

Relocation Plan for HACE Redevelopment – Purple Phase



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

Prepared by LACAL Consulting, Inc.

April 4, 2026
Updated: May 19, 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. Housing Mix	9
B. Project Rents	9
C. Occupancy and Overcrowding	9
D. Tenant Income Information	10
E. Qualified Population and Household Characteristics	10
F. Replacement Housing Needs.....	10
G. Ethnicity and Household Language	11
H. Household Disabilities and Senior Households.....	11
III. Housing Resources.....	12
A. Concurrent Displacement.....	13
IV. Relocation Program	14
A. Program Objectives, Standards and Assurances	14
B. Relocation Advisory Assistance	15
C. Relocation Financial Assistance	16
D. Voluntary Permanent Relocation Services.....	17
E. Resident Owned Fixtures.....	18
F. The Relocation Process.....	18
G. Return to Project.....	19
H. Over-Housed Tenants	19
I. Post-Occupancy in Overcrowded Units.....	20
J. Relocation Extensions Due to Construction Delays.....	20
K. Termination of Lease During Temporary Relocation.....	20

L. Record Keeping.....	20
M. Relocation Tax Consequences.....	21
N. Grievance Procedures.....	21
O. Eviction Policy	22
P. Immigration Status.....	22
Q. Citizen Rights and Participation	22
R. Non-Discriminatory Statement.....	23
S. Project Timing	24
T. Estimated Relocation Costs	24
Appendices.....	25
Appendix A.....	26
HACE Redevelopment – Purple Phase Property Schematics.....	26
Appendix B	29
HUD 2025 Income Limits - County of Humboldt.....	29
Appendix C	30
Qualified Population Summary	30
Appendix D.....	31
List of Available Market Units for Rent.....	31
Appendix E	34
Sample Notices	34
Appendix F.....	42
Relocation Budget	42
Appendix G.....	44
Public Review and Comments	44

List of Figures

Figure 1: Regional Project Site Setting.....	6
Figure 2: 1137 C Street Site.....	7
Figure 3: Aerial View of Project Vicinity.....	7

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 modernize affordable housing at HACE Redevelopment – Purple Phase, AKA 1137 C Street (Project). HACE is a public entity that was formed in 1946 to provide federally subsidized housing and housing assistance to Older Adults in Need of Supportive Services, pursuant to California Tax Credit Allocation Committee Regulations Section 10302(yy) 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.

HACE plans to use the U.S. Department of Housing and Urban Development (HUD) Section 18 Disposition program over a series of seven applications, HACE will be able to maximize the revenue available to the portfolio by utilizing options for net new Section 8 vouchers for each unit and carry out the desired physical redevelopment plans. Some of the properties do not need significant rehabilitation and/or do not 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. Redevelopment means to relocate the existing residents, raze the buildings, and develop the property with new and more units than previously were on the site.

For Brinshore and HACE, the residents and their success are the highest priority. They are committed to using any available HUD and private funding as a tool to improve the lives of residents and help them achieve success. The intent of the redevelopment of this property is to improve both the living conditions of residents and their quality of life. To successfully complete the redevelopment, temporary and/or voluntary permanent relocation of all residents will be required. HACE and Brinshore care about the impact this relocation will have on the lives of residents during each construction phase. To that end, this relocation plan conforms with Fair Housing laws and guidance to address the residents' needs during relocation in a manner which disrupts their daily lives as little as possible.

The following relocation plan (Plan) has been prepared for the property known as HACE Redevelopment – Purple Phase to be redeveloped with possible assistance of the HUD Section 18 program. Brinshore will utilize this Plan for submission to HUD, HACE, State of California HCD 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 subject of the Plan is one four-plex being redeveloped by Brinshore. The proposed project includes the rehabilitation of existing 4 townhouse units in the complex and downsizing 3 of the two-bedroom units to one-bedroom units and designate the remaining two-bedroom as manager's unit after redevelopment.

The statutory basis for this Plan arises from the anticipated need to temporarily or permanently displace the households from their Project units while these units are under construction, as well as to identify relocation requirements, special needs and preferences for these households and the relocation assistance program Brinshore and HACE will follow. The Plan is presented in four sections:

Section I: General demographic data and Project description

Section II: Profile of tenants who may be affected

Section III: Description of available housing resources

Section IV: Description of the relocation assistance program

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 the intersection of C Street and Hillsdale Street in the City of Eureka and County of Humboldt, generally between Hillsdale Street to the south, Clark Street to the north, E Street to the east and C Street to the west. The apartments associated with the Project are located in the northwestern area of the city, 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). Additional site plans/maps are provided in **Appendix A**.

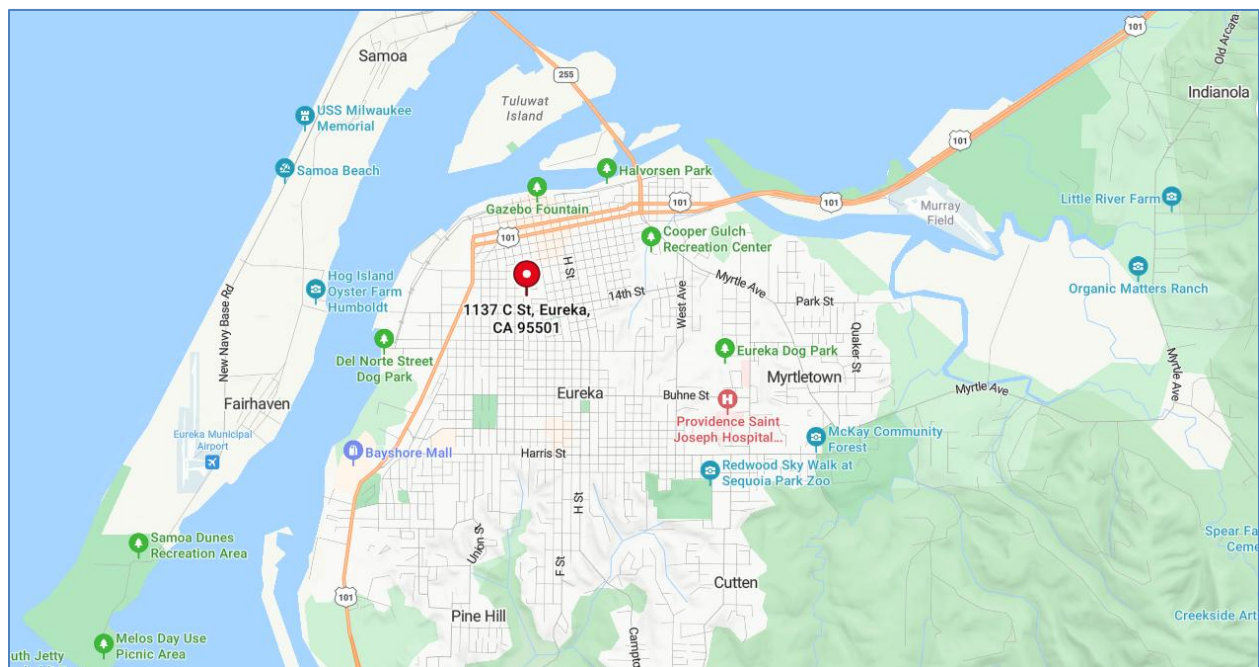


Figure 1: Regional Project Site Setting

The property is situated in a predominantly residential neighborhood, with Hammond Park to the south and Greenside Park to the east of the community. Adjacent to the north are Alder Grove Charter School, Eureka Music School and service providers, places of worship, shops, and eateries along Summer Street and SR-101 highway. The property is served by Humboldt Transit Authority's gold bus line with a stop at E Street / 12th Street, and red bus line with a stop at California Street / Simpson Street.

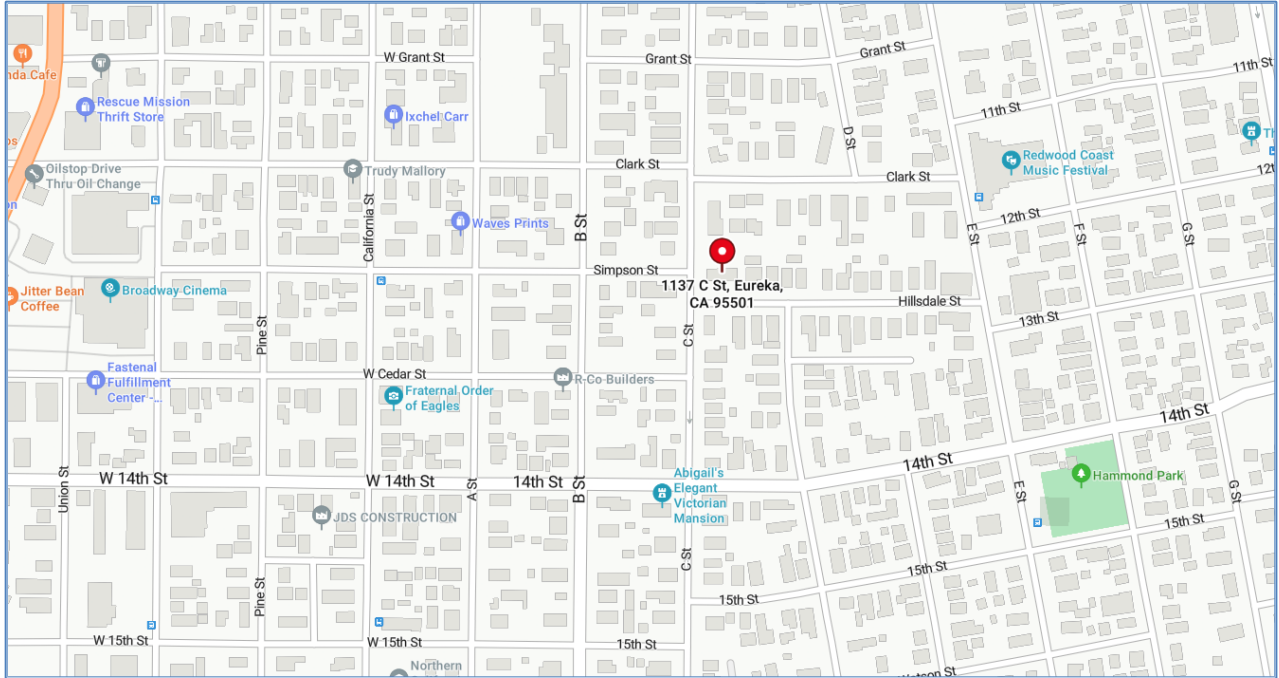


Figure 2: 1137 C Street Site

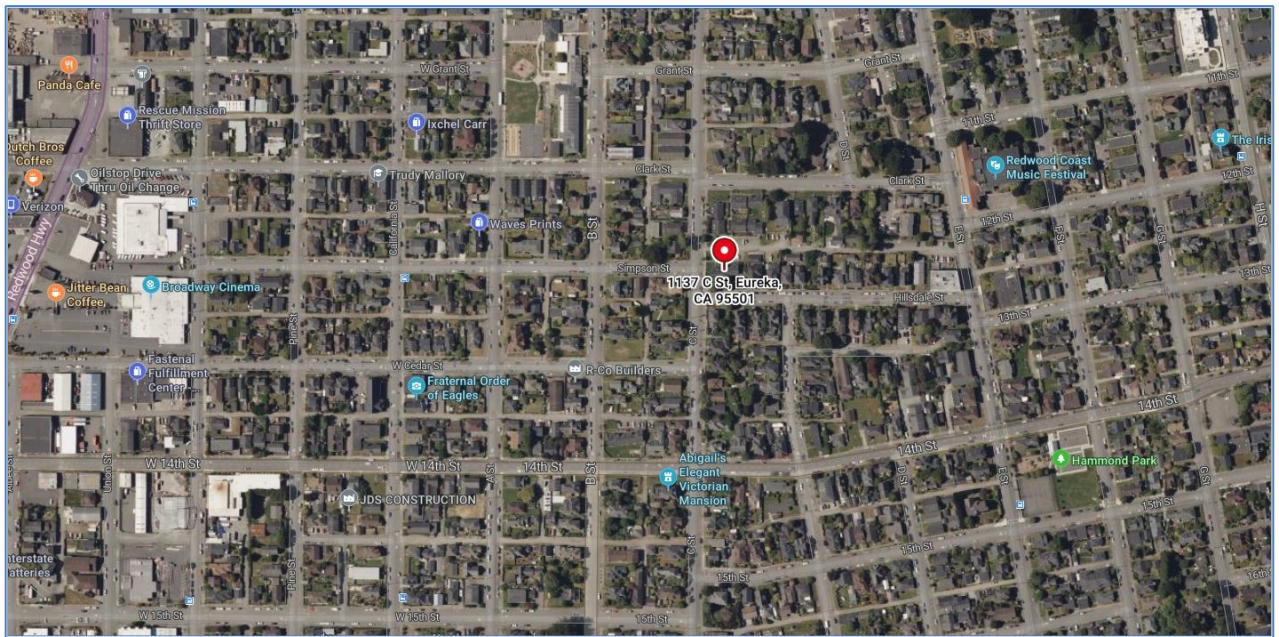


Figure 3: Aerial View of Project Vicinity

B. Project Description

HACE and Brinshore intend to redevelop the Project as a single phase (all 4 units will be under construction simultaneously) rehabilitation, preserving 4 units at this site. Three units out of 4 will be affordable for households earning 60% area median income, the remaining unit will become an unrestricted unit for an on-site manager. Three of the existing two-bedroom units will be converted into one-bedroom units. The project proposes a total of 3 one-bedroom units, affordable at 60% of area median income. One unit is set aside to be the manager's apartment.

Projected construction improvements are expected to occur starting in November 2026 and are expected to take approximately 22 months, in line with Blue Phase construction.

- General Information Notices: March 9, 2026
- Personal Tenant Interviews: March 12 – 17, 2026
- Relocation Plan Update, 30-Day Public Review: April 9 – May 9, 2026
- 90-Day Notices to Vacate: June – July 2026
- 30-Day Notices to Vacate: September – October 2026
- Displacement/Move-Out: October – November 2026
- Construction Period: November 2026 – September 2028 (approximately 22 months)
- Return to New Units (for those opting to return): October – November 2028

Construction activity will involve full redevelopment of existing units including converting the two bedrooms to one by breaking down the existing wall between both bedrooms. Since current residents require and are qualified for a two-bedroom apartment, permanent relocation of current tenants to another HACE-owned property or to off-site rental units with Tenant Based Section 8 Voucher will be necessary. If any of the residents need to be right sized from a two-bedroom to a one-bedroom or can qualify for assistance in a smaller than their current unit, HACE/Brinshore will give them an option to return to the Purple Phase apartments after construction.

Each unit will feature a fully equipped kitchen with appliances including refrigerator, stove, and oven, bathroom fixtures and finishes, energy efficient lighting and windows, floor and window coverings, improvements to sanitary sewer and central heating/air conditioning.

A detailed construction schedule is under development. Architectural drawings and proposed floor plans are presented in **Appendix A**.

II. Relocation Needs Assessment

This Plan provides the results of a needs assessment survey, their incorporation into the planning process, and details of proposed joint HACE/Brinshore relocation program. This Plan sets forth policies and procedures necessary to conform to federal and state statutes and regulations for temporary and voluntary permanent residential displacements.

To obtain information necessary for the implementation stage of this Plan, interviews have been conducted with the current residents on the Project site in March 2026. Inquiries made of the occupants included household size and composition, ages of occupants, rental and income information, length and type of occupancy, ethnicity, primary language in the home, disabilities, health problems, identification of other special needs and preferences related to replacement housing and location. Additional Project information for this Plan was provided by HACE and Brinshore. There are currently 4 occupied and no vacant units within the Project.

A. Housing Mix

The property consists of 4 apartment units (all occupied) as follows: 4 two-bedroom units. There are currently no vacant units within the complex.

B. Project Rents

Currently all 4 households pay rent based on their income. Rents range from \$131.00 to \$803.00. It is HACE/Brinshore intent to relocate all tenants to another HACE property where they will continue paying rents based on their income. All units will be affordability restricted and all households in the Project must qualify for Section 8 Housing and as such will only be required to pay 30% of their household income. If there are no HACE available units at the time of relocation, HACE will secure HACH administered Tenant Based Section 8 Vouchers to allow relocation to market rent apartments while tenants will still pay 30% of their household income for rent.

C. Occupancy and Overcrowding

During personal interviews with tenants the household mix of adults and children in each unit was evaluated. The Project site consists of 10 occupants: 5 adults and 5 minor children. HACE/Brinshore intend to follow TCAC occupancy standards which allow up to 3 people in a one-bedroom apartment, up to 5 people in a two-bedroom apartment and up to 7 people in a three-bedroom apartment.

Any household placed in a unit size different from that defined in these Occupancy Standards shall agree to transfer to an appropriate size unit at the same property when one becomes available.

Once an appropriate size unit is offered to the family/household, they have 30 days to complete the transfer or lose their subsidy.

D. Tenant Income Information

Income information for all Project households was provided by HACE. Two of the 4 households are at 30% area median income and two are at 50% area median income. All 4 tenant households meet CTCAC income eligibility requirements and will not receive a rent increase exceeding 5 %. The income levels for Humboldt County adjusted for family size as published by the California Department of Housing and Community Development (HCD), on April 23, 2025 are presented in **Appendix B**.

E. Qualified Population and Household Characteristics

The detailed household information and qualified characteristics for all 4 Project households are listed in **Appendix C**.

F. Replacement Housing Needs

For relocation activities, HACE and Brinshore will take into consideration individual household preferences and needs to be close to public transportation, employment, schools, medical/public/social services and agencies, recreational services, parks, community centers, and/or shopping and will accommodate all Purple Phase households by moving to another right size HACE apartment or off-site with a Tenant Based Section 8 Voucher. It is anticipated that the rehabilitation timing of temporary relocation will exceed 12 months and all households will be counseled of their rights to return to the Project or claim permanent relocation benefits as their apartments will convert to a single bedroom units. It is HACE and Brinshore's goal to ensure that all current residents who will relocate for 22 months during construction, are able to return to the newly constructed right-size units at Purple Phase, as long as they income as long as they income and age qualify, as Purple Phase will serve tenants 62+ after construction. If the right sized unit is not available or tenant prefers to move off-site with a Tenant Based Section 8 Voucher, HACE and Brinshore will accommodate such requests during relocation. For tenants who prefer to accept HACH issued Tenant Based Section 8 Voucher and permanently relocate from the Project, full relocation assistance for permanent replacement housing will be available. LACAL relocation consultants will ensure that any household requiring reasonable accommodation due to disability is not issued 90-day notice to vacate until a suitable, ADA-compliant replacement unit is available for them. HACE/Brinshore pledge to provide support in situations where landlord is unable to

provide certain ADA required accommodations to house displaced households in safe and secure housing.

G. Ethnicity and Household Language

The ethnic distribution among the Project households has been sought during the personal tenant interviews conducted in March of 2026. 75% of households are Caucasian and 25% are African American. English is the primary household language for all.

Relocation assistance information and counseling will be provided in the primary language of the Project occupants, to assure that all occupants obtain a complete understanding of the relocation program and eligible benefits.

H. Household Disabilities and Senior Households

Senior household is defined as a household with a head of household or spouse who is 62 years or older. There are no senior households in the Project and 50% of households reported household members with disabilities. The presence of disabilities will be considered at the time of displacement to the extent it may affect the physical move and necessary accommodation. HACE and Brinshore pledge to provide appropriate special care for households requiring additional assistance due to disabilities.

III. Housing Resources

The Project may result in permanent relocations, based on the plans to downsize 3 two-bedroom apartments to single bedroom units, and designate one of the units as manager's unit with attached office. While current tenants will have an option to return to the newly rehabbed apartments at the site, they will need to income qualify and qualify for the type/size of housing that will be constructed. The Purple Phase will include 3 downsized units and one manager unit; therefore, most current tenants may not be able to return to the site. HACE has 195 units in their portfolio with approximately 8 units that are either currently vacant or anticipated to be vacant in the next 120 days. Those vacancies correspond with the unit sizes of the displacees. Should any of the 4 households require units specifically designed or adapted to meet the needs of elderly and disabled households, HACE portfolio includes the following:

- Wheelchair-accessible units: 10
- Units with grab bars and accessible bathroom features: 10
- Ground-floor/single-story units suitable for mobility-impaired residents: 10
- Units with visual/hearing accommodations: 0

For any household requiring ADA-compliant or specially adapted housing, HACE and Brinshore commit to:

- Identifying appropriate replacement housing within the HACE portfolio that meets the household's specific accessibility needs;
- If no suitable HACE unit is available, providing a Tenant Based Section 8 Voucher with housing search assistance focused on accessible units in the Eureka/Humboldt County market;
- Ensuring that relocation consultants will not issue a 90-day notice to vacate to any household requiring reasonable accommodation due to disability until a suitable, ADA-compliant replacement unit has been identified and is available;
- Providing additional moving assistance as needed, including specialized moving services for medical equipment or mobility devices.

The available units survey in **Appendix D** includes currently available two-bedroom units on a market in Eureka and surrounding communities; accessibility features of available market units will be verified during housing search assistance for any household with accessibility needs.

Based on the available housing survey conducted, and given that HACE maintains a portfolio of 195 units with approximately 8 units currently vacant or anticipated to become vacant within 120 days, there is adequate comparable replacement housing available to meet the relocation needs of all 4 households to be displaced from the Purple Phase project. Specifically:

- All 4 households will be offered relocation to another HACE unit of appropriate size, or

- All 4 households will receive a HACH-administered Tenant Based Section 8 Voucher enabling relocation to market-rate housing while continuing to pay income-based rent.

Last Resort Housing Payments are not anticipated to be necessary for this project. However, should circumstances change such that comparable replacement housing becomes unavailable, HACE and Brinshore will provide Last Resort Housing Payments in accordance with applicable regulations, which may be provided as either lump sum or installment payments at the election of the displaced household.

A. Concurrent Displacement

There are 2 other HACE/Brinshore projects anticipated to be undergoing complete renovation or new construction at the similar time as the Purple Phase; they are HACE/Brinshore's Green Phase and Blue Phase projects which will require relocation of 7 households and 12 households, respectively, anticipated to commence at approximately the same time as Purple Phase. Additionally, HACE/Brinshore team is anticipating Red Phase rehab project affecting 92 occupied households who will be preferably relocated one time into the newly redeveloped units unless there is no right sized unit among the phase of units completing construction cycle and they may move to another unit temporarily and then again once their suitable size unit is available.

The timing of the Project will be determined by HACE stock of vacant units; there is no plan to house any of these tenants off-site and without the HUD subsidies. Competition for Section 8 units will likely be a factor and HACE and Brinshore will provide for sufficient planning and possibly longer than 90-day notices if there should not be sufficient number of available units for the tenants to relocate to.

IV. Relocation Program

The relocation program and assistance offered by HACE/Brinshore will conform to provisions of the federal and state law and guidelines, as appropriate.

Clarification Regarding Nature of Displacement

Due to the substantial rehabilitation nature of this project, and the anticipated construction timeline of approximately 22 months, all displacement under this Plan will likely exceed the 12-month threshold established in 25 CCR §6044 for temporary relocation. Therefore, all households will be treated as permanently displaced for purposes of relocation benefits and assistance, regardless of whether they opt to return to the newly rehabilitated Purple Phase units upon construction completion.

Specifically:

- All 4 households will receive permanent relocation benefits as described in this Plan;
- All eligible households may be able to return to a right-sized unit at the newly rehabilitated Purple Phase upon completion of construction;
- Households may voluntarily choose to accept permanent relocation with a Tenant Based Section 8 Voucher and waive their right to return;
- Because displacement will exceed 12 months, and units are downsized from two to one bedroom, no temporary relocation pursuant to 25 CCR §6044 is contemplated under this Plan.

A. Program Objectives, Standards and Assurances

It is HACE/Brinshore's objective to fully inform eligible Project occupants of the nature of the new construction activities, timing, and procedures for obtaining relocation assistance and benefits. In the scope of the relocation, HACE/Brinshore staff and relocation consultants will:

- Determine the needs of each residential household eligible for assistance (in more detail than what is obtained during relocation interviews).
- Provide adequate information and assistance to move temporarily or permanently to a HACE replacement apartment unit and return to the newly rehabilitated Purple Phase apartment if tenants so choose and qualify.
- Provide assistance that does not result in different, or separate treatment due to race, color, religion, national origin, sex, disability, creed, familial status, student status, marital status, sexual orientation, gender identity, age or other arbitrary circumstances.
- Supply information concerning federal and state governmental programs aiding low income or disabled persons.
- Assist each eligible person to complete applications for benefits.

- Make relocation benefit payments in accordance with applicable HUD guidelines.
- Inform all persons of HACE/Brinshore’s property management policies including criteria for pursuing tenant evictions.

B. Relocation Advisory Assistance

As a function of the overall relocation assistance program, advisory assistance will be provided to all residents by HACE/Brinshore and contracted relocation representatives. The following services and tasks have been or will be undertaken:

- Each household has been issued a General Information Notice and has been personally interviewed to gather appropriate information to determine needs and preferences regarding the permanent move to another HACE apartment or off-site with the Tenant Section 8 Voucher. Inquiries made of residential occupants by relocation personnel covered the following areas: family size, ethnic background, immigration status, age and health considerations, current employment status, family income, transportation needs, and preferences relative to temporary or permanent replacement housing. LACAL conducted personal interviews with current residents between March 12, 2026 and March 17, 2026. This relocation plan is being prepared after the completion of interviews and reflects specific household needs, preferences, and demographic information gathered during the interview process.
- Non-displaced residents will be provided a formal Notice of Non-Displacement. Every current Project household will be provided Notice of Non-Displacement and an opportunity to return to the Purple Phase upon completion of construction. However, due to the temporary relocation exceeding the legal limits for temporary relocation (12 months), each household will be counseled with the permanent relocation program options and how such choice will affect their relocation benefits. Sample notices: General Information Notice, Notice of Eligibility, 90-Day Notice, and 30-Day Relocation Plan Review Notice can be found in **Appendix E**.
- As soon as feasible, the relocation representative shall explain the relocation payments and other assistance for which households and individuals may be eligible, including related eligibility requirements and the procedures for obtaining such assistance.
- Assistance will be provided to complete appropriate forms and coordinate moving arrangements. Temporary displacees will be kept informed of Project timing and receive appropriate notice to prepare for required moves. Claims for compensable expenses associated with the temporary displacement process will be processed expeditiously.
- Bilingual assistance will be provided, as needed.

C. Relocation Financial Assistance

Relocation benefits will be offered to all households temporarily displaced in accordance with the URA and the implementing HUD Guidelines, as appropriate. Benefits will be paid to eligible Project households upon submission of required documentation in accordance with approved procedures.

Eligibility requirements and benefit plans will be discussed with all temporary/permanent displacees. In the course of personal interviews and follow-up visits, each displacee will be counseled as to available options and the consequences of any choice with respect to housing and potential financial assistance.

- Moving Assistance – Regardless of the type of temporary or permanent relocation required for a Project household, HACE/Brinshore and relocation staff will offer arrangements to move personal property by a third-party mover or based on a room count moving allowance if tenants choose a self-move. The relocation consultants shall be responsible for assuring that any third-party mover provides appropriate insurance to cover any and all claims resulting from damage incurred to resident possessions during the move process. Relocation representatives shall provide written information to all residents prior to their move, about the process and time period for filing a claim in the event that any damages occur.
- Packing Materials and Assistance - All tenants choosing professional move will be provided with packing materials and supplies. Upon request, households will be provided with packing and unpacking assistance. Tenants who choose to self-move will be provided with financial assistance and will procure their own moving materials.
- Storage - No furniture or personal items are to remain in the units. For residents temporarily relocating to an apartment that does not accommodate their furniture HACE/Brinshore will provide a designated storage unit or allow for securing a unit in the public storage facility for the time of relocation.
- If for any reason upon completion of the move back to Purple Phase, items in the storage unit are subsequently not claimed by the tenant, the applicable State Law regarding disposition of unclaimed property shall apply and no further compensation for the storage unit will be provided.
- Utility Reconnections – HACE/Brinshore and relocation consultants will coordinate with the appropriate utility companies to transfer utilities from the resident’s current unit to their temporary relocation unit and back to their final unit at Purple Phase.
- Essential utilities shall include electric, gas, water, sewer, trash disposal, and telephone land lines. Connection fees will only be paid for existing utilities at the level of service in place at the Project unit prior to temporary relocation. If disconnection of utilities results in a demand for a deposit to reconnect utilities, said deposit will be paid by HACE/

Brinshore upon reconnection of the utility. However, no payment will be made for past due utility bills prior to commencement of the temporary relocation period.

- Security and Pet Deposits – Existing security and pet deposits at the Project units will be transferred to Brinshore upon closing of the conversion process. Tenants will not be required to pay any additional security or pet deposit for temporary housing units or to return to the Purple Phase unit.

D. Voluntary Permanent Relocation Services

Additional services and financial assistance, described below, shall be provided when the relocation time period exceeds 12 months, because two-bedroom units will be downsized to one bedroom units, and if the resident chooses to accept the HACE offered Tenant Section 8 Voucher and relocate from the Project voluntarily.

- Additional Relocation Advisory Services – Additional information shall be provided on the options available for voluntary permanent relocation including availability and use of a tenant-based voucher; availability of replacement housing payments; and, move assistance in areas outside of Eureka, Humboldt County or even state of California, if desired.
- Housing Search Assistance – Within the City of Eureka transportation services will be provided and a minimum of three comparable replacement housing units will be offered to the residents at the time of eligibility determination. A comparable replacement unit is a unit that meets the HACE occupancy standards and is appropriate to the size of the family. Outside the City of Eureka, housing search assistance shall be limited to verification of a comparable replacement unit based on copies of lease agreements and/or move-in inspections conducted by the corresponding Landlord or Property Management Company.
- Replacement Housing Rental Assistance (RAP) – Replacement housing rental assistance shall be provided for voluntary permanent relocation in the event that Section 8 Voucher is not available or if the market rent exceeds the allowed Section 8 Voucher rent limit and shall be calculated pursuant to the Uniform Relocation Act.
- Replacement housing rental assistance is equal to the difference of: the greater of either total tenant payment (tenant rent plus tenant paid utilities) at the Project unit or 30% of monthly adjusted income; and the amount of rent plus tenant paid utilities (pursuant to the applicable voucher utility allowance schedule) at the replacement housing unit. The total rental assistance provided is for a period of 42 months or a maximum of \$7,200.00.
- Tenant Based Vouchers – HACE will provide a tenant-based voucher to all Purple Phase households relocating off-site; income and apartment size qualifying tenants can choose to return to Purple Phase or keep the Section 8 Voucher and reside off-site.
- Security and Pet Deposits – Security deposits for voluntary permanent relocation shall be processed as follows:

- If utilizing a tenant based voucher, upon approval of the voucher unit, HACE will pay the full security deposit required by the landlord directly to the landlord. Also eligible for payment are the fees associated with credit/background checks that the landlord requires.
- If not utilizing a tenant based voucher, the security and/or pet deposit shall be refunded in full to the tenant upon vacating the Project unit.

E. Resident Owned Fixtures

In all relocation methods, residents are responsible for disconnecting items that they have installed or attached inside or outside of their unit such as ceiling fans, wall-mounted televisions or other electronic devices, and exterior security gates or bars.

Items that have been disconnected and removed from the fixed mounting will be packed and moved with all other furnishings. Items not removed will be considered abandoned and unclaimed and will be removed as part of the demolition, new construction work.

Assistance with removing personal items will be provided as needed pursuant to a request for reasonable accommodation.

Personal items removed will be returned to the unit after the construction but may only be reinstalled if permissible under the new lease agreement.

F. The Relocation Process

The general steps that will be required of HACE/Brinshore and the relocation team in implementation of the Relocation Plan:

- The relocation program will be carried out by the relocation consultants and overseen by HACE/Brinshore to ensure consistency in the application of the local policies and state and federal requirements.
- Pursuant to HUD requirements, the General Information Notice (GIN) has been issued by HACE and personally delivered by HACE staff on March 9, 2026. Relocation consultants obtained signatures on GINs during personal interviews with residents.
- Brinshore and HACE prepared preliminary relocation assumptions and budgets based on current HACE vacancies and construction scope schedules for Purple Phase relocation.
- Relocation consultants have conducted assessments of each resident household and developed an individual temporary relocation plan, identified special needs and determined the level of assistance needed for each household. Relocation consultants will enter into a Relocation Agreement or other such document in which tenant acknowledges in writing their understanding of the need for temporary relocation; and their rights and

responsibilities during the temporary relocation period including the right to return to the Project upon completion of construction.

- Brinshore and relocation consultants shall secure all necessary third-party services to implement the relocation activities including moving companies, packing materials and transportation services.
- A minimum of 90 days prior to relocation commencement HACE and the relocation representatives shall issue a Notice of Relocation which serves as a Notice of Intent to temporarily relocate them.
- A minimum of 30 days prior to the temporary relocation of each tenant, the relocation consultants shall issue a 30 Day or reasonable Notice to Vacate; the Notice of Non-Displacement or the Notice of Eligibility of URA Relocation, as applicable, which shall include the offer of temporary relocation accommodation.
- Relocation consultants shall schedule temporary relocation moves after issuance of the required notices and coordinate and complete moves to temporary HACE units based on the construction schedule.
- Relocation staff shall be responsible for tracking tenants during the relocation period and coordinating support services as needed.

G. Return to Project

Residents who are staying out of their units for the duration of Project construction, and who are eligible to return, will be provided with at least 30 days' notice of the time they may return to the Project and which units will be prepared for them. Tenants utilizing a one-time move to another HACE unit will receive at least 10 days' notice of date and time to move to a fully rehabilitated Project unit. Consideration will be provided for circumstances beyond the control of the resident such as medical emergencies.

Failure to complete the move when advised doing so shall result in termination of the option to return and termination of any further relocation assistance. HACE/Brinshore may take all legal action necessary including eviction action, if residents fail to vacate the temporary housing unit as directed.

H. Over-Housed Tenants

Families that were over-housed prior to temporary relocation will be moved back to an appropriately sized Project unit. If appropriately sized units are not available, a family may not be able to return to the Project unless they can increase their family composition to meet Section 8 New Admission standards for the unit sizes available.

Over-housed families shall be right-sized in the following order:

- Households with the same number of excess bedrooms shall be right-sized based on length of tenancy beginning with the oldest lease dates of the initial move in at the property.
- Households with the greatest number of excess bedrooms shall be right-sized to the smallest appropriate size unit available at the property.
- Residents who may voluntarily request a smaller unit.

I. Post-Occupancy in Overcrowded Units

If a household will be overcrowded upon their return, they shall be housed in the largest unit available for their household size at the property. Any family that is under-housed may continue to be under-housed provided they are not overcrowded until a tenant leaves the Project.

Relocation consultants shall complete the return moves for all tenants to an appropriate unit within the Project as described in this Plan.

J. Relocation Extensions Due to Construction Delays

If construction delays result in temporary relocation exceeding the initially anticipated number of months, HACE/Brinshore and relocation representatives shall promptly notify all affected residents of the delay and provide all reasonable expenses reimbursement associated with such a delay. An addendum to the initial Relocation Agreement shall be prepared and advisory assistance provided to assure residents that but for the number of months they need to be away from their unit, no other terms are changing. They will potentially be able to claim additional financial benefits in which case relocation claim forms will be prepared and explained and reimbursements issued promptly.

K. Termination of Lease During Temporary Relocation

A material breach of the lease agreement or temporary housing lease agreement and failure to correct such breach, within the stated notice requirements under the lease, state law or federal regulation may result in eviction action during the temporary relocation period. No further relocation benefits will be provided to the evicted households, and they will not have the option to return to the new Purple Phase units. It is imperative that tenants maintain their good standing at the Project or in the temporary relocation unit.

L. Record Keeping

HACE shall be responsible for retention of all General Information Notices issued prior to the implementation of the relocation program. Brinshore and their relocation consultant shall be

responsible for all other records related to the resident relocation process. Records and documentation shall be kept in sufficient detail to demonstrate compliance with all URA, State and HUD requirements. Such records shall include all notices and claim forms including evidence of payment of claims, and shall be retained for at least 3 years after the latest date of (1) the issuance of all payments to affected tenants;(2) the date of project completion; or (3) resolution of all issues resulting from litigation, negotiation, audit, or other action.

M. Relocation Tax Consequences

In general, relocation payments are not considered income for the purpose of the Internal Revenue Code of 1968, or the Personal Income Tax Law, Part 10 of the Revenue and Taxation Code. Displaced persons are encouraged, however, to consult with personal tax advisors concerning the tax consequences or social service providers to obtain information concerning the tax consequences associated with relocation payments.

N. Grievance Procedures

HACE's Grievance Policy follows the standards described in 49 CFR Section 24.10, California Code of Regulations, Title 25, Section 6152 and Section 6158. All relocated tenants have the right to ask for administrative review concerning determinations of eligibility; relocation payment amount; the failure by HACE/Brinshore to provide comparable temporary housing referrals; or HACE/Brinshore's property management practices.

Requests for administrative review and informal hearings will be directed to HACE Executive Director and senior administrative staff. All requests for review will receive written responses from HACE 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.

O. Eviction Policy

HACE and Brinshore recognize that eviction is permissible only as a last resort and that relocation records must be documented to reflect the specific circumstances surrounding any eviction. Eviction will only take place in cases of nonpayment of rent, serious violation of the rental agreement, a dangerous or illegal act in the unit, or if the household refuses all reasonable offers to move. Eviction will not affect the eligibility of a person legally entitled to relocation benefits. However, legal action to evict shall be undertaken for tenant's refusal to accept temporary relocation housing without good cause.

Good cause for temporary relocation shall be limited to the following:

- The family demonstrates that the temporary housing unit poses an immediate and severe threat to the family's life, health or safety. HACE/Brinshore will provide the family with one additional alternate temporary housing unit.
- A health professional verifies temporary hospitalization. HACE/Brinshore will work with the identified emergency contact for the family to coordinate temporary relocation of furnishing and personal belongings to limit delays in the Project.

P. 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.

In order to track and account for relocation assistance and benefit payments, relocation staff will be required to seek immigration status information from each displacee 18 years and older by having them self-certify as to their legal status.

Q. Citizen Rights and Participation

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

- No re-screening of tenants upon relocation. Current households are not subject to re-screening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to relocation but will

be subject to any ongoing eligibility requirements for actions that occur after redevelopment. Over-income households at time of relocation would continue to be treated as assisted unit.

- **Option to Return.** Any residents that may want to return to new construction units will have an opportunity to request such preference and if they income and unit size qualify once construction is completed, HACE/Brinshore will consider their requests. Residents of a property undergoing conversion of assistance may voluntarily accept HACE/Brinshore's offer to permanently relocate to another assisted unit and thereby waive their option to return to the Project after construction is completed.
- **Public Review and Citizen Participation.** HACE and Brinshore are committed to ensuring meaningful citizen participation in the relocation planning process. The following activities have been or will be undertaken:
 - **Public Review Period** – a 30-day public review period was scheduled for April 9, 2026 through May 9, 2026;
 - Copies of this plan were made available at the Housing Authority of the City of Eureka, 735 W Everding St, Eureka, CA 95503 (during regular office hours), at the Humboldt County Library - Eureka Main Branch, 1313 3rd St, Eureka, CA 95501 (during library hours), and electronically by emailing nLenic@lacialconsulting.com
 - **Method of Delivery** - all current Project households received the 30-Day Relocation Plan Review Notice via personal delivery, and copies were hand-delivered to each occupied unit;
 - **Resident Meetings** - individual meetings and interviews were conducted with all 4 households between March 12, 2026 and March 17, 2026;
 - **Relocation Committee** - given that Project involves only 4 households potentially being displaced, this does not constitute a "substantial number of displaced persons" requiring formation of a formal Relocation Committee, however, all residents will continue to be included in and consulted regarding this relocation plan and any resident or community organization may submit comments during the public review period;
 - **Comments Received** – any comments received during the public review period will be compiled and included in **Appendix G** prior to submission to the HACE Board of Directors for approval.
- HACE Executive Director reviewed this Plan and found the relocation plan to be consistent with local housing element.

R. Non-Discriminatory Statement

Residents who are relocated under temporary, extended temporary or voluntary permanent relocation as a result of the rehabilitation or construction shall be relocated to other decent, safe,

sanitary and affordable housing (at rents no higher than permitted under the HUD program) on a non-discriminatory basis without regard to race, color, religion, creed, national origin, handicap, age, familial status, sex, sexual preference, sexual orientation or gender identity and in compliance with federal, state and local laws.

S. Project Timing

It is anticipated that Brinshore will secure funding for the Project in April 2026. Construction is scheduled to begin immediately upon closing, anticipated for November 2026 and the Project tenants could receive 90-day Relocation Notices to Vacate in June/July 2026, followed by 30-day Notices to Vacate to be issued to the remaining tenants, as needed.

T. Estimated Relocation Costs

The Project will be funded with a combination of local, state and federal funds. The estimate of relocation benefits is based on available tenant data, assuming 4 households will relocate permanently to other HACE units or to market units with Tenant Based Section 8 Voucher and move one time only. Relocation estimate is \$14,700.00 for all 4 units fixed moving allowance, security deposit, and rental assistance covering the rent difference of market rents and fair market rents and adding a 10% contingency (see **Appendix F**).

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

HACE Redevelopment – Purple Phase Property Schematics

All ideas, designs, arrangements and plans indicated or represented by this drawing are owned by and property of OPERATIVE OFFICE, INC. and are created, retained and controlled by use and construction with the specific project. None of such ideas, designs, arrangements, or plans shall be used by or disclosed to any person, firm or corporation for any purpose whatsoever without the written permission of OPERATIVE OFFICE, INC. Review drawings and use provisions over scaled dimensions. Contractor shall verify and be responsible for all dimensions and conditions on the job, and the office must be notified of any variations from the dimensions and conditions shown by these drawings.

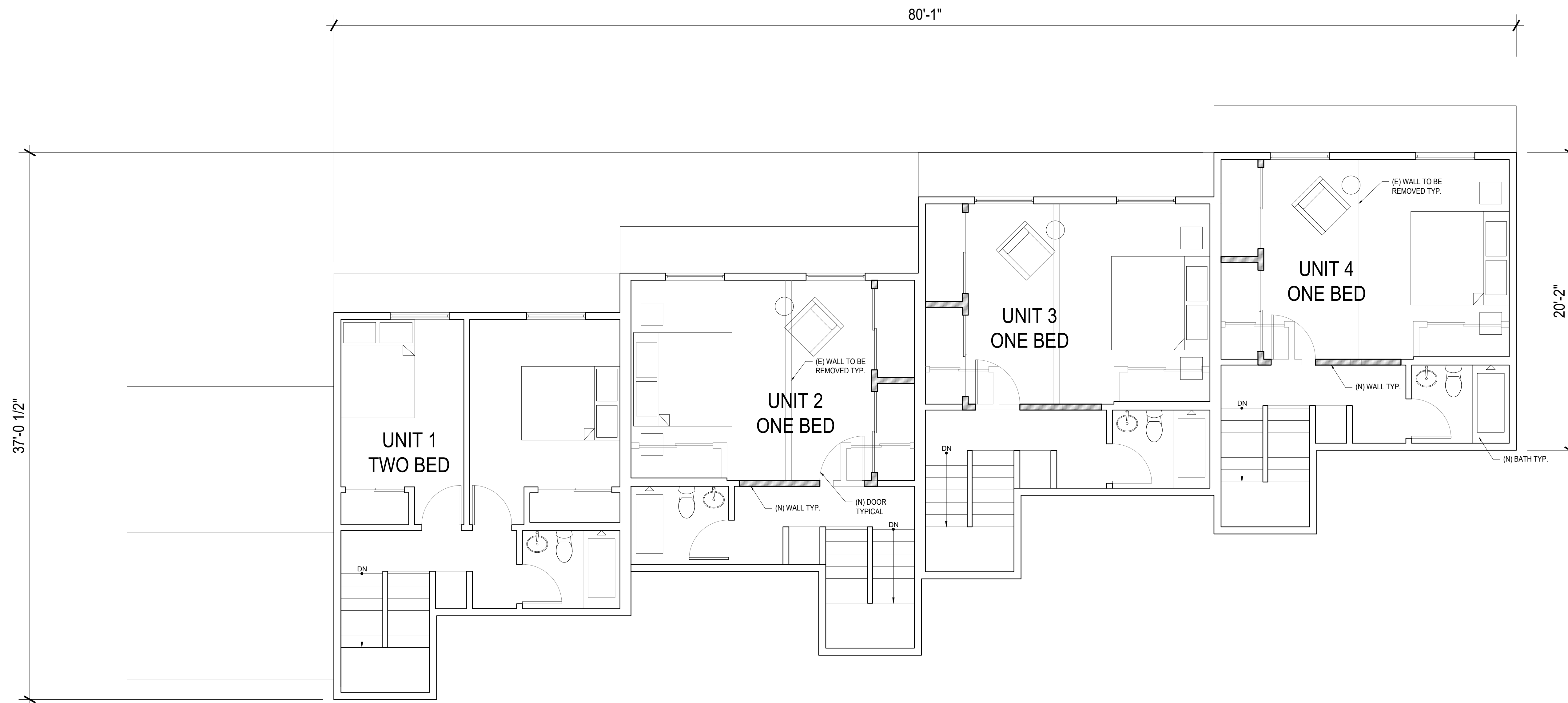
CONSULTANTS:

**SHN ENGINEERS
CIVIL AND ENVIRONMENTAL**
812 W. WABASH AVENUE,
EUREKA, CA 95501

**CRAWFORD & ASSOCIATES
GEOTECHNICAL**
4701 FREEPORT BLVD.
SACRAMENTO, CA 95822

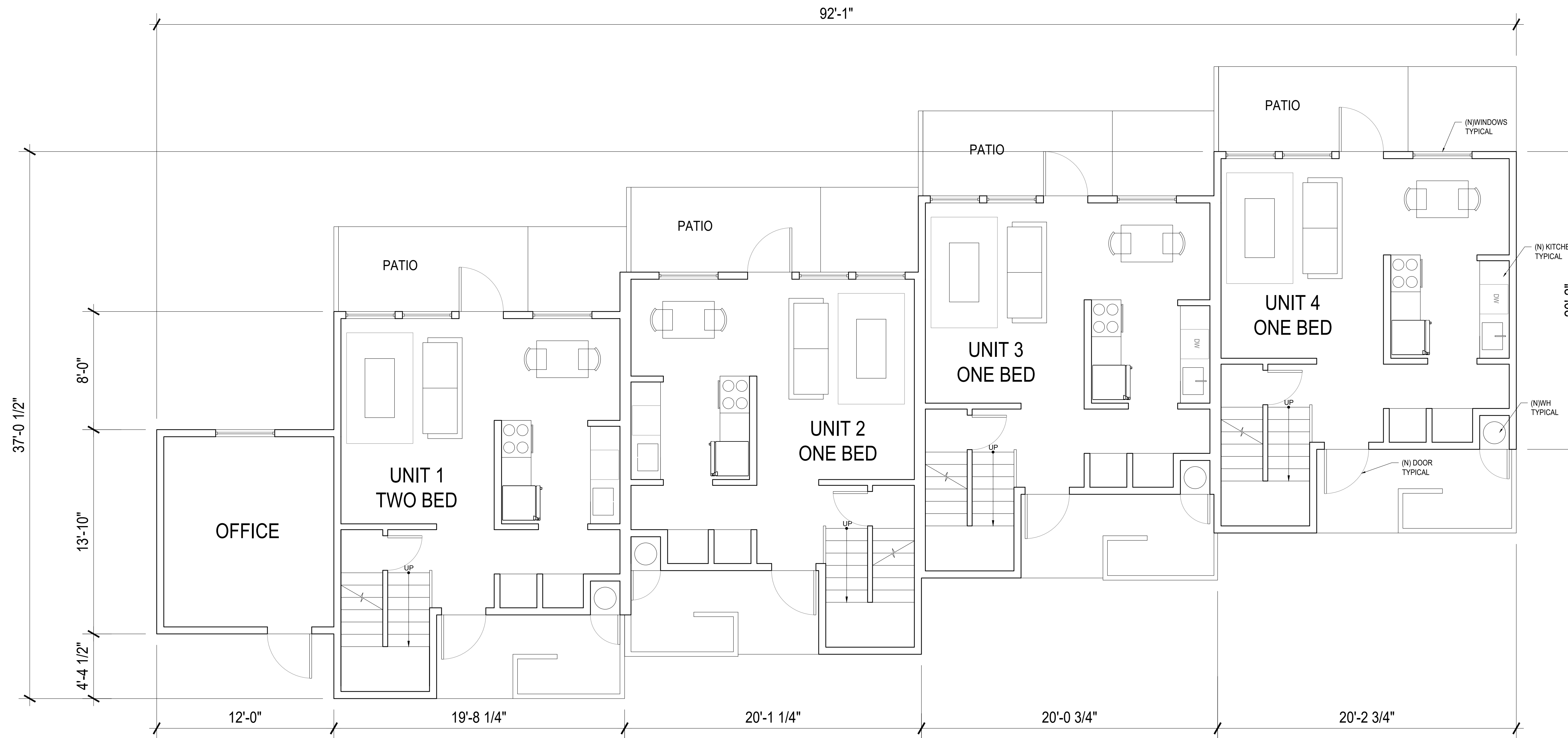
**KELLY-O'HERN ASSOCIATES
LAND SURVEYING**
3240 MOORE AVENUE,
EUREKA, CA 95501

**ROACH AND CAMPBELL
LANDSCAPE ARCHITECTS**
947 ENTERPRISE DRIVE, B
SACRAMENTO, CA 95825



REHAB - SECOND FLOOR PLAN
SCALE: 1/4" = 1'-0"

2



REHAB - FIRST FLOOR PLAN
SCALE: 1/4" = 1'-0"

1

C & CLARK APARTMENTS
AFFORDABLE FAMILY HOUSING
1115 & 1137 C STREET, EUREKA, CA 95501
APN: 004-163-001

CLIENT:

BRINSHORE DEVELOPMENT
1603 ORRINGTON AVE. ST. 450
EVANSTON, IL 60201

**HOUSING AUTHORITY OF
THE CITY OF EUREKA**
737 WEST EVERDING STREET
EUREKA, CA 95503

No.	Date	Issue
1	06.04.24	PRELIM. DESIGN REVIEW
2	06.21.24	DESIGN REVIEW
△	xx.xx.xxxx	xxxx

**REHAB FLOOR
PLANS**

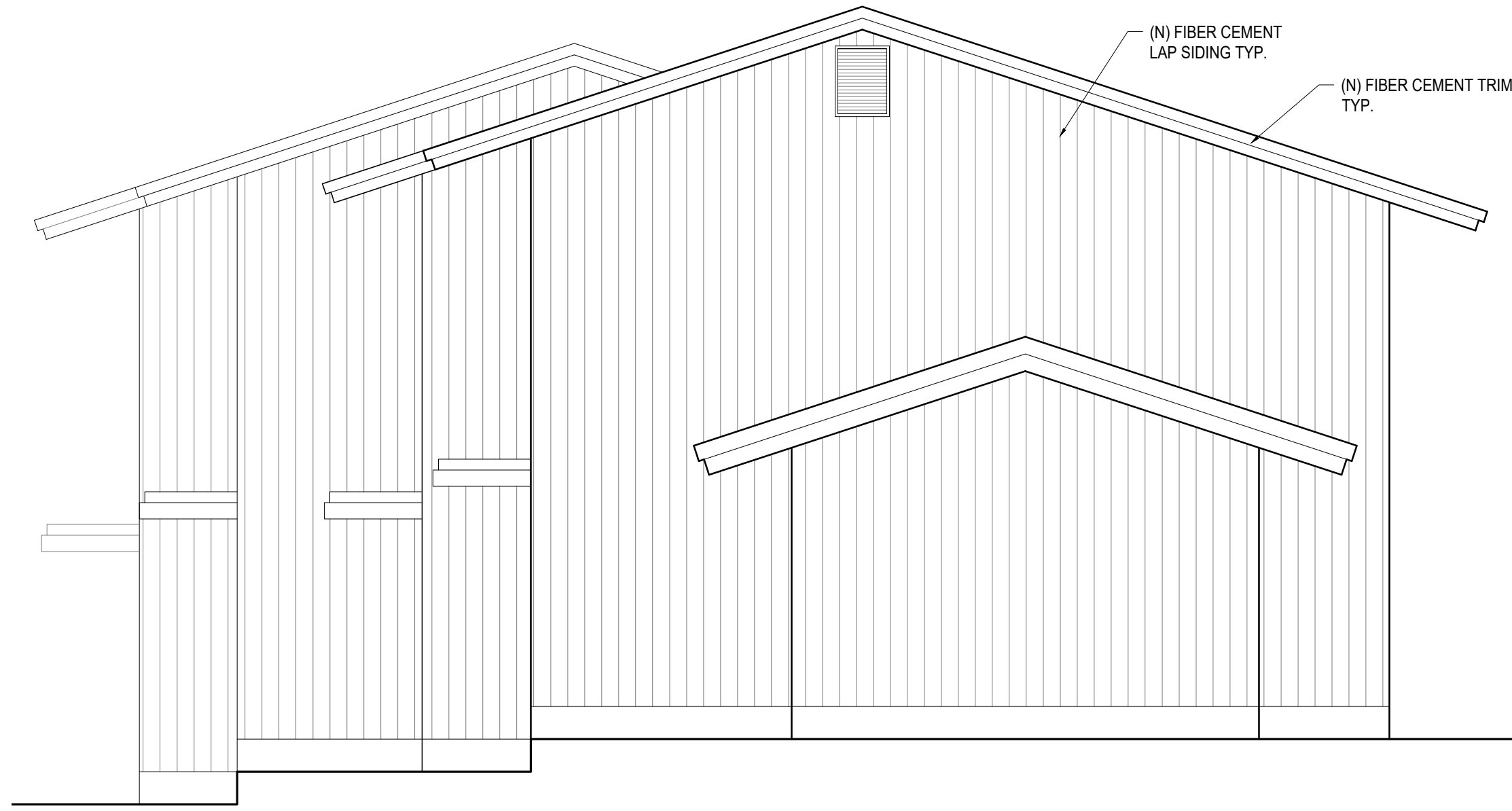
CONSULTANTS:

**SHN ENGINEERS
CIVIL AND ENVIRONMENTAL**
812 W. WABASH AVENUE,
EUREKA, CA 95501

**CRAWFORD & ASSOCIATES
GEOTECHNICAL**
4701 FREEPORT BLVD.
SACRAMENTO, CA 95822

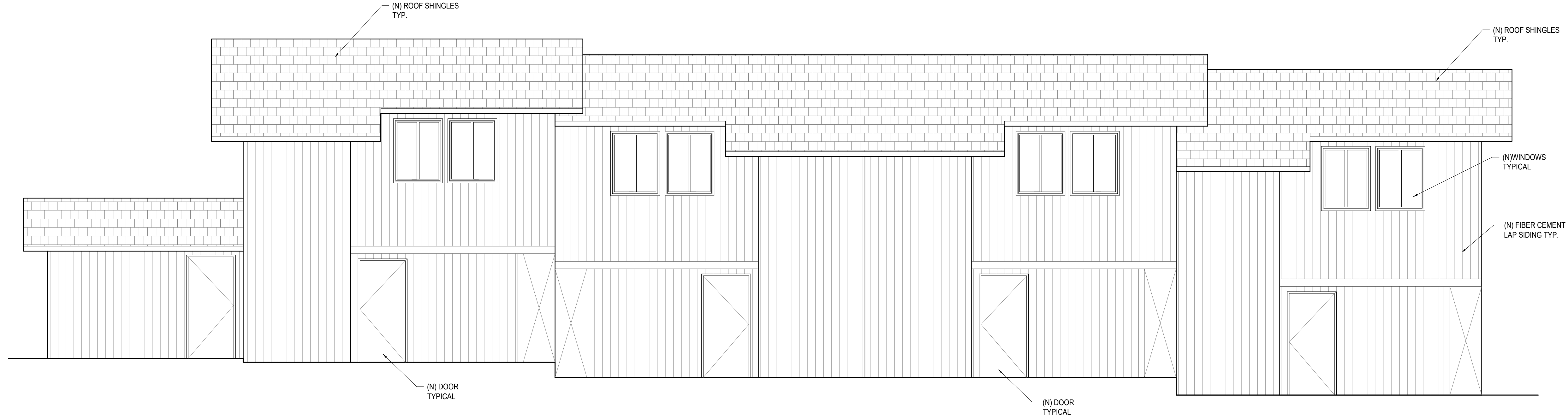
**KELLY-O'HERN ASSOCIATES
LAND SURVEYING**
3240 MOORE AVENUE,
EUREKA, CA 95501

**ROACH AND CAMPBELL
LANDSCAPE ARCHITECTS**
947 ENTERPRISE DRIVE, B
SACRAMENTO, CA 95825



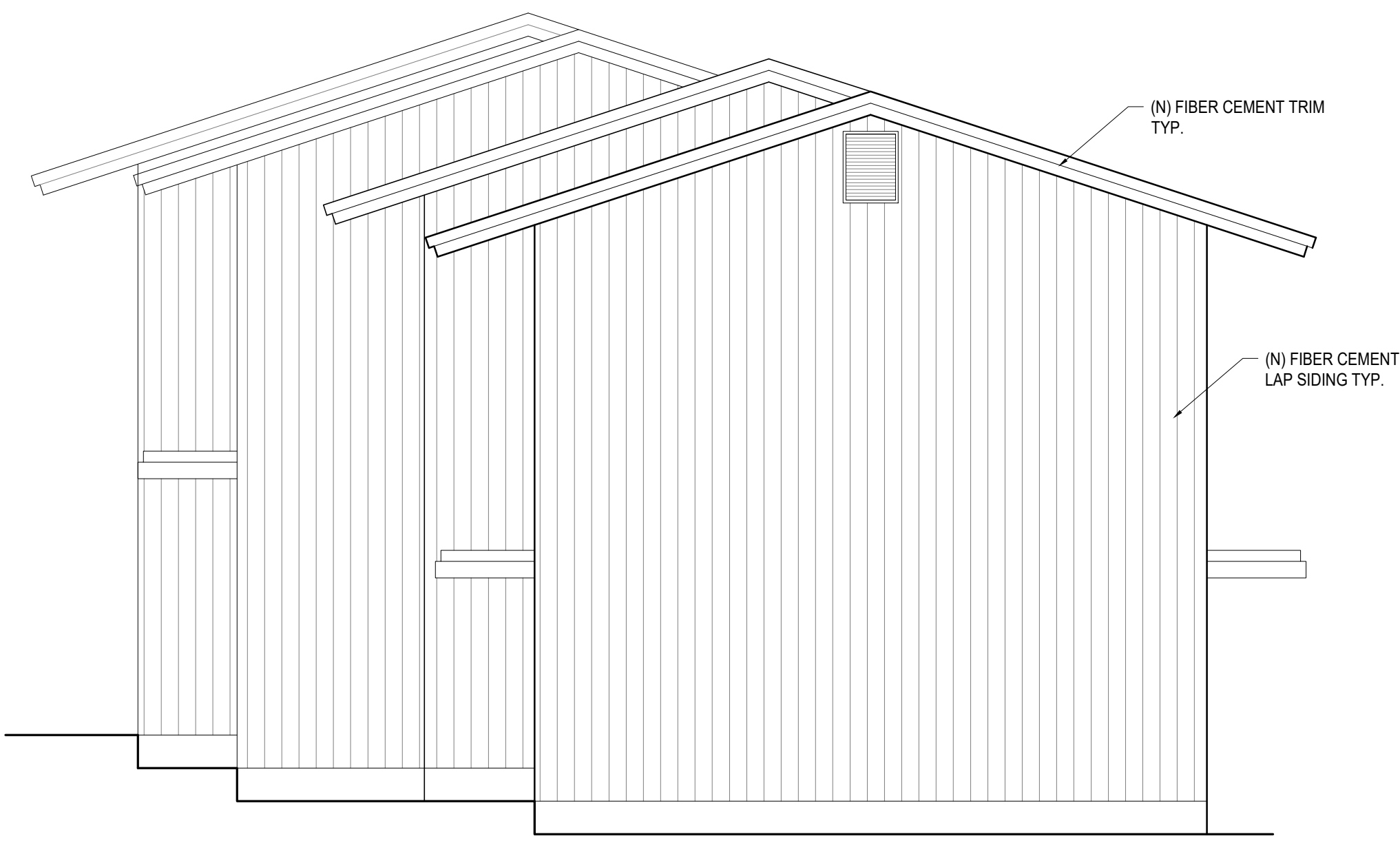
REHAB - EAST ELEVATION
SCALE: 1/4" = 1'-0"

1



REHAB - NORTH ELEVATION
SCALE: 1/4" = 1'-0"

3



REHAB - WEST ELEVATION
SCALE: 1/4" = 1'-0"

2



REHAB - SOUTH ELEVATION
SCALE: 1/4" = 1'-0"

1

C & CLARK APARTMENTS
AFFORDABLE FAMILY HOUSING
1115 & 1137 C STREET, EUREKA, CA 95501
APN: 004-163-001

CLIENT:

BRINSHORE DEVELOPMENT
1603 ORRINGTON AVE. ST. 450
EVANSTON, IL 60201

**HOUSING AUTHORITY OF
THE CITY OF EUREKA**
737 WEST EVERDING STREET
EUREKA, CA 95503

No.	Date	Issue
1	06.04.24	PRELIM. DESIGN REVIEW
2	06.21.24	DESIGN REVIEW
△	xx.xx.xxxx	xxxx

**REHAB
ELEVATIONS**

Appendix B

HUD 2025 Income Limits - County of Humboldt

The following figures are approved by the U. S. Department of Housing and Urban Relocation (HUD) for use in the County of Humboldt to define and determine housing eligibility by income level.

Area Median - \$93,900

Household Size	Extremely Low	Very Low	Low
One Person	\$19,750	\$32,900	\$52,600
Two People	\$22,550	\$37,600	\$60,100
Three People	\$26,650	\$42,300	\$67,600
Four People	\$32,150	\$46,950	\$75,100
Five People	\$37,650	\$50,750	\$81,150
Six People	\$43,150	\$54,500	\$87,150
Seven People	\$48,650	\$58,250	\$93,150
Eight People	\$54,150	\$62,000	\$99,150

Figures are per the Department of Housing and Community Development (California), Division of Housing Policy Development, published April 23, 2025.

Appendix C

Qualified Population Summary

The following list summarizes the income levels and household characteristics for each of the 4 households currently residing at the Project:

Unit	Bedrooms	Family Size	Annual Income	Income Level	Senior (62+)	Disability
Unit 1	2	2	\$11,040	30% AMI	NO	NO
Unit 2	2	3	\$39,144	50% AMI	NO	YES
Unit 3	2	2	\$19,312	50% AMI	NO	YES
Unit 4	2	3	\$16,728	30% AMI	NO	NO

Appendix D

List of Available Market Units for Rent

No	Address	Property Type	Bed	Bath	Rent
1	2500 Hubbard Ln #A, Eureka, CA 95501	APT	2	1	\$1,150.00
2	1231 Myrtle Ave #C, Eureka, CA 95501	APT	2	2	\$1,150.00
3	1231 Myrtle Ave, Eureka, CA 95501	APT	2	2	\$1,150.00
4	1711 G St, Eureka, CA 95501	APT	2	1	\$1,175.00
5	138 E St #307, Eureka, CA 95501	APT	2	1	\$1,200.00
6	1035 11th St #3, Eureka, CA 95501	APT	2	1	\$1,200.00
7	606 8th St #3, Eureka, CA 95501	APT	2	1	\$1,200.00
8	1035 11th St, Eureka, CA 95501	APT	2	1	\$1,200.00
9	3030 Park St, Eureka, CA 95501	APT	2	2.5	\$1,250.00
10	9 15th St. #D, Eureka, CA 95501	APT	2	1	\$1,275.00
11	15th St Unit D, Eureka, CA 95501	APT	2	1	\$1,275.00
12	1911 Hilfiker Ln # 20, Eureka, CA 95503	APT	2	1	\$1,300.00
13	1023 4th St #5, Eureka, CA 95501	APT	2	1	\$1,350.00
14	2142 Spring St. #B, Eureka, CA 95501	APT	2	1	\$1,350.00
15	606 8th St Unit # 3, Eureka, CA 95501	APT	2	1	\$1,390.00
16	1638 7th St, Eureka, CA 95501	APT	2	1	\$1,450.00
17	307 W Sonoma St, Eureka, CA 95501	APT	2	1	\$1,450.00
18	4153 Walnut Dr, Eureka, CA 95501	APT	2	1	\$1,490.00
19	2511 J St, Eureka, CA 95501	HOUSE	2	1	\$1,490.00
20	1815 Russ St, Eureka, CA 95501	APT	2	1	\$1,500.00
21	1617 3rd St, Eureka, CA 95501	APT	2	1	\$1,550.00
22	2810 H St, Eureka, CA 95501	APT	2	1	\$1,550.00
23	2214 Myrtle Avenue, Eureka, CA 95501	TOWN HOUSE	2	1	\$1,600.00
24	3983 T St Unit D, Eureka, CA 95503	APT	2	1	\$1,600.00
25	6613 2nd St, Fields landing, CA 95501	HOUSE	2	2	\$1,615.00
26	1440 Myrtle Ave, Eureka, CA 95501	APT	2	1.5	\$1,650.00
27	15th St Unit B, Eureka, CA 95501	APT	2	1	\$1,745.00
28	2810 H St, Eureka, CA 95501	HOUSE	2	1.5	\$1,750.00
29	4190 Hillside Ct, Eureka, CA 95501	APT	2	1	\$1,750.00
30	1711 G ST, Eureka, CA 95501	APT	2	1	\$1,750.00
31	187 F St #B, Arcata, CA 95518	APT	2	1	\$1,800.00
32	830 Bayside Rd #D, Arcata, CA 95518	APT	2	1	\$1,800.00

No	Address	Property Type	Bed	Bath	Rent
33	964 9th St #3, Arcata, CA 95518	APT	2	1	\$1,850.00
34	2970 Mack Rd #D, Arcata, CA 95518	APT	2	1.5	\$1,950.00
35	585 Ridge Rd #C, Arcata, CA 95518	APT	2	1.5	\$1,950.00
36	1093 5th St #E, Arcata, CA 95518	APT	2	1	\$1,990.00
37	4050 N US Highway 101 Unit 2	APT	2	1	\$2,000.00
38	5553 Noe Ave, Eureka, CA 95503	HOUSE	2	1	\$2,000.00
39	1016 F St #2, Arcata, CA 95518	APT	2	1	\$2,150.00
40	1016 F St #5, Arcata, CA 95518	APT	2	1	\$2,150.00
41	724 Hidden Creek Rd #B, Arcata, CA 95518	TOWN HOUSE	2	2	\$2,250.00
42	1720 Westfall Ct #A, Arcata, CA 95518	APT	2	1	\$2,500.00
43	4190 Hillside Ct Unit 1, Eureka, CA 95503	APT	2	1	\$2,500.00
44	401 4th St #C, Arcata, CA 95518	APT	2	1	\$3,000.00
				median	\$1,550.00

Appendix E

Sample Notices



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
WWW.EUREKAHUMBOLDTHA.ORG

GENERAL INFORMATION NOTICE

March 9, 2026

[Tenant Name] and All Other Occupants
1137 C St. # __
Eureka, CA 95501

Dear [Tenant Name] and All Other Occupants:

The Housing Authority of the City of Eureka (HACE) is planning to redevelop the property you currently occupy at 1137 C Street # __, Eureka, CA 95501 under Section 18 of the U.S. Housing Act of 1937. In October 2023, HACE in partnership with Brinshore Development LLC (Brinshore) proposed full redevelopment of the Blue Phase site, portion of which is AKA Purple Phase (Project). Further planning efforts on the feasibility of the Project, the need to ensure that all residents have a right to return to a right-sized new unit in the revitalized Project, to provide for reasonable and compliant handicap access to its residents, and the increasing need for affordable housing in Eureka led HACE to conclude that the best approach will be to rehabilitate the existing 4 units of public housing and relocate all existing households into newly rehabilitated Project apartments thus minimizing relocation and disruption to residents' daily activities.

HACE and Brinshore are currently finalizing design, feasibility, and financing plans for the Project. The Project construction is expected to begin in fall of 2026. Relocation advisory assistance will be provided to cause the least amount of inconvenience possible for all residents.

This is not a notice of eligibility for relocation assistance or a notice to vacate.

If you are determined to be eligible for relocation assistance in the future, you may be eligible for: (1) relocation advisory services to help you find another place to live; (2) at least ninety (90) days advance written notice of the date you will be required to move; (3) payment for your moving expenses; and (4) comparable housing, which may include housing with reasonable accommodations for disability if required under section 504 of the Rehabilitation Act of 1973 and HUD's regulations at 24 CFR part 8. HACE and Brinshore have retained LACAL Consulting, Inc. (LACAL), to assist in developing a Relocation Plan for Purple Phase rehabilitation project.

In order to prepare the Relocation Plan, representatives of LACAL will meet with each individual family/household to identify specific family needs during the relocation. You will be provided with advisory services to explain the relocation program and help answer any questions that you may have about this process.

Because Purple Phase is a Section 9 Public Housing site, the establishment of a relocation plan and all relocation activities are guided by Section 18 of the U.S. Housing Act of 1937 and its implementing regulations at 24 CFR 970 (the "Section 18 requirements") and the Uniform Relocation Act (46 U.S.C. § 4600 et seq.) (URA) and California Relocation Assistance Law, Sec 7260 et seq. of the CA Government Code (CRAL). The Section 18 requirements, URA and CRAL ensure that all households eligible for relocation are provided with direct assistance in locating a decent and safe replacement housing dwelling, are provided with significant notice of intent prior to the start of relocation activities, are eligible for reimbursement of related moving expenses, and assisted individually with claims preparation and supplemental services.

Note that pursuant to Public Law 105-117, aliens not lawfully present in the United States are not eligible for relocation assistance, unless such ineligibility would result in exceptional hardship to a qualifying spouse, parent, or child. All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an immigrant lawfully present in the United States.



The Housing Authorities are Equal Housing Opportunity Organizations



The purpose of this notice is to inform you that you may be required to relocate for a period of longer than twelve (12) months as a result of the proposed project. Even though you will be provided with all the assistance that Section 18 and CRAL requires, HACE believes that upon completion of construction residents may have the right to return to the Project if they remain eligible and have been asked to relocate outside of the Project during construction. In the meantime, you should continue to pay your rent and meet any other requirements specified in your lease. If you fail to do so, HACE may have cause for your eviction. If you choose to move, or if you are evicted, prior to receiving formal notice of relocation eligibility, you may become ineligible to receive relocation assistance. It is very important for you to contact us before making any moving plans.

Again, this is not a notice to vacate the premises and does not establish your eligibility for relocation assistance at this time. If you are determined to be displaced and are required to vacate the premises in the future, you will be informed in writing. In the event the proposed project does not proceed or if you are determined not to be displaced, you will also be notified in writing.

We are certain you will have many questions, and we look forward to meeting with you. Your interview with our relocation representatives is extremely important. Please call their office directly to set a convenient time for the interview. If they do not hear from you, they will personally contact you via phone number that we have on file for you or at your unit when they are conducting in-person meetings, anticipated for the week of March 16th and March 23rd. The LACAL toll-free office number is **(800) 345-5520**.

Sincerely,

Cheryl Churchill, Executive Director
HACE and HACH

Tenant Acknowledgement	
<i>This notice is to inform you of your rights under Federal and State law. If HACE and Brinshore proceed with the Red Phase Project and you are relocated for the Project, you may be eligible for relocation assistance under Section 18 of the U.S. Housing Act of 1937, as amended; the Uniform Relocation Act (46 U.S.C. § 4600 et seq.) (URA); the California Relocation Assistance Law (Sec 7260 et seq.) of the CA Government Code; and Handbook 1378 of the US Department of Housing and Urban Development (HUD). All residents are expected to adhere to the terms and conditions of their Lease and House Rules in order to qualify for relocation assistance.</i>	
I was personally contacted by HACE representative, and I have been given a copy of this notice.	
Received by:	Delivered date/by: 3/9/26 by HACE staff
Claimant signature:	Posted on/by:
Date:	Mailed on/Receipt received:

NOTE: this is your copy of the notice; LACAL will obtain signatures for the relocation file at the personal meeting with you.



The Housing Authorities are Equal Housing Opportunity Organizations



Notice of Eligibility

May 15, 2026

[Tenant Name] and All Other Occupants
1137 C St. Apt. __
Eureka, CA 95501

Dear [Tenant Name] and All Other Occupants:

The **Housing Authority of the City of Eureka (HACE)** in partnership with **Brinshore Development L.L.C. (Brinshore)** is proceeding with the substantial rehabilitation project known as the **Blue Phase**, portion of which is AKA **Purple Phase** (Project). To carry out this project, it will be necessary for you to permanently relocate from your dwelling at **1137 C Street, Eureka, California** to another affordable apartment within HACE portfolio or a suitable market rent apartment with Tenant Based Section 8 Voucher.

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

This is a notice of eligibility for relocation assistance. The effective date of your eligibility, known as the initiation of negotiations, is **January 12, 2023**. You are eligible for relocation assistance and benefits under the HACE's Relocation Assistance Program.

You are eligible to receive the following benefits:

1. **RELOCATION ADVISORY ASSISTANCE** provided by LACAL Consulting, Inc., a professional firm hired by HACE/Brinshore to provide relocation assistance to you, such as notices, assistance with move to replacement housing and help with filing for benefits.
2. **MOVING EXPENSES:** You will receive a payment to assist in moving your personal property. You may select one of the following payments:
 - A. A Fixed Moving Payment based on the number of rooms you occupy. Your entitlement under this option for **three (3)** rooms is **\$1,250.00; or**
 - B. A payment for your Actual Reasonable Moving and Related Expenses based on at least two written estimates and receipted bills.
3. **REPLACEMENT HOUSING ASSISTANCE:** You may receive the following financial assistance to purchase or to rent replacement housing:
 - A. If you RENT replacement housing, you may file a claim for a **RENTAL ASSISTANCE** payment, equal to the difference between the monthly rent and utilities necessary to rent a comparable replacement dwelling (as determined by HACE) and the base monthly rent, multiplied by 42 months. (See table following)

A study was completed to determine the cost of a comparable, 'decent, safe and sanitary or DS&S' replacement dwelling most nearly representative of your current dwelling. The study indicated that the 1-bedroom apartment located at _____, **Apartment __, Eureka, California** with a monthly rent and estimated utilities of **\$1,200.00** was the most representative of your current dwelling. Your HACH provided Tenant Based Section 8 Voucher will cover monthly rent of \$1,032.00 and estimated utilities.

Base monthly rent is defined as the lesser of:

- (1) **\$1,032.00**, which represents the average monthly rent and average monthly utilities at your displacement dwelling or Section 8 Tenant Voucher rent (if you are paying little or no rent, the amount is based on the economic rental value of your dwelling); **or**
- (2) **N/A**, which represents thirty (30) percent of your adjusted gross monthly household income. (If "N/A", income was not used in the calculation because the income information provided was insufficient evidence of income.)

Based on the above, your base monthly rent amount is **\$1,032.00**, and your maximum rental assistance payment is calculated as follows:

Maximum Rental Assistance Payment Calculation		
1	Comparable Dwelling Cost	\$1,200.00
2	Base Monthly Rent	\$1,032.00
3	Monthly Difference (Line 1 minus Line 2)	\$168.00
4	Maximum payment (Line 3 times 42 months)	\$7,056.00

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

B. If you BUY replacement housing, you may file a claim for **DOWNPAYMENT ASSISTANCE** payment. You may then use the full amount of your rental assistance payment, as calculated above based on comparable cost (**\$7,056.00**), for a down payment and incidental expenses (typically known as "closing costs") associated with the purchase of a replacement dwelling. All amounts used as a down-payment and incidental expenses must be applied to the purchase of the replacement dwelling. Any payments you may have received as rental assistance will be deducted from your down payment assistance. Let us know if you prefer to buy a replacement home, and we will help you find such housing.

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

You do not have to accept any dwelling referred to you by the Property Owner. You may choose your own replacement, but to qualify for relocation assistance payments it must first be inspected to assure that it

meets the decent, safe and sanitary-DS&S@ standards. For this reason, **DO NOT MOVE from your home and DO NOT CONTRACT to rent or purchase a replacement dwelling without first contacting your relocation consultant.** The “decent, safe and sanitary-DS&S” inspection is **not** a substitute for a professional housing inspection.

You must continue to pay your rent to HACE for the period of your tenancy, as well as meet all other conditions stated in your lease or rental agreement. Failure to pay rent may reduce the replacement housing payment which you are eligible to receive.

The Relocation Assistance Program is very complex. It is important that you carefully read and understand the matters explained in this notice and in the Informational Statement which is provided to you. Any person aggrieved by a determination as to eligibility for, or the amount of, a payment authorized by HACE’s Relocation Assistance Program may have the appeal application reviewed by HACE in accordance with its appeals procedure.

If at any time you have questions or need assistance, please contact me at 800-345-5520 ext 1001.

Sincerely,



Natasa Lenic, SR/WA, R/W-RAC
Relocation Director
LACAL Consulting, Inc.
6728 Fair Oaks Blvd., Suite 400C
Carmichael, CA 95608
Phone: 800-345-5520 ext. 1001

Tenant Acknowledgement – I was personally contacted by the Relocation Consultant for HACE/Brinshore. I have been given a copy of this notice and I have had the available services and entitlements explained to me. I have been advised that the Relocation Consultant will be available to assist me if any questions arise or assistance is needed.	
Received by:	Delivered date/by:
Claimant signature:	Posted on/by:
Date:	Mailed on/Receipt received:

90-Day Notice to Vacate

May 31, 2026

[Tenant Name] and All Other Occupants
1137 C St. Apt. ____
Eureka, CA 95501

Dear [Tenant Name] and All Other Occupants:

The Housing Authority of the City of Eureka (HACE) in partnership with Brinshore Development L.L.C. (Brinshore) (called here the “Displacing Agency”) as the owner of the property which you occupy located at **1137 C Street, Unit # __**, in **Eureka, CA** (called here the “Premises”), provided you with a Notice of Eligibility with referrals to units you may want to consider for a replacement site. The Displacing Agency has now determined that it will be necessary for you to vacate the Premises.

Notice is hereby given that the Displacing Agency elects to terminate your tenancy in ninety (90) days beginning June 1, 2026 and ending August 31, 2026. You are hereby noticed to quit and deliver up possession of the property you occupy on or before August 31, 2026. If you do not vacate the Premises by that date, the Displacing Agency will initiate legal proceedings to recover possession of the Premises, along with any rents and damages.

During this period, **LACAL Consulting** relocation staff will continue to be available to provide assistance with referrals to replacement sites, coordination with movers and other vendors, the processing of relocation benefit claim forms, and other tasks to help facilitate your relocation. Please contact your relocation consultant, _____ at (323) 951-9887 ext. 1002, if you have any questions regarding this notice or the relocation process. Please contact your consultant prior to signing a lease as the unit you select must be inspected to meet Decent, Safe and Sanitary conditions.

Upon vacating your unit, you are responsible for removing all of your personal property, delivering the Premises in satisfactory condition and turning in the keys to your relocation consultant on the day you schedule your consultant to perform a final abandonment walk-thru of your current unit.

Sincerely,

Natasa Lenic, SR/WA, R/W-RAC
LACAL Consulting, Inc.
6728 Fair Oaks Blvd., Suite 400C
Carmichael, CA 95608

Received by:	Delivered date/by:
Claimant signature:	Posted on/by:
Date:	Mailed on/Receipt received:

30-Day Relocation Plan Review Notice

April 6, 2026

[Tenant Name] and All Other Occupants
1137 C St. Apt. ____
Eureka, CA 95501

Dear [Tenant Name] and All Other Occupants:

The Housing Authority of the City of Eureka (HACE) in partnership with Brinshore Development L.L.C. (Brinshore) want to inform you that the Relocation Plan for HACE Redevelopment - Blue Phase, portion of which is AKA Purple Phase is available for review and comments now, and over the next 30 days, at the following locations:

- 1) Housing Authority of the City of Eureka and County of Humboldt, 735 W Everding St, Eureka, CA 95503 at the reception desk (during regular office hours)
- 2) Humboldt County Library - Eureka Main Branch, 1313 3rd St, Eureka, CA 95501 (during regular library opening hours)
- 3) Electronically by requesting a copy via email: nLenic@lacalconsulting.com

The public is encouraged to provide comments during this 30-day review period (April 6, 2026 to May 6, 2026). Citizen and tenant participation is encouraged as part of this process; members of the community are invited to voice their concerns and provide input on the contents of the Relocation Plan by responding during this review period. To receive a copy of the Plan, submit comments, and ask questions about the proposed project, contact:

Natasa Lenic, SR/WA, R/W-RAC
LACAL Consulting, Inc.
6728 Fair Oaks Blvd., Suite 400C
Carmichael, CA 95608
(323) 951-9887
nLenic@lacalconsulting.com

Received by:	Delivered date/by:
Claimant signature:	Posted on/by:
Date:	Mailed on/Receipt received:

Appendix F

Relocation Budget

Phase	Address	Bedroom Size	Occupancy	HACE unit /TPV	Market Unit	Monthly Need	Permanent off-site with TPV - RAP	Sec deposit	Moving	Total
Purple	1137 C Street #A	2	Yes	\$ 1,643.00	\$ 1,550.00	\$ -	\$ -	\$ 1,550.00	\$ 1,790.00	\$ 3,340.00
Purple	1137 C Street #B	2	Yes	\$ 1,643.00	\$ 1,550.00	\$ -	\$ -	\$ 1,550.00	\$ 1,790.00	\$ 3,340.00
Purple	1137 C Street #C	2	Yes	\$ 1,643.00	\$ 1,550.00	\$ -	\$ -	\$ 1,550.00	\$ 1,790.00	\$ 3,340.00
Purple	1137 C Street #D	2	Yes	\$ 1,643.00	\$ 1,550.00	\$ -	\$ -	\$ 1,550.00	\$ 1,790.00	\$ 3,340.00
										\$ 13,360.00
										\$ 14,696.00

+10% contingency

Appendix G

Public Review and Comments

This Relocation Plan was made available for public review between April 9, 2026 and May 9, 2026. No public comments were received during the public review period.

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