ROSELAND REDEVELOPMENT PROJECT
FIVE-YEAR IMPLEMENTATION PLAN
For the Period 2006 - 2011
(Adopted 10/3/06 and Amended on 12/15/09)

I. INTRODUCTION

A. Background

The Sonoma County Board of Supervisors (the "Board of Supervisors") adopted the Redevelopment Plan for the Roseland Redevelopment Project on November 27, 1984, pursuant to Ordinance No. 3377 (the "Redevelopment Plan"). The Plan has been amended by the Board of Supervisors as follows:

- First Amendment: By Ordinance No. 4835 adopted on December 13, 1994, the Board of Supervisors revised the Plan to set the time limit on establishing debt to November 27, 2004; and to set the time limits for the effectiveness of the Plan, repayment of debt, and receipt of tax increment to November 27, 2014.

- Second Amendment: By Ordinance No. 5211 adopted on December 14, 1999, the Board of Supervisors extended the time limit for the effectiveness of the Plan to November 27, 2024, and extended the time limits for the repayment of debt and receipt of tax increment to November 27, 2034.

- Third Amendment: By Ordinance No. 5518 adopted on November 2, 2004, the Board of Supervisors eliminated the time limit on establishing debt, as permitted by State Senate Bill 211.

In 2006, the Sonoma County Community Development Commission (the "Commission"), serving in its capacity as the governing body of the Sonoma County Community Redevelopment Agency (the "Agency"), adopted a Five-Year Implementation Plan ("2006 Plan") for the Roseland Redevelopment Project Area ("Project Area") as required by Section 33490(a) of the California Community Redevelopment Law ("CRL"). The 2006 Plan describes specific goals and objectives, actions and projects, and expenditures proposed by Agency during the five-year period from July 1, 2006 through June 30, 2011, encompassing FY 2006-07 through FY 2010-11.

In accordance with Health and Safety Code Section 33490(c), the Commission is required to, at least once within the five-year term of the Plan, conduct a public hearing and hear testimony of all interested parties regarding review of the Plan (the "Mid-Term Review"). During the preparation for the Mid-Term Review, it was determined that additional information should be provided for in the 2006 Plan. This document constitutes the new Five-Year Implementation Plan for the Project Area (as so amended, the "2006 Implementation Plan") and as such succeeds the 2006 Plan and generally covers the same five-year period from July 1, 2006 through June 30, 2011, encompassing FY 2006-07 through FY 2010-11.

The 2006 Implementation Plan serves as an implementation planning tool for, and supplements the description of the overall redevelopment program presented in, the Redevelopment Plan. In conformance with the CRL, this document updates the achievements of the Agency within the Project Area during the past five years and lays out the plan for the remainder of this five-year term.

On December 15, 2009, the Commission conducted its Mid-Term Review of the 2006 Plan and approved this Revised 2006 Five-Year Implementation Plan for the Roseland Redevelopment Project.

B. The Project Area: Making Effective Use of Limited Resources

The Roseland Redevelopment Project Area is relatively small, consisting of approximately 264 acres, located in the northern portion of the Roseland area, running horizontally just south of Highway 12, along Sebastopol Road between Stony Point Road on the west and South Davis Street on the East, just west of Highway 101.

Development and property value increases have been relatively limited during the twenty-two year life of the Project to date. Correspondingly, resources available for implementation activities during the years covered by the 2006 Implementation Plan are relatively limited. Accordingly, the 2006 Implementation Plan is based on an estimate of approximately $ 7.2 million in gross tax increment revenues over the term of the 2006 Implementation Plan. However, the elimination in 2004 of the date beyond which the Project can incur debt has triggered the requirement to pass-through twenty percent (20%) of the increase in gross tax increment revenues beginning with FY 2005-06. The amount of the mandated pass-throughs is estimated to exceed $488,455 during the term of this Plan. Additionally in July of 2009, the State Legislature passed a budget that included a $1.7 billion Supplemental Educational Revenue Augmentation Fund (SERAF) contribution from redevelopment agencies statewide in FY 2009-10 and another $350 million in FY 2010-11. Early estimates show that this would amount to approximately $417,600 from the Project Area for FY 2009-10 and another approximately $87,000 in FY 2010-11. With these considerations in mind, this Plan is predicated on the intent to give emphasis to infrastructure improvements, affordable housing programs, and economic development projects to create more jobs in the Project Area.

Purpose of Implementation Plan

The primary purpose of the 2006 Implementation Plan is to provide a reasonably detailed, yet flexible framework for redevelopment program implementation by the Commission, in its capacity as the governing body of the Agency. A second purpose of this Plan is to inform affected taxing entities, business persons, residents, community organizations, and interested citizens of anticipated actions to be taken and expenditures to be made during the next stage of the redevelopment program.

The 2006 Implementation Plan was developed under the assumption that the Commission will continue to manage the Project Area for the 2006 Implementation Plan's full term. However, under the provisions of the 1984 Jurisdictional Annexation Agreement between the County and the City of Santa Rosa (Jurisdictional Agreement), when annexations result in at least sixty percent (60%) of the Project Area being incorporated into the City, management of the Project will be transferred to the City. Under the provisions of a more recent Memorandum of Understanding (MOU), responsibility for management of the Project may be transferred to the City prior to the annexation of at least 60% of the Project Area. At that time, the City would have the options of continuing to use the 2006 Implementation Plan or revising it.

C. Potential for Issuance of Tax Allocation Bonds

The preliminary budget included in this Plan conservatively assumes that programs and projects will be funded on a pay-as-you-go basis from annual tax increment revenues. Though CRL permits the issuance of tax allocation bonds by redevelopment agencies, such bonding is not anticipated within the term of this Plan. If the Commission should conclude that it is prudent and appropriate to issue bonds at a later stage of the five-year period of this Plan, the 2006 Implementation Plan could be updated to reflect expenditure targets and additional programs and/or projects to be funded with the proceeds of such bonds.

II. AMENDED REDEVELOPMENT PLAN LIMITS

In compliance with CRL Section 33490(a)(5), the following are various time limits set forth in the Amended Redevelopment Plan.

Type of Limit	Date of Limit
Eminent Domain Authority	Expired 1996
Debt Incurrence	Eliminated
Effectiveness of Plan	Nov. 27, 2024
Receipt of Tax Increment/Debt Repayment	Nov. 27, 2034

III. PAST PROJECTS

The Agency provided almost $900,000 in Roseland Redevelopment funding for various projects and programs, from July 1, 2001 through June 30, 2006. The Agency also provided almost $600,000 to the City of Santa Rosa for its housing programs, as required under the Jurisdiction Agreement. Listed below is a list of accomplishments achieved during this time:

Community Revitalization & Economic Development

- Sebastopol Road Urban Vision Plan – June 2007

- Cinco De Mayo Celebration

- Keyser Marston Study

Infrastructure Improvements

- Sebastopol Road improvements

- West Avenue improvements

- Sewer hookup assistance

Increasing Housing Opportunities

- Timothy Commons Apartments – Opened in 2005
- Mobile home earthquake bracing grants
- Housing rehabilitation assistance

IV. GOALS AND OBJECTIVES

Redevelopment Plan Goals and Objectives

The Specific Goals and Objectives set forth below are based upon the statement of goals and objectives in the Redevelopment Plan for the Project Area, hereby incorporated in the 2006 Implementation Plan by reference. The scope of the 2006 Implementation Plan narrows the focus of priorities for the next five-year period.

Goals and Objectives for the Five-Year Period from 2006 through 2011

Goals and Objectives for the five-year period of this Plan include:

- Elimination of conditions that blight the Project Area
- Infrastructure improvements in the Project Area
- Improvement of substandard housing conditions in the Project Area
- Economic development that leads to increased employment opportunities
- Revitalization of the Project Area's businesses and business districts
- Improvement of vehicle and pedestrian safety
- Provision of public improvements, facilities and open space
- Funding of other appropriate redevelopment activities

Although these goals and objectives cover the proposed program for the five-year period of this Plan, funding limitations will allow only their partial accomplishment.

V. NON-HOUSING PROGRAMS AND PROJECTS

A. Proposed Projects

The preliminary projection of the revenues available for non-housing programs is very limited. After accounting for mandatory pass-through payments, projected administrative costs, debt service, FY 2009-10 and FY 2010-11 State-mandated SERAF contributions, housing transfers, beginning fund balances, and projected tax increment revenues, approximately $3.5 million is projected to be available for economic development and other non-housing programs and projects for the five-year term of this Plan. Consequently, it is anticipated that special emphasis will be given to the following implementation programs and projects:

- <u>Streetscape and Infrastructure Improvements</u>: The highest non-housing priority for the Project Area has been the improvement of Sebastopol Road west of Dutton with curbs, gutters, sidewalks, street lighting, and landscaping. Emphasis will be given to Sebastopol Road improvement east of Dutton, improvements associated with the Sebastopol Road Urban Vision Plan, and other infrastructure improvements such as neighborhood street improvements, pedestrian crossings, street trees and other landscaping, traffic circulation improvements, and other installation and repair of storm drainage systems. Other improvements may be accomplished as opportunities arise and funds are available. Approximately $532,000 is proposed for funding continued streetscape and infrastructure programs and projects.

- <u>Open space, recreation, community and other public facilities</u>: The Agency will explore opportunities for open space, recreation, community and other public facilities to promote the public health, safety and welfare. $1,000,000 is proposed for funding open space, including plazas, recreation, community, and other public facilities.

- <u>Commercial revitalization and economic development</u>: The Agency will seek opportunities to assist economic development and revitalization of the Project Area, especially including the extension of financial support targeted to improvement and expansion of existing businesses and attraction of compatible new businesses. Projects may include assistance to efforts to market the Project Area's attributes and services, assistance with property acquisition, environmental clean-up, if required, facade improvements and commercial rehabilitation, improved signage, public art, and programs and projects to reinforce the Project Area's identity. Approximately $2,000,000 is proposed for funding other redevelopment activities.

B. Proposed Expenditure Plan

The Preliminary Budget for the 2006 Implementation Plan, as described above, is presented as Table 1. The Expenditure Plan includes total expenditures based upon actual cash reserves accumulated from previous tax increment revenue through FY 2008-09 and estimated projections of future tax increment revenues for FY 2009-10 and FY 2010-11. It should be noted that this Expenditure Plan is based partly on estimated revenues and simply sets general guidelines and targets for Agency expenditures and that the actual allocation and appropriation of funds will be set through the Commission's adoption of annual budgets for the Agency. It should also be noted that the Expenditure Table is based on actual expenditures for FY 2006-07 through FY 2008-09 and estimated expenditures for FY 2009-10 and FY 2010-11. Allocations for various activities in the current and future adopted annual budgets may vary from the Expenditure Plan presented in Table 1 of the 2006 Implementation Plan to reflect the judgment of the Commission about changing redevelopment needs and opportunities.

TABLE 1
EXPENDITURE PLAN
(values in thousands of dollars)

PROGRAM	2006-2007	2007-2008	2008-2009	2009-2010	2010-2011	TOTAL
Streetscape/lnfrastructure	-	-	-	266	266	532
Other Public Facilities/Open Space Recreation	-	-	-	500	500	1,000
Commercial Revitalization	77	4	0	960	959	2,000
'l'OTAL	**$77**	**$4**	**$**	**$1,726,**	**$1,725**	**$3,532**

VI. ALLEVIATION OF BLIGHT

Adverse physical and economic conditions in the Project Area were originally described in Part II of the Report on the Plan for the Project Area which accompanied the Initial Redevelopment Plan. Adverse conditions anticipated to be partially or fully alleviated during the five-year period of the 2006 Implementation Plan are summarized in the Table 2.

TABLE 2
ALLEVIATION OF ADVERSE CONDITIONS
FIVE-YEAR IMPLEMENTATION PERIOD 2006- 2011

Documented Adverse Physical and Economic Conditions	Proposed Redevelopment Actions and Projects Designed to Alleviate Conditions
Deficient or Deteriorated Buildings • Structurally unsound residences • Physically damaged residences • Residences with leaking roofs • Deteriorated residences • Buildings that fail to provide adequate access for the disabled	Deficient or Deteriorated Buildings • Stabilization of residences • Residential rehabilitation • Provision of accessibility improvements for the disabled
Blighting Conditions • Abandoned, fire damaged and dilapidated buildings • Abandoned vehicles • Trash and debris accumulations	Blighting Conditions • Assistance in the removal of abandoned, fire damaged and dilapidated buildings • Removal of abandoned vehicles • Clean-up of trash and debris
Adverse Economic Conditions • Declining tax revenues • Underutilized properties • Limited job opportunities • Limited purchasing power	Adverse Economic Conditions • Economic development funding • Assistance with business district revitalization • Economic assistance programs
Substandard Public Improvements • Inadequate and substandard park and recreational facilities • Substandard, deteriorated and hazardous roads	Substandard Public Improvements • Clean-up and rehabilitation of existing park and recreational facilities • Repair and improvement of substandard, deteriorated and hazardous roads

VII. AFFORDABLE HOUSING ACTIVITIES

A. Project Area Housing Production Requirement

CRL Section 33413(b) requires that specified percentages of all new or substantially rehabilitated housing units in the Project Area during each ten-year compliance period over the life of the Amended Redevelopment Plan be made available as affordable housing to low- and moderate-income households, including very low-income households. CRL Section 33490(a)(2)(B) requires that each Five-Year Implementation Plan contain specified information about compliance with this Project Area affordable housing production requirement. This section of the 2006 Implementation Plan addresses these requirements.

Because the Agency itself does not intend to develop or rehabilitate housing units in the Project Area, but instead intends to facilitate such development and rehabilitation by private parties—affordable housing developers, property owners and individual homeowners—the applicable CRL requirement is that the Agency must assure, during each applicable compliance period, that at least 15% of all new or substantially rehabilitated housing units in the Project Area are made affordable to low- and moderate-income households through long-term affordability covenants, and that at least 40% of these housing units be made affordable to very low-income households through long-term affordability covenants.

Table 3 summarizes the status of the Agency's compliance with this Project Area affordable housing production requirement for various historical and future periods. As detailed in Table 3, the Agency has incurred an obligation from the inception of the Initial Redevelopment Plan to the present (through June 30, 2009) to cause the development or substantial rehabilitation of at least 5 moderate income units and at least 3 very low-income units. In actuality, the Agency has exceeded these requirements, with the development of 16 moderate-income units (resulting in a surplus to-date of 11 moderate-income units above the statutory production requirement), and an additional 16 very low-income units (resulting in a surplus of 13 very low-income units above the statutory requirement).

Based on Table 3, for the current ten-year Project Area affordable housing production compliance period running from 2004 through 2014, the Agency estimates that a total of 86 new or substantially rehabilitated units have been or will be developed in the Project Area. This total yields an affordable housing production obligation during this current compliance period of 8 moderate-income units and 5 very low-income units. During this current compliance period, the Agency has not produced any affordable moderate-income units, but expects to produce 21 affordable moderate-income units during the balance of the compliance period. This total constitutes an estimated surplus for the current compliance period of 13 affordable moderate-income units.

Likewise for the current ten-year Project Area affordable housing production compliance period, Table 3 indicates that the Agency has not yet produced any affordable very low-income units during the first five years of the compliance period, but expects to produce 56 affordable very low-income units during the remaining five years of the compliance period. This total constitutes an estimated surplus for the current compliance period of 5 affordable very low-income units.

In summary, as also shown in Table 3, the Agency estimates that it will continue to create and expand upon affordable units above the statutory production requirement during the balance of the current ten-year compliance period and throughout the remaining life of the Amended Redevelopment Plan by using its Housing Fund deposits and other funding sources to continue to produce affordable units in a manner similar to past performance. In conclusion, the Agency is currently in compliance with the Project Area affordable housing production obligation and expects to build upon past performance to maintain and enhance such compliance through the end of the Amended Redevelopment Plan period.

TABLE 3

HOUSING PRODUCTION

Compliance Period	New/ Substantially Rehabilitated Units In Project Area	Number of Moderate Income Units Required	Number of Very Low Income Units Required	Number of Moderate Income Units Created	Number of Very Low Income Units Created	Surplus/ (Deficit) In Moderate Income Units	Surplus/ (Deficit) In Very Low Income Units
1984-04	52	5	3	16	16	11	13
2004-14	-	-	-	-	-	-	-
2004-2009	2	0	0	0	0	0	0
**2009-14	84	8	5	21	56	13	51
**2014-2024 (End of Plan)	10	1	1	0	0	(1)	(1)
Subtotal— To Date	**54**	**5**	**3**	**16**	**16**	**11**	**13**
Subtotal— Estimated Future	**94**	**9**	**6**	**21**	**56**	**12**	**50**
Total**	**148**	**14**	**9**	**37**	**72**	**23**	**63**

**Estimated Future Projects identified below.

B. 20% Set-Aside Housing Fund Deposits and Expenditures

CRL Sections 33334.2 et seq. require that the Agency deposit specified portions (typically not less than 20%) of its tax increment revenue into a Low- and Moderate-Income Housing Fund (the "Housing Fund") and that it make timely expenditures from the Housing Fund to facilitate the development, improvement, and preservation of the community's affordable housing stock. CRL Sections 33490(a)(2)(A) and (C) require that each Five-Year Implementation Plan contain specified information about compliance with these Housing Fund deposit and expenditure requirements. This section of the 2009 Implementation Plan addresses these requirements.

1. Total Deposits and Expenditures. Deposits to the Housing Fund during the five-year implementation period are provided below in Table 4:

TABLE 4
ESTIMATED REDEVELOPMENT 20% HOUSING SET-ASIDE REVENUES
(** Estimated Future)

REVENUE SOURCE	2006-2007	2007-2008	2008-2009	**2009-2010	**2010-2011	TOTAL
Tax Revenue	$225,886	$313,996	$293,560	$293,000	$293,000	**$1,419,442**
Interest	$39,043	$38,130	$24,391	$35,000	$34,000	**$170,564**
Loan Repayments and Other	$150	$69	$0	$0	$0	**$219**
TOTAL	**$265,079**	**$352,195**	**$317,951**	**$328,000**	**$327,000**	**$1,590,225**

The Housing Fund balance as of the July 1, 2006 beginning date of the five-year implementation plan period was $801,436. Taking into consideration that beginning Housing Fund balance, together with the estimated tax increment revenue deposits, interest earned, and loan repayments to the Housing Fund as shown in Table 4, it is anticipated that there will be approximately $2,391,661 available from the Housing Fund for affordable housing projects for the five-year term of this 2006 Implementation Plan.

Estimated expenditures from the Housing Fund during the five-year implementation period are detailed below in Table 5.

TABLE 5
HOUSING FUND EXPENDITURES

Expenditure Type/Program	2006-2007	2007-2008	2008-2009	**2009-2010	**2010-2011	TOTAL
Land Acquisition	$0	$0	$0	$0	$0	$0
Rehabilitation Loans (Scattered-Site Owner-Occupied Single-Family & Mobile Homes)	$35,265	$19,904	$29,228	$60,000	$60,000	$204,397
Rehabilitation Direct Delivery Costs	$15,512	$20,665	$10,993	$20,000	$20,000	$87,170
Loan to Developer (specific housing development to be determined)	$0	$0	$0	$1,088,200	$0	$1,088,200
Transfer to Santa Rosa	$102,643	$133,549	$133,922	$135,000	$135,000	$640,114
Administration	$17,196	$17,173	$21,628	$43,950	$44,000	$143,947
TOTAL	**$170,616**	**$191,291**	**$195,771**	**$1,347,150**	**$259,000**	**$2,163,828**

Expenditures from the Housing Fund during the five-year implementation period are estimated to produce new, rehabilitated and price-restricted affordable housing units are reflected in Table 6 below.

TABLE 6

HOUSING FUND ASSISTED UNITS

Housing Type	2006-2007	2007-2008	2008-2009	**2009-2010	**2010-2011
New Rent-Restricted	0	0	0	0	77
Rehabilitated	9	5	8	8	8
New Sales Price-Restricted	0	0	0	0	0

2. <u>Ongoing or in Process Housing Fund Activities</u>:

The following affordable housing activity began during the previous implementation plan period using funds provided by the Agency from the Housing Fund and other sources and is yet to be completed:

In 2005, the Burbank Housing Development Corporation (BHDC) completed the Timothy Commons Project with Agency financial assistance. The development of these new units that are restricted by affordability covenants exceeds the Agency's housing production requirements, to date. Currently, the Agency does not intend to serve as a developer but, rather, plans to assist non-profit housing organizations, property owners, and private developers in their developments and place an emphasis on rehabilitation efforts. There is very little vacant, residentially zoned land in the Project Area. However, based on the housing production rate to date, the number of affordable units already produced will be sufficient to cover the Agency's future housing production obligation.

Tax increment revenues available for affordable housing programs over the five-year period from 2006 through 2010 will be at least twenty percent (20%) of gross tax increment revenues for the Project and are projected to total approximately $1.25 million. However, under the provisions of the previously mentioned MOU, the Agency transfers part of each year's housing set-aside funds to the City of Santa Rosa in proportion to the part of the Project Area incorporated into the City. At the beginning of the term of this 2006 Implementation Plan, that proportion was approximately one-half and the Implementation Plan assumes that no additional property will be annexed into the City during the term of the Plan. Therefore, the 2006 Implementation Plan assumes that one-half of each year's housing set-aside funds, totaling approximately $630,000 will be available for affordable housing projects under the management of the Agency.

The Agency proposes to use affordable housing funding as follows:

- **Rehabilitation** of units occupied by persons of low- and very low-income, especially elderly homeowners and renters in single-family homes and mobile home parks. Such work is anticipated to include but not necessarily be limited to roofing repairs, removal of termite infestation and dry rot, installation/ improvement of insulation and thermal efficiency, access improvements, and plumbing and electrical improvements, earthquake bracing and other assistance to mobile homes, and public information and other outreach programs to increase participation in and effectiveness of the rehabilitation programs.

- **Development** of new multifamily units, especially in conjunction with efforts to increase the number of units available to agricultural workers. Activities may include but would not necessarily be limited to the acquisition and disposition of land for the development of affordable housing units, and participation with other lenders in financing affordable housing development projects.

These programs are anticipated to be provided through low-cost, low-interest loans and, where appropriate, small grants, in combination with other programs as appropriate and available. Housing Set-Aside funds will be distributed between these programs as opportunities arise. Revenues received during the five-year term of this Plan may be added to the funding levels projected above through the annual budgeting process.

4. Targeting. Over the course of the Agency's current Housing Fund targeting compliance period (2006-2011), the Agency will expend funds from its Low- and Moderate-Income Housing Fund in compliance with the CRL Section 33334.4 requirement to expend Housing Fund monies to assist very low- and low-income households in at least the same proportion as the ratio of (1) the total number of housing units needed in the community for those two income categories to (2) the total number of units needed in the community for very low-, low-, and moderate-income households, using the regional housing needs allocation (RHNA) prepared for Sonoma County by the Association of Bay Area Governments (ABAG). ABAG has provided two sets of RHNA numbers: one set for the period 2002-2007, and the other set for the balance of the Housing Fund targeting period ending in 2011.

The first set of RHNA numbers for 2002-2007 indicated that for the unincorporated County of Sonoma, 1,311 units (33%) were needed for very low-income households, 1,116 units (28%) were needed for lower-income households, and 1,563 (39%) were needed for moderate-income households. During that portion of the Housing Fund targeting compliance period, the Agency used $740,598 from the Housing Fund to assist 32 housing units: 59% of the funds assisted very low-income units, and 41% of the funds assisted low-income units. Consequently, during the first portion of the compliance period, with the RHNA need allocations then in effect, the Agency far exceeded its very low-income targeting requirement (59% spent vs. 33% need), and its low-income targeting requirement (41% spent vs. 28% need).

The 2008-2014 RHNA for unincorporated Sonoma County indicates that 319 units (40%) are needed for very low-income households, 217 units (27%) are needed for lower-income households and 264 (33%) are needed for moderate-income households. The Agency's Housing Fund expenditure program for the current five-year implementation period indicates that the Agency will fully comply with the its Housing Fund income targeting requirement by the 2011 end of the current compliance period. For instance, as shown in Table 5, the Agency will provide $1,088,000, or just over 50% of the estimated Housing Fund expenditures for the coming five years, for loans to developers to build approximately 77 new rent-restricted multifamily housing units, 71% of which will be made available for occupancy by very low–income households (vs. 40% requirement) and 29% will be available for low-income households (vs. 27% requirement). Through this spending strategy, the Agency intends to meet its overall targeting requirement through the two RHNA cycles that together establish the targeting requirement for the 2006-1011 Housing Fund targeting compliance period

The Agency will also expend funds from its Low- and Moderate-Income Housing Fund in compliance with CRL Section 33334.4(b) requirement to assist housing that is not restricted to seniors (over 65 years of age) in at least the same proportion as the numbers of low-income households in the community with a member under age 65 bears to the total number of low-income households in the community as reported in the most recent census. The 2000 Census of Population and Housing data indicates that 33% of the County's low-income households are categorized as senior households (65 and over). Consequently, not more than 33% of the Agency's Housing Fund expenditures during the 2002-2014 Housing Fund targeting compliance period may be spent for senior housing, and at least 67% of the Agency's Housing Fund expenditures during the compliance period must be spent for non-age restricted affordable housing units.

Since the July, 2006 start of the current Housing Fund targeting compliance period, none of the expended Housing Fund monies assisted households restricted to seniors (below the maximum percentage expenditure of 33%), and all of the expended monies assisted non-age restricted affordable units. The Agency's expenditure plan for the coming five-years, as shown in Tables 5 and 6 and accompanying text, will continue to assist households in compliance with the CRL senior vs. non-age restricted household targeting requirement during the balance of the current Housing Fund targeting compliance period ending in 2011.

C. Replacement Housing Requirement

CRL Section 33413(a) requires that the Agency cause the replacement in a specified time and manner of dwelling units within the Project Area housing low- and moderate-income households that are destroyed or removed from the low- and moderate-income housing market as part of a redevelopment project. CRL Section 33490(a)(3) requires that each Five-Year Implementation Plan contain specified information about compliance with this replacement housing requirement. No redevelopment funds have been committed to any project planned over the next five years that would result in the destruction or removal of low- and moderate-income housing units.

In the event any future redevelopment activities were to require the destruction or removal of any of the low- and/or moderate-income housing stock, the responsible entity would be required to adhere to the provisions of the State Relocation Law (Government Code Section 7260 et seq.), the State Relocation Guidelines, as those regulations may be amended by the State from time-to-time, and the relocation methods incorporated in the October, 1984 and the March, 2008 Reports to the Board of Supervisors on the Initial Redevelopment Plan and the Amended Redevelopment Plan, respectively. Any amendments to the State Relocation Guidelines shall automatically be incorporated without the need for further action by the Agency.