

**CALIFORNIA DEBT LIMIT ALLOCATION COMMITTEE  
CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE  
Project Staff Report  
Qualified Private Activity Tax-Exempt Bond Project  
August 6, 2024**

Regional Street Apartments, located at 6541 - 6543 Regional Street in Dublin on a 1.33 acre site, requested and is being recommended for a reservation of \$3,736,224 in annual federal tax credits and \$44,202,679 of tax-exempt bond cap to finance the new construction of 113 units of housing, consisting of 112 restricted rental units, and 1 unrestricted manager's unit. The project will have 55 studio units, 57 one-bedroom units, and 1 two-bedroom unit, serving seniors with rents affordable to households earning 30%-50% of area median income (AMI). The building will be five story Type 1-A and Type V-A construction. Common amenities include large community room, laundry facilities, community kitchen, and computer room. Each unit will have refrigerator, and range/oven/cooktop. The construction is expected to begin in February 2025 and be completed in September 2026. The project will be developed by Eden Housing, Inc. and will be located in Senate District 7 and Assembly District 20.

The project financing includes state funding from the No Place Like Home (NPLH) and Multifamily Housing Program (MHP) programs of HCD.

**Project Number** CA-24-473

**Project Name** Regional Street Apartments  
Site Address: 6541 - 6543 Regional Street  
Dublin, CA 94568  
County: Alameda

<b>Tax Credit Amounts</b>	<b>Federal/Annual</b>	<b>State/Total</b>
Requested:	\$3,736,224	\$0
Recommended:	\$3,736,224	\$0

**Tax-Exempt Bond Allocation**  
Recommended: \$44,202,679

**CTCAC Applicant Information**  
CTCAC Applicant / CDLAC Sponsor: Regional Street Investors, L.P.  
Contact: Andrea Osgood  
Address: 22645 Grand Street  
Hayward, CA 94541  
Phone: 510-247-8103  
Email: aosgood@edenhousing.org

**Bond Financing Information**  
CDLAC Applicant/Bond Issuer: California Municipal Finance Authority  
Bond Counsel: Jones Hall, A Professional Law Corporation  
Private Placement Purchaser: JP Morgan Chase Bank, N. A.

**Development Team**

General Partner(s) or Principal Owner(s): Regional Street, LLC  
 General Partner Type: Nonprofit  
 Parent Company(ies): Eden Housing, Inc.  
 Developer: Eden Housing, Inc.  
 Investor/Consultant: Hudson Housing Capital  
 Management Agent: Eden Housing Management, Inc.

**Project Information**

Construction Type: New Construction  
 Total # Residential Buildings: 1  
 Total # of Units: 113  
 No. / % of Low Income Units: 112 100.00%  
 Average Targeted Affordability: 38.75%  
 Federal Set-Aside Elected: 40%/60%  
 Federal Subsidy: Tax-Exempt

**Information**

Geographic Area: East Bay Region  
 State Ceiling Pool: New Construction  
 Set Aside: N/A  
 Homeless Set Aside Units: 34  
 CDLAC Project Analyst: Jake Salle  
 CTCAC Project Analyst: Jacob Couch

**55-Year Use / Affordability**

<b>Aggregate Targeting</b>	<b>Number of Units</b>	<b>Percentage of Affordable Units</b>
30% AMI:	34	30%
50% AMI:	78	70%

**Unit Mix**

55 SRO/Studio Units
57 1-Bedroom Units
1 2-Bedroom Units
<b>113 Total Units</b>

<b>Unit Type &amp; Number</b>	<b>2023 Rents Targeted % of Area Median Income</b>	<b>Proposed Rent (including utilities)</b>
17 SRO/Studio	30%	\$326
38 SRO/Studio	50%	\$1,295
17 1 Bedroom	30%	\$368
40 1 Bedroom	50%	\$1,387
1 2 Bedrooms	Manager's Unit	\$0

**Project Cost Summary at Application**

Land and Acquisition	\$8,846,865
Construction Costs	\$52,099,894
Construction Hard Cost Contingency	\$3,630,854
Soft Cost Contingency	\$1,100,000
Const. Interest, Perm. Financing	\$9,151,951
Legal Fees	\$155,000
Reserves	\$1,103,646
Other Costs	\$3,508,377
Developer Fee	\$3,500,000
<b>Total</b>	<b>\$84,896,587</b>

**Residential**

Construction Cost Per Square Foot:	\$615
Per Unit Cost:	\$751,297
Estimated Hard Per Unit Cost:	\$421,628
True Cash Per Unit Cost*:	\$670,766
Bond Allocation Per Unit:	\$391,174
Bond Allocation Per Restricted Rental Unit:	\$394,667

<b>Construction Financing</b>		<b>Permanent Financing</b>	
Source	Amount	Source	Amount
Chase: Tax-Exempt	\$44,202,679	CCRC <sup>2</sup>	\$2,740,015
Chase: Taxable	\$16,693,460	HCD: MHP	\$19,919,853
Alameda County: A-1	\$5,048,319	HCD: NPLH	\$9,776,465
Alameda County: LHTF <sup>1</sup>	\$3,333,333	Alameda County: A-1	\$5,048,319
General Partner Contribution: Land	\$8,400,000	Alameda County: LHTF <sup>1</sup>	\$3,333,333
Deferred Costs	\$3,148,646	General Partner Contribution: Land	\$8,400,000
Deferred Developer Fee	\$700,000	Deferred Developer Fee	\$700,000
General Partner Equity	\$100	General Partner Equity	\$100
Tax Credit Equity	\$3,370,050	Tax Credit Equity	\$34,978,502
		<b>TOTAL</b>	<b>\$84,896,587</b>

\*Less Fee Waivers, Seller Carryback Loans, and Deferred Developer Fee

<sup>1</sup> Local Housing Trust Fund

<sup>2</sup> California Community Reinvestment Corporation

**Determination of Credit Amount(s)**

Requested Eligible Basis:	\$71,850,454
130% High Cost Adjustment:	Yes
Applicable Fraction:	100.00%
Qualified Basis:	\$93,405,590
Applicable Rate:	4.00%
Total Maximum Annual Federal Credit:	\$3,736,224
Approved Developer Fee (in Project Cost & Eligible Basis):	\$3,500,000
Investor/Consultant:	Hudson Housing Capital
Federal Tax Credit Factor:	\$0.93620

Except as allowed for projects basing cost on assumed third party debt, the “as if vacant” land value and the existing improvement value established at application for all projects, as well as the eligible basis amount derived from those values, shall not increase during all subsequent reviews including the placed in service review, for the purpose of determining the final award of Tax Credits. The sum of the third party debt encumbering the property may increase during subsequent reviews to reflect the actual amount.

### **CTCAC Significant Information / Additional Conditions**

Staff noted a per unit development cost of \$670,766. Factors affecting this cost include prevailing wages and construction design elements encouraged by the local Specific Plan.

### **CDLAC Analyst Comments**

None

### **Standard Conditions**

If applicant is receiving tax-exempt bond financing from other than CalHFA, the applicant shall apply for a bond allocation from the California Debt Limit Allocation Committee's next scheduled meeting, if not previously granted an allocation; shall have received an allocation from CDLAC; and, shall issue bonds within time limits specified by CDLAC.

The applicant anticipates financing more than 50% of the project aggregate basis with tax-exempt bond proceeds as calculated by the project tax professional. Therefore, the federal credit reserved for this project will not count against the annual ceiling.

State tax credit recipients are limited to cash distributions from project operations pursuant to California Revenue and Taxation Code Section 12206(d). By accepting the tax credit reservation, the applicant/owner is agreeing to comply with the statutory limitations and requirements.

CTCAC makes the preliminary reservation only for the project specified above in the form presented, and involving the parties referred to in the application. No changes in the development team or the project as presented will be permitted without the express approval of CTCAC.

The applicant must pay CTCAC a reservation fee calculated in accordance with regulation. Additionally, CTCAC requires the project owner to pay a monitoring fee before issuance of tax forms.

As project costs are preliminary estimates only, staff recommends that a reservation be made in the amount of federal credit and state credit shown above on condition that the final project costs be supported by itemized lender approved costs and certified costs after the buildings are placed in service.

All unexpended funds in reserve accounts established for the project must remain with the project to be used for the benefit of the property and/or its residents, except for the portion of any accounts funded with deferred developer fees.

All fees charged to the project must be within CTCAC limitations. Fees in excess of these limitations will not be considered when determining the amount of credit when the project is placed-in-service.

If the applicant has requested the use of a CUAC utility allowance, CTCAC's Compliance staff will review the CUAC documentation for this project prior to placed in service. Until written approval is received from CTCAC, this project is not eligible to use a utility allowance based on the CUAC.

The applicant/owner shall be subject to underwriting criteria set forth in Section 10327 of the regulations through the final feasibility analysis performed by CTCAC at placed-in-service.

Credit awards are contingent upon applicant's acceptance of any revised total project cost, qualified basis and tax credit amount determined by CTCAC in its final feasibility analysis.

**CDLAC Additional Conditions**

The applicant/owner is required to comply with the CDLAC Resolution. At the time of the CTCAC placed in service review, CTCAC staff will verify that the project is in compliance with all applicable items of CDLAC Resolution Exhibit A.

If points were awarded by CDLAC for housing type, the project shall comply with the housing type requirements at the time of CTCAC's Placed In Service review. The housing type requirement shall be conditioned in the CTCAC Regulatory Agreement and CTCAC Compliance staff shall verify the project is meeting those housing type requirements, consistent with California Code of Regulations, title 4, section 10322(i).

<b>Point Criteria</b>	<b>New Const. Max. Points</b>	<b>Rehabilitation Max. Points</b>	<b>Points Scored</b>
Preservation and Other Rehabilitation Project Priorities	0	20	0
New Construction Density and Local Incentives	10	0	10
Exceeding Minimum Income Restrictions	20	20	20
Exceeding Minimum Rent Restrictions	10	10	10
General Partner Experience	7	7	7
Management Company Experience	3	3	3
Housing Needs	10	0	10
Leveraged Soft Resources	8	8	8
Readiness to Proceed	10	10	10
Affirmatively Furthering Fair Housing	10	0	9
Site Amenities	10	10	10
Service Amenities	10	10	10
Cost Containment	12	12	12
Negative Points	No Maximum		0
<b>Total Points</b>	120	110	119

The criteria for which points are awarded will also be incorporated into the Resolution transferring Allocation to the Applicant as well as the appropriate bond documents and loan and finance agreements.

**Tie Breaker:** 67.953%