

CITY OF GARDEN GROVE
INTER-DEPARTMENT MEMORANDUM

Garden Grove City Council
and
Garden Grove Agency for Community Development

To: Matthew Fertal From: Economic Development

Dept: City Manager/Director

Subject: UPDATED RELOCATION PLAN FOR Date: June 14, 2011
 TRAVEL COUNTRY RV PARK AND
 ONE ADJACENT BUSINESS

OBJECTIVE

It is requested that the City Council adopt the attached Resolution (Attachment 1) approving the updated Relocation Plan for the Travel Country RV Park and one (1) adjacent business ("2011 Relocation Plan") (Attachment 2). The Resolution authorizes the City Manager and his designees to implement the 2011 Relocation Plan. It is requested that the Garden Grove Agency for Community Development (Agency) receive and file and authorize the Agency Director and his designees to implement the 2011 Relocation Plan.

BACKGROUND

The California Relocation Assistance Law, Government Code Section 7260, *et seq.*, and the implementing regulations in Title 25 Cal Code of Regulations Section 6000, *et seq.* are the state laws that govern relocation assistance and benefits (together, "Relocation Law"). The Relocation Law requires preparation, public availability, and action on a relocation plan if displacement might occur. The term displacement means when a person or business is caused to move from real property as a direct result of the implementation of a public program or project. The City Council, as the legislative body of the Agency, is vested with the authority to review and take action on Agency relocation plans. The Relocation Law requires that relocation plans be updated on an annual basis.

On May 12, 2009, the Agency entered into a Disposition and Development Agreement ("DDA") with Garden Grove MXD, LLC ("Developer") and adopted a Relocation Plan relating to the proposed redevelopment on a site that includes the Travel Country RV Park located on 12721 Harbor Boulevard ("RV Park") ("2009 Relocation Plan"). The Proposed Project includes development of an approximately 600-room hotel, with a water park,

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TRAVEL COUNTRY RV PARK AND ONE ADJACENT BUSINESS
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entertainment or other resort theme uses, along with meeting space, 18,000 gross square feet of restaurant or retail uses, and structured parking.

On April 13, 2010, the Agency approved a First Amended and Restated Development and Disposition Agreement (FARDDA) with the Developer that amended the structure of the Agency's financial obligations and expanded the Proposed Project Site by incorporating two (2) adjacent parcels. On the same evening, City Council approved an updated relocation plan for the RV Park and one (1) adjacent business at 12581 Harbor Boulevard known as the Humdinger, a bar and restaurant establishment ("2010 Relocation Plan"), which included updated information pertaining to the occupant households at the RV Park, availability of comparable replacement housing and comparable replacement business locations for the potential displaced residential households/persons and business.

DISCUSSION

As approximately one year has passed since the adoption of the 2010 Relocation Plan, Agency staff prepared and made available for public comment the 2011 Relocation Plan. As a part of the update, the Agency's relocation consultant, Overland Pacific & Cutler ("OPC"), provided relocation profiles to all 39 occupant households/persons at the RV Park and asked each occupant household to review and update the information that OPC had gathered from interviews conducted by OPC staff in connection with the 2009 Relocation Plan and from responses to a request for updated information that OPC sent to all occupant households in connection with the 2010 Relocation Plan. OPC received responses from 29 occupant households/persons who updated and/or confirmed the accuracy of their household and personal information. The 2011 Relocation Plan assumes that the household and personal data formerly received from the occupants remains accurate for the 10 occupant households who did not respond. Also incorporated into the 2011 Plan is data from an interview that OPC conducted with the owner of the Humdinger in April 2011 regarding existing conditions of the business and relocation preferences, needs, and objectives.

The Relocation Law does not expressly describe how updated plans are considered and approved. Citizen participation and making the 2011 Relocation Plan available for public review and comment has occurred during the past 30 days. A copy of the 2011 Relocation Plan was mailed to all occupant households at the RV Park along with advisory notices in English and Spanish that provided the contact information of bilingual City staff if the occupants had any questions or wanted to request a copy of the 2011 Relocation Plan in Spanish. English and Spanish notices were also posted on the City of Garden Grove's website <http://www.ci.garden-grove.ca.us/> in the News Releases section of the City's home page and added

to the informational scroll on the City's public access television station notifying of the availability of the 2011 Relocation Plan at the City Clerk's Office in City Hall, at the Travel Country RV Park Management Office, and at three (3) Orange County Public Libraries located within the City.

In connection with the site preparation necessary to implement the FARDDA, it is estimated that relocation process will be undertaken in 2011, with an estimated completion in about October 2011. The Agency issued a 90-day Notice to Vacate to the Humdinger in February 2011 and OPC has been working with the business providing advisory assistance. It is anticipated that the Agency will issue 90-day Notices to Vacate to all occupant households/persons at the RV Park before the end of June 2011. Prior to the actual displacement of occupant households/persons, eligibility requirements and benefit estimates will be detailed on a household-by-household basis and a statement will be provided to each occupant household. OPC will contact individual occupant households to provide back-up documentation for relocation claims and following the verification of their eligibility, the Agency will process and remit relocation payments that occupant households are entitled to under Relocation Law. In the course of the contacts by OPC, each eligible displacee will be counseled as to available options and resources for comparable replacement housing, taking into consideration the needs and preferences of individual displacees in securing comparable replacement housing.

The total cost to relocate the occupant households and the one business is estimated to be \$1,050,000, which includes estimated moving costs, rental assistance payments, including last resort housing payments to eligible households and business relocation for the one (1) business pursuant to Relocation Law. The estimate does not account for occupant households who could be eligible for Section 8 rental assistance.

FINANCIAL IMPACT

- Relocation costs are estimated to be \$1,050,000, and will be paid from Agency funds. The financial impact to the City and the Agency relating to the Proposed Project is set forth in the FARDDA.

RECOMMENDATION

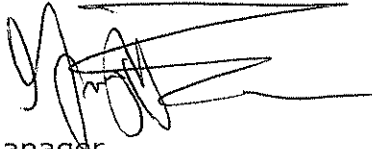
Staff recommends that the City Council:

- Adopt the attached Resolution approving the Agency's 2011 Relocation Plan and authorizing the City Manager/Agency Director and his designees to implement the 2011 Relocation Plan.

Staff recommends the Agency:

- Receive and file and authorize the Agency Director and his designees to implement the 2011 Relocation Plan in cooperation with the City.

GREG BROWN
Real Property Manager



Kathleen Angel

By: Kathleen Angel
Economic Development Specialist

Attachment 1: City Council Resolution
Attachment 2: 2011 Updated Relocation Plan

mm(h:Staff/KA/TCRV Relocation Plan sr 061411v1.doc)

Recommended for Approval

Matthew Fertal
Matthew Fertal
City Manager

RESOLUTION NO. _____**A RESOLUTION OF CITY COUNCIL OF THE CITY OF GARDEN GROVE APPROVING THE 2011 UPDATED RELOCATION PLAN FOR THE TRAVEL COUNTRY RV PARK AND ONE BUSINESS AND MAKING CERTAIN OTHER FINDINGS IN CONNECTION THEREWITH**

WHEREAS, the Garden Grove Agency for Community Development (“Agency”) is a public body corporate and politic and a community redevelopment agency organized and existing under the California Community Redevelopment Law, Health and Safety Code Sections 33000, *et seq.* (“CRL”) and has been authorized to transact business and exercise the powers of a redevelopment agency pursuant to action of the City Council of the City of Garden Grove (“City Council”), a California municipal corporation (“City”);

WHEREAS, the City Council originally adopted the Redevelopment Plan for the Garden Grove Community Project by Ordinance No. 1339 on June 26, 1973, and thereafter amended said Redevelopment Plan and Project Area by City Council Ordinance Nos. 1388, 1476, 1548, 1576, 1642, 1699, 1760, 1971, 2035, 2232, 2304, 2455, 2576, and 2709;

WHEREAS, the Redevelopment Plan for the Garden Grove Community Project, as amended, and the Garden Grove Community Project Area, as amended, are referred to, respectively, as the “Redevelopment Plan” and “Project Area”;

WHEREAS, relocation assistance and benefits for eligible persons and businesses in California are governed by and provided for in the California Relocation Assistance Law, Government Code §7260, *et seq.* (“CRAL”) and the implementing regulations promulgated by the California Department of Housing and Community Development set forth in California Code of Regulations, Title 25, Housing and Community Development, Division 1, Chapter 6, §6000, *et seq.* (“Guidelines”), together the CRAL and Guidelines are referred to as the “Relocation Law”;

WHEREAS, the Agency acquired that certain real property in the Project Area improved with the Travel Country RV Park property located at 12721 Harbor Boulevard, Garden Grove (“RV Park”) in July 2005 for future redevelopment purposes and in December 2010 the Agency acquired that certain adjacent improved commercial real property in the Project Area located at 12581 Harbor Boulevard that includes one existing business called the “Humdinger,” a bar and restaurant establishment;

WHEREAS, the Agency entered into that certain Disposition and Development Agreement (“DDA”) with Garden Grove MXD, LLC (“Developer”) dated as of May 12, 2009, relating to a proposed redevelopment project in the Project Area on a site that includes the Travel Country RV Park property and several commercial properties, including without limitation the Humdinger commercial business (“Proposed Project Site”);

WHEREAS, the project proposed for the Proposed Project Site includes development of an approximately 600-room hotel, with a water park, entertainment or other resort theme uses, along with meeting space, 18,000 gross square feet of restaurant or retail uses, and structured parking (“Proposed Project”);

WHEREAS, pursuant to the Relocation Law, specifically Section 6038 of the Guidelines, and in planning for implementation of the Proposed Project and in connection with consideration and action on the DDA, and if such project proceeds, the City and Agency caused to be prepared, made available to the public and approved by City Council Resolution No. 8890-09 on May 12, 2009 that certain Relocation Plan that presents, among other provisions, the plans for and relating to potential displacement of lawful and eligible occupant households from the RV Park (“Relocation Plan”);

WHEREAS, on April 13, 2010, the Agency approved a First Amended and Restated Development and Disposition Agreement (FARDDA) with the Developer that amended the structure of the Agency’s financial obligations and expanded the Proposed Project Site by incorporating two adjacent parcels and that includes the amended and restated terms, conditions, provisions, and schedule for the Proposed Project;

WHEREAS, on April 13, 2010, the City Council approved an updated relocation plan for the RV Park and one adjacent business at 12581 Harbor Boulevard (Humdinger) (“2010 Relocation Plan”), which plan included updated information pertaining to the occupant households at the RV Park, availability of comparable replacement housing and comparable replacement business locations for the potential displaced residential households/persons and business;

WHEREAS, approximately one year has passed since the adoption of the 2010 Relocation Plan and because it is now anticipated that displacement and relocation of approximately thirty-nine (39) occupant households from the RV Park and the one (1) commercial business (Humdinger) will occur in 2011 the Agency staff has caused to be prepared and made available for public comment an updated relocation plan for the residential and commercial relocation (“2011 Relocation Plan”);

WHEREAS, pursuant to the CRL, the City Council is the legislative body of the Agency;

WHEREAS, pursuant to the Relocation Law Section 6038 provides that the local legislative body consider and approve relocation plans, although such regulations do not expressly provide for the consideration and action on an updated relocation plan, nonetheless the Agency and City Council have caused to be made available to the occupants at the RV Park, and to the one commercial business (Humdinger), and to the public generally a copy of the 2011 Relocation Plan and notice of such updated plan has been posted on the City of Garden Grove’s official website: <http://www.ci.garden-grove.ca.us/> in the News Releases section of the home page and added to the informational scroll on the City’s public access television station notifying in English and Spanish of the availability of the 2011 Relocation Plan at the City of Garden Grove, City Hall, 11222 Acacia Parkway, Garden Grove, City Clerk’s Office, and at the RV Park Management Office, 12721 Harbor Blvd., Garden Grove, and at three (3) Orange County Public Libraries located within the city of Garden Grove;

WHEREAS, the 2011 Relocation Plan has been made available for public review and comment for a period not less than 30 days prior to submittal of the 2011 Relocation Plan to the City Council for consideration, action, and approval;

WHEREAS, the City Council has reviewed the 2011 Relocation Plan and considered public comment (both oral and written), if any, and the City Council determines the Proposed Project and the implementation of the 2011 Relocation Plan, are in the best interests of the Agency and the health, safety, and welfare of the community and in accord with the public purposes and provisions of applicable state and local law requirements; and

WHEREAS, by this Resolution, the City Council desires to approve the 2011 Relocation Plan and authorize the City Manager and his designees, to carry out the 2011 Relocation Plan, which authorization includes processing and payment of relocation claims and issuance of warrants necessary thereto.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Garden Grove, as the legislative body of the Garden Grove Agency for Community Development, as follows:

Section 1. The foregoing recitals are a substantive part of this Resolution and fully incorporated herein.

Section 2. The City Council approves the 2011 Relocation Plan and authorizes the implementation of such 2011 Relocation Plan.

Section 3. The City Manager/Agency Director and his designees are hereby authorized to carry out the 2011 Relocation Plan.

Section 4. In furtherance of such approval and authorization, the City Manager/Agency Director is authorized take all necessary actions and execute all documents necessary or appropriate to carry out the 2011 Relocation Plan. The City Manager/Agency Director is further authorized to the extent necessary during the implementation of the 2011 Relocation Plan to accept, process, and approve relocation claims, to provide interpretations and waivers, to cause issuance of warrants for payment of relocation claims, to cause issuance of warrants to pay consulting, legal, and other administrative costs incurred in connection therewith, and to administer the City's and Agency's obligations, responsibilities, and duties to be performed under the 2011 Relocation Plan pursuant to the Relocation Law.

Section 5. A copy of the final, approved 2011 Relocation Plan shall be placed on file in the City Clerk's official records.

Section 6. The City Clerk shall certify to the adoption of this Resolution.

*Relocation Plan
for the Travel Country
RV Park and One Adjacent Business
“Great Wolf” Water Park Hotel Project*

Prepared for:

Garden Grove Agency for Community Development

By:

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February 9, 2009
Updated March 12, 2010
Updated May 12, 2011

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- EXHIBIT A: Projected Site Plan
- EXHIBIT B: Residential and Business Interview Forms
- EXHIBIT C: Tenant Letter Requesting Household Information Update
- EXHIBIT D: HCD Income Limits - County of Orange
- EXHIBIT E: List of RV Parks in the Vicinity of Project Site
- EXHIBIT F: Residential Informational Brochure
- EXHIBIT G: Commercial Informational Brochure
- EXHIBIT H: Public Comments and Response to Public Comments

INTRODUCTION

The Garden Grove Agency for Community Development ("Agency") is a California community redevelopment agency organized and existing pursuant to the California Community Redevelopment Law, Health & Safety Code Section 33000, *et seq.* ("CRL"). On May 12, 2009 the Agency entered into a Disposition and Development Agreement with Garden Grove MXD, LLC ("Developer") and adopted a relocation plan ("2009 Plan") relating to a proposed redevelopment project on a then approximately 10.3-acre site that included the following addresses: 12581, 12591, 12621 and 12721 Harbor Boulevard, Garden Grove, California. The development is proposed to include new development of an approximately 600-room hotel, with a water park, entertainment or other resort theme uses, a limited amount of meeting space, 18,000 gross square feet of restaurant or retail uses, and structured parking (together, "Proposed Project").

On April 13, 2010, the Garden Grove Agency for Community Development approved a FARDDA (First Amended and Restated Development and Disposition Agreement) with Garden Grove MXD, LLC, which amended the structure of the Agency's financial assistance and expanded the Site of the Proposed Project to approximately 11 acres by incorporating two adjacent parcels. On the same evening, a relocation plan (an updated 2009 Plan) was considered and approved by the Garden Grove City Council that covered the TCRV Park and adjoining properties in consideration of the revised terms under the FARDDA. As approximately one year has passed since these actions took place, the Agency has prepared an annual update of the approved relocation plan. The data included in this 2011 Relocation Plan has been updated to the extent appropriate and reflects changes since the adoption of the 2010 Plan.

The Proposed Project Site includes multiple parcels, one of which is a vacant/unimproved parcel owned by the Agency at **12621 Harbor Boulevard**. Another property within the proposed Project Site is the existing Travel Country RV Park ("RV Park") at **12721 Harbor Boulevard**. The RV Park was acquired by the Agency in July 2005 and since then has been owned and operated by the Agency with property management services provided through Overland, Pacific & Cutler, Inc. ("OPC") and Pacific Housing Management, Inc.

Upon the Agency's acquisition of the RV Park in 2005, all lawful occupants were informed by the Agency, as the new landlord, that although the Agency had acquired the property, the occupants were not being displaced and were not required to move. The residents were advised they should continue to make timely payment of space pad rent and comply with the Rules and Regulations at the RV Park. The residents were also advised that in the event the Agency moved forward in the future with a publicly funded project, and the residents were required to relocate, the residents would be eligible for relocation assistance under the lawful Relocation Law (defined below).

Two other parcels within the proposed Project Site, **12581 and 12591 Harbor Boulevard**, are improved commercial properties ("Commercial Properties"). The Agency has acquired both the vacant commercial building located at 12591 Harbor Boulevard and the occupied property at 12581 Harbor Boulevard through voluntary

transactions. The acquisition and pending relocation of the business tenant on site triggers the requirement to provide relocation assistance and benefits for the business thereon.

The Proposed Project Site includes the addresses included in the 2009 Plan as well as two Agency-owned properties on Leda Lane. The owners of the Leda Lane properties willingly and voluntarily offered the properties for sale, the Agency negotiated the acquisition of the properties, and the seller acknowledged and agreed to the Agency that they are not eligible for any relocation assistance or benefits from the Agency. A site map depicting the Proposed Project Site of the Proposed Project is included as Exhibit A and fully incorporated by this reference.

The California Relocation Assistance Law, Government Code Section 7260, *et seq.*, ("CRAL") and the implementing regulations promulgated by the California Department of Housing and Community Development ("HCD") set forth in California Code of Regulations, Title 25, Housing and Community Development, Division 1, Chapter 6, Section 6000, *et seq.* ("Guidelines"), are the statutes and regulations that control state relocation assistance and benefits (together, Relocation Law). The Proposed Project is, and will continue to be, funded only with Agency monies that are state/local funds, with no federal funding, requiring the application of State Relocation Law, if displacement were to occur.

The Relocation Law requires preparation of a relocation plan and provision of relocation assistance and benefits when eligible residents and/or business(es) are displaced as a direct result of a public entity's implementation of a public program or project or as a direct result of a public entity's acquisition of real property. In connection with the site preparation required under the FARDDA for the implementation of the Proposed Project, the Agency issued a 90-day notice to vacate to the operating commercial business at the Commercial Properties on February 5, 2011 and has provided a statement of the assistance and benefits the owner is eligible for under Relocation Law. It is anticipated that the Agency will issue 90-day notices to vacate to the 39 current occupant households at the RV Park in mid-June at which time, the then current occupant households will become eligible for relocation assistance and benefits pursuant to the Relocation Law, which also requires the provision of an approved relocation plan that has been updated to the extent and frequency required by the Relocation Law ("Plan".) This document serves as the updated required Plan.

As provided by the Relocation Law, the purposes of the Plan, in broad terms, are to address the needs of potential displacees, the availability of adequate comparable replacement housing and comparable replacement business sites, along with the scope of, and procedures for, the Agency's provision of relocation advisory assistance and benefits to eligible displacees. In addition to professional property management services, Overland, Pacific & Cutler, Inc. is an experienced, professional relocation consulting firm and has been retained by the Agency to prepare this Plan.

The Plan presents the results of a needs assessment survey, a housing resource study, and details of the proposed relocation program the Agency will follow in the event the

Proposed Project proceeds at all, or a part of, the Proposed Project Site and this Plan is implemented. The Plan sets forth policies and procedures necessary to conform with the Relocation Law as such relate to provision of relocation assistance and benefits to eligible residents and businesses.

The Plan is organized in four sections:

1. A description of the Proposed Project's regional location and specific site setting (SECTION I);
2. An assessment of the relocation needs for eligible residents and business that may be subject to displacement as a direct result of implementation of the Proposed Project (SECTION II);
3. An assessment of available comparable replacement housing for eligible residents at the RV Park and comparable replacement sites for the business at the Commercial Properties in proximity to the Proposed Project (SECTION III); and
4. A review of the relocation program to be made available to eligible displaced residents and business, including advisory assistance and payment of benefits (SECTION IV).

I. PROJECT AREA DESCRIPTION

A. THE REGIONAL LOCATION

The Proposed Project is located in the City of Garden Grove in the central portion of Orange County, approximately 25 miles south-east of downtown Los Angeles. Garden Grove is easily accessible from Interstate Routes 5 and 405 and State Routes 22 and 57. (See Figure 1: Regional Project Location)

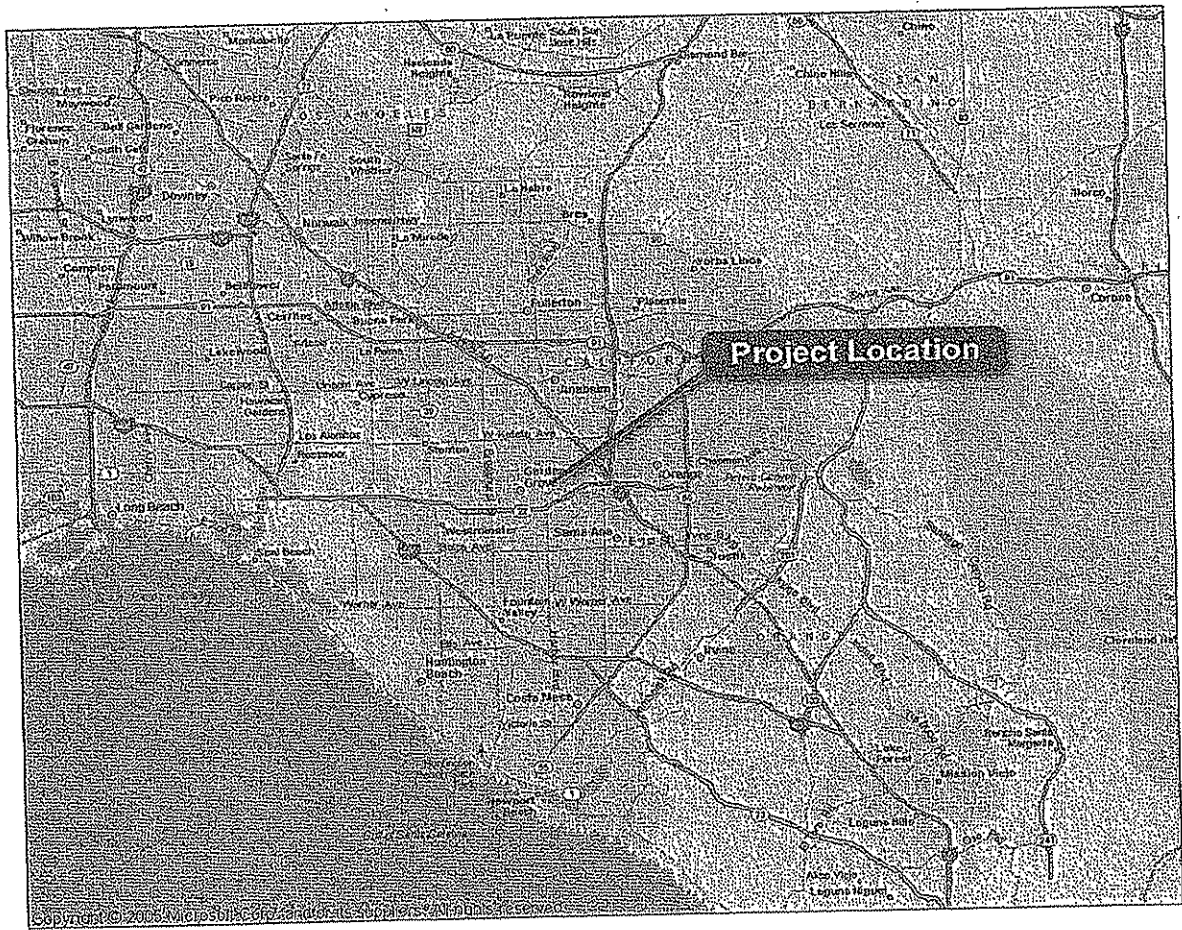


Figure 1: Regional Project Location

B. PROJECT SITE LOCATION

The Proposed Project is generally bounded by Lampson Avenue to the north, Garden Grove Boulevard to the south, Harbor Boulevard to the east, and Buaro Street to the west (See Figure 2: Project Site Location).

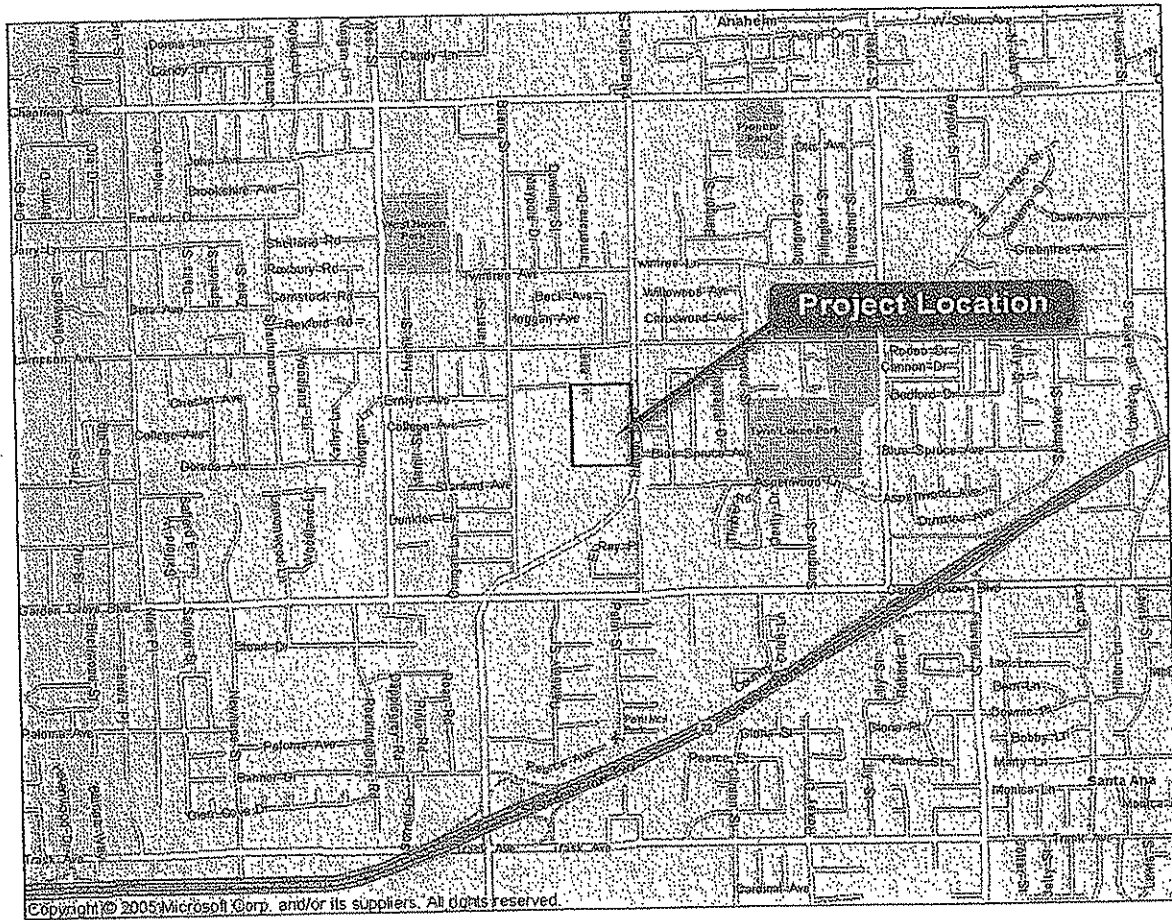


Figure 2: Specific Site Location

II. ASSESSMENT OF RELOCATION NEEDS

A. SURVEY METHOD

To obtain information and data necessary for the preparation of this Plan, personal interviews were conducted by OPC staff (including bilingual staff) over a two-week period in August and September 2008 with residential occupants at the RV Park. A survey update opportunity was extended to the Park residents and the business owner in February 2010 and again via mail and in person in April 2011.

At the time the 2009 Plan was prepared, interviews were conducted in English and Spanish as applicable and necessary to communicate with each household's language preference, with 40 of the 43 existing residential households being interviewed. As to the other three households at the RV Park, OPC interviewers attempted numerous contacts during the course of the interview process for the 2009 Plan and again attempted contacts during preparation of the updated 2010 and 2011 Plans.

In connection with this updated Plan, all but 10 households out of the 39 households currently occupying the RV Park were successfully contacted to confirm the continuing accuracy of, or changes to, the data gathered for the 2009 Plan and 2010 Plan update. The data in this section of the Plan are based solely on the unconfirmed and undocumented responses from the occupant households, who participated in the initial survey and subsequent updates in 2010 and 2011. A meeting was held at the RV Park on April 28, 2011, where updates were gathered from 27 occupant households. Two additional updates from occupant households were mailed to OPC staff. In total, OPC staff received 29 updated surveys, and this 2011 Plan assumes the data collected for the 2009 Plan and 2010 Plan are accurate for any households not responding to the 2011 update request. (Since the 2010 Plan update, four households moved voluntarily.)

The interviews and update requests included inquiry regarding each occupant household's: size and composition; gross income; monthly housing costs, including monthly space rent, and if applicable loan or mortgage status on their RVs; length of occupancy; ethnicity; home language and language preference; physical disabilities and special needs; and replacement housing preferences.

As to the Commercial Properties, numerous attempts were made in December 2008 and January 2009 to meet with, and interview, the business owner(s) on-site at the business(es), but no business owner would schedule or conduct an interview. One of the Commercial Properties was confirmed vacant, and the Agency has since acquired the property. As to the other Commercial Property, OPC was successful in interviewing the business operator in April 2011. Survey questions for the business owner related to 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 sample of the residential and business interview forms used in the Plan interview process is attached and incorporated as **Exhibit B** to this Plan. A sample of the letter sent to the Park

occupants requesting confirmation of the previously submitted data is attached as Exhibit C.

B. FIELD SURVEY DATA

1. Current Residential Occupants

Since the adoption of the 2009 Plan 11 tenant households vacated the RV Park voluntarily or have been the subject of eviction proceedings. There are currently 38 recreational vehicles/travel trailers occupied at the RV Park and one apartment unit on-site that is occupied by one household, for a total of 39 households in occupancy at the RV Park. All other spaces at the RV Park are unoccupied, vacant with no RVs and no occupants or rights to occupancy of such spaces/lots. From the interviews, the length of occupancy for the 38 respondent households varies from seven years to 24 years with an average occupancy of 12 years. Twenty-two of the 38 interviewed occupant households have resided in their RVs/travel trailers for 10 years or longer.

2. Housing Mix

The housing mix, as shown below in Table 1, consists of 38 households, who occupy their recreational vehicles/motor homes/travel trailers (together, "RVs") and one occupied apartment unit. Thirty-eight households own their individual RVs and live in the RVs and rent a space/lot pad from the Agency pursuant to an occupancy agreement and park rules. All of the RVs located at the RV Park are typically small, older RVs. The apartment is a two-story unit of approximately 900 square feet.

TABLE 1: Housing Mix (38 respondents)			
# of Bedrooms	Studio	One	Two
	33	4	1
# of Units	(all 33 RVs)	(all 4 RVs)	(1 apartment)

3. Project Rents - One Apartment Rent and All Others Space Rent for RVs

The one household residing in the single apartment at the RV Park, which is a 2-bedroom former on-site manager's unit, pays \$955 monthly rent. This household has resided in this single apartment unit for over 20 years.

All 38 remaining occupant households reside in their individual RVs that each household owns (Agency owns none of the RVs), and each occupant household pays space rent for their parking space at the RV Park. The monthly space rent charged ranges from \$425 to \$720 per month for a lot/space.

4. Occupancy/Overcrowding; Uniform Building Code versus Housing Quality Standard

From Agency records and survey data, there is a total known Project population of 133 individuals, consisting of 94 adults and 39 children. The average household size is 3.4 persons per RV (recreational vehicle/motor home/travel trailer, plus the one apartment). The distribution of household sizes within the RV Park is provided in Table 2 below.

# in Household	One	Two	Three	Four	Five	Six	Seven
# Households	5	11	4	5	6	6	1

Occupancy standards in California are set forth in the State Uniform Building Code, which requires not less than 70 square feet per person exclusive of kitchen and bathroom. For example, a 600 square foot housing unit with 90 square feet of kitchen and bath area would allow for occupancy by seven persons. Alternatively, the federal housing quality standard for occupancy per housing unit allows for two persons per common living area and sleeping area. Thus, using this standard, generally, maximum occupancy is as follows: two persons in a studio, four persons in a one-bedroom unit, six persons in a two-bedroom unit, eight persons in a three-bedroom unit, and ten persons in a four-bedroom unit. It is noted that many owners/landlords for housing units do not follow the Uniform Building code standard and perceive that such standard allows for overcrowding of housing units. Therefore, in order to identify adequate and available comparable replacement housing, this Plan utilizes the HQS standard, rather than the Uniform Building Code standard. Based on this criteria and available tenant data, there are 18 known overcrowded RVs.

5. Comparable Replacement Housing Needs

Pursuant to the Relocation Law, comparable replacement housing needs, as expressed in this Plan, are defined by the total number of necessary comparable replacement housing units and the distribution of those units by bedroom size. In this Project, because few to none of the RVs located at the RV Park comply with State Department of Motor Vehicles (DMV), State Housing and Community Development (HCD), California Vehicle Code, California Health & Safety Code, and other applicable state statutory and regulatory requirements, few to none of the RVs will be in a condition or in a state of compliance to allow for moving the RVs from this RV Park to another recreational vehicle park or to a mobile home park; thus, comparable replacement housing units may include non-RV housing accommodations, such as apartments or mobile homes.

The projected number of required units by bedroom size is determined by comparing survey data for household size with comparable replacement housing using the housing quality standard for occupancy described in Section 4 above

(rather than the State Uniform Building Code), i.e., two persons per living and sleeping area that allow for up to two persons in a studio, four persons in a one-bedroom unit, six persons in a two-bedroom unit, eight persons in a three-bedroom unit and ten persons in a four-bedroom unit. Therefore, the RV Park's comparable replacement housing requirements are summarized in Table 3.

Bedroom Size	Studio	One	Two	Three
# Needed	16	9	12	1

6. Income

Household income information was provided by all 38 responding occupant households interviewed at the RV Park for the 2009 Plan; 29 households provided updated income information for this Plan. According to area median income (AMI) limits promulgated annually by State HCD for the County of Orange adjusted for family size (Exhibit D) the occupant households income-qualify as follows: 28 households qualify as extremely low income (30% or less of AMI), seven as very low income (31%-50% of AMI) and three as low income (51%-80% of AMI). The income level for the household not interviewed is unknown.

Extremely Low	Very Low	Low	Moderate	Above Moderate
28	7	3	0	0

7. Ethnicity/Language

The ethnicity of occupant households at the RV Park is shown below in Table 5.

Ethnicity	# of Households	Project %
Caucasian	6	15%
Hispanic	33	85%

All Hispanic households stated Spanish as their primary household language; the six Caucasian households identified English as their primary language. The interviews for all Hispanic occupant households were conducted in Spanish by bilingual staff of OPC.

8. Senior/Handicapped Households

There are six senior occupant households (head of household or spouse 62 years or older) at the RV Park, and four occupant households report having individuals with various degrees of disability or special needs. The Agency

acknowledges that should any displaced household require special assistance such as barrier-free or first-floor comparable replacement housing, then reasonable and appropriate steps will be taken to accommodate such case(s) in accordance with the Relocation Law.

9. Preferred Relocation Areas

Most occupant households at the RV Park expressed their preference to remain in, or around, the immediate area in order to maintain access to medical facilities, employment, schools, recreation and public transportation. Alternative locations mentioned or requested by some residents include: Carson, Santa Ana, Westminster, Huntington Beach, Irvine, and Costa Mesa in California, and out of state locations in Las Vegas, Nevada and Utah.

10. Commercial Use

As noted in the introduction, there is one commercial business operating on the Proposed Project Site. The business owner received a 90-day Notice to Vacate and will vacate the property by early May 2011. This business is eligible for business relocation assistance and benefits, as a direct result of its displacement from the Proposed Project Site. The following information in Table 6 reflects information gathered from OPC staff's personal site visits to the property/business, as well as from public data and the real estate appraisal. Business type, reported move-in date, estimated square footage, monthly rent, and any particular features are outlined.

TABLE 6: Non-Residential Use				
Business Type	Move-in Date	Est. Sq. Footage	Monthly Rent	Special Features
Bar/Restaurant (nightclub)	1997	1,650	\$5,000	Nightclub, 40 paved open lot surface spaces plus 2 covered spaces; entertainment license, beer & wine license

III. RELOCATION RESOURCES

A. METHODOLOGY

Comparable replacement housing resources were surveyed generally beginning within a five-mile area surrounding the RV Park and beyond, with research including rental opportunities/resources at existing recreational vehicle parks, existing mobile home parks, multi-family apartments, and attached and detached single-family houses.

The following sources were utilized:

- Classified rental listings from *The Orange County Register* and *For Rent* publications;
- Contacts with real estate/property management companies serving the community; and
- Internet sources.

B. COMPARABLE REPLACEMENT HOUSING AVAILABILITY

1. Residential Rental Housing

After researching, surveying, and considering the rental resources for comparable replacement housing and rental opportunities/resources at existing recreational vehicle parks and existing mobile home parks, both resources confirmed to be inadequate. There are 14 recreational vehicle parks (see Exhibit E) in the vicinity of the Proposed Project Site that may have available space pads/lots for rent; however, in general and by their intended business and land use purpose, many recreational vehicle parks provide for daily or weekly rates and occupancy and do not allow RVs to remain at the park for longer than 30 days. In this regard, it is important to note that the age and/or condition of the RVs in the RV Park may present a deterrent to relocation to another recreational vehicle park because many of these RVs are not in an operable, and/or registered, and/or drivable condition to move from the RV Park and establish occupancy in another recreational vehicle park. In addition, due to recreational vehicle parks that do not allow for long-term occupancy, it will be necessary that an existing RV or a comparable replacement RV be in an age and condition that will allow for moving from one recreational vehicle park to another recreational vehicle park.

Further, in researching potential resources for comparable replacement housing, OPC found that as of the date of this Plan, there were only three mobile homes for rent within existing mobile home parks in Orange County, with most mobile home park managers stating to OPC that they do not have or maintain an inventory of mobile homes for rent. While there may be rental opportunities from individual mobile home owners directly, this option is not considered comparable

because of the lack of resources and the potential that park management may not approve rentals by individual coach owners.

In addition, due to limited available resources at recreational vehicle parks and mobile home parks, in researching potential resources for comparable replacement housing, OPC's focus in the survey shifted to apartment rentals (duplex/tri-plex/four-plex, and larger) as well as attached/detached single family homes. This data is summarized in **Table 7** below. The survey identified a multitude of comparable replacement housing resources, specifically a total of 164 available studio, one-, two- and three-bedroom comparable replacement housing units.

The number of units found, by bedroom size, are presented alongside the number of units needed (noted parenthetically) to meet re-housing obligations in the event current RV owners, that are occupant households at the RV Park, move to comparable replacement housing that is neither an RV nor a mobile home, i.e., to apartments or attached/detached single-family housing units. The market rent amounts for these comparable replacement housing units is shown in **Table 7**, which figures were used to prepare an estimated range of benefit payments for eligible displaced households and an overall budget for implementation of the Plan, if the Proposed Project proceeds. These amounts are subject to change according to the market rates and conditions prevailing at the time of displacement.

Bedroom Size	Studio	One	Two	Three
# Found (# needed)	56 (16)	47 (9)	46 (12)	15 (1)
Rent Range	\$575 - \$1,030	\$650 - \$1,090	\$875 - \$1,295	\$1,425 - \$1,695
Median Comparable Rent	\$850	\$925	\$1,250	\$1,550

As evidenced by the survey data presented in **Table 7**, there are adequate numbers of comparable replacement housing units to accommodate all occupant households at the RV Park, who may become eligible and displaced as a direct result of the Proposed Project. A goal of this Plan is to identify and make available comparable replacement housing that is consistent with the type of housing that the displacees occupy; therefore, OPC will continue to search and update its survey of housing resources among various rental housing types, including recreational vehicle parks, mobile home parks, multi-family apartments, and attached and detached single-family houses.

2. Space Pad Rent

While surveying recreational vehicle parks and mobile home parks, space pad rents at such parks were considered where available. The space pad rents at available recreational vehicle park lots range between \$699 and \$2,550 on a monthly basis, but often are charged on a weekly or daily basis and meant for

short-term registration only. The space rents at mobile home parks range between \$457 and \$1,325 with a median rent of \$850, and this survey included mobile homes that are listed for sale with a space pad within a park.

3. Commercial Sites Availability

Table 8 represents the available space for lease and price range per property type for smaller retail/restaurant space as comparable replacement business sites for the commercial business that will be displaced. Specifically, eight spaces were identified that are currently built-out for restaurant use with a median rent of \$1.85. In addition, due to restrictions with liquor and entertainment licenses, the business owner is interested in "for sale" opportunities regarding purchasing a comparable business. OPC identified 14 bar/entertainment businesses for sale in Garden Grove and surrounding areas, which have already been offered as referrals to the business owner as of the date of this Plan.

Use	# of Properties Found	Sq. Ft. Range	Cost/Sq. Ft.
Restaurant/Retail	132	1,500 - 2,000	\$.35 - \$3.95

C. RELATED ISSUES

1. Concurrent Residential Displacement

Based on the actual knowledge of the staff that prepared this Plan update and Agency staff, there are no other active City/Agency public programs or public projects in the implementation phase that will compete for housing units in the vicinity of the Proposed Project.

2. Temporary Housing

No need for temporary housing is anticipated.

3. Loss of Business Goodwill

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

Where claims are anticipated, the California Eminent Domain Law, Code of Civil Procedure Section 1263.510 (and related sections thereof), requires business owners to allege and prove all of the following for just compensation of goodwill thereunder: (1) the loss is caused by the taking of the property; (2) the

loss cannot reasonably be prevented by relocation of the business, or by taking steps and adopting procedures that a reasonably prudent person would take to preserve the goodwill; and, (3) the compensation for the loss has not been included as a relocation payment, or duplicated in compensation otherwise awarded to the owner.

IV. THE RELOCATION PROGRAM

The Agency will provide all eligible occupant households at the RV Park and the eligible business displacee (one commercial business described above), assistance and benefits, both advisory and financial assistance, as required by, and pursuant to, the Relocation Law.

A. PROGRAM ASSURANCES, STANDARDS AND OBJECTIVES

Prior to displacement and to meet its regulatory obligations, pursuant to the requirements of the Relocation Law, the Agency will:

1. Distribute appropriate written information concerning the Relocation Law and relocation program to inform eligible occupant households at the RV Park and the business displacee of the nature of, and procedures for, obtaining relocation assistance and benefits;
2. Determine the needs of the eligible occupant households at the RV Park and the business displacee;
3. Provide eligible occupant households at the RV Park and the business displacee with three, and preferably more, referrals to comparable replacement housing or comparable replacement business sites, as applicable, within a reasonable time prior to displacement;
4. Assure that no eligible residential occupant household and no business is required to move without a minimum of 90 days written notice to vacate;
5. Provide assistance that does not result in different or separate treatment due to race, color, religion, national origin, sex, marital status or other arbitrary circumstances;
6. Supply information concerning other federal, state and local programs relating to assistance to displaced persons, if any;
7. Assist with the completion of claims, applications, and other forms/documents for all eligible occupant households and eligible business displacees;
8. Make benefit determinations and payments in accordance with the Relocation law and the Agency's adopted relocation guidelines, which incorporate the State Relocation Law;
9. Inform all eligible residential occupants and businesses that are subject to displacement of the Agency's policies with regard to eviction and property management under the Relocation Law; and

10. Establish and maintain a formal grievance procedure for use by residential occupants and businesses that are subject to displacement as a direct result of the Agency's implementation of a public program or public project or as a direct result of the Agency's acquisition of property with regard to seeking administrative review of basic eligibility decisions, the adequacy of replacement housing referrals, challenge of claims, or property management practices.

B. ADVISORY ASSISTANCE

Every reasonable effort will be made to ensure that the relocation of displacees occurs with a minimum of delay and hardship and in compliance with the Relocation Law.

If/when displacement does occur, the following specific services will be provided or caused to be provided by the Agency or its professional relocation consultant.

1. Each residential household and each business in lawful occupancy that are subject to displacement as a direct result of the Agency's implementation of a public program or public project or as a direct result of the Agency's acquisition of property will be interviewed in person to gather household or business information, as applicable and as appropriate (or reasonable and multiple attempts will be made to contact displacees), in connection with the determination of needs and preferences regarding comparable replacement of existing accommodations.
2. A printed Informational Brochure (see Exhibits F and G) will be provided to all potential displacees, both residential households and business(es). Informational Brochures will be provided in Spanish, as necessary. Signed acknowledgments will be obtained to verify receipt of this informational material.
3. Prior to issuance of a notice-to-vacate of not less than 90 days, eligible business displacee(s) will be provided referrals to comparable replacement business sites pursuant to the Relocation Law. Resource surveys and referrals will be undertaken and updated on a continuous basis over the duration of the implementation of this Plan and relocation activities thereafter.
4. Prior to issuance of a notice-to-vacate of not less than 90 days, eligible residential displacees will be provided, at least three, and preferably more, referrals to comparable replacement housing, pursuant to the Relocation Law, in particular Guidelines Section 6042. In no event will an eligible residential displacee be required to move until comparable replacement housing has been made available. As evidenced by this updated Plan, resource surveys and referrals for comparable replacement housing will be undertaken and updated on a continuous basis over the

duration of the implementation of this Plan and relocation activities thereafter.

Generally, comparable replacement housing must satisfy the following criteria:

- (a) The comparable replacement housing unit is decent, safe and sanitary - electrical, plumbing and heating systems in good repair - no major, observable hazards or defects. The unit is comparable to the housing unit from which the eligible household is being displaced with respect to number of rooms, habitable living space and type and quality of construction, but not lesser in rooms or living space as necessary to accommodate the displaced person; and
 - (b) The comparable replacement housing unit is located in an area not subjected to unreasonable adverse environmental conditions from either natural, or man-made sources, and not generally less desirable with respect to public utilities, transportation, public and commercial facilities, including schools and municipal services and reasonably accessible to the displaced person's place of employment; and
 - (c) The comparable replacement housing unit is available both on the private market and to all persons regardless of race, color, sex, marital status, religion, or national origin; and
 - (d) The monthly housing cost (rental rate and/or mortgage payment) for the comparable replacement housing unit is within the financial means of the displaced residential tenant.
5. Transportation will be provided, if reasonably necessary, for any eligible person, who may be displaced, to inspect comparable replacement housing units within the local area. Specific assistance will be offered, as appropriate, to help occupants find housing near friends, relatives, medical facilities and services, and convenient transportation.
 6. Assistance will be offered to all displacees in connection with arrangements for securing comparable replacement housing and completion of applications for housing that a displacee intends to rent, lease, or purchase and the filing of claim forms to request relocation benefits; including advance payments for security and other deposits, as reasonably necessary;
 7. Special assistance in the form of referrals to governmental and non-governmental social service agencies will be made, as reasonably

necessary. Agencies to which referrals may be made include, but are not necessarily limited to the following:

- (a) Federal Social Security Administration;
- (b) Garden Grove Housing Authority;
- (c) Orange County Housing Authority;
- (d) City of Garden Grove Community Development Department;
- (e) City of Garden Grove Economic Development Department, Business Retention and Development;
- (f) Small Business Administration; and
- (g) Garden Grove Chamber of Commerce

C. RELOCATION BENEFITS (RESIDENTIAL OCCUPANTS)

Relocation benefits will be provided in accordance with the provisions of the Relocation Law. Benefits to eligible persons/households will be determined, calculated, and paid to displaced persons subject to, and upon submission of, necessary, verifiable, and complete information on required claim forms and related documentation.

Eligibility requirements and benefit estimates will be detailed on an eligible household-by-household basis, and shall include personal interviews and follow-up contacts by phone, mail, internet, and/or in person. In the course of personal interviews and follow-up contacts, each eligible displacee will be counseled as to available options and the consequences of any choice with respect to financial assistance.

The Agency will allow application and processing of advance payment requests, as reasonably necessary, in order to alleviate hardships for eligible residential displacees, who do not have access to sufficient funds to pay move-in costs such as first and/or last month's rent and/or security deposits. Reasonable requests for advance payments will be reviewed and processed expeditiously to help avoid the loss of desirable, appropriate comparable replacement housing.

1. Residential Moving Expense Payments

All eligible residential displacees may receive a payment for actual and reasonable moving expenses. Moving expense payments will be based either on the actual cost of a professional move or a fixed payment amount determined by room count.

a. Actual Cost (Professional Move)

The cost of professional moving services will be based on the lower of at least two responsible, acceptable bids obtained from licensed, professional movers. Compensable actual moving services and costs for boxes, packing, transportation, un-packing and insurance, as reasonably

and actually incurred. The Agency will make direct payment to the selected mover, if requested, or provide reimbursement upon presentation of appropriate documentation substantiating the move and full payment therefor. Transportation costs related to an approved and selected professional mover are limited to a distance of 50 miles. In addition to payment for the actual move, one-time costs (not deposits) associated with utility re-connections (i.e., gas, water, electricity, telephone, and cable, if any), are eligible for reimbursement as a relocation benefit.

b. Fixed Payment (based on room count schedule)

An eligible residential displacee may elect to receive a fixed payment for moving expenses that is based on the number of rooms occupied in the displacement unit (not including bathrooms) per the schedule set forth in the Relocation law. In this case, the eligible residential displacee to be relocated takes full responsibility for the move. The fixed payment includes all utility connections as described in a., above.

At a minimum, the fixed schedule payment for single occupancy efficiency unit, furnished with the tenants own personal property, is \$625 including all utility connections at the replacement location. From the Relocation Law, the current schedule for fixed moving payments is set forth in **Table 9** following:

TABLE 9: Schedule of Fixed Moving Payments	
Tenant Furnished Housing Unit	
One room	\$625
Two rooms	\$800
Three rooms	\$1,000
Four rooms	\$1,175
Five rooms	\$1,425
Six rooms	\$1,650
Seven rooms	\$1,900
Eight rooms	\$2,150
each additional room	\$225
Landlord Furnished Housing Unit	
First Room	\$400
Each additional room	\$65

Source: The Federal Highway Administration

2. Rental Assistance to 90-day Tenants Who Choose to Rent

To qualify for a rental assistance payment, residential occupant households must have been in lawful occupancy in the subject residence (here their RV) for a minimum period of 90 days prior to the initiation of negotiations, as defined by the Relocation Law. (An exception to the 90-day requirement does apply to low-income households under Last Resort Housing provisions, but such households may be subject to a 30-day lawful occupancy requirement.)

The computation of rental assistance benefits is based on four factors:

- 1) Old rent including a monthly utility allowance;
- 2) Monthly gross household income;
- 3) Market rent for decent, safe and sanitary comparable replacement housing, including utility allowance;
- 4) Actual new rent including a monthly utility allowance.

Utility allowance amounts are based upon the standards of the Orange County Housing Authority for a similar type housing unit assuming services include gas, water, and electric utilities.

Table 10 provides an example of how a rental assistance payment is calculated for an eligible displacee:

TABLE 10: Computation of Rental Assistance Payments		
1. Old Rent	\$650	Old Rent (plus Utility Allowance)
	-or-	
2. Ability to Pay	\$600	30% of Monthly Gross Household Income*
3. Lesser of lines 1 and 2	\$600	
Subtracted From the lesser of:		
4. Actual New Rent	\$750	Actual New Rent (plus Utility Allowance)
	-or-	
5. Comparable Rent	\$775	Set by the Agency (includes Utility Allowance)
6. Lesser of lines 4 and 5	\$750	
7. Yields Monthly Need	\$150	Subtract line 3 from line 6
Rental Assistance Payment	\$6,300	Multiply line 7 (Monthly Need) by 42 months*

* Gross household income means the total annual income of an individual less the following: (1) a deduction of \$500 for each dependent in excess of three; (2) a deduction of 10% of total income for the elderly or disabled head of household; (3) a deduction for recurring extraordinary medical expenses defined for this purpose to mean medical expenses in excess of 3% of total income, where not compensated for, or covered by insurance or other sources; (4) a deduction of reasonable amounts paid for the care of children or sick or incapacitated family members when determined to be necessary to employment of the head of household or spouse, except that the amount deducted shall not exceed the amount of income received by the person who would not otherwise be able to seek employment in the absence of such care. Further, under the Relocation Law, in particular Section 7264(b) a maximum rental assistance payment of \$5,250 is

available to displaced households for comparable replacement housing that is within their financial means, except in the case of LRH (low income or very low income households).

3. Downpayment Assistance to Residential Displacees Who Choose to Purchase Comparable Replacement Housing

Eligible residential occupant households, who were tenants at the displaced property, and who were otherwise eligible to receive a rental assistance payment, may choose to utilize up to the full amount of their rental assistance payment (including any Last Resort Housing benefits) toward purchase of comparable replacement housing that is ownership housing. The Agency will arrange to deposit, in an open escrow account, the total amount of rental assistance payment benefit for which a displacee tenant qualifies, provided that the entire amount is used toward the downpayment and eligible, non-recurring incidental costs associated with the purchase and owner-occupancy of decent, safe and sanitary comparable replacement housing. Provision shall be made in the escrow arrangements for the return of the Agency' funds, in the event escrow should fail to close within a reasonable period of time.

D. LAST RESORT HOUSING (LRH)

An eligible occupant household displaced from the RV Park will be entitled to consideration for supplementary benefits in the form of Last Resort Housing (LRH) assistance when the computed rental assistance payment, as applicable, exceeds \$5,250 when the household is considered low-income (or below) and does not meet the 90-day lawful occupancy requirement, but meets the 30-day lawful occupancy requirement. Calculation of Last Resort Housing rental assistance benefits for tenants who fail to meet 90-day lawful occupancy requirements will be based solely on verifiable gross household income. Those who do not meet the 90-day lawful occupancy requirement, but meet the 30-day lawful occupancy requirement, must meet the basic eligibility requirements applied to other displacees pursuant to the Relocation Law.¹

¹ Last Resort Housing assistance payments are available to eligible property owners and as computed as a replacement housing payment (including related increased interest costs) and other reasonable expenses, including closing costs exceed \$22,500, but in any event must meet all eligibility requirements therefor under the Relocation Law.

For eligible property owners that occupy the property/housing unit acquired by the public entity, as and if applicable, comparable replacement housing (including related increased interest costs and other reasonable expenses including closing costs), a statutory replacement housing payment of up to a maximum \$22,500 may be available to eligible displaced owners, subject to the condition that a replacement housing payment shall not exceed the total amount of just compensation paid by the public entity for the property/housing unit acquired by the public entity, if acquisition occurs. Therefore, a replacement housing payment for an owner of property/housing unit cannot exceed the total of the amount of just compensation paid for the property/housing unit, if acquired by the public entity; thus, this statutory limitation may adjust this benefit to a nominal amount because due to the age, condition, and non-compliance of the RV at the RV Park it is unlikely that the appraised in-place value of any RV will reach or exceed \$22,500.

The Agency, at its sole discretion, may elect to make Last Resort Housing rental assistance payments on a periodic basis; otherwise such payment is made in a lump sum. Recipients of Last Resort Housing rental assistance payment, who intend to purchase rather than rent comparable replacement housing, have the right to request a lump sum payment of all benefits deposited into an escrow for the purpose of making a downpayment and paying standard, non-recurring closing costs for the purchase and owner-occupancy of comparable replacement housing. Households receiving periodic payments may elect, at any time, to request a lump sum payment of all remaining benefits to assist with the purchase and owner-occupancy of comparable replacement housing. All standard claim processing procedures will be applied to Last Resort Housing payments including the lump sum disbursement of approved benefits.

Based on data derived from the interviews of the occupant households at the RV Park and the surveys of comparable replacement housing resources, it is anticipated that "comparable replacement housing" will not be available in the same type of housing unit, i.e. there is not an adequate number of RVs or mobile homes as comparable replacement housing. Therefore, for occupant households at the RV Park, when the comparable replacement housing and eligible rental assistance payment exceeds \$5,250 or comparable replacement housing monthly housing cost for rent (including utilities and other reasonable recurring expenses) is not within the financial means (exceeds 30% of income), then Last Resort Housing payments will be necessary and paid, which rental assistance payments under the Relocation Law can exceed \$5,250 and will be based on rental assistance within the financial means of the displaced household and calculated for a period of 42 months.

Therefore, if the Proposed Project is to proceed, the Agency will authorize its funds to provide Last Resort Housing; however, due to the demonstrated number of available comparable replacement housing resources for the occupant households at the RV Park, as shown above in Section III. B., 1-3, the need to develop a replacement housing plan to produce sufficient number of comparable replacement dwellings will not be necessary. The Agency has adequate funds budgeted to implement this Plan, including making all required Last Resort Housing payments, which payments will exceed monetary limits in Relocation Law and therefore, comparable replacement housing will be available to all displaced households.

E. RELOCATION BENEFITS (COMMERCIAL TENANTS)

Relocation benefits will be paid to the eligible displaced business subject to, and upon submission of, necessary, verifiable, and complete information on required claim forms and related documentation in accordance with the Agency's approved procedures.

In all instances, specific eligibility requirements and benefits estimates will be detailed and explained to the business owner, and shall include a personal interview with the business owner or his/her representative(s) and follow-up contacts by phone, mail, internet, and/or in person. In the course of personal interviews and follow-up contacts, the eligible business owner will be counseled as to available options and the consequences of any choice with respect to financial assistance.

Payments To Businesses

Pursuant to the requirements of the Relocation Law, an eligible business may receive a relocation payment to cover reasonable and necessary costs of moving. A business owner may choose either (1) a payment for actual reasonable and necessary moving and related expenses, or (2) a fixed payment not to exceed \$20,000.

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

This payment may include the following:

- Transportation of persons and personal property from the present business location to the comparable replacement site for the business with transportation costs limited to a distance of 50 miles (and exclusive of personal property, if any, acquired by the public entity);
- Packing, crating, uncrating, and unpacking personal property (exclusive of personal property, if any, acquired by the public entity);
- Disconnecting, dismantling, removing, reassembling, and installing relocated and substitute machinery, equipment and other personal property (exclusive of personal property, if any, acquired by the public entity). This includes connection to utilities available nearby and modifications necessary to adapt such property to the replacement structure or to the utilities or to adapt the utilities to the personal property (exclusive of personal property, if any, acquired by the public entity);
- Temporary storage of personal property for up to 12 months, at the Agency's discretion (exclusive of personal property, if any, acquired by the public entity);
- Insurance of personal property (exclusive of personal property, if any, acquired by the public entity) while in authorized storage or pre-approved transit and the replacement value of personal property lost, stolen, or damaged (not through the fault or negligence of the displaced business or its agent) in the process of moving, where insurance is not readily available;
- Subject to certain limitations, any license, permit, or certification required by the displaced business, to the extent that the cost is necessary for reestablishment at the replacement location;
- Subject to certain limitations and as determined by the Agency, reasonable, necessary and pre-authorized professional services, including architects', attorneys', engineers' fees, and consultants' charges, required for and limited to directly related to: (1) planning the move of the personal property; (2) moving the personal property; or (3) installing the relocated personal

property at the replacement location (exclusive of personal property, if any, acquired by the public entity);

- Subject to certain limitations, the purchase and installation of substitute personal property limited to the lesser of: (1) the estimated cost to move the personal property item to the replacement location; or (2) the replacement cost of the personal property item, less any proceeds from its sale;
- Subject to certain limitations (such as exclusion of personal property, if any, acquired by the public entity), modifying the machinery, equipment or other personal property to adapt it to the comparable replacement location or to utilities available at the comparable replacement location or modifying the power supply;
- Actual direct losses of tangible personal property resulting from moving or discontinuing a business, not-to-exceed the lesser of: (1) the fair market value of the personal property for continued use at its location prior to displacement; or (2) an amount equal to the reasonable expenses that would have been required to relocate the personal property, as determined by the Agency, subject to certain limitations;
- Actual and reasonable expenses incurred in searching for a replacement business location, not-to-exceed \$1,000, and including compensation for transportation expenses; time spent searching for a reasonable location; meals; lodging; and, real estate broker or agent fees;
- Actual and reasonable expenses necessary to reestablish a displaced business at its new location, not-to-exceed \$10,000. Examples of expenses that may be considered for reimbursement include advertising, redecoration, and certain increased costs of operation at the new location;
- If applicable to the business described in this Plan, an owner of an outdoor advertising display, if applicable, may be eligible for a relocation payment for "Actual Reasonable Moving and Related Expenses." If the owner wants to move the sign, the payment would be the lesser of the sign's in-place value or, cost to move the sign. If the owner does not want the sign, but wants to replace it, or wants to discontinue its use, the payment would be the lesser of the replacement cost, less any proceeds of a sale of the existing sign or the costs to move the sign.

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

The amount of this payment shall be based on the average, annual net earnings of the business or non-profit organization. The payment to an eligible business or non-profit organization may not be less than \$1,000, or more than \$20,000.

To qualify for this payment a displaced business:

- Cannot be a part of a commercial enterprise having at least three other establishments which are not being acquired by the Agency, and which is under the same ownership and engaged in the same or similar business activities; and
- Must not be able to relocate without substantial loss of patronage; and,
- Must have contributed at least 33 ⅓ percent of the owner's total gross income during each of the two taxable years prior to displacement or meet specific earnings criteria.

F. GENERAL INFORMATION ON PAYMENT OF RELOCATION BENEFITS

Claims and supporting documentation for relocation benefits must be filed with the Agency within 18 months from the later of:

The date the claimant moves from the property acquired by the public entity due to issuance of a 90-day Notice to Move/Vacate; or,

The date on which final payment for the acquisition of real property is made.

(Here, the Agency acquired the subject RV Park in July 2005.)

The procedure for the preparation and filing of claims and the processing and delivery of payments will be as follows, and shall be subject to submission of necessary, verifiable, and complete information on required claim forms and related documentation in accordance with the Agency's approved procedures:

1. Claimant(s) shall provide all necessary documentation, in legible and complete form, to substantiate eligibility for assistance;
2. Assistance amounts will be determined in accordance with the provisions of the Relocation Law;
3. Required claim form(s) will be prepared by relocation personnel with the cooperation of each claimant. Signed claims and supporting documentation, in legible and complete form, will be submitted by relocation personnel to the Agency;
4. The Agency will review and approve claims for payment, or request additional information;
5. The Agency will issue benefit checks expeditiously and cause delivery in person or through the U.S. Mail;

6. Final payments will be issued after confirmation that the premises have been completely vacated, and actual reestablishment of the business at a comparable replacement site or actual residency in the replacement housing unit is verified; and
7. Receipts of payment will be maintained in each relocation case file.

G. RELOCATION TAX CONSEQUENCES

In general, benefits payments made pursuant to the Relocation law are not considered income for the purpose of the federal Internal Revenue Code of 1986 or the California Personal Income Tax Law, Part 10 of the Revenue & Taxation Code. The above statement on tax consequences is not intended in any manner, expressly or impliedly, to be provision of tax advice by the Agency or by any agent of the Agency. Any and all residential and business displacees are solely responsible for consulting with their own tax advisors concerning, and liable for any, tax consequences of relocation payments. In such regard, the Agency will not characterize or re-characterize compensation of any form or type payable or paid pursuant to acquisition proceedings, including payment for loss of business goodwill, for any real property or personal property interests, both tangible and intangible, as relocation benefits payments to avoid federal and/or state tax consequences.

H. GRIEVANCE PROCEDURES

The Agency's Grievance Policy will follow the Relocation Law, in particular the standards set forth in the Guidelines Section 6150, *et seq.*

Eligible displacees have the right to ask for administrative review when they believe themselves aggrieved by a determination as to eligibility, the rejection of a claim, the amount of payment for a claim, the failure to provide comparable replacement housing referrals or comparable replacement business site referrals, or the Agency's property management practices. Requests for review will be directed to the appropriate Agency official. Further details concerning the appeals process will be provided upon request.

I. EVICTION POLICY

1. Under the Relocation Law and legal precedent, eviction by the Agency is permissible, but only as a last alternative, such alleged unlawful occupancy due to non-payment of rent or violation(s) of the rules and regulations for continued occupancy of the subject property, or other lawful basis for notice and eviction, all subject to applicable landlord/tenant laws. With the exception of persons considered to be in unlawful occupancy, a displaced person's (residential or business occupant) eviction for other than cause does not affect eligibility for relocation assistance and benefits; however, eviction for cause, such as due to non-payment of rent or violation(s) of the rules and regulations for continued occupancy of the subject property, will cause loss of eligibility for

relocation assistance and benefits. Relocation records must be documented to reflect the specific circumstances surrounding an eviction.

2. In furtherance of IV. I. 1. above, eviction may be undertaken only for one or more of the following reasons:
 - a) Failure to pay rent, except in those cases where the failure to pay is due to the lessor's failure to keep the premises in habitable condition pursuant to applicable landlord/tenant laws, is the result of harassment or retaliatory action, or is the result of discontinuation or substantial interruption of services.
 - b) Performance of certain criminal activities, including dangerous, illegal act(s) in the unit.
 - c) Material breach of the rental agreement or other occupancy agreement for the subject property and failure to correct breach within 30 days of notice. Material breach of the rental or other occupancy agreement may include, but not be limited to, violation of the rules and regulations in place for the subject property after proper notice pursuant to applicable laws.
 - d) Maintenance of a nuisance and failure to abate within a reasonable time following notice.
 - e) Refusal to accept one of a reasonable number of offers of comparable replacement housing or comparable replacement business site(s).
 - f) A requirement under State or local law or emergency circumstances that cannot be prevented by reasonable efforts on the part of the public entity.

J. CITIZEN PARTICIPATION

As the process for considering the Proposed Project moves forward, the Agency will observe the provisions of the Guidelines Section 6012, including without limitation the following protocol:

1. Provide affected occupant households and businesses with full and timely access to documents relevant to the relocation program, including the provisions relating to formation of a relocation committee;
2. Provide technical assistance through Agency staff and/or OPC as necessary to interpret elements of the Relocation Plan and other pertinent materials;

3. Issuance of a general notice concerning the availability of the Plan for public review, as required, 30 days prior to its proposed adoption by the City Council, as the legislative body of the Agency; as to residential occupant households such notice may include without limitation, publication and/or posting at the management office at the RV Park, placing a copy of any notice in the boxes/cubbies for each occupant household at the RV Park office, mailing by USPS or placing a copy of this Plan in the boxes/cubbies for each occupant household at the RV Park office, posting the notice and related information on the City of Garden Grove official city website, advertising or adding to the informational scroll on the City's public access television station, posting it at the Garden Grove Regional library, Chapman Avenue Branch and West Garden Grove Branch library, and, any other reasonable method to cause general notice about the availability of the Plan for public review.
4. Include any written or oral comments, if any received, concerning this Plan and Agency response as an attachment (**Exhibit H**), when it is forwarded to the City Council for consideration and action;
5. Collect and submit for review the relocation survey results to local housing, development and planning agencies, including the Garden Grove Housing Authority, Orange County Housing Authority or City of Garden Grove.

K. PROJECTED DATES OF DISPLACEMENT

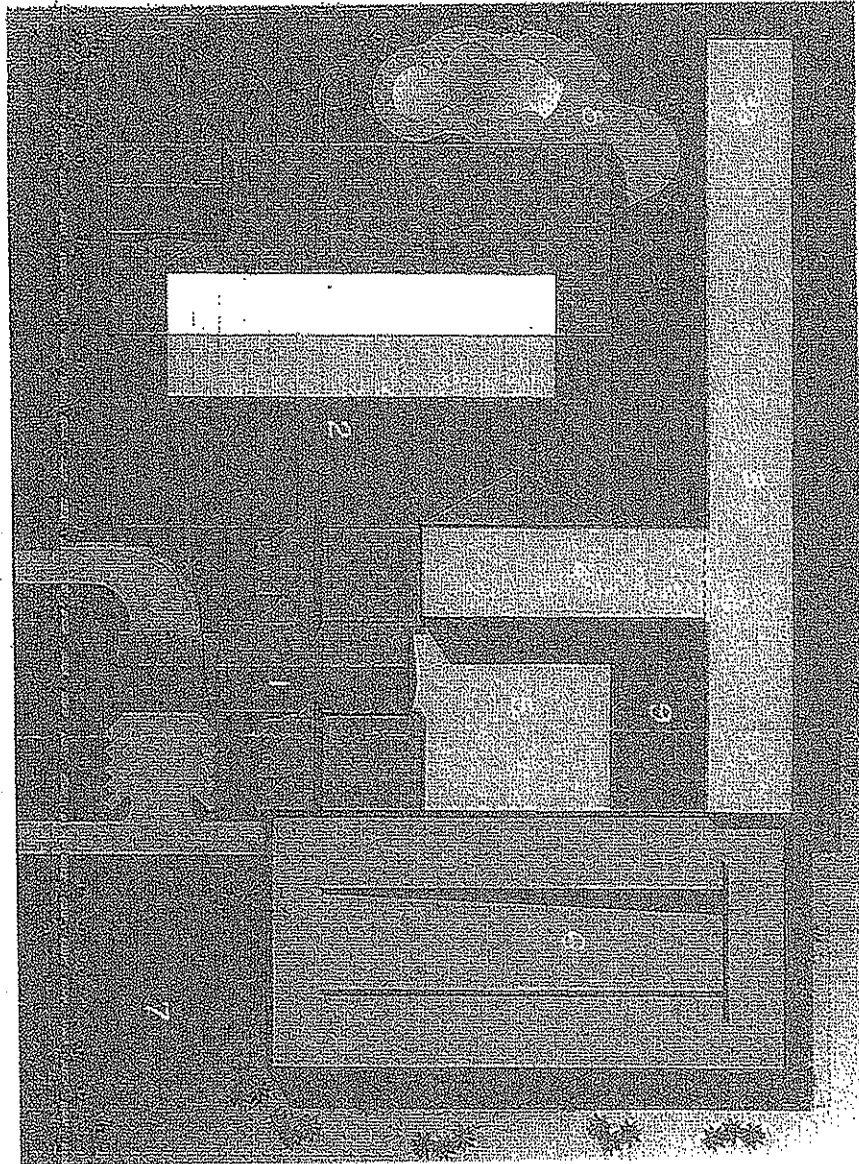
The Agency anticipates the relocation process will begin no earlier than late June 2011 and be completed by October 2011.

L. ESTIMATED RELOCATION COSTS

The budget estimate for relocation-related payments, including a 10% contingency, for the Proposed Project is \$1,050,000.

The estimated relocation budget does not include any payments for real property or improvements pertaining to realty. In addition, the budget does not consider the cost of any services necessary to implement the Plan and complete the relocation element of the Proposed Project.

EXHIBIT A: Projected Site Plan
(see attached)



Index

1. Hotel Entry
31,000 sq ft
2. Indoor Workshop
774,000 sq ft
3. Hotel Units
25,000 sq ft
- 3a. Hotel Unit Expansion
& Storage, 100,000 sq ft
4. Hotel Units
- 2 Storage, Support Reception
- 6 Storage, 100,000 sq ft
5. Conference Center
270,000 sq ft
6. Parking Structure
5 Levels
- 550 stalls per level
7. Outdoor
- 25,000 sq ft
8. Outdoor Waterpark
26,000 sq ft
9. Underdeveloped Green Space
11,700 sq ft

EXHIBIT B: Residential and Business Interview Forms

[to be attached]

Residential Relocation Interview

Client/Project:	Case ID:		
Site Address:	Total occupants:	Interview Date:	<input type="checkbox"/> Unoccupied
City, St, ZIP:		Interviewer:	<input type="checkbox"/> No Contact

INDIVIDUAL OCCUPANTS (use additional pages as needed)

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

Notes/special needs:

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

Notes/special needs:

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

Notes/special needs:

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

Notes/special needs:

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

Notes/special needs:

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

Notes/special needs:

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

INTERVIEW NOTES (explain all special dwelling/household circumstances including those noted on page 2)

Lined area for handwritten notes.

- 1. Relation: Spouse, Child, Foster Child, Parent, Partner, Sibling, Aunt/Uncle, Cousin, Grandparent, Parent In-Law, Sibling In-Law, Other Relative, Roommate
- 2. Income: Wages/Salaries, Social Security/Disabi/Pension, Child Support/Alimony, Welfare/TANF/AFDC, Family Subsidy/Gift, Business Income, Interest/Dividends, Unempl./Workers Comp, AF pay, EITC, Cash Income, Rent Reduction, Other
- 3. Legal Status: Unknown, Citizen/National, Lawful Other, NOT Lawful, Decline to provide.
- 4. Dwelling: SFR, Duplex, 3-Plex, 4-Plex, Apartment, Condo/Townhome, Hotel/Motel, Mobile Home, RV, Other
- 5. Loans: Fixed Mortgage, Adjustable Mortgage, Interest Only, Fixed HELOC, Adjustable HELOC, Reverse Mortgage, Other

I certify that all occupants have been identified above and that all information provided for this survey is true and complete to the best of my knowledge.

Claimant Name: _____

Date: _____

Signature: _____

Business Relocation Interview

Client/Project:	Case ID:
Site Address:	Interview Date: <input type="checkbox"/> Unoccupied
City, St, ZIP:	Interviewer: <input type="checkbox"/> No Contact

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

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

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

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

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

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

Preferred replacement site attributes

Relocation area:	Property access (RR, dual):
Zoning/type of use:	Truck access:
Lease / purchase:	Freeways/arterials proximity:
Building size/layout:	Public transport access:
Single/multistory building:	Pedestrian access:
Clearance/height:	Parking spaces:
Lot/yard size:	Shipping/receiving type:
Special utility needs:	Demographic needs:
Internet service needs:	Traffic count needs:
Franchise/ordinance restrictions:	Visibility needs:

Specific concerns and anticipated move challenges

List of any identified replacement sites

	Address	Bldg size	Lot size	Lease amount	Status	Broker info
1						
2						
3						

ADDITIONAL INTERVIEW NOTES (explain all special circumstances, including those noted above)

- 1. URA business type: Business, Farm, Non-Profit
- 2. OPC business type: Agricultural, Industrial, Office, Retail Sales, Retail Service, Special Purpose (detail online)
- 3. Professional Specialty: Attorney, Accountant, Broker, Move Planner, Contractor
- 4. Internet service: DSL, cable, T1, fiber, satellite, other

I certify that all information in this survey is true and complete to the best of my knowledge. The information contained herein shall be treated confidential to the extent permitted by law.

Claimant Name: _____ Date: _____ Signature: _____

**EXHIBIT C: Letter to Occupants Requesting Updated
Household Information**

[to be attached]

C-1

Overland, Pacific & Cutler, Inc.

DOCSOC/1397264v6/022012-0238



OVERLAND
PACIFIC &
CUTLER, INC.

20 Fairbanks, Suite 178
Irvine, CA 92618-1673
949.951.5263 ph | 949.951.6651 fax

April 14, 2011

Name
Address
Address

RE: Travel Country RV Park Relocation Plan 2011 Update

Dear Name:

In November, 2008 the Garden Grove Agency for Community Development (Agency) authorized Overland, Pacific & Cutler, Inc. (OPC) to commence preparation of a relocation plan (Relocation Plan) for the Travel Country RV Park Project in connection with a potential redevelopment project that would include a water park hotel and other improvements (Project). As you may recall, OPC interviewed you on or about August 28, 2008 regarding your household composition, income, rental payments and relocation preferences. The Relocation Plan was approved in April, 2009 by the Garden Grove City Council, as the legislative body of the Agency. The Agency authorized OPC to update the Relocation Plan in 2010, which updated plan was approved in April, 2010. Therefore, the most current information we have regarding your household is based on your response in 2010.

OPC has been authorized to update the Relocation Plan again for 2011 and the Project may be moving forward, so the Agency requests that you cooperate with OPC in obtaining the most up to date information about your household and relocation needs. As a part of the 2011 update of the Relocation Plan, the Agency would like to confirm that the information you provided OPC between 2008 to 2010 remains accurate and if there are any changes to your household and relocation needs from the information previously provided.

Please review the enclosed Relocation Case Profile for your household and, if needed, make any appropriate revisions. OPC must receive the updated profile for your household by 5:00 p.m., **Friday, April 29, 2011**. If you have revisions or corrections, you may either write your corrections on the enclosed form and mail it back in the enclosed postage-paid envelope or call us at the number listed below, and we will make the necessary revisions. Please note that if we do not hear from you by the end of the day **Friday, April 29, 2011**, we will include your household information in the Relocation Plan without any changes from the 2010 updated Relocation Plan and assume your information remains the same. It is important that we develop an accurate picture of your relocation needs, the impacts of relocation, relocation options, and

related costs. Your participation in this update of your Relocation Case Profile will help to ensure we achieve this goal.

Please be assured the 2011 updated Relocation Plan will not contain any individual information (financial or otherwise) obtained in the surveys; your personal information will remain confidential. The data will be used solely to prepare the updated Relocation Plan in an aggregate form.

If you have any questions, please do not hesitate to contact either Brenda Loera or myself at (800) 901-5263.

Sincerely,

Overland, Pacific & Cutler, Inc.

A handwritten signature in cursive script, appearing to read "Laura Kane".

Laura Kane
Project Manager

Enclosures



OVERLAND
PACIFIC &
CUTLER, INC.

20 Fairbanks, Suite 178
Irvine, CA 92618-1673
949.951.5263 ph | 949.951.6651 fax

14 de abril de 2011

Name
Address
Address

Re: Travel Country RV Park Relocation Plan Update

Estimado(a) Name:

En noviembre del 2008 the Garden Grove Agency for Community Development (Agencia) autorizo Overland, Pacific & Cutler, Inc. (OPC) a preparar un plan de reubicación actualizado para el Travel Country RV Park Project con respecto a un proyecto potencial de reurbanización que incluiría un hotel de parque acuático y otras mejoras. Como usted recordara, en o aproximadamente el 28 de agosto del 2008, OPC lo(a)s entrevisto referente a la composición familiar, pagos de arrendamiento, y preferencias de reubicación. El plan de reubicación fue aprobado en abril de 2009 por el Ayuntamiento de la Ciudad de Garden Grove, como el cuerpo legislativo de la Agencia. La Agencia autorizó OPC a actualizar el plan de reubicación en 2010, que actualizó plan fue aprobado en abril de 2010. Por lo tanto, la información más reciente que tenemos con respecto a su casa es basada en su respuesta en 2010.

OPC ha sido autorizado para actualizar el Plan de Reubicación de nuevo para el 2011 y el proyecto se puede avanzar, por lo que la Agencia solicite que usted coopere con OPC para obtener la información más actualizada acerca de su hogar y las necesidades de reubicación. Como una parte de la actualización de 2011 del Plan de Reubicación, la Agencia querría confirmar que la información usted proporcionó OPC entre 2008 a 2010 sigue siendo exacta y si hay cualquier cambio en sus necesidades de la casa y de recolocación de la información proporcionó anteriormente.

Por favor revise el perfil de su caso de reubicación (Relocation Case Profile), de ser necesario, haga los cambios apropiados. Necesitamos recibir la información actualizada a más tardar el viernes 29 de abril del 2011. Si usted necesita hacer algún cambio o corrección, usted podrá hacer las correcciones en la forma adjunta y enviarnos la forma por correo, en el sobre con estampilla que le hemos enviado, o puede llamarme al numero que aparece abajo y yo haré los cambios necesarios. Por favor tome en cuenta que si para el viernes 29 de abril del 2011 a las 5:00 PM no hemos escuchados de usted nosotros incluiremos la información de su caso sin ningún cambio del 2010 plan actualizado de reubicación y asume que su información se queda el mismo. Es importante que nosotros preparemos un escenario apropiado y exacto del impacto de la reubicación, opciones de reubicación y los gastos relacionados. Su participación en este proyecto ayudara ha alcanzar esta meta.

Tenga la seguridad de la actualización 2011 del plan de reubicación no contendrá información individual (financieras o similares) obtenida durante esta entrevista; su información personal será confidencial. La información será usada solamente para preparar la actualización de plan de reubicación en una forma acumulada.

Si usted tiene alguna pregunta, por favor no dude en ponerse en contacto con cualquiera de Brenda Loera o yo mismo en (800) 901-5263.

Sinceramente,

Overland, Pacific & Cutler, Inc



Laura Kane
El Director del Proyecto

Recintos

EXHIBIT D: HCD Income Limits - Orange County

The following figures are promulgated by the State Department of Housing and Community Development and are for Orange County for 2010.¹

<i>Income Level</i>	<i>1 person household</i>	<i>2 person household</i>	<i>3 person household</i>	<i>4 person household</i>	<i>5 person household</i>	<i>6 person household</i>	<i>7 person household</i>	<i>8 person household</i>
<i>Extremely Low</i>	\$19,500	\$22,300	\$25,100	\$27,850	\$30,100	\$32,350	\$34,550	\$36,800
<i>Very Low</i>	\$32,550	\$37,200	\$41,850	\$46,450	\$50,200	\$53,900	\$57,600	\$61,350
<i>Lower</i>	\$52,050	\$59,450	\$66,900	\$74,300	\$80,250	\$86,200	\$92,150	\$98,100
<i>Median</i>	\$61,050	\$69,750	\$78,500	\$86,200	\$94,200	\$101,150	\$108,150	\$115,000
<i>Moderate</i>	\$73,250	\$83,700	\$94,20	\$104,650	\$113,000	\$121,400	\$129,750	\$138,150

¹ Based on currently effective median income of Orange County, as released by the Department of Housing and Community Development ("HCD") by memorandum dated as of June 17, 2010. These median income numbers are revised annually.

EXHIBIT E: List of RV Parks in the Vicinity of Project

[to be attached]

**City of Garden Grove
Travel Country RV Park
Surrounding RV Park**

RV Park Information	Vacancies	Restrictions	Lot Size	Rate	Utilities	Notes
CC Camperland RV Park 12262 Harbor Blvd Garden Grove, CA 92840 714.750.6747	Vacancies, No charge for children under 3 yrs old if paying per day rates.	Small dogs & tamed, \$3.00 per extra; person, car and dog, \$1.00 per extra cat.	24 ft, 30 ft, 32 ft, 40ft	2 person monthly rate \$750.00, \$90 a month for any additional person.	\$2.00 per day for electric. Rates are subject to change without notice	Tent rates 2 person (no pets w/ tent space. Single space \$36.00, Double space \$56.00 per day.
Ponderosa Travel Trailer Park 2300 S. Lewis Street Anahiem, CA 92802 714.634.3390	15	Pets ok under 50 lbs, no extra charge	20 X 40 & up to 58 ft.	\$699 monthly fee, \$184.85 refundable deposit	Utilities 1 month behind comes with monthly statement.	Don is the contact person, Monday, Wednesday, Friday 8:00am to 4:00pm
Anaheim Harbor RV Park 1009 S. Harbor Blvd. Anahiem, CA 92805 714.535.6495	8	No Restrictions	20' x 40' 30' x 40'	\$695, Mo + electric & water \$850.00 Mo + electric & water	Included in monthly bill.	Security deposit for single \$347.00, \$399.00 for double, \$49.00 additional person rate per month.
Canyon RV Park 24001 Santa Ana Canyon Rd. Anahiem, CA 92808 714.637.0210	No vacancies this weekend, some for next weekend	No Pitbulls or Rottweilers, \$1.00 daily rate	Max 45 ft.	\$45.00 daily \$285.00 weekly	Included in price	Monthly rate available if 6 mo. Or more, additional guest \$2.00 per day max 8 people per site.
Anaheim RV Villager 333 W. Ball RD. Anahiem, CA 92805 714.991.0100	9	Large aggressive dogs not allowed	40 ft / 60 ft space	\$74.75 / \$85.00 tax included on per day.	Included in price	10 % disco, if AAA or Sam's member.
Anaheim Resort RV Park 110 W. Midway Dr. Anahiem, CA 92805 714.774.3860	2	Will not take large aggressive dogs	26 ft. - 60 ft.	Up to 26ft. \$45.00, up to 45 ft. \$55.00, 60 ft. \$65.00	Full hook-ups & Cable TV.	2 person per vehicle, any additional person is \$2.00 per day ages 3 and up.
Orangeland Recreation Vehicle 1600 W. Struck Avenue Orange, CA 92602 714.633.0414	5	\$1.00 each dog, max of 2 dogs no pit bulls, rottweilers, dobermans, mastiffs, chows.	takes up to 45 ft.	Regular \$65.00. Premium \$70.00, Preferred \$75.00, deluxe \$80.00	Included in the price	\$2.00 each extra for person over eight, if tenant stay 3 weeks or more the deposit is not refundable. CA Rving Rewards (CCR): 10% Discount.

**City of Garden Grove
Travel Country RV Park
Surrounding RV Park**

RV Park Information	Vehicles	Restrictions	Lot Size	Lot Rent	Utilities	Notes
Huntington By the Sea RV Park 21871 Newland Street Huntington Beach, CA 92660 714.536.8316	30	Large aggressive dogs not allowed	24-60 ft.	\$75.00 day, or \$1,640 mo. w/ AAA \$67.50 day, or \$1,476.00	Included in the price	No extra charge for pets, utilities are included in price.
Rancho Del Rey Mobile Estates 16222 Monterey Huntington Beach, CA 92649 714.846.1429	8-10 MH spaces available	Small pets OK	Mostly Dbl Wide	\$1,020.00	Paid by tenant	In regards to bringing a home in, you will need to contact Richard at 5 Star (714) 891-6383. Senior MH Park.
Goforth MH Village 1801 E. Collins Orange, CA 92667 714.532.3603	3 Spaces available #16,35,72	1 dog or cat	20 Wide	Rent \$750.00	Paid by tenant	This is a Senior MH 55+ No spaces for RV storing available
Satellite MH Estates 1844 Haster Street Anaheim, CA 92502 714.750.2332	no MH space available, RV Parking	small dogs	20-68 ft.	\$1,250 + tax a month	Included in price	Space Availability is very limited RV parking available at Anaheim RV Village 866-991-0103.
Del Rey Mobile Estates 1949 S. Manchester Avenue Anaheim, CA 92802 714.750.2240	1 double wide available	Small pets OK	Dbl. wide OK	\$800.00	Trash, and sewer only	MH Park, no RV parking available.
Rio Vista MHP 320 N. Park Vista Street Anaheim, CA 92806 714.630.7704	Phone Disco.					
Western Skies MH Estates 2770 W. Lincoln Avenue Anaheim, CA 92801 714.828.2124	2 spaces available	Pets Ok	Dbl wide OK	\$1,030.00	Trash, and sewer only	No RV Parking available

EXHIBIT F: Residential Informational Brochure

[to be attached]

Relocation Assistance
Informational Statement
for Families and Individuals

(CA State)

Agency:

Garden Grove Agency for Community Development

Project Name:

Travel Country RV Park

Agency Representative:



Overland, Pacific & Cutler, Inc.
20 Fairbanks, Suite 178
Irvine, CA 92618
Phone: (800) 901-5263

Informational Statement Content:

1. General Information
2. Assistance In Locating Comparable Replacement Housing
3. Moving Benefits
4. Rental Assistance Payment for Comparable Replacement Housing - Tenants and Certain Others
5. Section 8 Tenants
6. Qualification for and Filing of Claims for Relocation Benefits
7. Last Resort Housing Assistance
8. Rental Agreement
9. Evictions
10. Appeal Procedures – Grievance
11. Tax Status of Relocation Benefits
12. Non-Discrimination and Fair Housing
13. Additional Information and Assistance Available

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

Informational Statement for Families and Individuals

(CA State)

1. GENERAL INFORMATION

The housing unit you now live in (a recreational vehicle ("RV") or as applicable the one apartment on-site) is located within a proposed project site for a public project being considered for implementation by the Garden Grove Agency for Community Development ("Agency"). The "Proposed Project" would be developed on an approximate 11-acre site ("Proposed Project Site"), a part of which includes the Travel Country RV Park ("RV Park") where you rent a lot/space pad and reside in an RV (RV Park street address is 12721 Harbor Boulevard). If and when the Proposed Project proceeds, it may become necessary for you to move from the RV Park. If you are required to move as a direct result of a Notice to Move from the Agency, you may be eligible for certain relocation assistance and benefits. You will be notified in a timely manner as to the date by which you must move, if you will be required to move, and you will be provided not less than 90 days notice before you would be required to move from the RV Park.

Please read this informational statement, as it will be helpful to you in determining your eligibility and the amount of the relocation benefits you may receive under state laws and regulations. The California Relocation Assistance Law is set forth in Government Code Section 7260, *et seq.*, and the implementing regulations to these laws are issued by the California Department of Housing and Community Development set forth in the California Code of Regulations, Title 25, Housing and Community Development, Division 1, Chapter 6, Section 6000, *et seq.*, these laws regulations control state relocation assistance and benefits (together, "Relocation Law"). In order to evaluate your eligibility for and the estimated amount of relocation benefits, it is necessary that you provide adequate and timely information to the Agency's staff and/or professional relocation advisors. The information you provide is voluntary, but if you don't provide us necessary and complete information, you may not be determined eligible, or be eligible, to receive certain relocation assistance and benefits, or it may take longer to process and pay your claims. We suggest you save this informational statement for reference.

As you know the Agency has owned the RV Park since July 2005 and the Agency has had property management services at the RV Park provided by Overland, Pacific & Cutler, Inc. (OPC) and now by Pacific Housing Management ("PHM"). OPC is also an experienced professional in relocation and will be administering the relocation program for the Proposed Project. OPC representatives are available to explain the relocation advisory assistance program and monetary benefits that you may be eligible for if and when the Proposed Project proceeds. OPC's address and telephone number is listed on the cover.

THIS INFORMATIONAL STATEMENT IS NOT A NOTICE TO VACATE FROM THE RV PARK AND NOT A NOTICE TO MOVE YOUR RV HOUSING UNIT FROM THE RV PARK. PLEASE DO NOT MOVE NOW OR OTHERWISE PREMATURELY FROM THE RV PARK, OTHERWISE YOU MAY NOT BECOME OR REMAIN ELIGIBLE FOR RELOCATION ASSISTANCE AND BENEFITS.

If you desire to move sooner than required, you must contact your OPC representative, so you will not jeopardize your eligibility, if any, for relocation assistance and benefits. This is a general informational brochure only, and is not intended to give a detailed description of the Relocation Law or the Agency's specific relocation program for the Proposed Project.

The Agency is the owner and your landlord at the RV Park and the Agency will continue to be your landlord. You are required to continue to comply with your Occupancy Agreement and the Rules and Regulations at the RV Park. **YOU ARE REQUIRED TO CONTINUE TO TIMELY PAY YOUR RENT IN FULL AND WHEN DUE TO THE AGENCY THROUGH OPC, AS THE PROPERTY MANAGER OF THE RV PARK.** If you do not pay your rent on time and in full or do not otherwise follow the Rules and Regulations of the RV Park and your Occupancy Agreement the Agency or OPC or PHM will issue notices and if you do not pay on time or cure a noticed violation then an eviction action may be commenced and you may be evicted, which will cause you to lose any eligibility you may have had for relocation assistance and benefits. Do not jeopardize your eligibility by failing to pay your rent on time and in full or by failing to comply with the RV Park Rules and Regulations.

2. ASSISTANCE IN LOCATING COMPARABLE REPLACEMENT HOUSING

The Agency, through its staff and representatives of OPC, will assist you in locating comparable replacement housing by providing you referrals to comparable, appropriate, and available housing units. You are encouraged to actively seek housing yourself that is comparable, decent, safe, sanitary, and within your financial means.

When a suitable comparable replacement housing unit has been found and selected, your OPC relocation consultant will carry out an inspection of the unit and advise you whether the housing meets decent, safe and sanitary housing and other comparable replacement housing requirements. A decent, safe and sanitary housing unit provides adequate space for its occupants, proper weatherproofing and sound heating, electrical and plumbing systems and other requirements of the Relocation Plan. Your new housing unit must pass inspection before relocation benefits payments can be authorized, processed, and paid.

3. MOVING BENEFITS

If you are issued a Notice to Move by the Agency and thereafter you move as a direct result of the Agency's notice and action, you will be eligible to receive relocation assistance and benefits payments, including a moving benefit to assist in moving your personal property from the RV Park to your comparable replacement housing. The actual, reasonable and necessary expenses for moving your household belongings may be determined based on the following methods:

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

For example, you may choose a Self Move, receiving a payment based on the Fixed Residential Moving Cost Schedule set forth in the Relocation Law as summarized below. With regard to an RV, generally it qualifies as a single-room unit as set forth in the following Fixed Residential Moving Cost Schedule.

A. Fixed Moving Payment

A Fixed Moving Payment is based upon the number of rooms you occupy and whether or not you own your own furniture. The payment is based upon a schedule issued by the State of CA and approved by the Agency, and ranges, for example, from \$625 for a one-room unit to \$2,150 for an eight-room unit. (For details see the table above.) Your OPC relocation representative will inform you of the amount you are eligible to receive, if you choose this type of payment.

If you select a fixed payment, you will be responsible for arranging for your and your household's entire move from the RV Park to comparable replacement housing, and the Agency will assume no liability for any loss or damage of your personal property related to your move. A fixed payment also includes utility hook-up, credit check and other related moving fees so those expenses will not be paid separately.

B. Actual Moving Expense (Professional Move)

If you wish to engage the services of a licensed commercial mover and have the Agency pay the bill, you may claim the ACTUAL cost of moving your personal property to the comparable replacement housing at a location up to 50 miles. Your OPC relocation representative will inform you of the number of competitive moving bids (if any) that may be required, and assist you in developing a "mover" scope of services for Agency pre-approval and as a condition to payment for a professional move.

Fixed Moving Schedule CALIFORNIA (Effective 2008)	
Occupant Owns Furniture:	
1 room	\$625
2 rooms	\$800
3 rooms	\$1,000
4 rooms	\$1,175
5 rooms	\$1,425
6 rooms	\$1,650
7 rooms	\$1,900
8 rooms	\$2,150
Each additional room	\$225
Occupant does NOT Own Furniture:	
1 room	\$400
Each additional room	\$65

4. RENTAL ASSISTANCE PAYMENT – COMPARABLE REPLACEMENT HOUSING FOR RESIDENTIAL OCCUPANTS

You may be eligible for a rental assistance payment of up to \$5,250 to assist you in paying rent for your comparable replacement housing unit. In order to qualify for a rental assistance payment of up to \$5,250, you must be a tenant who has occupied the present dwelling for at least 90 days, unless you qualify under the law for Last Resort Housing assistance as explained in this brochure in which you must have been a lawful occupant for at least 30 days.

A. Rental Assistance. If you qualify and wish to rent your comparable replacement housing unit, your maximum rental assistance benefits will be based upon the difference over a forty-two (42) month period between the rent you must pay for a comparable replacement housing unit and the lesser of your current rent (space pad rent) and estimated utilities or thirty percent (30%) of your gross monthly household income. You will be required to provide your OPC relocation representative

with monthly rent and household income verification with supporting documentation prior to the determination of your eligibility for this payment.

OR

- B. **Use of Rental Assistance Payment toward a Down payment.** If you qualify and wish to purchase a housing unit as a comparable replacement housing unit, you can apply up to the total amount of your rental assistance payment towards the down payment and non-recurring incidental expenses on purchase of a housing unit and if eligible the Agency will deposit the full amount of your rental assistance payment into the escrow opened for purchase of that unit. Your OPC relocation representative will clarify eligibility and the procedures necessary to apply for this payment.

5. SECTION 8 TENANTS

If you hold a Section 8 voucher and if you are required to move, you may be eligible to transfer your Section 8 voucher and eligibility to your comparable replacement housing unit. In such cases, a comparable replacement housing unit will be determined based on your eligible household at the time you are displaced and required to move and the current Section 8 program criteria; the comparable replacement unit may not be the size of the unit you currently occupy. Agency staff and your OPC relocation representative will provide you advisory assistance and housing counseling in connection with eligibility to transfer your Section 8 voucher and to provide you moving benefits.

6. QUALIFICATION FOR AND FILING OF, RELOCATION CLAIMS

To qualify for a Rental Assistance Payment for your comparable replacement housing unit, you must rent (or purchase) and occupy a comparable replacement unit **within one year from** the date you move from the RV Park after a Notice to Move is issued by the Agency.

Claims and supporting documentation for relocation benefits must be filed with the Agency within 18 months from the *later of*:

The date the claimant moves from the property acquired by the public entity after a Notice of Move is issued; or,

The date on which final payment for the acquisition of real property is made.
(Here, the Agency acquired the subject RV Park in July 2005.)

7. LAST RESORT HOUSING ASSISTANCE

If comparable replacement housing is not available when you are required to move as a direct result of a Notice to Move issued by the Agency, or if comparable replacement housing is not available within the monetary limits described above, the Agency will provide Last Resort Housing assistance to enable you to rent or purchase comparable replacement housing on a timely basis if you meet certain eligibility requirements. Last Resort Housing assistance is based on the individual circumstances of the displacee/household. Your OPC relocation representative will explain the process for determining whether or not you qualify for Last Resort Housing assistance.

If you are a tenant and you choose to purchase rather than rent a comparable replacement housing unit and you meet the eligibility criteria, the entire amount of your rental assistance payment, including any eligible Last Resort Housing payment, must be deposited into an escrow and be applied toward the down-payment and eligible incidental expenses of the housing unit you intend to purchase.

8. RENTAL AGREEMENT/OCCUPANCY AGREEMENT AT RV PARK; RULES AND REGULATIONS OF RV PARK

As you are aware, the Agency acquired the RV Park in July 2005 and has been your landlord since then; you are subject to the existing Occupancy Agreement and Rule and Regulations as between you, as tenant, and the Agency, as landlord. You must continue to pay your rent on time, in full, and when due and you and all members of your household must comply with the Rules and Regulations of the RV Park.

9. EVICTIONS

Any person, who lawfully occupies real property, and is not in unlawful occupancy, may become eligible for relocation assistance and benefits. Except for the causes of eviction set forth below, no existing occupant household at the RV Park in lawful occupancy will be required to move without having been provided with at least 90 days written notice from the Agency (Notice to Move). Eviction will occur only in the event of one or more of the following reasons:

- Failure to pay rent on time, in full, and when due, except in those cases where the failure to pay is due to the lessor's failure to keep the premises in habitable condition pursuant to applicable landlord/tenant laws, is the result of harassment or retaliatory action, or is the result of discontinuation or substantial interruption of services.
- Performance of a criminal activity(ies) including dangerous, illegal act in the unit.
- Material breach of the rental agreement or other Occupancy Agreement for the subject property and failure to timely correct the breach after proper notice. Material breach of the rental or other Occupancy Agreement may include, but not be limited to, violation of the Rules and Regulations in place for the subject property after proper notice pursuant to applicable laws.
- Maintenance of a nuisance and failure to abate within a reasonable time following notice.
- Refusal to accept one of a reasonable number of offers of comparable replacement housing or comparable replacement business site(s).
- A requirement under State or local law or emergency circumstances that cannot be prevented by reasonable efforts on the part of the public entity.

10. APPEAL PROCEDURES - GRIEVANCE

Any person aggrieved by a determination as to eligibility for a relocation payment, or the amount of a payment, may have the claim reviewed or reconsidered in accordance with the Agency's appeals procedure. Complete details on appeal procedures are available upon request from the Agency.

11. TAX STATUS OF RELOCATION BENEFITS

California Government Code Section 7269 indicates no relocation payment received shall be considered as income for the purposes of the Personal Income Tax Law, Part 10 (commencing with Section 170 01) of Division 2 of the Revenue and Taxation Code, or the Bank and Corporation Tax law, Part 11 (commencing with Section 23001) of Division 2 of the Revenue and Taxation Code. Furthermore, federal regulations (49 CFR Part 24, Section 24.209) also indicate that no payment received under this part (Part 24) shall be considered as income for the purpose of the Internal Revenue Code of 1954, which has been redesignated as the Internal Revenue Code of 1986. No federal dollars have been expended and are not anticipated for this Proposed Project. Therefore, federal regulations may not apply and the IRS may consider relocation payments as income. 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)

12. NON-DISCRIMINATION AND FAIR HOUSING

No person shall, on the grounds of race, color, national origin or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under the Agency's relocation assistance and benefits program pursuant to Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, and other applicable state and federal anti-discrimination and fair housing laws. You may file a complaint if you believe you have been subjected to discrimination. For details contact the Agency.

13. ADDITIONAL INFORMATION AND ASSISTANCE AVAILABLE

OPC and its representatives and Agency staff will be responsible for providing you with relocation assistance and benefits. They will assist you in every reasonable way to minimize the hardships involved in relocating to comparable replacement housing as your new home. Your cooperation will be helpful and greatly appreciated. If you have any questions at any time during the process, please do not hesitate to contact your relocation representative at Overland, Pacific & Cutler.

EXHIBIT G: Commercial Informational Brochure

[to be attached]

Introduction

The property on which you now conduct your business is located within a proposed project site for a public project being considered for implementation by the Garden Grove Agency for Community Development (Agency). The "Proposed Project" would be developed on an approximate 11-acre site, a part of which includes the real property that you operate your business and rent from the owner of such property. If the Proposed Project proceeds, the Agency may acquire several land parcels and may require the relocation of existing commercial uses thereon. If and when the Proposed Project proceeds, you will be notified in a timely manner as to the date by which you must move. You are not required to move now and this letter is not a notice to move; this letter introduces the Agency and its relocation consultant Overland, Pacific and Cutler, Inc. ("OPC")

Please read this informational statement as it will be helpful to you in determining your eligibility and the amount of your relocation benefits under state law if your business moves as a direct result of the Agency's implementation of the Proposed Project. We suggest you save this informational statement for reference.

This is not a notice to move. It is important that you do not move before you learn what you must do to receive relocation assistance and benefits to which you may be entitled. The Agency has retained the services of Overland, Pacific & Cutler, Inc., a qualified professional relocation firm, to administer the relocation program for the Proposed Project, and in particular to assist you with business relocation if you are required to move as a direct result of the Agency's action. OPC is available to explain the program and benefits. Their address and telephone number is:



Overland, Pacific & Cutler, Inc.

20 Fairbanks, Suite 178

Irvine, CA 92618

Telephone: (800) 901-5263

Spanish speaking representatives are available.

Si necesita esta información en Español, por favor llame a su representante.

Summary of Relocation Assistance

If you become eligible for relocation assistance and benefits due to being displaced by the Agency as a direct result of carrying out the Proposed Project, you will be provided advisory assistance and payment of benefits to help you relocate your business to a comparable replacement business site, including:

- A. Payment for your moving expenses. You will receive either:
 - A Payment for Actual Reasonable Moving and Related Expenses, or
 - A Fixed Payment In Lieu of a Payment for Actual Moving and Related Expenses
- B. Referrals to suitable comparable replacement locations for your business.
- C. Other help to reestablish your business and minimize the impact of the move including help in preparing claim forms to request relocation payments.

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

SOME GENERAL QUESTIONS

How Will the Agency Know How Much Help I Need?

You will be contacted at an early date and personally interviewed by a representative of the Agency and/or OPC to determine your needs and preferences for a comparable replacement location for your business and other relocation advisory services and benefits. The interviewer will ask questions about such matters as your space requirements. It is to your advantage to provide the information so that the Agency, through its relocation consultant, can assist you in moving your business with a minimum of hardship. The information you give will be kept in confidence.

How Soon Will I Have to Move?

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

Will I Have to Pay Rent to the Agency before I Move?

If and when the Agency acquires the real property at which you operate your business, you may be required to pay a fair rent to the Agency for the period between the acquisition of your property and the date that you move. Your rent and the terms of your tenancy will be generally the same as in the prior arrangement with your previous landlord.

How Will I Find a Comparable Replacement Location for my Business?

The Agency and OPC will provide you with current and continuing information on available comparable replacement locations that meet your business' needs. The Agency and OPC may also provide you with the names of real estate agents and brokers who can assist you in finding the type of comparable replacement location you require for your business. While the Agency will assist you in obtaining a suitable comparable replacement location, you should take an active role in finding and relocating to a location of your choice that is comparable. No one knows your needs better than you. You will want a facility that provides sufficient space for your planned business activities. You will also want to ensure that there are no zoning or other requirements which will unduly restrict your business operations. Ask the Agency and OPC to explain which kind of moving costs are eligible for repayment and which are not eligible, which will enable you to carry out your move in the most advantageous manner.

What Other Assistance Will be Available to Help Me?

In addition to help in finding a suitable comparable replacement location, other assistance, as necessary, will be provided by the Agency. This includes information on Federal, State, and local programs that may be of help in reestablishing a business; for example, the Small Business Administration (SBA) provides managerial and technical assistance to some businesses. There may also be a government grant or loan program which can help you reestablish your business. The Agency will assist you in applying for help available from government agencies. The range of services depends on the needs of the business being displaced. You should ask the Agency representative to tell you about the specific services that will be available to you.

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

Do not move or plan to move prior to the Agency issuing a 90-day Notice to Move. Before you make any arrangements to move, notify the Agency, in writing, of your desire to move. This should be done at least 90 days before the date you begin your move. You must become eligible before the Agency will pay for your move and relocation. The Agency will discuss the move with you, will inspect the proposed replacement site, and advise

you of the relocation payment(s) for which you may be eligible, the requirements to be met, and how to obtain a payment.

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

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

What Kinds of Payments for Moving Expenses Will I Receive?

Every displaced, eligible business is entitled to a relocation payment to cover the reasonable cost of moving. You may choose either:

- A. Payment for Actual Reasonable Moving and Related Expenses, or
- B. Fixed Payment In Lieu of Moving and Related Expenses (if you meet the eligibility requirements).

What is Payment for Actual Reasonable Moving and Related Expenses?

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

This payment may include the following:

- A. Transportation of persons and personal property from the present business location to the comparable replacement site for the business, with transportation costs limited to a distance of 50 miles (and exclusive of personal property, if any, acquired by the public entity);
- B. Packing, crating, uncrating, and unpacking personal property (exclusive of personal property, if any, acquired by the public entity);
- C. Disconnecting, dismantling, removing, reassembling, and installing relocated and substitute machinery, equipment and other personal property (exclusive of personal property, if any, acquired by the public entity). This includes connection to utilities available nearby and modifications necessary to adapt such property to the replacement structure or to the utilities or to adapt the utilities to the personal property (exclusive of personal property, if any, acquired by the public entity);
- D. Temporary storage of personal property for up to 12 months, at the Agency's discretion (exclusive of personal property, if any, acquired by the public entity);
- E. Insurance of personal property (exclusive of personal property, if any, acquired by the public entity) while in authorized storage or pre-approved transit and the replacement value of personal property lost, stolen, or damaged (not through the fault or negligence of the displaced business or its agent) in the process of moving, where insurance is not readily available;
- F. Subject to certain limitations, any license, permit, or certification required by the eligible, displaced business, to the extent that the cost is necessary for reestablishment at the replacement location;
- G. Subject to certain limitations and as determined by the Agency, reasonable, necessary and pre-authorized professional services to the eligible, displaced business owner, including architects', attorneys', engineers' fees, and consultants' charges, required for and limited to directly related to: (1) planning the move of the personal property; (2) moving the personal property; or (3) installing the relocated personal property at the replacement location (exclusive of personal property, if any, acquired by the public entity);

- H. Subject to certain limitations, the purchase and installation of substitute personal property limited to the lesser of: (1) the estimated cost to move the personal property item to the replacement location; or (2) the replacement cost of the personal property item, less any proceeds from its sale;
- I. Subject to certain limitations (such as exclusion of personal property, if any, acquired by the public entity), modifying the machinery, equipment or other personal property to adapt it to the comparable replacement location or to utilities available at the comparable replacement location or modifying the power supply;
- J. Actual direct losses of tangible personal property resulting from moving or discontinuing an eligible, displaced business, not-to-exceed the lesser of: (1) the fair market value of the personal property for continued use at its location prior to displacement; or (2) an amount equal to the reasonable expenses that would have been required to relocate the personal property, as determined by the Agency, subject to certain limitations;
- K. Actual and reasonable expenses incurred in searching for a replacement business location, not-to-exceed \$1,000, and including compensation for transportation expenses; time spent searching for a reasonable location; meals; lodging; and, real estate broker or agent fees;
- L. Actual and reasonable expenses necessary to reestablish an eligible, displaced business at its new location, not-to-exceed \$10,000. Examples of expenses that may be considered for reimbursement include advertising, redecoration, and certain increased costs of operation at the new location;
- M. If applicable to the business(es) described in the Relocation Plan, an owner of an outdoor advertising display, if applicable, may be eligible for a relocation payment for "Actual Reasonable Moving and Related Expenses." If the owner wants to move the sign, the payment would be the lesser of the sign's in place value or, cost to move the sign. If the owner does not want the sign, but wants to replace it, or wants to discontinue its use, the payment would be the lesser of the replacement cost, less any proceeds of a sale of the existing sign or the costs to move the sign.

The Agency and OPC representatives will explain all eligible moving costs, as well as, those which are not eligible relating to an eligible, displaced business. You must be able to account for all costs that you incur, so keep all your receipts. The Agency and OPC will inform you of the documentation needed to support your claim.

You may minimize the amount of documentation needed to support your claim, if you elect to "self-move" your property. Payment for self-move is based on the amount of an acceptable low bid or estimate obtained by the Agency. If you self-move, you may move your personal property using your own employees and equipment or a commercial mover. If you and the Agency cannot agree on an acceptable amount to cover the cost of the "self-move," you will have to submit full documentation in support of your claim.

If and when the Agency issues a 90-day Notice to Move, you may elect to pay your moving costs yourself and be reimbursed by the Agency or, if you prefer, you may have the Agency pay the mover directly. In either case, let the Agency know before you move. Select your mover with care. The Agency representative can help you select a reliable and reputable mover.

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

What are Reestablishment Expenses?

A small business, farm or non-profit organization may be eligible to receive a payment of up to \$10,000 for eligible expenses actually incurred in relocating and reestablishing such operation at a replacement site.

Eligible expenses for an eligible, displaced business must be reasonable and necessary, as determined by the Agency. They may include but are not limited to the following:

- A. Repairs or improvements to the replacement real property as required by federal, state or local law, code or ordinance.
- B. Modifications to the replacement property to accommodate the business operation or make replacement structures suitable for conducting the business.
- C. Construction and installation costs for exterior signage to advertise the business.
- D. Provision of utilities from right-of-way to improvements on the replacement site.
- E. Redecoration or replacement of soiled or worn surfaces at the replacement site, such as paint, paneling or carpeting.
- F. Licenses, fees, and permits where not paid as part of moving expenses.
- G. Feasibility surveys, soil testing and marketing studies.
- H. Advertising of replacement location.
- I. Professional services in connection with the purchase or lease of a replacement site.
- J. Estimated increased costs of operation during the first 2 years at the replacement site, for such items as:
 - 1. Lease or rental charges
 - 2. Personal or real property taxes
 - 3. Insurance premiums, and
 - 4. Utility charges (excluding Impact fees)
- K. Impact fees or one-time assessments for anticipated heavy utility usage.
- L. Other items that the Agency considers essential to the reestablishment of the business.

What Expenses are Not eligible for Reestablishment Payment?

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

- A. Purchase of capital assets, such as, office furniture, filing cabinets, machinery or trade fixtures.
- B. Purchase of manufacturing materials, production supplies, product inventory, or other items used in the normal course of the business operation.
- C. Interior or exterior refurbishment at the replacement site, except as otherwise provided for under the business reestablishment payment.
- D. Interest costs associated with any relocation expense or the purchase of replacement property.
- E. Payment to a part-time business in the home which does not contribute materially to the household income.

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

A Fixed Payment In Lieu of a Payment for Actual Reasonable Moving and Related Expenses to a business or farm operation is based on the average annual net earnings of the business or farm operation. The payment to an eligible business or farm operation may not be less than \$1,000.00, nor more than \$20,000.00. The nonprofit organization may be eligible for a payment from \$1,000.00 to \$20,000.00 subject to the following:

A displaced nonprofit organization may choose a fixed payment as stated above if the Agency determines that it cannot be relocated without a substantial loss of existing patronage (membership or clientele.) A nonprofit organization is assumed to meet this test, unless the Agency demonstrates otherwise. Any payment in excess of \$1,000.00, must be supported with financial statements for the two 12 month periods prior to displacement. The amount to be used for the payment is the average of the last two (2) years annual net earnings. Documentation required may be income tax returns, certified financial statements and accounting records or other similar evidence acceptable to the Agency. To qualify for an In-Lieu payment:

A. An eligible, displaced **business**:

1. must own or rent personal property which must be moved in connection with the displacement and for which an expense would be incurred in such move, and the business vacates or relocates from its displacement site;
2. must be unable to relocate without a substantial loss of existing patronage;
3. must not be part of a commercial enterprise having more than one other entity which is not being acquired by the Agency, and which is under the same ownership and engaged in the same or similar business activities;
4. must not be operated at a displacement dwelling/site solely for the purpose of renting such dwelling/site to others; and
5. must have contributed materially to the income of the displaced person during the two (2) taxable years prior to displacement.

B. A displaced **nonprofit organization** (1) must be unable to relocate without a substantial loss of its existing patronage; and, (2) must not be part of an enterprise having another establishment which is not being acquired by the Agency.

The Agency will inform you as to your eligibility for this payment and the documentation you must submit to support your claim. Remember, when you elect to take this payment you are not entitled to reimbursement for any other moving expenses.

How Do I File a Claim for a Relocation Payment?

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

If you are a tenant, you must file any and all claims within 18 months after the date you move after issuance of a 90-day Notice to Move by the Agency. However, it is to your advantage to file as soon as possible after you move. The sooner you submit your claim, the sooner it can be processed and paid. If you are unable to file your claim within 18 months, the Agency may extend this period.

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

Appeals

If you disagree with the Agency's decision as to your right to a relocation payment or the amount of payment, you may appeal the decision to the Agency. The Agency will inform you of its appeal procedures. At a minimum, you will have 18 months to file your appeal with the Agency. Your appeal must be in writing. However, if you need help, the Agency will assist you in preparing your appeal. If you are not satisfied with the final appeal decision, you may seek review of the matter by the courts.

Tax Status of Relocation Benefits

Relocation benefit payments are not considered as income for the purpose of the Internal Revenue Code of 1986 or the Personal Income Tax Law, Part 10 (commencing with Section 17001) of Division 2 of the Revenue and Taxation Code, or the Bank and Corporation Tax law, Part 11 (commencing with Section 23001) of Division 2 of the Revenue and Taxation Code. 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.

Additional Information

If you have further questions after reading this brochure, contact Overland, Pacific & Cutler, Inc. and discuss your concerns with your relocation representative. You may wish to read the California Relocation Assistance Law and Guidelines referenced above which describe the relocation process in more detail.

EXHIBIT H: Public Comments and Response

[to be attached]