020. The report is comprehensive in its scope of review. As of the final report, Bureau concluded needs totaling $123,401 through 2024. These costs do not appear to include general conditions, Builder Profit, Architectural or PHA Administrative Costs. Assuming correct, these costs would be additive.

f) Total Development Cost / Housing Construction Cost analysis:
Several HUD Repositioning tools rely upon Total Development Cost (TDC) or Housing Construction Cost (HCC) to determine eligibility. The tables below illustrate the TDC and HCC amounts for 510 W. Harris. The 2021 TDC is $1,515,518 At 57.14%, the Obsolescence threshold amount is $865,967.

Section 18 Analysis 17,858

Size	Override Unit	Units	HCC	TDC	Unit Dist - Blend RAD	Section 18	Total
0BRD	0	0	$94,256	$164,949	0	0	0
1BRD	34	0	$128,610	$225,068	0	0	0
2BRD	101	4	$162,852	$284,992	3	1	4
3BRD	46	1	$214,601	$375,551	1	0	1
4BRD	12	0	$265,874	$465,279	0	0	0
5BRD	0	0	$299,528	$524,173	0	0	0
6BRD	0	0	$332,759	$582,328	0	0	0
Total		5	$866,010	$1,515,518	4	1	5
					80%	20%	100%

TDC / HCC Thresholds

						RAD	Section 18
Obsolescence		57.14%	of TDC	$865,967	or $173,193 / U	0%	100%
Const Blend	> 30%	30.00%	of HCC	$259,803	or $51,961 / U	80%	20%
Const Blend	> 60%	60.00%	of HCC	$519,606	or $103,921 / U	60%	40%
Const Blend	> 90%	90.00%	of HCC	$779,409	or $155,882 / U	40%	60%
Const Blend	> 90% high $	90.00%	of HCC	$779,409	or $155,882 / U	20%	80%

Using the Bureau Veritas capital needs value through 2024 and applying the allowable load factors for General Conditions (5%), Buildings Profit (10%), Architectural (7%), and PHA Administration (2%), the gross capital needs for 510 W Harris is projected to be $153,017 or 10.10% of the TDC. An additional $712,950 in cost is needed to meet threshold.

g) Development capacity analysis:
510 W Harris is entirely located in a Residential Medium (R2) Zone. R2 permits development density of 22 dwelling units per acre. Additional development standards including Floor Area Ratio (FAR), building height, and building setback further define the development capacity of a site.

For purpose of this repositioning plan, a development capacity analysis was completed to determine if the underlying zone would allow for more units than currently exist on the site. This capacity analysis mathematically test fit units based on development standards. Gross Square Footage (GSF) was determined using a bedroom mix, unit square footage, and a building efficiency factor. Detail supporting this analysis can be found in Appendix XX.

510 W Harris is currently non-conforming with the existing zoning designation. This should not present a problem as the development was built under a prior code. There is no additional development capacity on the site.

510 W Harris

			NSF		GSF	# of Stories
Size	%	#	Target	Total NSF	0.75 Eff	3
SRO	0%	0				
0 BRD	0%	0	410 SF	SF	SF	
1 BRD	100%	4	600 SF	2,400 SF	3,200 SF	
2BRD	0%	0	860 SF	SF	SF	
3BRD	0%	0	1,145 SF	SF	SF	
4 BRD	0		SF	SF	SF	
TOTALS	100%	4	600 SF	2,400 SF	3,200 SF	1,067 SF

Information	
APN	009-064-005
Zoning	R2
District	14
Acres	0.19
SF	8,276
Existing Units	5

Standards		Calcs
Density	22 units/acre	4 units
FAR	1.00	8,276
Site Coverage	70%	5,793
Height	35 ft.	3 stories

Program			
0 BRD	0	FAR	0.39
1 BRD	4	Stories	3
2BRD	0	Site Coverage	13%
3BRD	0		
4 BRD	0		
Total	4	Existing Units	5
		Net Change	-1

h) Economic analysis:
A fundamental consideration for public housing repositioning is how to maximize property revenue post conversion. The two bases for consideration are RAD rents and Fair Market Rents (FMR). RAD rents are available through a RAD repositioning. FMR is the basis for determining property revenue when using Section 18 Disposition.

The table below reflects a comparison of 2022 RAD rents and 2022 FMR available to CEHA. Both RAD rents and FMR figures reflect the net revenue to a project.
[need to settle on how much description of rent setting should be in this document. And how the implication of FMR rents to a redevelopment scenario work].

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	101	4	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	46	1	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		5	$71.92	$836	$1,134	$1,266	$1,381	$1,726

FMR based rents for 510 W Harris are significantly higher than RAD rents. FMR weighted average rents for the property bedroom mix are 26% higher than RAD rents ($1,134 versus $836). This difference across 5 units for one-year totals $17,858.

i) Discussion of development opportunity:
510 W Harris is among the smallest of CEHA properties. Capital needs are conservatively projected at approximately $153K within the next several years. This amount is short of the Obsolescence threshold criteria for Section 18 Disposition by $712,950.

The property exceeds the current allowable development capacity of the site. No additional units could be developed on site.

Under a FMR based revenue scenario, the 5 residential units in 510 W Harris would be approximately $17,858 more revenue per year than a RAD revenue scenario.

j) Repositioning Tool Analysis:
HUD offers a variety of repositioning tools that convert traditional public housing to the Section 8 platform. These tools include RAD, RAD / Section 18 Blends, Section 18, and Section 22 Streamline Voluntary Conversion. Each tool has its own eligibility criteria and resulting rent structure post conversion to Section 8.

Identifying the optimal tool for CEHA begins with determining eligibility. The table below reflect eligibility by repositioning tool and option. Information in the 2020 physical needs assessment completed by Bureau Veritas is used to conclude conditional eligibility.

Public Housing Repositioning Tool: Option Eligibility

Type	Eligibility	Threshold	Note
RAD			
PBV	Yes	na	Available by right to PHA
PBRA	Yes	na	Available by right to PHA
PBRA Rent Boost	No	Located in OZ	Project is not in an Opportunity Zone
Streamline	No	50 units	Not less than 50 units
RAD / Section 18 Blends			
Const Blend > 30%	Conditional	$259,803	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 60%	Conditional	$519,606	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 90%	Conditional	$779,409	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 90% High Cost	No		Project is not in a HUD deteremied "high cost" area.
Small PHA	Conditional	<= 250 units	PHA must have 250 or fewer units remaining in PIC at time of application.
Very Small PHA	Conditional	<= 50 units	PHA must have 50 or fewer units remaining in PIC at time of application.
Section 18			
Obsolescence	Conditional	$865,967	Project does not meet Threshold based on Bureau Vista report.
Scattered Site	No	<= 4 units / lot	Project is not "scattered site."
Health & Safety	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Infeasible Opereations	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Section 22			
SVC	Yes	<=250 units	CEHA has less than 250 units in PIC.

10) 330 Grant Street

a) Aerial photo: *insert*

b) Street level photo: *insert*

c) Bedroom mix and rent table:

Project	10	**Name**	330 Grant Street	**DOFA Date**	1982/04/30
AMP	CA025000001	**Bldg Type**	Walkup	**Year Built**	1970/01/01

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	101	4	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	46	1	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		5	$71.92	$836	$1,134	$1,266	$1,381	$1,726

d) Building & Site Information

a.	Address:	330 Grant Street
b.	City/state/zip:	Eureka, CA 95501
c.	Census Tract:	6023000100
d.	Building age:	40 years
e.	QCT:	Yes
f.	Opportunity Zone:	No
g.	Minority Census Tract:	No
h.	Lot size:	7,841 sf / 0.18 acres
i.	Zoning:	R2
j.	District:	14
k.	APN:	004-161-002

e) Physical description:
The building and property at 330 Grant Street appear to be in satisfactory condition for their age, original construction type, and historical funding trends in public housing. The property is located on the corner of Grant Street and E Street.

The buildings consist of rowhouse and stacked flat units in a two-story wood frame construction with gable roofs. Foundations are slab on grade. Parking for the building is serviced from an alley off Grant Street. The building fronts on Grant Street. Private space is located behind the building.

The site is flat. The site lacks any natural features that would impact operations of development of site. Water and sanitary service are available to the site. Information about the capacity of the system for additional conveyance or service is not available.

In 2020, CEHA contracted with Bureau Veritas (fka EMG) to complete a Physical Needs Assessment. On site investigation occurred from January 14 to 17, 2020, and the final report is dated August 5, 2020. The report is comprehensive in its scope of review. As of the final report, Bureau concluded needs totaling $62,190 through 2024. These costs do not appear to include general conditions, Builder Profit, Architectural or PHA Administrative Costs. Assuming correct, these costs would be additive.

f) Total Development Cost / Housing Construction Cost analysis:
Several HUD Repositioning tools rely upon Total Development Cost (TDC) or Housing Construction Cost (HCC) to determine eligibility. The tables below illustrate the TDC and HCC amounts for 330 Grant. The 2021 TDC is $1,515,518. At 57.14%, the Obsolescence threshold amount is $865,967.

Section 18 Analysis 17,858

Size	Override Unit	Units	HCC	TDC	Unit Dist - Blend RAD	Section 18	Total
0BRD	0	0	$94,256	$164,949	0	0	0
1BRD	34	0	$128,610	$225,068	0	0	0
2BRD	101	4	$162,852	$284,992	3	1	4
3BRD	46	1	$214,601	$375,551	1	0	1
4BRD	12	0	$265,874	$465,279	0	0	0
5BRD	0	0	$299,528	$524,173	0	0	0
6BRD	0	0	$332,759	$582,328	0	0	0
Total		5	$866,010	$1,515,518	4	1	5

Using the Bureau Veritas capital needs value through 2024 and applying the allowable load factors for General Conditions (5%), Buildings Profit (10%), Architectural (7%), and PHA Administration (2%), the gross capital needs for 330 Grant Street is projected to be $71,116 or 5.09% of the TDC. An additional $788,851 in cost is needed to meet threshold.

g) Development capacity analysis:
330 Grant Street is entirely located in a Residential Medium (R3) Zone. R3 permits development density of 44 dwelling units per acre. Additional development standards including Floor Area Ratio (FAR), building height, and building setback further define the development capacity of a site.

For purpose of this repositioning plan, a development capacity analysis was completed to determine if the underlying zone would allow for more units than currently exist on the site. This capacity analysis mathematically tests fit units based on development standards. Gross Square Footage (GSF) was determined using a bedroom mix, unit square footage, and a building efficiency factor. Detail supporting this analysis can be found in Appendix XX.

330 Grant Street is currently non-conforming with the existing zoning designation. This should not present a problem as the development was built under a prior code. There is no additional development capacity on the site.

330 Grant Street

			NSF		GSF	# of Stories
Size	%	#	Target	Total NSF	0.75 Eff	3
SRO	0%	0				
0 BRD	0%	0	410 SF	SF	SF	
1 BRD	100%	4	600 SF	2,400 SF	3,200 SF	
2BRD	0%	0	860 SF	SF	SF	
3BRD	0%	0	1,145 SF	SF	SF	
4 BRD	0		SF	SF	SF	
TOTALS	100%	4	600 SF	2,400 SF	3,200 SF	1,067 SF

Information	
APN	004-161-002
Zoning	R2
District	14
Acres	0.18
SF	7,841
Existing Units	5

Standards		**Calcs**
Density	22 units/acre	4 units
FAR	1.00	7,841
Site Coverage	70%	5,489
Height	35 ft.	3 stories

Program			
0 BRD	0	FAR	0.41
1 BRD	4	Stories	3
2BRD	0	Site Coverage	14%
3BRD	0		
4 BRD	0		
Total	4	Existing Units	5
		Net Change	-1

h) Economic analysis:
A fundamental consideration for public housing repositioning is how to maximize property revenue post conversion. The two bases for consideration are RAD rents and Fair Market Rents (FMR). RAD rents are available through a RAD repositioning. FMR is the basis for determining property revenue when using Section 18 Disposition.

The table below reflects a comparison of 2022 RAD rents and 2022 FMR for available to CEHA. Both RAD rents and FMR figures reflect the net revenue to a project.
[need to settle on how much description of rent setting should be in this document. And how the implication of FMR rents to a redevelopment scenario work].

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	101	4	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	46	1	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		5	$71.92	$836	$1,134	$1,266	$1,381	$1,726

FMR based rents for 1645 C Street are significantly higher than RAD rents. FMR weighted average rents for the property bedroom mix are 26% higher than RAD rents ($1,134 versus $836). This difference across 5 units for one year totals $17,858.

i) Discussion of development opportunity:
330 Grant Street is among the smallest of CEHA properties. Capital needs for 330 Grant Street are far below the threshold criteria for Obsolescence.

The building frontage on Grant Street is welcoming. The north side of the buildings facing the busier E Street includes a bank of gas and electric meters and no windows.

The property exceeds the current allowable development capacity of the site. No additional units could be developed on site.

Under a FMR based revenue scenario, the 5 residential units in 330 Grant Street would be approximately $17,858 more revenue per year than a RAD revenue scenario.

j) Repositioning Tool Analysis:
HUD offers a variety of repositioning tools that convert traditional public housing to the Section 8 platform. These tools include RAD, RAD / Section 18 Blends, Section 18, and Section 22 Streamline Voluntary Conversion. Each tool has its own eligibility criteria and resulting rent structure post conversion to Section 8.

Identifying the optimal tool for CEHA begins with determining eligibility. The table below reflect eligibility by repositioning tool and option. Information in the 2020 physical needs assessment completed by Bureau Veritas is used to conclude conditional eligibility.

Public Housing Repositioning Tool: Option Eligibility

Type	Eligibility	Threshold	Note
RAD			
PBV	Yes	na	Available by right to PHA
PBRA	Yes	na	Available by right to PHA
PBRA Rent Boost	No	Located in OZ	Project is not in an Opportunity Zone
Streamline	No	50 units	Not less than 50 units
RAD / Section 18 Blends			
Const Blend > 30%	Conditional	$259,803	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 60%	Conditional	$519,606	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 90%	Conditional	$779,409	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 90% High Cost	No		Project is not in a HUD deteremied "high cost" area.
Small PHA	Conditional	<= 250 units	PHA must have 250 or fewer units remaining in PIC at time of application.
Very Small PHA	Conditional	<= 50 units	PHA must have 50 or fewer units remaining in PIC at time of application.
Section 18			
Obsolescence	Conditional	$865,967	Project does not meet Threshold based on Bureau Vista report.
Scattered Site	No	<= 4 units / lot	Project is not "scattered site."
Health & Safety	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Infeasible Opereations	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Section 22			
SVC	Yes	<=250 units	CEHA has less than 250 units in PIC.

11) Albee & Del Norte

a) Aerial photo: *insert*

b) Street level photo: *insert*

c) Bedroom mix and rent table:

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	101	4	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	43	4	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		8	$71.92	$936	$1,274	$1,266	$1,381	$1,726

d) Building & Site Information

a. Address:	514 W Del Norte Street
b. City/state/zip:	Eureka, CA 95501
c. Census Tract:	6023000100
d. Building age:	40 years
e. QCT:	Yes
f. Opportunity Zone:	No
g. Minority Census Tract:	No
h. Lot size:	13,068 sf / 0.30 acres
i. Zoning:	R3
j. District:	14
k. APN:	004-052-006, 004-052-007

e) Physical description:
The building and property at Albee & Del Norte appear to be in satisfactory condition for their age, original construction type, and historical funding trends in public housing. The development occupies a full quarter block between W Wabash Avenue and W Del Norte, Spring Street and Albee Street. The block is bisected by an alley running east west.

There are two bar shaped buildings, oriented north / south on the property. Parking for the building is serviced from an alley. Space between the buildings makes an outdoor courtyard for both buildings. Within the courtyard is a small laundry building (not in service), vertical circulation for the western building and access to parking. The courtyard is behind a 6-foot-tall privacy fence.

The total property includes two parcels. It appears from county parcel maps that building footprints overlay lot lines.

The overall site is flat and lacks any natural features that would impact operations of development of site. At the lot line there is a 3-foot-tall fence that creates semi-private space along W Del Norte Street and Albee Street. Water and sanitary service are available to the site. Information about the capacity of the system for additional conveyance or service is not available.

In 2020, CEHA contracted with Bureau Veritas (fka EMG) to complete a Physical Needs Assessment. On site investigation occurred from January 14 to 17, 2020, and the final report is dated August 5, 2020. The report is comprehensive in its scope of review. As of the final report, Bureau concluded needs totaling $465,735 through 2024. These costs do not appear to include general conditions, Builder Profit, Architectural or PHA Administrative Costs. Assuming correct, these costs would be additive.

f) Total Development Cost / Housing Construction Cost analysis:
Several HUD Repositioning tools rely upon Total Development Cost (TDC) or Housing Construction Cost (HCC) to determine eligibility. The tables below illustrate the TDC and HCC amounts for Albee & Del Norte. The 2021 TDC is $2,551,625. At 57.14%, the Obsolescence threshold amount is $1,457,999.

Section 18 Analysis

Size	Override Unit	Units	HCC	TDC		RAD	Section 18	Total
						Unit Dist - Blend		
0BRD	0	0	$121,118	$211,956		0	0	0
1BRD	34	0	$156,551	$273,964		0	0	0
2BRD	101	4	$162,852	$284,992	*WAVG Bldg Type*	3	1	4
3BRD	43	4	$201,666	$352,915	*WAVG Bldg Type*	3	1	4
4BRD	12	0	$262,665	$459,663		0	0	0
5BRD	0	0	$287,862	$503,758		0	0	0
6BRD	0	0	$311,468	$545,070		0	0	0
Total		8	$1,458,072	$2,551,625		6	2	8
						75%	25%	100%

TDC / HCC Thresholds

Obsolescence		57.14%	of TDC	$1,457,999	or $182,250 / U	0%	100%
Const Blend	> 30%	30.00%	of HCC	$437,421	or $54,678 / U	80%	20%
Const Blend	> 60%	60.00%	of HCC	$874,843	or $109,355 / U	60%	40%
Const Blend	> 90%	90.00%	of HCC	$1,312,264	or $164,033 / U	40%	60%
Const Blend	> 90% high $	90.00%	of HCC	$1,312,264	or $164,033 / U	20%	80%

Using the Bureau Veritas capital needs value through 2024, and applying the allowable load factors for General Conditions (5%), Buildings Profit (10%), Architectural (7%), and PHA Administration (2%), the gross capital needs for Albee & Del Norte is projected to be $557,551 or 22.63% of the TDC. This projection is $880,847 short of meeting the obsolescence threshold criteria.

g) Development capacity analysis:
Albee & Del Norte is entirely located in a Residential Medium (R3) Zone. R3 permits development density of 44 dwelling units per acre. Additional development standards including Floor Area Ratio (FAR), building height, and building setback further define the development capacity of a site.

For purpose of this repositioning plan, a development capacity analysis was completed to determine if the underlying zone would allow for more units than currently exist on the site. This capacity analysis mathematically tests fit units based on development standards. Gross Square Footage (GSF) was determined using a bedroom mix, unit square footage, and a building efficiency factor. Detail supporting this analysis can be found in Appendix XX.

Combined, the property at Albee & Del Norte can yield 6 additional housing units on the same land under a redevelopment scenario.

Total: Alber & Del Norte						
			NSF		GSF	# of Stories
Size	%	#	Target	Total NSF	0.75 Eff	3
0 BRD	0%	0	410 SF	SF	SF	
1 BRD	80%	8	600 SF	4,800 SF	6,400 SF	
2BRD	60%	6	860 SF	5,160 SF	6,880 SF	
3BRD	0%	0	1,145 SF	SF	SF	
4 BRD	0	0	SF	SF	SF	
TOTALS	140%	14	711 SF	9,960 SF	13,280 SF	4,427 SF

Information	
APN	
Zoning	R3
District	14
Acres	0.3
SF	13,068
Existing Units	12

Standards		Calcs
Density	22 units/acre	7 units
FAR	1.00	13,068
Site Coverage	70%	9,148
Height	35 ft.	3 stories

Program			
0 BRD	0		
1 BRD	8		
2BRD	6		
3BRD	0		
4 BRD	0		
Total	14	Existing Units	12
			2

h) Economic analysis:
A fundamental consideration for public housing repositioning is how to maximize property revenue post conversion. The two bases for consideration are RAD rents and Fair Market Rents (FMR). RAD rents are available through a RAD repositioning. FMR is the basis for determining property revenue when using Section 18 Disposition.

The table below reflects a comparison of 2022 RAD rents and 2022 FMR available to CEHA. Both RAD rents and FMR figures reflect the net revenue to a project.
[need to settle on how much description of rent setting should be in this document. And how the implication of FMR rents to a redevelopment scenario work].

Property Units & Rents

	Override	Existing		2020 RAD Rent	2022 FMR-UA			
Size	Unit	Units	Utility Allowance*	OCAF'd 2022	100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	101	4	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	43	4	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		8	$71.92	$936	$1,274	$1,266	$1,381	$1,726

FMR based rents for Albee & Del Norte are significantly higher than RAD rents. FMR weighted average rents for the property bedroom mix are 27% higher than RAD rents ($1,274 versus $936). This difference across 8 units for one year totals $32,492.

i) Discussion of development opportunity:
Albee & Del Norte is a moderate sized property in CEHA's portfolio. Capital needs are conservatively projected at approximately $577,511 within the next several years. This amount is short of the Obsolescence threshold criteria for Section 18 by $880,487.

The site is square, served by an alley and on a corner. These dimensions, size, access and adjacencies are conducive to an efficient building design.

Current zoning allows for 44 units per acre. The current development is at 27 units per acre. An additional 6 units is achievable on this site.

Under a FMR based revenue scenario, the 8 residential units in Albee & Del Norte would be approximately $32,492 more revenue per year than a RAD revenue scenario.

j) Repositioning Tool Analysis:
HUD offers a variety of repositioning tools that convert traditional public housing to the Section 8 platform. These tools include RAD, RAD / Section 18 Blends, Section 18, and Section 22 Streamline Voluntary Conversion. Each tool has its own eligibility criteria and resulting rent structure post conversion to Section 8.

Identifying the optimal tool for CEHA begins with determining eligibility. The table below reflect eligibility by repositioning tool and option. Information in the 2020 physical needs assessment completed by Bureau Veritas is used to conclude conditional eligibility.

Public Housing Repositioning Tool: Option Eligibility

Type	Eligibility	Threshold	Note
RAD			
PBV	Yes	na	Available by right to PHA
PBRA	Yes	na	Available by right to PHA
PBRA Rent Boost	No	Located in OZ	Project is not in an Opportunity Zone
Streamline	No	50 units	Not less than 50 units
RAD / Section 18 Blends			
Const Blend > 30%	Conditional	$437,421	Project meets Threshold based on Bureau Vista report.
Const Blend > 60%	Conditional	$874,843	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 90%	Conditional	$1,312,264	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 90% High Cost	No		Project is not in a HUD deteremied "high cost" area.
Small PHA	Conditional	<= 250 units	PHA must have 250 or fewer units remaining in PIC at time of application.
Very Small PHA	Conditional	<= 50 units	PHA must have 50 or fewer units remaining in PIC at time of application.
Section 18			
Obsolescence	Conditional	$1,457,999	Project does not meet Threshold based on Bureau Vista report.
Scattered Site	No	<= 4 units / lot	Project is not "scattered site."
Health & Safety	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Infeasible Opereations	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Section 22			
SVC	Yes	<=250 units	CEHA has less than 250 units in PIC.

12) 131 West Del Norte

a) Aerial photo: *insert*
b) Street level photo: *insert*
c) Bedroom mix and rent table:

Property Units & Rents

	Override	Existing		2020 RAD Rent	2022 FMR-UA			
Size	Unit	Units	Utility Allowance*	OCAF'd 2022	100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	86	19	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	47	0	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		19	$71.92	$770	$1,040	$1,266	$1,381	$1,726

d) Building & Site Information

a. Address:	131 W Del Norte Street
b. City/state/zip:	Eureka, CA 95501
c. Census Tract:	6023000100
d. Building age:	38 years
e. QCT:	Yes
f. Opportunity Zone:	No
g. Minority Census Tract:	No
h. Lot size:	32,234 sf / 0.74 acres
i. Zoning:	R3
j. District:	14
k. APN:	004-084-006

e) Physical description:

The buildings and property at 131 W Del Norte appear to be in satisfactory condition for their age, original construction type, and historical funding trends in public housing. The development occupies a full half block between W Sonoma Street and W Del Norte, Pine Street and California Street. Based on aerial photos and site observations, it appears CEHA has granted an easement to the neighboring property for shared use of the existing drive isle and parking.

There are two buildings on the property. Parking for the building is interior to the site and accessed from a shared drive isle located on CEHA property. Buildings are oriented towards the parking area. Rears of the buildings are street facing. A combination of privacy fences and lower perimeter fences divide and separate the exterior space.

The overall site is flat and lacks any natural features that would impact operations of development of site. Water and sanitary service are available to the site. Information about the capacity of the system for additional conveyance or service is not available.

In 2020, CEHA contracted with Bureau Veritas (fka EMG) to complete a Physical Needs Assessment. On site investigation occurred from January 14 to 17, 2020, and the final report is dated August 5, 2020. The report is comprehensive in its scope of review. As of the final report, Bureau concluded needs totaling $500,017 through 2024. These costs do not appear to include general conditions, Builder Profit, Architectural or PHA Administrative Costs. Assuming correct, these costs would be additive.

f) Total Development Cost / Housing Construction Cost analysis:

Several HUD Repositioning tools rely upon Total Development Cost (TDC) or Housing Construction Cost (HCC) to determine eligibility. The tables below illustrate the TDC and HCC amounts for Albee & Del Norte. The 2021 TDC is $5,414,840. At 57.14%, the Obsolescence threshold amount is $3,094,040.

Section 18 Analysis 61,656

Size	Override Unit	Units	HCC	TDC	Unit Dist - Blend RAD	Section 18	Total
0BRD	0	0	$94,256	$164,949	0	0	0
1BRD	34	0	$128,610	$225,068	0	0	0
2BRD	86	19	$162,852	$284,992	15	4	19
3BRD	47	0	$214,601	$375,551	0	0	0
4BRD	12	0	$265,874	$465,279	0	0	0
5BRD	0	0	$299,528	$524,173	0	0	0
6BRD	0	0	$332,759	$582,328	0	0	0
Total		19	$3,094,194	$5,414,840	15	4	19

Using the Bureau Veritas capital needs value through 2024, and applying the allowable load factors for General Conditions (5%), Building Profit (10%), Architectural (7%), and PHA Administration (2%), the gross capital needs for Albee & Del Norte is projected to be $620,021 or 11.45% of the TDC. This projection is $2,474,018 short of meeting the obsolescence threshold criteria.

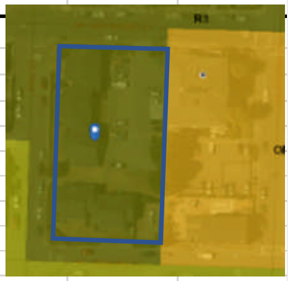
g) Development capacity analysis:
131 W Del Norte is entirely located in a Residential Medium (R3) Zone. R3 permits development density of 44 dwelling units per acre. Additional development standards including Floor Area Ratio (FAR), building height, and building setback further define the development capacity of a site.

For purpose of this repositioning plan, a development capacity analysis was completed to determine if the underlying zone would allow for more units than currently exist on the site. This capacity analysis mathematically tests fit units based on development standards. Gross Square Footage (GSF) was determined using a bedroom mix, unit square footage, and a building efficiency factor. Detail supporting this analysis can be found in Appendix XX.

Combined, the property at 131 W Del Norte can yield 14 additional housing units on the same land under a redevelopment scenario.

131 West Del Norte

Size	%	#	NSF Target	Total NSF	GSF 0.75 Eff	# of Stories 3
SRO	0%	0				
0 BRD	0%	0	410 SF	SF	SF	
1 BRD	61%	20	600 SF	12,000 SF	16,000 SF	
2BRD	39%	13	860 SF	11,180 SF	14,907 SF	
3BRD	0%	0	1,145 SF	SF	SF	
4 BRD	0		SF	SF	SF	
TOTALS	100%	33	702 SF	23,180 SF	30,907 SF	10,302 SF



Information	
APN	004-084-006
Zoning	R3
District	14
Acres	0.74
SF	32,234
Existing Units	19

Standards		Calcs
Density	44 units/acre	33 units
FAR	1.15	37,070
Site Coverage	80%	25,788
Height	35 ft.	3 stories

Program			
0 BRD	0	FAR	0.96
1 BRD	20	Stories	3
2BRD	13	Site Coverage	32%
3BRD	0		
4 BRD	0		
Total	33	Existing Units	19
		Net Change	14

h) Economic analysis:
A fundamental consideration for public housing repositioning is how to maximize property revenue post conversion. The two bases for consideration are RAD rents and Fair Market Rents (FMR). RAD rents are available through a RAD repositioning. FMR is the basis for determining property revenue when using Section 18 Disposition.

The table below reflects a comparison of 2022 RAD rents and 2022 FMR for available to CEHA. Both RAD rents and FMR figures reflect the net revenue to a project.
[need to settle on how much description of rent setting should be in this document. And how the implication of FMR rents to a redevelopment scenario work].

Property Units & Rents

Size	Override Unit	Existing Units	Utility Allowance*	2020 RAD Rent OCAF'd 2022	2022 FMR-UA 100%	110%	120%	150%
0BRD	0	0	$71.92	$512	$669	$736	$803	$1,004
1BRD	34	0	$71.92	$597	$790	$869	$948	$1,185
2BRD	86	19	$71.92	$770	$1,040	$1,144	$1,248	$1,560
3BRD	47	0	$71.92	$1,102	$1,508	$1,659	$1,810	$2,262
4BRD	12	0	$71.92	$1,315	$1,831	$2,014	$2,197	$2,747
5BRD	0	0	$71.92	$1,315	$2,117	$2,328	$2,540	$3,175
6BRD	0	0	$71.92	$1,315	$2,402	$2,642	$2,882	$3,603
Total / Weighted Ave		19	$71.92	$770	$1,040	$1,266	$1,381	$1,726

FMR based rents for 131 W Del Norte are significantly higher than RAD rents. FMR weighted average rents for the property bedroom mix are 26% higher than RAD rents ($1,040 versus $770). This difference across 19 units for one year totals $61,656.

i) Discussion of development opportunity:
131 W Del Norte is a moderate sized property in CEHA's portfolio. Capital needs are conservatively projected at approximately $620,021 within the next several years. This amount is short of the Obsolescence threshold criteria for Section 18 by $2,474,018.

The site is square, served by an alley and on a corner. These dimensions, size, access and adjacencies are conducive to an efficient building design.

Current zoning allows for 44 units per acre. The current development is at 26 units per acre. An additional 14 units is achievable on this site.

Under a FMR based revenue scenario, the 19 residential units in 131 W Del Norte would be approximately $61,656 more revenue per year than a RAD revenue scenario.

j) Repositioning Tool Analysis:
HUD offers a variety of repositioning tools that convert traditional public housing to the Section 8 platform. These tools include RAD, RAD / Section 18 Blends, Section 18, and Section 22 Streamline Voluntary Conversion. Each tool has its own eligibility criteria and resulting rent structure post conversion to Section 8.

Identifying the optimal tool for CEHA begins with determining eligibility. The table below reflect eligibility by repositioning tool and option. Information in the 2020 physical needs assessment completed by Bureau Veritas is used to conclude conditional eligibility.

Public Housing Repositioning Tool: Option Eligibility

Type	Eligibility	Threshold	Note
RAD			
PBV	Yes	na	Available by right to PHA
PBRA	Yes	na	Available by right to PHA
PBRA Rent Boost	No	Located in OZ	Project is not in an Opportunity Zone
Streamline	No	50 units	Not less than 50 units
RAD / Section 18 Blends			
Const Blend > 30%	Conditional	$928,258	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 60%	Conditional	$1,856,517	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 90%	Conditional	$2,784,775	Project does not meet Threshold based on Bureau Vista report.
Const Blend > 90% High Cost	No		Project is not in a HUD deteremied "high cost" area.
Small PHA	Conditional	<= 250 units	PHA must have 250 or fewer units remaining in PIC at time of application.
Very Small PHA	Conditional	<= 50 units	PHA must have 50 or fewer units remaining in PIC at time of application.
Section 18			
Obsolescence	Conditional	$3,094,040	Project does not meet Threshold based on Bureau Vista report.
Scattered Site	No	<= 4 units / lot	Project is not "scattered site."
Health & Safety	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Infeasible Opereations	Conditional	Situational	Meets criteria in 24 CFR 970.17(a) and Notice 2021-07
Section 22			
SVC	Yes	<=250 units	CEHA has less than 250 units in PIC.

Section VII: Repositioning Recommendations

1. Repositioning Recommendations – Mike
    a. Guiding Principles / Vision statements – Final
    b. Goals – Final
    c. Approach
        i. Joint Ventures
        ii. Sole Development
        iii. Jurisdictional Partnerships (City)
    d. Repositioning Recommendations for each property
        1. 25-1
        2. Prospect Avenue
        3. C & Clark
        4. Buhne / Union / Summer
        5. Spring & Garland
        6. 1335 B
        7. 2523 Albee
        8. 1645 C Street
        9. 510 W Harris
        10. 330 Grant Street
        11. Albee & Del Norte
        12. 131 West Del Norte

Section VIII: Implementation Plan

a. Board Adopts Repositioning Plan
b. Flow Chart for HUD Applications
    ii. Describe steps as needed
c. Due Diligence Needed
    iii. [to be listed]
d. Joint Ventures of Developer Partners
    iv. Methods to attract interest
    v. Define Key Aspects of a partnership from EHA’s perspective.
        1. To be used in future RFP for developer
e. City Partnerships
f. Schedule (high level)