

Relocation Plan for Everding Community Center



Prepared for Clark I LP, Brinshore Development L.L.C & Housing Authority of the City of Eureka

Prepared by LACAL Consulting, Inc.

April 3, 2026

Table of Contents

Introduction.....	4
I. Project Location and Description	6
A. Location.....	6
B. Project Description	8
II. Relocation Needs Assessment.....	9
A. Current Occupants.....	9
III. Relocation Resources.....	11
A. Replacement Site Availability.....	11
B. Related Issues	12
IV. Relocation Program.....	13
A. Program Objectives, Standards and Assurances.....	13
B. Relocation Advisory Assistance.....	13
C. Relocation Financial Assistance.....	14
D. General Information on Payment of Relocation Benefits.....	17
E. Relocation Tax Consequences	18
F. Grievance Procedures	18
G. Eviction Policy.....	19
H. Immigration Status.....	19
I. Citizen Participation.....	20
J. Project Timing	20
K. Estimated Relocation Costs.....	20
Appendices.....	21
Appendix A.....	22
Project Schematics and Proposed Plans.....	22
Appendix B.....	29
Relocation Informational Brochure	29
Appendix C.....	36
Public Comments and Response	36

List of Figures

Figure 1: Regional Project Site Setting	6
Figure 2: Specific Boys & Girls Club Site.....	7
Figure 3: Aerial View of Project Vicinity.....	7

List of Tables

Table 1: Description of Non-Residential Use	9
Table 2: Availability and Cost of Commercial Space.....	11

Introduction

The Housing Authority of the City of Eureka (HACE) is partnering with Brinshore Development L.L.C. (Brinshore or Developer) to preserve and to create additional affordable housing at HACE Redevelopment – Blue Phase including demolition of 2 facilities and new construction of Everding Community Center (Project). HACE is a public entity that was formed in 1946 to provide federally subsidized housing and housing assistance to low-income families within the City of Eureka and jointly with the Housing Authority of the County of Humboldt (HACH) to the general Humboldt County area. HACE owns and manages a variety of affordable housing units and HACH administers Section 8 Housing Assistance Vouchers, along with a myriad of supportive service programs for its residents.

HACE is committed to creating and sustaining affordable housing communities and partnerships that inspire self-reliance, growth and optimism. In January 2023 HACE updated their Repositioning Plan with a goal to reposition their traditional public housing units. A move motivated by

- Backlogs of capital needs have outpaced the ability of public housing funding to keep pace.
- Operating revenue from public housing is uncertain year-to-year, and in many instances, less than other available options.
- Repositioning public housing can reduce or eliminate administrative requirements and generally ease burdens of operations; and
- 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 following relocation plan (Plan) has been prepared for the property known as Everding Community Center or Boys & Girls Club of the Redwoods to be redeveloped with possible assistance of the HUD Section 18 program. Brinshore will utilize this Plan for submission to HUD, HACE, and TCAC's 9% low-income housing tax credit program and other funding agencies, as necessary. The Plan is prepared in conformance with the applicable provisions of the Uniform Relocation Act (46 U.S.C. § 4600 et seq.), its implementing regulations (49 C.F.R. Part 24); as well as the California Relocation Assistance Law, California Government Code Section 7260 et seq. (CRAL) and the California Relocation Assistance and Real Property Acquisition Guidelines, Title 25, California Code of Regulations, Chapter 6, Section 6000 et seq., and HUD Handbook

1378 (Guidelines). The proposed project includes the demolition of existing two-story building currently occupied by Boys & Girls Club of the Redwoods and adjacent Eureka POP Unit office which is inactive and under special agreement with HACE to vacate any personal items still onsite prior to construction. The new Everding Community Center will be ground-up new construction with approximately 4,500 square feet and will include a kitchen, built-ins and outside space for children.

The statutory basis for this Plan arises from the anticipated need to temporarily displace the Boys & Girls Club of the Redwoods for the duration between demolition of existing structure and new construction, as well as to identify relocation requirements, special needs and preferences for this occupant and the relocation assistance program Brinshore and HACE will follow. The Plan is presented in four sections:

Section I: General Project area and site description

Section II: Profile of non-residential occupant who may be affected

Section III: Description of available suitable replacement sites in the vicinity of Project

Section IV: Description of the relocation assistance program

It is important to be aware that the preparation of the Plan fulfills an administrative requirement but does not, by itself, constitute a commitment to proceed with the Project or the eligibility for relocation assistance or benefits.

The Plan has been prepared by LACAL Consulting, Inc. (LACAL). The LACAL office is located at 6728 Fair Oaks Boulevard, Suite 400C, in Carmichael, California. LACAL maintains a toll-free number (800)345-5520 which is attended Monday through Friday, between 9 a.m. and 5 p.m. PST

I. Project Location and Description

A. Location

The Project is located at 3117 Prospect Avenue in the City of Eureka and County of Humboldt, generally between West Everding Street to the South, West Harris Street to the North, Elizabeth Street to the east and Prospect Avenue to the west. The project is located next to HACE offices, immediately next to a Problem-Oriented Policing unit, less than half a mile east of State Route 101, and less than a mile to Humboldt Bay. (see figure 1 for Regional Location Setting, Figure 2 for Specific Site Location and Figure 3 for Aerial Project View).

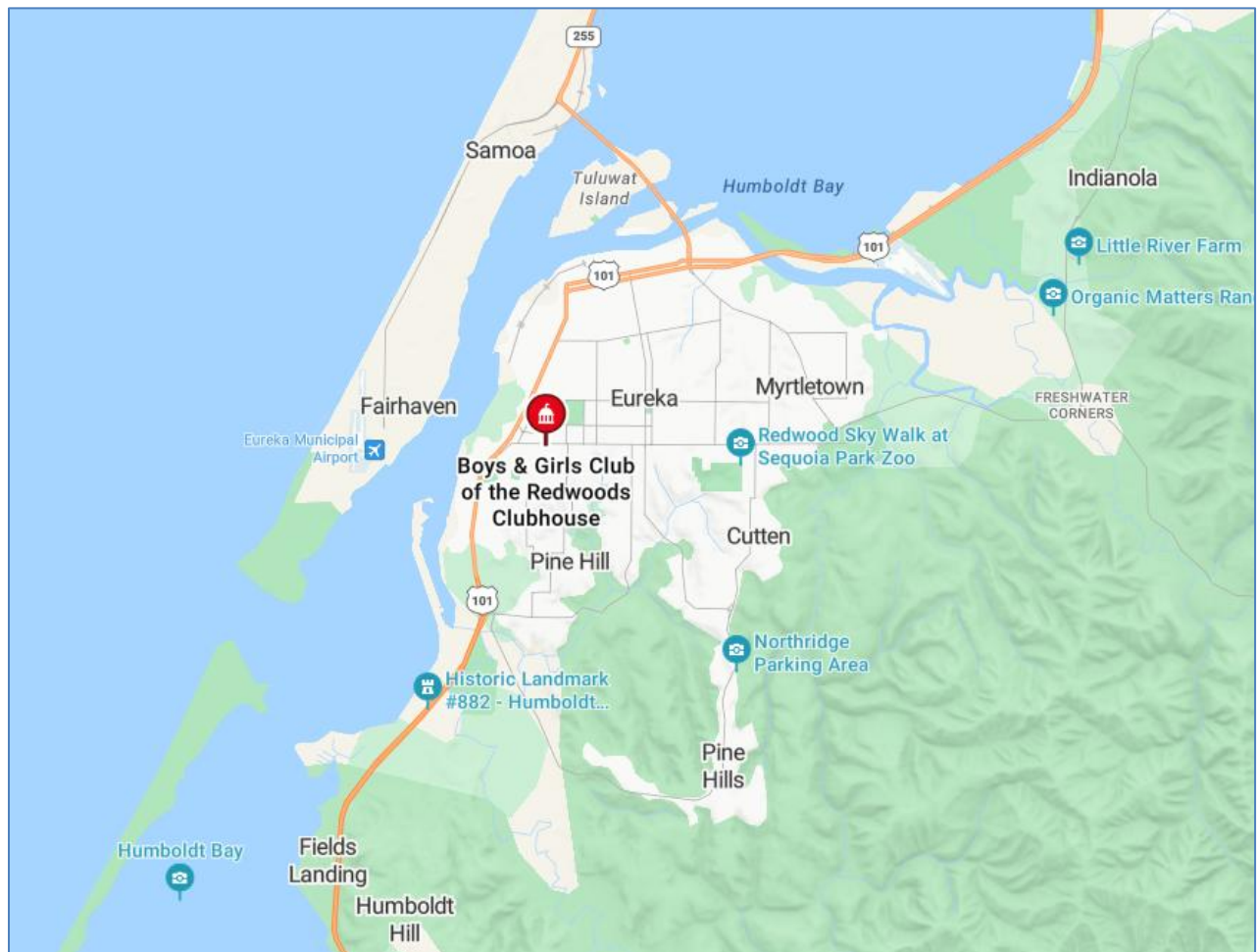


Figure 1: Regional Project Site Setting

The property is situated in a predominantly residential neighborhood, with Highland Park to the south and Da ‘Yas Park to the north of the community. Immediately adjacent to the south is Calvary Lutheran Church, Alice Birney Elementary School, and service providers, shops, and eateries along West Harris Street. The property is served by Humboldt Transit Authority’s bus lines: green, gold, red and rainbow with a stop at Harris/Elizabeth and Harris/Central.

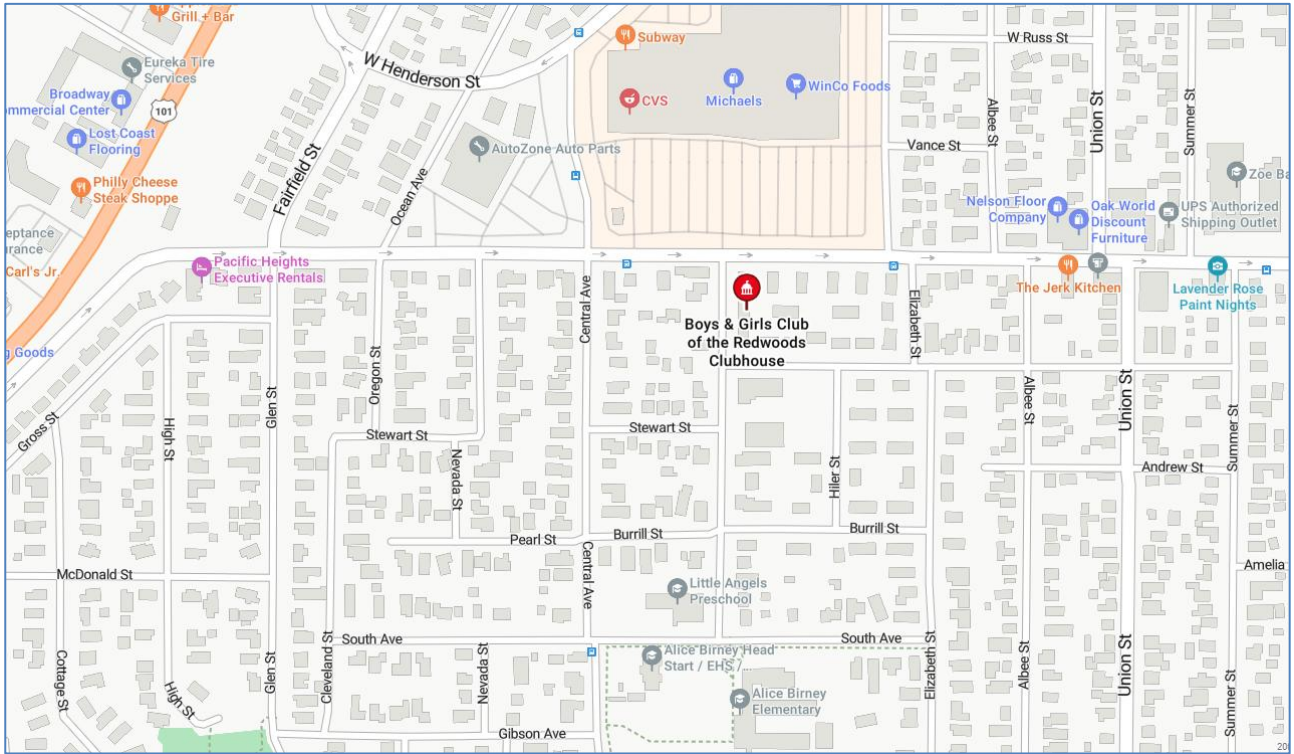


Figure 2: Specific Boys and Girls Club Site

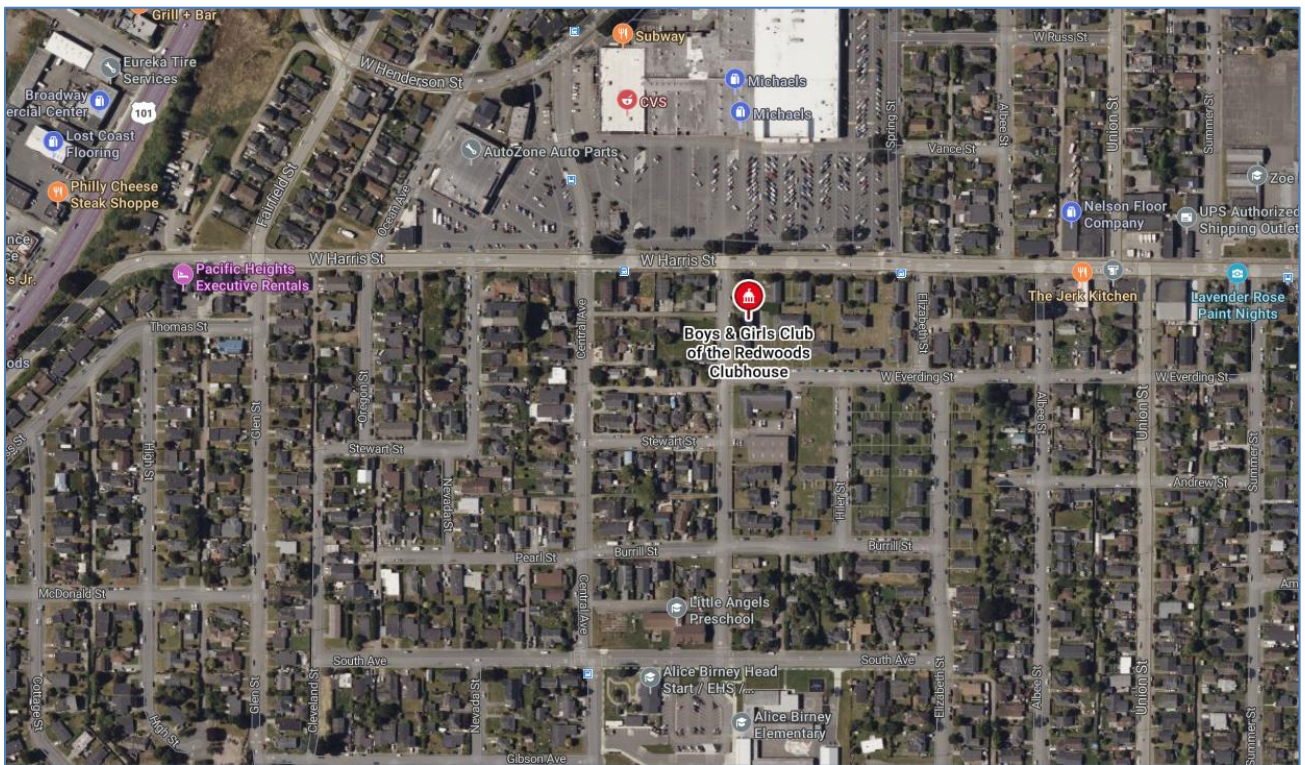


Figure 3: Aerial View of Project Vicinity

B. Project Description

HACE/Brinshore in collaboration with Housing Authority of the City of Eureka is planning to redevelop the existing site into the modernized and enlarged facilities. See **Appendix A** for proposed Project schematics and pictures. The proposed project includes the relocation of the existing Boys and Girls of the Redwoods Clubhouse, demolition of current site, and construction of a new facility designed to better support residents of the affordable housing community.

II. Relocation Needs Assessment

This Plan provides the results of a needs assessment survey, their incorporation into the planning process, and details of HACE/Brinshore's proposed relocation program. This Plan sets forth policies and procedures necessary to conform to federal and state statutes and regulations for non-residential displacements. Permanent funding sources for the Project include equity generated from the sale of Federal and California State low income housing tax credits, and CDBG funds.

The information necessary for the preparation of this Plan was provided by the HACE/Brinshore and it is substantiated by the personal interview with the Executive Director of the Boys & Girls Club of the Redwoods. Survey questions of non-residential occupant involved existing conditions such as type of business, type of occupancy, lease/rental and income information, description and size of current operations, any special requirements, and area/facility preferences for replacement locations.

A. Current Occupants

The Project includes one operating non-profit business, Boys & Girls Club of the Redwoods Clubhouse (interchangeably called ‘non-residential use’, ‘business’, and ‘commercial tenant’) which is one of 6 sites in Humboldt County offering a youth development program for children ages 6 to 18, and a safe place for children to learn, play and develop citizenship and leadership skills. Table 1, following, provides a visual presentation of the current commercial use on-site: type, estimated square footage, notable features, longevity and rent/lease rates.

Name	Type of Operation	Square Footage	Particular Features	Move-In/ Lease Start	Monthly Lease
Boys & Girls Club of the Redwoods – 3117 Prospect Avenue Location	Non-profit organization serving local youth with safe space for after-school activities and learning	2,800	2-story facility with 4 classrooms equipped with computers, reading/research materials, kitchen, 2 bathrooms, large fenced-in back yard	Operating at this site since 1972	\$200

Current tenant at the Project property is a well-organized and community-centered non-profit organization, one of the locations of Boys & Girls Club of the Redwoods serving kids in kindergarten through 6th grade.

Personal interview with the Executive Director, Ms. Rose was conducted on March 16, 2026 and she revealed that Boys & Girls Club of the Redwoods was established in 1938 to serve the Humboldt County youth, and this location at 3117 Prospect Avenue in Eureka has opened in 1972. The classrooms, including their computer lab are tastefully equipped and functional, and inviting for children utilizing their after-school programs. The kitchen equipped with stove, fridge, dishwasher, microwave, coffee maker and ample storage cabinets was recently updated by in-kind donations of the community members who value the organization's presence in the community and donate their time and funds to keep it from having to spend their resources on upkeep and improvements. All upkeep and maintenance for the building are done by staff or volunteers from community, the only paid service contract the Boys & Girls Club maintains is with the IT vendor to ensure the communications and IT available to the children are professionally managed.

The business has currently a lease arrangement with HACE where they pay monthly lease of \$200.00 or provide the equivalent value for improvements to the property in exchange for paying rent. Per Ms. Rose, most of the time they are not paying the lease amount but rather provide services for the value. Because the location and size of the building/classrooms and outside lot is of utmost importance for this organization, they have been in negotiations with HACE/Brinshore to relocate temporarily and HACE/Brinshore will design the new Boys & Girls Clubhouse space per their specifications within the newly built Everding Community Center. The organization has 1 full-time employee, Unit Director, at this site and 4 additional Program Aides who are part-time employees, their standard working hours are Monday to Friday between 1-5 PM on Mondays and 2-6 PM Thursday through Friday. Ms. Rose is already actively looking for available sites to move to temporarily while the new Everding Community Center is being constructed; the organization has a good relationship with the Calvery Lutheran Church and Pacific View Charter School, and these are the 2 locations they are considering for temporary space to continue serving their children. They will not be searching for regular commercial sites in the city. Rental rates at the temporary replacement site will be similar to what they pay now or free. Everything on the current site is movable, no trade fixtures or tenant improvements are expected. The temporary space they are considering will be approximately half the size of their current space and some equipment will be placed in storage for the temporary displacement.

Every attempt will be made to find and secure one of the suitable replacement sites in the vicinity and to provide storage for equipment not fitting in the smaller temporary space. HACE/Brinshore will cover moving expenses, temporary storage expenses and any miscellaneous costs related to the temporary relocation. Boys & Girls Club will have no out-of-pocket expenses due to new Everding Community Center being developed.

III. Relocation Resources

While there is no specific requirement under current Relocation Law that alternate relocation sites be made available to non-residential occupants at the time of displacement, HACE/Brinshore are committed to making every effort to satisfactorily relocate this business for approximately 12 months and build the built-to-suit space within the new Everding Community Center.

Boys & Girls Club organization will temporarily relocate to one of the facilities with which they have a long-standing relationship. Proximity to the neighborhood school where children walk from or take school buses to and from is most important when looking for a replacement site. Ms. Rose is actively pursuing the leads and will not even consider any commercial space for rent. As a last resort, if neither the church or school location was able to accommodate them, the clubhouse will temporarily relocate to their own facilities at Eureka Teen Center.

A. Replacement Site Availability

The Project nonprofit organization will be returning to the newly built Everding Community Center and will relocate temporarily to a smaller facility and place some equipment to storage. Table 2 below lists the 3 potential sites for temporary relocation, church and school are preferred locations and Teen Center is last resort if no arrangements can be made at the church or school.

Table 2: Availability and Cost of Commercial Space

Space Size/Type	Location	Cost / Sq. Foot / Monthly Lease
2 classrooms and use of kitchen, restrooms and common space at Lutheran Calvary Church	716 South Ave., Eureka	Free or minimal usage fee
2 classrooms and use of kitchen, restrooms and common space at Pacific View Charter School	115 Henderson St., Eureka	Free or minimal usage fee
Shared space with Eureka Teen Center location	3015 J St., Eureka	Free; last resort option

HACE/Brinshore will provide professional consulting assistance to the business during the relocation implementation phase to minimize any downtime and loss of revenue. Any increased rent costs, storage costs and costs for moving to the replacement site and back will be reimbursed.

B. Related Issues

1. Language

Relocation assistance information will be provided in English as Boys & Girls Club staff all speak English. No translation or interpretation to another language is needed.

2. Temporary Relocation

Temporary relocation is the best solution for this Project non-residential occupant. They are tied to the community and neighborhood and HACE/Brinshore recognize the importance of having Boys & Girls Club Clubhouse at this site. The negotiations with the non-residential use and HACE/Brinshore team included architectural plans for a similar size space as they currently enjoy at the new Everding Community Center. The space will be built out per the specific requirements of the occupant and while the construction of the new facility is underway, Boys & Girls Club will temporarily relocate to an alternate, smaller site in the neighborhood, and require moving assistance, storage for some equipment which will not fit in the temporary location, and then return move to the Everding Community Center. HACE/Brinshore will reimburse non-residential use for their actual and reasonable moving expenses based on 2 bids from professional moving companies, searching for replacement site, storage for the duration of construction and return move back once Everding Community Center is ready for occupancy. HACE/Brinshore and LACAL relocation team will be assisting the Boys & Girls Club to relocate temporarily with least disturbance to their operations and downtime due to the move.

IV. Relocation Program

The relocation program and assistance offered by HACE/Brinshore will conform to provisions of the California Relocation Law, Government Code Section 7260, et seq., the California Relocation Guidelines, California Code of Regulations Title 25, Chapter 6, as amended January 1, 1998, the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended and the implementing regulations of Handbook 1378 of the Department of Housing and Urban Development (HUD), as appropriate.

A. Program Objectives, Standards and Assurances

It is HACE/Brinshore's objective to fully inform eligible Project occupants of the nature of the site development activities, timing, and procedures for obtaining relocation assistance and benefits. To meet all regulatory requirements, HACE/Brinshore and LACAL relocation staff will:

- Distribute appropriate written informational brochure (Appendix B); and fully inform eligible Project occupants of the nature of and procedures for obtaining relocation assistance and benefits.
- Determine the needs of the commercial displacee eligible for assistance.
- Assist commercial displacee to identify appropriate replacement spaces.
- Provide assistance that does not result in different, or separate treatment due to race, color, religion, national origin, sex, sexual orientation, marital status or, other arbitrary circumstances.
- Supply information concerning federal and state governmental programs providing assistance to displacees.
- Assist non-residential occupant to complete applications for relocation benefits.
- Make relocation benefit payments in accordance with applicable law and guidelines.
- Assure that the occupant is not required to move without a minimum of 90 days written notice to vacate.
- Inform all persons of HACE/Brinshore's property management policies including criteria for pursuing tenant evictions.
- Establish and maintain a formal grievance procedure for use by displaced persons seeking administrative review of HACE/Brinshore's decisions with respect to relocation assistance.

B. Relocation Advisory Assistance

Advisory assistance services are provided in order to inform displacee about the relocation program, help find replacement accommodations, coordinate claims processing, maintain a communication link with HACE/Brinshore and assist with the involvement of outside providers of social and other support services. To follow through on the advisory assistance component of the relocation program, LACAL relocation staff has and will perform the following functions:

- The non-residential occupant in the Project area was personally interviewed on March 16, 2026 to gather information appropriate to the determination of needs and preferences regarding replacement of existing facilities.
- A printed Informational Brochure was provided and signed acknowledgment was obtained to verify receipt of this material.
- Follow up on available desirable space for Boys & Girls Club and assist in securing the space.
- Assistance will be offered to displacee in connection with arrangements for the suitable storage facilities, if applicable, obtaining required business permits or licenses, the filing of claim forms to request relocation benefits from HACE/Brinshore and to obtain services from other vendors.
- Special assistance in the form of referrals to governmental and non-governmental agencies will be made, if requested.
- Assist eligible displacee with the preparation and submission of relocation assistance claims.
- Make benefit determinations and payments in accordance with applicable law and HACE/Brinshore's policy.

C. Relocation Financial Assistance

Benefits will be paid to the eligible displaced occupant upon submission of required claim forms and documentation in accordance with HACE/Brinshore's approved procedures. LACAL will assist claimant in the preparation of the necessary claim forms.

Specific eligibility requirements and eligible benefits will be detailed on an individual basis with displacee. In the course of personal interview and follow-up visits, the displacee will be counseled as to available options and the consequences of any choice with respect to financial assistance.

Pursuant to the requirements of Federal Relocation Guidelines, the eligible business may receive a relocation payment to cover reasonable cost of moving. They may choose either (1) a payment for all eligible actual reasonable and necessary moving and related expenses, or (2) a fixed payment not to exceed \$53,200.

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

Any business which qualifies as a displaced person is entitled to payment for such actual moving expenses, as HACE/Brinshore determines to be reasonable and necessary, including expenses for:

- Transportation of persons and property from the present location to the replacement location (transportation costs for a distance beyond 50 miles are not eligible, unless HACE/Brinshore determines that relocation beyond 50 miles is justified).
- Packing, crating, uncrating, and unpacking personal property.
- Disconnecting, dismantling, removing, reassembling, and installing relocated and substitute machinery, equipment and other personal property. Includes connection to utilities available nearby and modifications necessary to adapt such property to the replacement structure or to the utilities or to adapt the utilities to the personal property.
- Storage of personal property for a period not to exceed 12 months, unless HACE/Brinshore determine that a longer period is necessary.
- Insurance of personal property while in storage or transit and the replacement value of property lost, stolen, or damaged (not through the fault or negligence of the displaced person) in the process of moving, where insurance is not readily available.
- Any license, permit, or certification required by the displaced business, to the extent that the cost is necessary for reestablishment at the replacement location. (These costs may be pro-rated based on the remaining useful life of any existing license, permit or certification).
- Reasonable and pre-authorized professional services, including architects', attorneys', engineers' fees, and consultants' charges, necessary for: (1) planning the move of the personal property; (2) moving the personal property; or, (3) installing the relocated personal property at the replacement location.
- Professional services performed prior to the purchase or lease of a replacement site to determine its suitability for the business operation including, but not limited to, soil testing, feasibility and marketing surveys.
- The purchase and installation of substitute personal property limited to the lesser of: (1) an amount equal to the reasonable expenses that would have been required to relocate the property, as determined by HACE/Brinshore, subject to certain limitations, or, (2) the replacement cost, less any proceeds from its sale or trade-in.
- Connection to available nearby utilities from the right-of-way to improvements at the replacement site.
- The modification of machinery, equipment or other personal property necessary to adapt these to the replacement location or to utilities available at the replacement location.
- Relettering signs and replacing stationary on hand at the time of displacement that are made obsolete as a result of the move.
- Actual direct losses of tangible personal property resulting from moving or discontinuing a business or non-profit organization, not-to-exceed the lesser of: (1) the fair market value of the property for continued use at its location prior to

displacement less any proceeds from sale of the property; or, (2) an amount equal to the reasonable expenses that would have been required to relocate the property, as determined by HACE/Brinshore, subject to certain limitations.

- Actual and reasonable expenses incurred in searching for a replacement business or non-profit organization location, not-to-exceed \$5,000, and including compensation for transportation expenses; time spent searching for a reasonable location, meals, and lodging; real estate broker or agent fees; time spent in obtaining permits and attending zoning hearings; and time spent negotiating the purchase of a replacement site. HACE/Brinshore determined that it is advantageous in this case to allow for payment of searching expenses of \$1,000 with minimal or no documentation if non-profit organization requests it.
- Impact fees or one-time assessments for anticipated heavy utility usage.
- Low Value/High Bulk: when the personal property to be moved is of low value and high bulk, and the cost of moving the property would be disproportionate to its value in the judgment of HACE/Brinshore, the allowable moving cost payment shall not exceed the lesser of: (1) the amount which would be received if the property were sold at the site or (2) the replacement cost of a comparable quantity delivered to the new business location. Examples of personal property covered by this provision include, but are not limited to, stockpiled sand, gravel, minerals, metals and other similar items of personal property as determined by HACE/Brinshore.
- A Reestablishment allowance of up to \$33,000, available to farms, nonprofit organizations and small businesses with no more than 500 employees. Reestablishment allowance payments are made in addition to compensation provided for actual, reasonable and necessary moving expenses. Reestablishment allowance expense categories include but are not limited to:
 - Repairs or improvements to the replacement property as required by Federal, State or local law, code or ordinance;
 - Modifications to the replacement property to accommodate the business operation or make replacement structures suitable for conducting business;
 - Construction and installation costs for exterior signing to advertise the business;
 - Redecoration or replacement of soiled or worn surfaces at the replacement site, such as paint paneling or carpeting;
 - Advertisement of replacement location;
 - Estimated increased costs of operation during the first two years at the replacement site for such items as: a) Lease or rental charges, b) Personal or real property taxes, c) Insurance premiums, and d) Utility charges, excluding impact fees;
 - Other items essential to the reestablishment of the business.

If the displaced business elects to take full responsibility for the move of the business, HACE/Brinshore will make a payment for the business's moving expenses in an amount not to exceed the lower of two acceptable bids or estimates submitted to HACE/

Brinshore. At HACE/Brinshore discretion, a payment for a low cost or uncomplicated move may be based on a single bid or estimate.

2. A Fixed Payment In Lieu of A Payment For Actual Reasonable Moving and Related Expenses

The option to claim a fixed payment in-lieu of actual reasonable moving and related expenses enables both for-profit and non-profit businesses to receive relocation assistance compensation without providing documentation of bids and actual expenses. The payment amount available to any individual business is based on an average of annual net earnings over a two year period. For businesses which have not been in operation for two years, income figures can be annualized. The method for establishing income is through tax returns and/or certified financial statements. The payment to an eligible business may not be less than \$1,000, nor more than \$53,200.

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

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

D. General Information on Payment of Relocation Benefits

Claims and supporting documentation for relocation benefits must be filed with HACE/Brinshore within 18 months from:

- the date the claimant moves from the acquired property; or,
- the date on which final payment for the acquisition of real property is made, whichever is later.

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

- Claimants will provide all necessary documentation to substantiate eligibility for assistance;
- Assistance amounts will be determined in accordance with the provisions of the Law;

- Required claim forms will be prepared by LACAL relocation personnel in conjunction with claimants. Signed claims and supporting documentation will be submitted by LACAL to HACE/Brinshore;
- HACE/Brinshore will review and approve claims for payment, or request additional information;
- HACE/Brinshore will issue benefit checks and they will either be personally delivered or sent by mail;
- Final payments will be issued after confirmation that the Project area premises have been completely vacated;
- Receipts of payment will be maintained in the relocation case file.

E. Relocation Tax Consequences

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

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

F. Grievance Procedures

HACE/Brinshore's Grievance Policy will follow the standards described in 49 CFR, Part 24, Section 24.10. Briefly stated, aggrieved persons will have the right to ask for administrative review when they believe themselves aggrieved by a determination as to eligibility or the amount of payment. Requests for review will be directed to HACE/Brinshore's Senior Vice President, or authorized designee. Details concerning the entire appeals process will be provided upon request.

Requests for administrative review and informal hearings will be directed to HACE/Brinshore's principals and senior administrative staff. All requests for review will receive written responses

from HACE/Brinshore within 3 weeks of their receipt. If an informal appeal is denied, appellants will be entitled to file a written request for a formal hearing before an impartial and independent hearing officer. The appellant does not have to exhaust administrative remedies first; the appeal/grievance can either go directly to the city, directly to HCD or directly to the Court. Any person and/or organization directly affected by the relocation plan may petition the Department of Housing and Community Development (HCD), located at 651 Bannon Street, SW Tower, Sacramento, CA 95811 to review the relocation plan.

More detail concerning the appeals process will be provided upon request. Appellants will retain their appeal rights for up to 18 months following the date of displacement from the Project premises or receipt of final payment for relocation benefits, whichever is later.

G. Eviction Policy

Eviction for cause must conform to applicable State and local law. Any person who occupies the real property and is not in unlawful occupancy on the date of the initiation of negotiations, is presumed to be entitled to relocation payments and other assistance set forth in this part unless HACE/Brinshore determines that:

- The person received an eviction notice prior to the initiation of negotiations and, as a result of that notice is later evicted; or
- The person is evicted after the initiation of negotiations for serious or repeated violation of material terms of the lease or occupancy agreement; and
- In either case the eviction was not undertaken for the purpose of evading the obligation to make available the payments and other assistance set forth in this part.

For purposes of determining eligibility for relocation payments, the date of displacement is the date the person moves, or if later, the date a comparable replacement dwelling is made available. This section applies only to persons who would otherwise have been displaced by the Project.

H. Immigration Status

Federal legislation (PL105-117) prohibits the payment of relocation assistance benefits under the Uniform Act to any alien not lawfully present in the United States unless such ineligibility would result in an exceptional and extremely unusual hardship to the alien's spouse, parent, or child any of whom is a citizen or an alien admitted for permanent residence. Exceptional and extremely unusual hardship is defined as significant and demonstrable adverse impact on the health or safety, continued existence of the family unit, and any other impact determined by the overseeing government authority to negatively affect the alien's spouse, parent or child. HACE/Brinshore may elect to authorize the payment of relocation assistance benefits to any otherwise eligible commercial displacee from non-federally authorized reimbursable funds.

In order to track and account for relocation assistance and benefit payments, LACAL relocation staff will be required to seek immigration status information from each non-residential occupant by having them self-certify as to their legal status.

I. Citizen Participation

HACE/Brinshore will fully meet its obligations under the Relocation Guidelines with respect to the following activities:

- Full and timely access to documents relevant to the relocation program.
- Provide assistance necessary to interpret elements of the Plan and pertinent notices.
- Distribution of a general notice concerning the availability of this Plan for public review, as required, 30 days prior to its proposed adoption. Notice recipients will include affected Project non-residential use and all other interested parties.
- The opportunity to submit written or oral comments concerning the Plan and to have these comments attached to the Plan (**Appendix C**) when it is forwarded to the HACE, CTCAC, or HUD for adoption.
- Final review of the Plan to ensure its feasibility, compliance and compatibility with relocation law and guidelines.

J. Project Timing

HACE/Brinshore is submitting 9% TCAC application in April 2026 and construction is anticipated to begin in November 2026. The relocation activities will commence promptly upon securing funding award to allow ample time for the affected business to plan their move. HACE/Brinshore will approve, or request additional information, individual relocation claims as soon as they are presented and eligible business will be able to move any time, even prior to issuance of 90-day notice – relocation activities are expected to begin in May/June 2026.

K. Estimated Relocation Costs

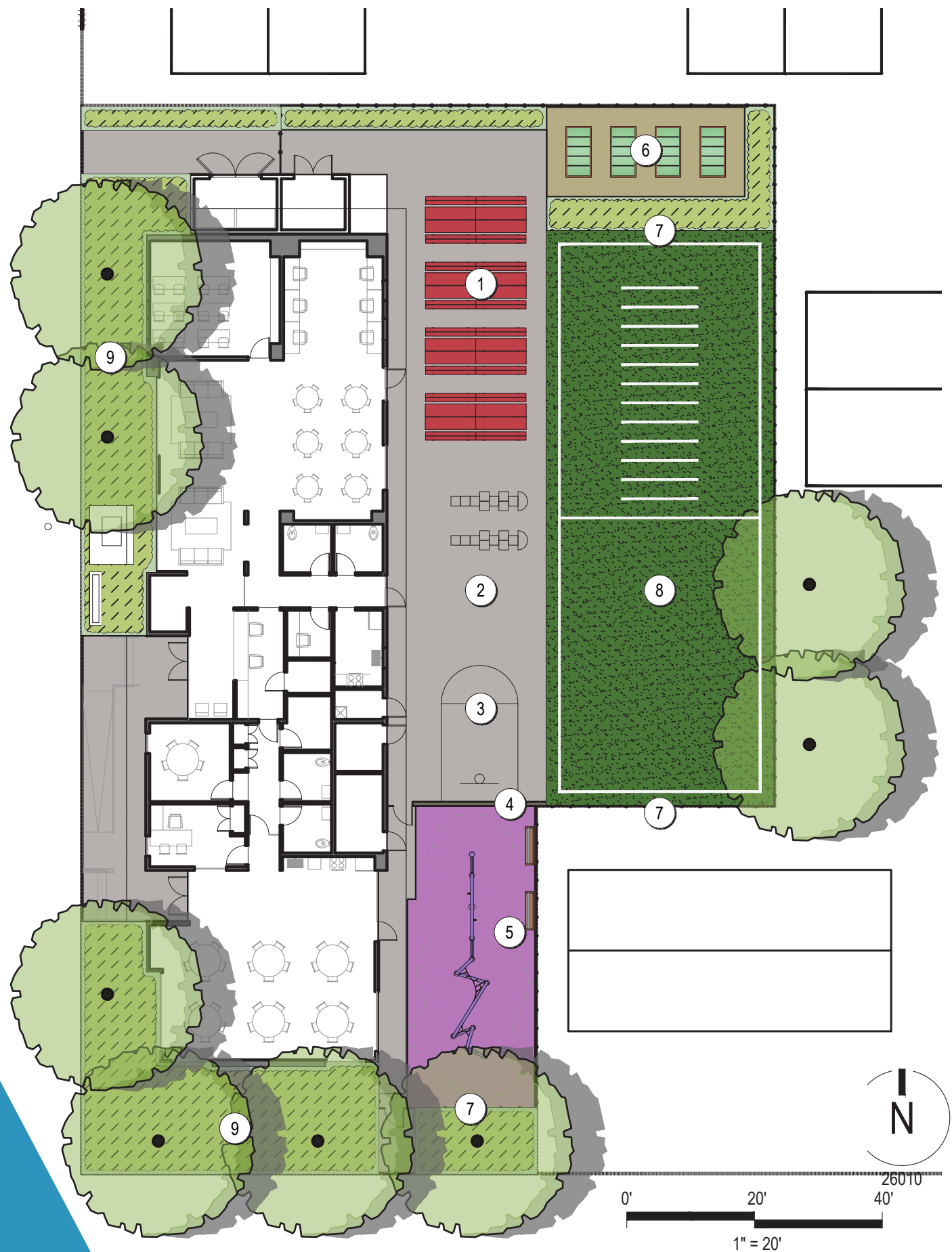
The Project will be funded with a combination of local, state and federal funds. The budget estimate for relocation-related payments for this Project is \$14,500 and HACE/Brinshore have adequate resources and commit to providing resources and funds for relocation assistance payments as described in this Plan. The estimated relocation budget does not include consideration of relocation administrative services nor any related consulting services which may be necessary for the implementation of the Plan and Project.

Appendices

Appendix A

Project Schematics and Proposed Plans

**Everding
Community Center
Eureka, CA**



- ① COLORFUL PICNIC TABLES
- ② COLORED CONCRTE SURFACE WITH PLAYGROUND GAMES
- ③ BASKETBALL HOOP
- ④ WALL WITH CHALK WALL ON SOUTH SIDE
- ⑤ PLAY EQUIPMENT WITH RESILIENT SURFACING AND BENCHES
- ⑥ RAISED BEDS WITH BORDER POLLINATORS AND HERBS
- ⑦ FENCE
- ⑧ ARTIFICIAL TURF FIELD
- ⑨ PLANTING AND STREET TREES

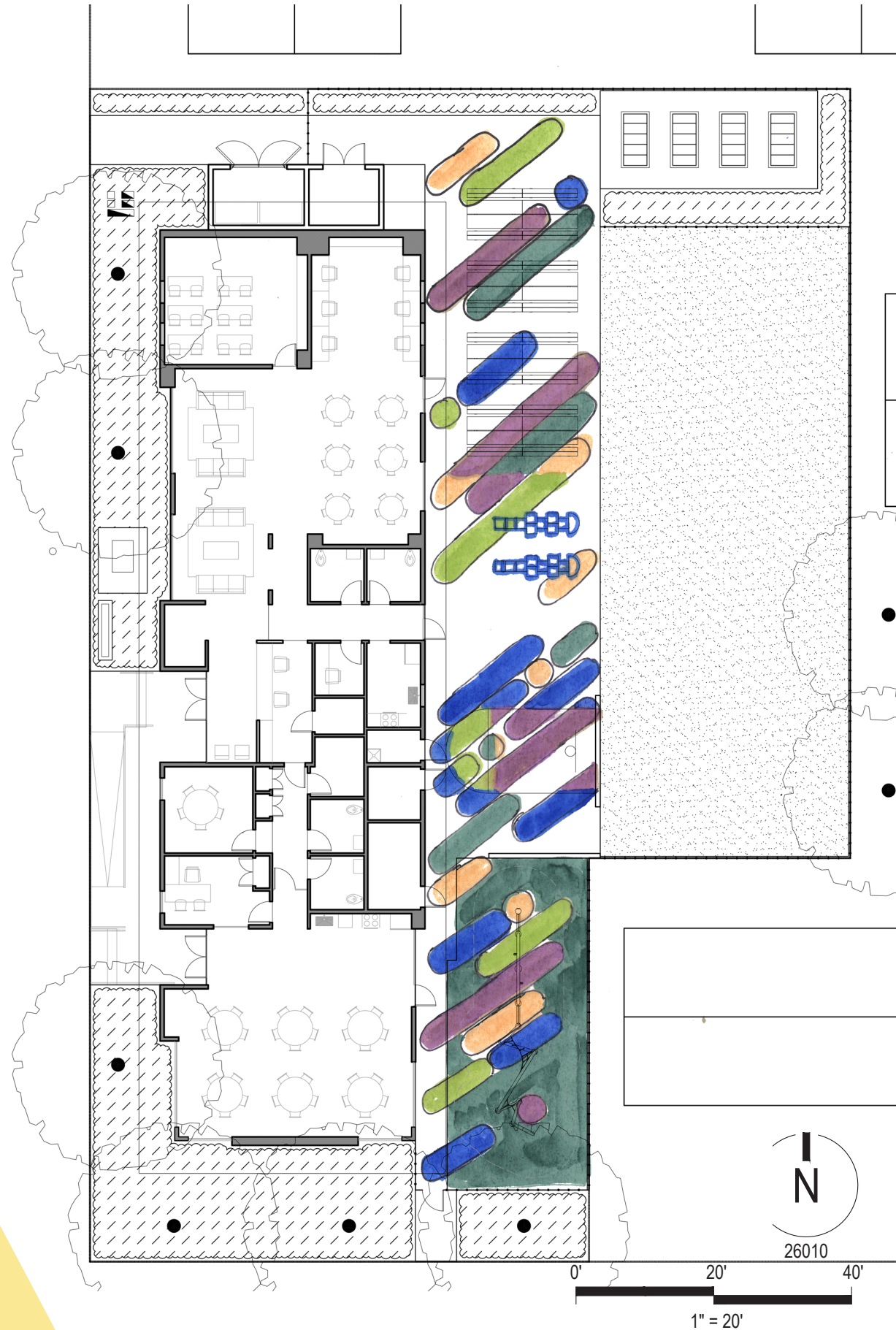
Landscape Design



03.04.2026



Color Palette



Pavement Color Concept



Pattern

**Everding
Community Center
Eureka, CA**



03.04.2026



Basketball Hoop



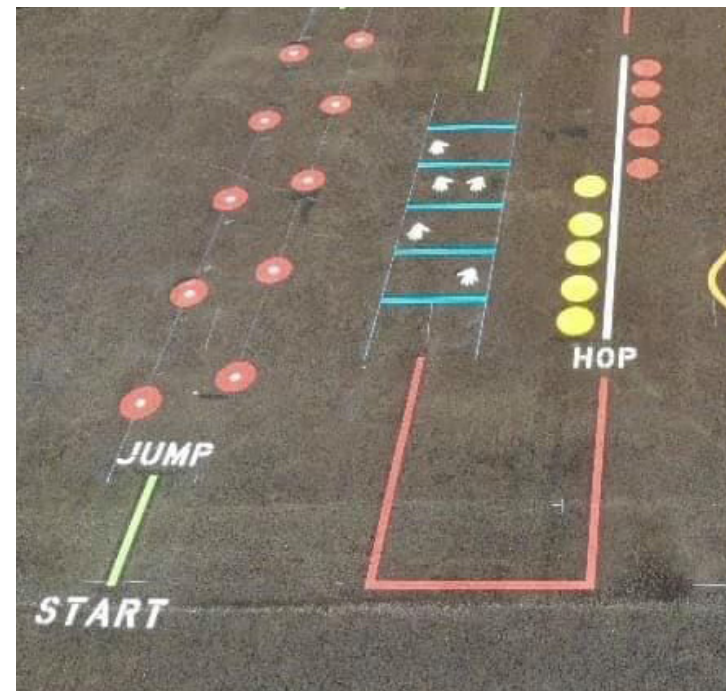
Chalk Wall



Artificial Turf Field



Playground Games



Playground Games



Artificial Turf Field

**Everding
Community Center
Eureka, CA**

Playground and Field



03.04.2026



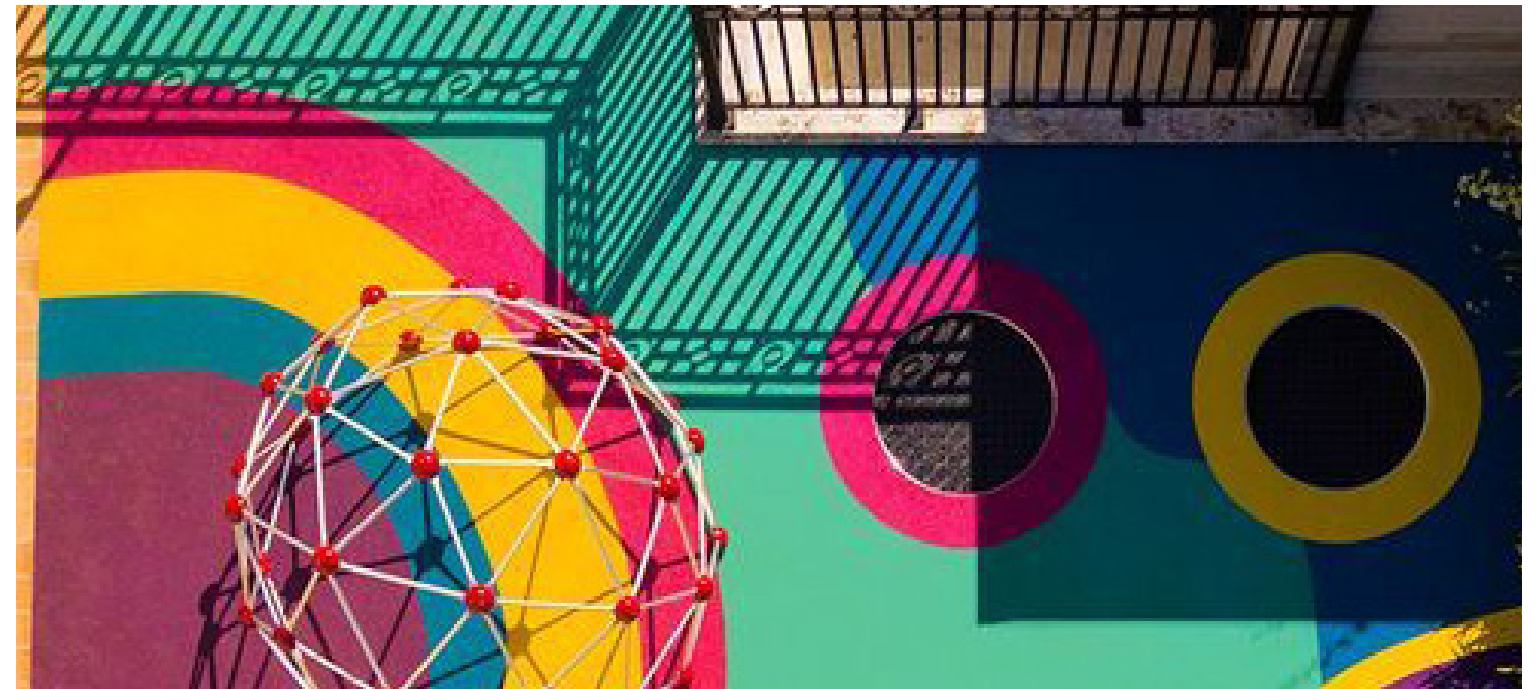
Twist Play Structure



Twist Play Structure



Climbing Wall - Alternate play option



Resilient Surfacing

**Everding
Community Center
Eureka, CA**

Playground



03.04.2026



Herb and Pollinator Border



Raised Beds



Colorful Seating



Colorful Picnic Tables



Colorful Picnic Tables

Everding Community Center Eureka, CA

Vegetable Garden and Seating



03.04.2026

Appendix B

Relocation Informational Brochure



RELOCATION ASSISTANCE PROGRAM
FOR BUSINESS OWNERS,
NON PROFIT ORGANIZATIONS AND
FARM OPERATIONS

Relocation Assistance Program Brochure – Business

The Relocation Assistance Program provides the policies for orderly, timely and efficient relocation of business occupants displaced by the acquisition and development activities. The relocation program is administered by offering advisory assistance and making relocation payments as follows:

1. Relocation Advisory Assistance

Maximum assistance to re-establish with a minimum of delay and loss of earning will be provided to displaced businesses. A Relocation Consultant will be assigned to each displaced business throughout the relocation process and will be the principal contact in all relocation matters. Information will also be supplied regarding other programs which may offer assistance to displacees, including consultation with the Small Business Administration. The Relocation Consultant will assist in completing and submitting claim forms for relocation payments.

2. Relocation Payments

Relocation payments are available to eligible businesses, non-profit organizations and farm operations. To qualify for these payments, an owner or tenant must have legally occupied the property on which the displacee conducted a business as HACE/Brinshore makes its first written offer to purchase the property. Relocation payments to businesses consist entirely of moving costs and related moving costs. Relocation moving payments do not cover such costs as down time, overtime, loss of business goodwill, loss of profits, loss of employees, or other similar items. Generally, claims are submitted and moving payments are made after the move is completed and the premises are left clean and orderly. All claims must be submitted within 18 months of the date displacee vacates the property. Commercial displacees may elect one of the two types of relocation moving payments as outlined below:

1. Actual Reasonable Moving and Related Expenses. You may choose to be reimbursed for actual moving and related expenses which include:

Relocation Assistance Program Brochure – Business

Moving Expenses. Each displacee will be eligible for complete moving services to a new location and will have the option of having either a commercial move or conducting a self-move. HACE/Brinshore must be supplied with a written inventory listing of the personal property items to be moved at least 30 days in advance of the move. Also, no later than 15 days prior to moving, written notice must be given to HACE/Brinshore of the date of the move and the type of move requested. Relocation Advisors must be allowed to make reasonable and timely inspections of the personal property at both the displacement and replacement sites, and to monitor the move.

The displacee will be required to obtain a minimum of two competitive bids from qualified, approved professional moving carriers. HACE/Brinshore may make direct payment to the professional moving carrier with the lowest bid, or if a self-move is elected, payment can be made to the displacee in an amount not to exceed the lower of the two bids. To assist in filing a claim, the following is a list of expenses which are generally included:

- 1) Transportation of personal property from the acquired site to a replacement site (limited to a distance of 50 miles).
- 2) Packing, crating, unpacking and uncrating of personal property to be moved.
- 3) Removal and reinstallation of appliances, machinery and equipment, including utility connection charges.
- 4) Re-lettering of trucks, signs and similar items such as re-printing of business cards and stationery made obsolete by the move.
- 5) Insurance of property in connection with the move, and reasonable replacement of property lost or damaged where insurance is unavailable.
- 6) Storage of property for a period generally not to exceed 12 months, when HACE/Brinshore determines it to be necessary.
- 7) Any re-application fee for a professional license, permit or certification required by a displacee for the replacement location.
- 8) Other moving and related expenditures that HACE/Brinshore determines are reasonable and necessary.

The following is a list of items which would **NOT** be eligible in a moving expense claim:

- 1) Additional expenses incurred because of operating in a new location, except as permitted under the reestablishment payment described in Subparagraph 1d listed below.
- 2) Interest on loans to cover moving expenses.
- 3) Loss of goodwill.

Relocation Assistance Program Brochure – Business

- 4) Loss of trained employees.
- 5) Personal injury.
- 6) Preparation of claim for moving and related expenses.
- 7) Other items HACE/Brinshore determines are not reasonable and necessary.

Payments Related to Personal Property Not Moved. A displacee may receive a payment for actual direct loss of tangible personal property which is not relocated. Payment is determined on the basis of the value of the property minus any proceeds from the sale of the item or the cost to move the item whichever is less. Appropriate documentation to support a claim, such as reasonable advertising costs, auction records, or other supporting evidence, will be required.

A displacee may receive a payment for personal property which is not relocated, but rather is replaced with substitute equipment at the replacement site. Payment is determined on the basis of the cost of the substitute item minus any proceeds from the sale of the replaced item or the cost to move the replaced item whichever is less. Appropriate documentation to support a claim, such as proof of cost of substitute item installed, reasonable advertising costs, auction records, receipts from sale proceeds or other supporting evidence will be required.

When personal property is abandoned with no effort made by displacee to dispose of such property, the displacee is not entitled to claim moving expenses or losses for the abandoned items and may be required to reimburse HACE/Brinshore for the cost to remove such items from the property.

Searching Costs for a Replacement Location. A displacee may file for reimbursement of costs to search for a replacement location, not to exceed \$5,000. Such a claim must be supported by accurate records of dates, times, locations, expenses, receipts, diaries and similar evidence and may include the following expenses:

- 1) Transportation within a radius of 50 miles from the displaced site.
- 2) Meals and lodging while away from home, when receipts are presented as documentation.
- 3) Reasonable time spent in searching, based on the individual's average hourly wage rate.
- 4) Reasonable fees paid to real estate agents or brokers to locate the replacement site, excluding any fees or commissions related to the purchase of a replacement site.

HACE/Brinshore will allow displacee to file a searching reimbursement request for \$1,000 with minimal to none documentation.

Re-establishment Costs for a Business. A displacee may file for reimbursement of actual and reasonable costs necessary to relocate and re-establish a business at its new site, not to exceed \$33,000. Such a claim must be supported by accurate records of dates, times, expenses, fees, receipts and similar evidence, and may include the following expenses:

Relocation Assistance Program Brochure – Business

- 1) Repairs, improvements or modifications to the replacement site as required by law, code or ordinance.
- 2) Construction and installation costs for exterior signing to advertise the business.
- 3) Provision of utilities from right-of-way to improvements at replacement site.
- 4) Advertisement of replacement location.
- 5) Licenses, fees and permits when not paid as part of moving expenses.
- 6) Estimated increased costs of operation during the first two years at the replacement site.

OR

Instead of receiving payments as outlined in “Actual Reasonable Moving and Related Expenses” above, a displacee may elect to receive:

2. A Fixed Payment In-Lieu of Actual Moving and Related Expenses. A fixed payment (in-lieu of actual moving and related expenses) may be made and is computed on the basis of the average annual net earnings of the displacee for the two years immediately preceding displacement and shall be in an amount of not less than \$1,000 or more than \$53,200. To be eligible to receive an in-lieu payment, HACE/Brinshore must determine the following:
 - a) That the organization cannot be relocated without a substantial loss of existing patronage. The term “existing patronage” includes membership, persons, community and/or clientele served or affected by the activities of the organization.
 - b) That the business is not part of a commercial enterprise having no more than three other establishments which are not being acquired for the project and which are engaged in the same or similar activity.
 - c) The business is not operated solely for the purpose of renting the site to others.
 - d) That during the two taxable years prior to displacement, the displacee’s business must have:
 - 1) Had average annual gross receipts of at least \$5,000 or;
 - 2) Had average annual net earnings of at least \$1,000 or;
 - 3) Contributed to at least one-third of the average gross income of the displacee.

To establish average annual net earnings a displacee must submit certified copies of income tax returns for two years immediately preceding the taxable year in which the business is displaced.

Relocation Assistance Program Brochure – Business

GRIEVANCE PROCEDURE.

If a displacee believes that a claim has been unfairly administered, the claimant may, within 30 days after the claimant receives written notification, request review by the Administrator of HACE/Brinshore.

Project occupants are encouraged to contact HACE/Brinshore's Relocation Consultant, LACAL Consulting, Inc. The Consultant's address and telephone number are listed below:

LACAL Consulting, Inc.
Natasa Lenic, Project Director
6728 Fair Oaks Blvd., Suite 400C
Carmichael, CA 95608
(323) 951-9887 ext. 1001
nlenic@lacialconsulting.com

Appendix C

Public Comments and Response

The public review period for this Relocation Plan is scheduled for April 9, 2026 through May 9, 2026. Comments received during the public review period will be compiled and included below prior to final approval.

HACE Executive Director reviewed the relocation plan and found it consistent with local housing element.